



January 30, 2024

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Mayor

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Christopher French  
Deputy Chief  
National Forest System  
1400 Independence Ave., SW  
Washington, D.C. 20250

Dear Deputy Chief French:

Salt Lake County ("County") has reviewed the notice of a proposed new chapter outlined in the draft for the Forest Service Manual 2300— Recreation, Wilderness, and Related Resource Management, titled Chapter 2350—Trail, River, and Similar Recreation Opportunities, Section 2355—Climbing Opportunities. The County appreciates the opportunity to comment on the Forest Service's Proposed Directive on managing climbing and protecting natural and cultural resources in Wilderness Areas. This letter provides the following comments regarding the draft published in the NR 11/17/23 85734, with a comment period extended until January 30<sup>th</sup>, 2024.

As Mayor of Salt Lake County, I am writing on behalf of the County to provide comment on sustainable climbing management practices in Wilderness areas, specifically in response to the recently released draft policies by the U.S. Forest Service (USFS) regarding the classification of fixed anchors as "prohibited installations."

**Background:**

Forest Service Lands within Salt Lake County, situated close to urban centers along the Wasatch Front, are a hub for a variety of recreational activities, with climbing contributing to Utah's \$6.1 billion Outdoor Recreation economy. Three Wilderness Areas within the management of Salt Lake Ranger District of the Uinta-Wasatch-Cache National Forest, popular for climbing year-round, hold historical significance and contribute to the unique outdoor experience of the Wasatch Mountains. Recognizing the substantial demand, the County collaborates closely with the Wasatch Ranger District, striving for a balanced approach that provides recreation opportunities while ensuring the conservation of these ecologically important areas. Through our collaborative efforts, we aim to support sustainable climbing practices, preserve historical and cultural values, and maintain the balance between recreation and conservation.

In 2017, the County adopted a County Resource Management Plan (CRMP) under Utah Code 63L-6-103, outlining goals, objectives, and policies for the responsible management of natural resources on public lands. This document involved collaborative efforts between local and Federal land management agencies.

Recognizing federal obligations to manage public lands in alignment with laws like the Federal Land Policy and Management Act (FLPMA), National Forest Management Act (NFMA), and the National Environmental Policy Act (NEPA), federal agencies must consider local plans. The County CRMPs offer

these plans to federal land managers for incorporation into their planning processes, ensuring consideration of local perspectives in the management of public lands. The county incorporates the CRMP into its comments by reference.

The County is dedicated to advocating for increased outdoor opportunities through equitable access to public lands within the Central Wasatch, Traverse, and Oquirrh mountain ranges. Rooted in a deep connection to our natural landscapes, I am committed to a balanced approach between recreation and conservation, seeking to position Salt Lake County as a leader in coordinating holistic strategies for the Canyons. The following are comments regarding FSM 2355 Climbing Opportunities #ORMS-3524.

**Points of Consideration:**

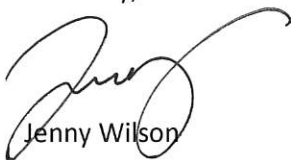
1. **Preservation of Climbing Legacy:** The proposed classification of fixed anchors as prohibited installations in Wilderness areas threatens the preservation of the climbing legacy of the Wasatch region dating back to the 1960's, erasing some of the world's greatest climbing achievements. We advocate for a reconsideration of this classification to ensure the preservation of historic climbing routes.
2. **Safety:** Prohibiting fixed anchors poses safety concerns, hindering regular maintenance and creating obstacles for the safety of recreationists in the Wilderness. We emphasize the importance of allowing climbers to experience Wilderness areas in a way that permits minimal use of bolts and fixed anchors that are necessary for navigating complex vertical terrain, ensuring both safety and access for all.
3. **Balanced Climbing Management Plans:** We recommend a balanced approach to climbing management that utilizes location-specific Climbing Management Plans, involving dedicated resources and personnel. This approach should protect existing routes, incentivize safe anchor replacement, and encourage collaboration with local climbing organizations.
4. **Collaboration and Partnerships:** Salt Lake County encourages collaboration between federal agencies and local climbing organizations. We believe existing management constructs, including cost-sharing or volunteer agreements, can enhance recreation quality with sustainable, publicly sourced funding support.

**Conclusion:**

Salt Lake County advocates for a thoughtful and balanced approach to climbing management in Wilderness areas. We believe that protecting ecological and social values in the canyons can be achieved through collaborative efforts that consider the safety of climbers, preserve climbing legacies, and maintain the delicate balance between conservation and recreation.

Thank you for your consideration, and we look forward to continued collaboration in stewarding our natural landscapes.

Sincerely,



Jenny Wilson