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First name: Katie

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Organization: Access Fund

Title: Policy Analyst

Comments: Dear Forest Planning Team,

Please find attached Access Funds Manti-La Sal Draft Revised Forest Plan-Preliminary Scoping Comments. Thank you for your time and attention. Feel free to reach out directly with any questions.

Sincerely,

Katie

Katie Goodwin

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Thank you for considering the following feedback from Access Fund regarding the Manti-La Sal National Forest Draft Revised Forest Plan (#50121). We recognize and genuinely appreciate the effort that the Manti-La Sal National Forest Planning Team has dedicated to the Draft Revised Forest Plan and are grateful for the opportunity to provide feedback.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing[mdash]rock climbing, ice climbing, mountaineering, and bouldering[mdash]the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

Comments

The development of an updated Forest Plan for the Manti-La Sal National Forest is a complex project which will need to balance the needs of multiple communities and integrate lessons learned from plans of the past along with current conditions, USFS policy, visitor behavior patterns, and public input. Access Fund provides the following comments to assist the Forest in developing a management plan that provides thoughtful management for the future of our public lands by supporting sustainable recreation opportunities while preserving the health and integrity of the surrounding cultural and natural resources.

Tribal Consultation

In striving to create the most effective, harmonious, and sustainable management plan possible, Access Fund will work alongside local Indigenous tribes who possess centuries of experience maintaining natural resources and moving across the land. Numerous archaeological sites and oral accounts provide ample evidence for the connection between traditional uses of the land and recreation. Whether climbing technical rock faces to access home sites and granaries in the southwest, running trails to deliver messages in the Andes, seasonally migrating between desert lowlands and alpine environments to herd livestock and find temperate weather in the Sierra Nevada and the Rockies, or constructing shelters and hunting blinds just below the summits of some of the nation's most prominent mountains, Indigenous people have been running trails, climbing rock, hunting and fishing, and summiting peaks long before the modern concept of outdoor recreation - and continue to do so today.

Access Fund is committed to fostering the natural allyship between Indigenous tribes and outdoor recreation in order to realize our shared aspirations. To accomplish this, Access Fund in partnership with Outdoor Alliance has created the Native Lands Coordinator position to serve as a catalyst for meaningful relationship building with tribes and to ensure that we are hearing the voices of Indigenous peoples. As the original stewards, residents, and recreationists of the land, tribes have approached its up-keep in a manner that understands both ecological processes and sacred values. Access Fund believes that these practices must be respected and prioritized in our modern era so that future generations of user groups continue to share the deep connection to the land we all so value.

Rock Climbing

Rock climbing is an important recreation activity on the Manti-La Sal National Forest, and is an appropriate and sustainable form of recreation on National Forest lands. Approximately 37 percent of America's climbing resources (about 10,000 climbing sites) are managed by the Forest Service. The Manti-La Sal affords exceptional and diverse climbing opportunities, including Mill Creek, Brumley Creek, Joe's Valley, and Maple Canyon. We recommend that the revised forest plan include provisions that recognize rock climbing as a legitimate wilderness and non-wilderness activity and supports the use of fixed climbing anchors as appropriate. In order to achieve this goal, the Forest Service should develop strategies for human waste management, resource protection, and erosion control and collaborate with local climbing organizations on education and stewardship initiatives.

We recommend the following language be included specific to fixed anchor management in wilderness:

RECREATIONAL CLIMBING.[mdash]Nothing in this plan prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this plan[mdash]

(1) in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and

(2) subject to any terms and conditions determined to be necessary by the Secretary.

Access Fund and The Wilderness Society have crafted this guidance language together to assist in future management of fixed anchors in wilderness. This specific language has been incorporated into other public land designations in Utah 1 and a pending USFS Act in California 2 .

Maple Canyon Climbing

Maple Canyon provides world class sport climbing opportunities and is also breeding territory for golden eagles.

Climbing areas across the United States share habitat with nesting raptors including golden eagles. Seasonal monitoring is suggested to locate exact nest locations each season. We encourage ongoing partnerships with Hawk Watch International, Salt Lake Climbers Alliance and Access Fund to assist in monitoring and public outreach to promote avoidance areas. The climbing community has a proven track record of respecting seasonal avoidance areas as well as assisting in collection monitoring data 3 , 4 . We support ongoing stewardship of the area being shared with the climbing community to facilitate maintenance of fixed anchors and climbing access trails. Access Fund and Salt Lake Climbers Alliance have the resources and knowledge to assist and lead efforts in these areas of need. We encourage the Forest Service to include language in the plan that explicitly allows for the use and maintenance of fixed anchors as appropriate in Maple Canyon.

Joe's Valley

Joe's Valley is a world class destination for bouldering. The area has been through an extensive planning process with the Forest Service including an Environmental Assessment (EA) in 2017 5 to aid in management of the area as a recreational resource. In addition the Salt Lake Climbers Alliance compiled a detailed assessment of existing climbing resources and access paths including images and maps. This assessment was submitted to the Manti-La Sal National Forest in 2015. We can provide this data again if needed. This previous planning process included in-depth partnerships and feedback from Salt Lake Climbers Alliance, Access Fund and the local climbing community. We encourage the findings and management decisions of this EA be incorporated as appropriate into this Forest Plan revision.

Mill Creek and Brumley Creek

Mill Creek and Brumley Creek in the La Sal Mountains offer stellar summer climbing opportunities. These areas are relatively close to Moab and offer solid rock and cool temperatures for summer time climbing. These areas provide a mix of sport and traditional climbs and are a valuable recreational resource for climbers. We have provided location data for these areas in our collaborative map with Outdoor Alliance 6 . Access Fund suggests these existing climbing areas be recognized as climbing resources and use and maintenance of fixed anchors approved as appropriate. In addition we would like to partner with the Forest to address any potential erosion issues and stabilize climber approach paths as necessary.

Justice, Equity, Diversity, and Inclusion (JEDI)

Access Fund urges the Forest to work with the local community to advance inclusive and equitable access to the Manti-La Sal National Forest. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area located in a diverse community, within driving distance to large metropolitan areas in Utah and Colorado. The Manti-La Sal should be accessible to people from a true diversity of backgrounds. We encourage the Forest to address environmental justice issues and make similar efforts to engage with communities of color and other underrepresented demographics. Access Fund has staff dedicated to JEDI issues, and is available to offer our time and resources to assist the Forest in applying JEDI principles to this Manti-La Sal National Forest Plan revision.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the Forest may require to provide for the outstanding opportunities found in the Manti-La Sal National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain 7 climbing areas throughout the United States by assessing climbing

area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

* * *

Thank you for your consideration of these comments regarding the Manti-La Sal Forest Draft Revised Forest Plan (#50121). Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. Access Fund looks forward to continuing to work with the Forest. Please keep us informed as the planning process proceeds.

1 <https://www.congress.gov/bill/115th-congress/house-bill/5727/text?format=txt>

2 <https://www.congress.gov/bill/116th-congress/house-bill/2250/text>

3 <https://www.accessfund.org/news-and-events/news/climbers-partner-with-park-service-to-protect-zions-pegregrine-falcons>

4 <https://www.accessfund.org/open-gate-blog/why-raptors-need-space>

5 Joe[rsquo]s Valley Bouldering Area, Environmental Assessment. 2017
https://www.fs.usda.gov/nfs/11558/www/nepa/101516_FSPLT3_4032859.pdf

6 <https://outdooralliance.maps.arcgis.com/apps/webappviewer/index.html?id=ebb9961b38664dc2b6f2bae00aca9bf6>

7 See <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant> and <https://www.accessfund.org/pages/conservation-team>