

OUTDOOR ALLIANCE

October 31, 2022

Bears Ears National Monument
Resource Management Plan Project Manager
BLM Monticello Field Office
365 North Main
P.O. Box 7
Monticello, Utah 84535

RE: Scoping Comments for the Bears Ears National Monument Resource Management Plan

Outdoor Alliance is grateful for the opportunity to provide input in the planning process for the Bears Ears National Monument (BENM) Resource Management Plan (RMP).

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

Background

The human-powered outdoor recreation community supported the 2016 designation of Bears Ears National Monument through robust advocacy, garnering significant support from the outdoor recreation community and industry. Through these advocacy efforts, Access Fund, an OA member organization, developed collaborative relationships with the Native American community and the Bears Ears Inter-Tribal Coalition (BEITC). The outdoor recreation community's campaign for Bears Ears National Monument, in part, resulted in the acknowledgement of specific recreation opportunities in the preamble to President Obama's Proclamation 9558.



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The outdoor recreation community deeply appreciates the acknowledgement of world-class recreation opportunities in Proclamation 9558 and 10285, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. The order of the recreation activities (rock climbing first) reflects both the importance of the specific activity and also the extensive advocacy and ongoing stewardship efforts by the climbing community. The outdoor recreation community will continue to support and protect the Bears Ears landscape into the future. We intend to continue collaborating with the BEITC and Native American community, BLM, USFS, and key stakeholders while engaging in management planning processes, and continue to steward the recreation resources and encourage their responsible enjoyment, as we have for more than two decades.

Tribal Co-Management

The Tribal co-management agreement for Bears Ears National Monument is a historic step to elevate the role of Tribal Nations in public land management. We are deeply grateful to the Biden administration for taking this important step. Indigenous Peoples have a profound and unique understanding of their ancestral homelands, as well as a cultural connection to many of the sacred spaces on these lands. We should be honoring and elevating Indigenous Traditional Ecological Knowledge in the stewardship of our lands, and we look forward to learning from (and working with) the Bears Ears Commission (BEC).

Recreation Management Needs

We support the scoping comments in the joint letter submitted by the Access Fund, American Alpine Club, and Friends of Indian Creek and summarize the human-powered recreation management needs in the following section. This planning area contains some of the most scenic, wild, and adventurous rock climbing in the desert southwest, most notably Indian Creek, a world-class climbing area attracting thousands of climbers from across the United States and internationally each year. This plan also affects less frequented but nonetheless iconic sandstone climbing areas, such as Arch Canyon and Valley of the Gods. The outdoor recreation community regularly climbs at these locations. The Access Fund and local climbing organizations like Friends of Indian Creek (FOIC), have provided climbing management comments, funding, expertise and labor for stewardship projects, and community outreach throughout this planning area for several years to assist the Bureau of Land Management (BLM) and Forest Service (USFS) regarding various



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projects to ensure the appropriate management of the climbing resources found within this national monument. In addition to rock climbing, the planning area includes renowned multi-day rafting opportunities on the Colorado and San Juan Rivers and unique packrafting through the Dark Canyon Wilderness.

- Recreation Management – We acknowledge the “*Management Actions for Recreation and Visitor Services*” identified by the BEC, and we support the objective to “manage recreation resources while maintaining and preserving cultural and natural resources, wildlife habitats, and vegetation.”¹ In addition, Outdoor Alliance looks forward to working with the BEC, BLM, and USFS to develop recreation plans for BENM.
- Camping - The demand for camping at Indian Creek has grown significantly in the last twenty years.² This monument plan should consider what future campground needs might be necessary and determine whether existing group sites should be expanded, such as at Hamburger Rock, or new campgrounds established, such as the Shaw Mountain Vista Campground.
- Human and Pet Waste - A primary consideration for managing campers, as well as all visitors, throughout BENM is providing adequate human waste facilities. Ensuring appropriate human waste management has been a longstanding project for the climbing community.
- Trails and Trailheads - This plan should consider non-motorized recreation access trails that may not be included in existing transportation plans required by Proclamation 9558. Key trails include the many climbing access trails throughout the Indian Creek corridor, as well as hiking, biking, and equestrian trails throughout BENM. Inventorying what non-system trails may be important for recreation access, while also ensuring that they do not impact objects, values, or cultural sites, should be evaluated so that trails can be sustainably managed.
- Climbing management – We recognize the need for a range of climbing management initiatives related to visitor use impacts and cultural and natural resource protection. We will support the Access Fund, American Alpine Club, and local climbing organizations to develop a climbing

¹ <https://www.bearscoalition.org/beitc-land-management-plan-2/>

² Nelson, Rachel. February, 2021. Dispersed Campsite Inventory and Assessment in Indian Creek Canyon, Utah. Prepared by the Access Fund and Friends of Indian Creek. Unpublished.



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management approach that ensures consistency with the protection of the objects, values, cultural resources, wildlife habitat, and vegetation.

- River Recreation – The planning area includes segments of the Colorado and San Juan Rivers and almost the entirety of Dark Canyon. These rivers and their surrounding landscapes provide for high quality rafting and packrafting opportunities that support the local economy and quality of life for residents and visitors. Key infrastructure exists within the planning area, such as boat launch areas, river campsites, and parking areas that make these recreation opportunities possible. Recreation infrastructure should be maintained or enhanced in coordination with Tribal priorities and other management approaches that protect the historic and scientific objects in the planning area.
- Education – We recognize that recreation activities may have impacts on the environment, and education and stewardship are appropriate strategies to resolve or reduce recreation-related impacts. We are advocates for “Recreate Responsibly,” and this coalition is actively working to put together comprehensive information and resources on Tribal and Indigenous land and water.³
- Preliminary Alternative Concepts - Outdoor Alliance appreciates that the BLM and USFS have reviewed the BEITC Land Management Plan (LMP) and that many of the concepts presented in the preliminary alternatives are informed by the initial review of the BEITC LMP. We look forward to working with the BLM, USFS, and BEC to develop recreation management approaches that protect the objects and values within the monument, enhance recreational experiences, and minimize user conflict.

³ <https://www.recreateresponsibly.org/landandwater>



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Water Resources

The planning area includes more than 6,124 miles of streams or washes and 16,640 acres of wetlands, which is a significant amount for such an arid region. These streams, wetlands, and riparian areas sustain the entire region and many of the rivers and water bodies themselves are sacred to Indigenous peoples or have cultural significance. Proclamation 10285 states that the landscape itself is an object that needs protection, and water is an integral part of the landscape. As such, in coordination with Tribes, management approaches in the planning area should protect or enhance all water resources to the greatest extent possible. Water resources should be protected through a variety of overlapping and complimentary management approaches, including but not limited to Areas of Critical Environmental Concern, Wilderness Areas, Wild and Scenic eligible streams, Inventoried Roadless Areas, and other management strategies that are guided by Indigenous Traditional Ecological Knowledge.

Manti-La Sal National Forest Plan Revision

In October of 2021, Outdoor Alliance submitted scoping comments on the Manti-La Sal National Forest Draft Revised Forest Plan (see Appendix). Within this comment letter is a section on “Areas of Tribal Importance,” and we feel this information is relevant to the BENM planning process.

To achieve a comprehensive forest plan, it is important that this planning process proactively engage in effective and meaningful Tribal consultation. Empowering and drawing from Tribal knowledge will seek to gain a perspective on the overlap between traditional and modern Indigenous practices and other public uses on the Manti-La Sal National Forest, as well as adjacent areas. These efforts should involve collaboration from any and all interested Tribal representatives, government officials, and Tribal members. Additionally, efforts should consider geographic locations where overlaps exist between various user group activities and Indigenous sacred sites or traditional resources (e.g. hunting, medicine collection, wood gathering, ceremonial sites, etc.). Finally, efforts should seek to identify management strategies that respect current needs, as well as historical practices of Tribal communities.



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Outdoor Alliance appreciates the efforts of the BLM and USFS to develop a Tribally co-managed resource management plan for BENM that protects the important objects and values of historic and scientific interest, while also providing opportunities for the world-class outdoor recreation that are unique to this landscape. We look forward to working with the BEC, BLM, USFS, and other stakeholders to develop a balanced and durable plan for the Bears Ears National Monument.

Best regards,



Levi Rose
Land Use Planning and GIS Director
Outdoor Alliance

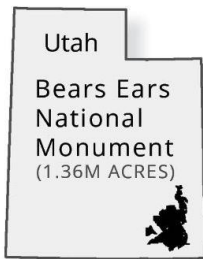
cc: Adam Cramer, CEO, Outdoor Alliance
Chris Winter, Executive Director, Access Fund
Beth Spilman, Executive Director, American Canoe Association
Clinton Begley, Executive Director, American Whitewater
Kent McNeill, CEO, International Mountain Bicycling Association
David Page, Executive Director, Winter Wildlands Alliance
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Pete Ward, Interim Executive Director, American Alpine Club
Kaleen Deatherage, Interim Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club
Chad Nelsen, CEO, Surfrider Foundation



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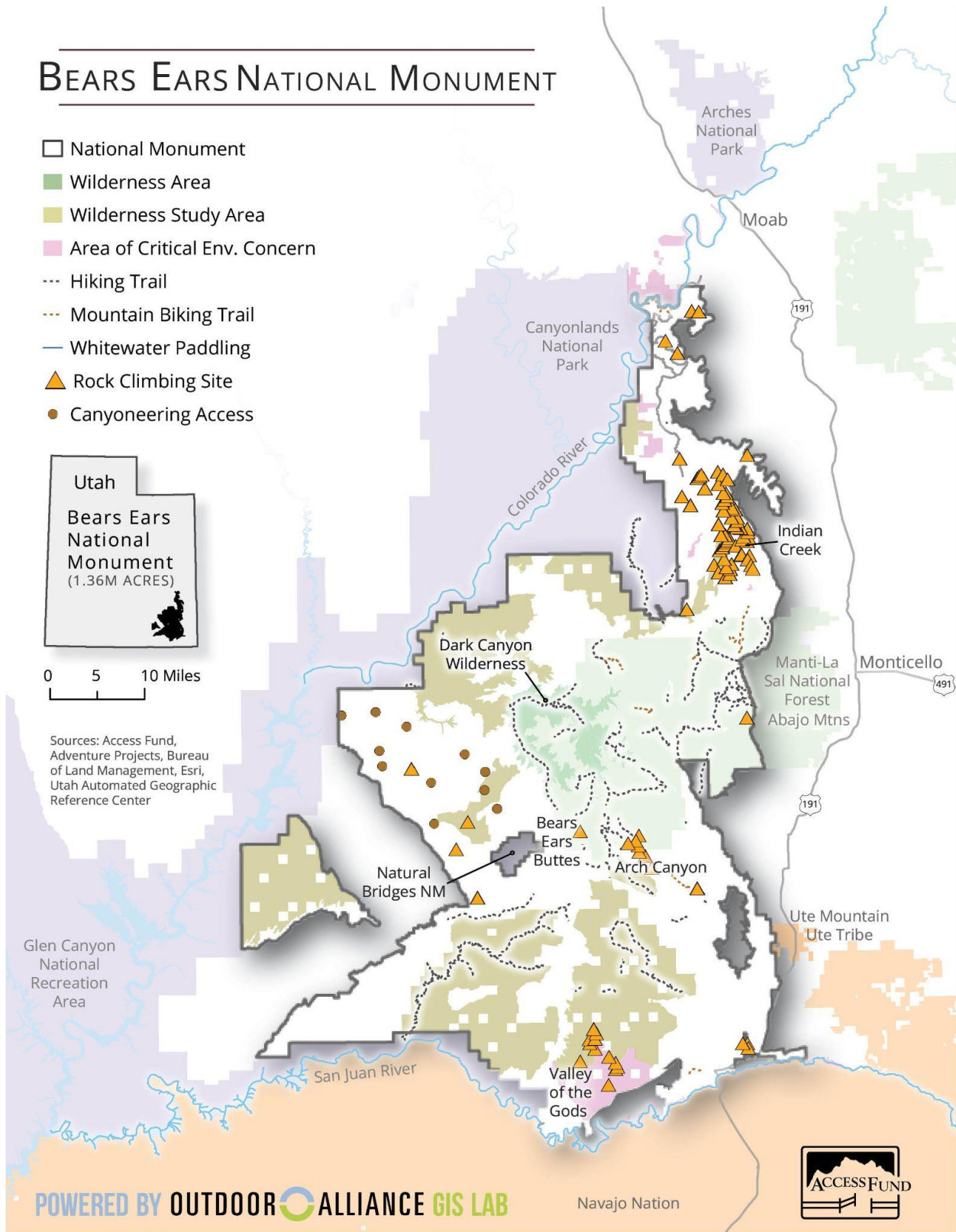
BEARS EARS NATIONAL MONUMENT

- National Monument
- Wilderness Area
- Wilderness Study Area
- Area of Critical Env. Concern
- Hiking Trail
- Mountain Biking Trail
- Whitewater Paddling
- ▲ Rock Climbing Site
- Canyoneering Access



0 5 10 Miles

Sources: Access Fund, Adventure Projects, Bureau of Land Management, Esri, Utah Automated Geographic Reference Center



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Appendix



October, 22, 2021

Manti-La Sal National Forest
Attn: Plan Revision Team
599 West Price River Dr.
Price, UT 84501

Submitted via: CARA public comment portal

Re: Outdoor Alliance Scoping Comments on the Manti-La Sal National Forest Draft Revised Forest Plan

Dear Plan Revision Team,

Thank you for considering the following feedback from Outdoor Alliance regarding the Manti-La Sal National Forest Draft Revised Forest Plan. Outdoor Alliance submits these comments in partnership with local and regional advocacy organizations that include Friends of Indian Creek, Public Land Solutions, and Salt Lake Climbers Alliance. We recognize and genuinely appreciate the effort that the Manti-La Sal Planning Team has dedicated to the Manti-La Sal National Forest Draft Revised Forest Plan and are grateful for the opportunity to provide feedback.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

This comment letter builds off comments that were submitted by Outdoor Alliance in February 2021 and includes recommended forest plan components that could be integrated to strengthen the Manti-La Sal National Forest Draft Revised Forest Plan (i.e. we are supportive of the plan components in Draft Revised Forest Plan, except where referenced and revised in our comments). For efficiency and clarity, added or updated text since February 2021 has been highlighted in [blue](#).

How to use and interpret our feedback. Throughout this document we have used a combination of terminology (e.g. Revise) and editing symbology (e.g. ~~strikethrough~~, and [colored text](#)) to convey our feedback on forest plan components.

- **Add**, this is a new plan component that should be added to improve the Draft Revised Forest Plan (for simplicity, all plan components proposed by Outdoor Alliance in blue text should be added to the Draft Revised Forest Plan).
- **Revise**, this plan component is revised using strikethrough where text should be eliminated and purple text where new language should be added.

In the table of contents, corresponding section numbers in the Draft Revised Forest Plan have been referenced.

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A Shared Vision for the Manti-La Sal

To help the Forest Service reach consensus during the Manti La-Sal National Forest Plan revision process, Outdoor Alliance provides support for grassroots leaders to pursue consensus positions with other stakeholders, government agencies, and Tribal Nations, and through this process, create a shared vision for the Forest among wide ranging interests. Although we are a coalition of human-powered recreation advocacy organizations, our approach is to view the Forest holistically, with careful considerations for Tribal lands, wildlife habitat, sensitive landscapes, water resources, and places where recreation intersects with other uses or resources.

Our working group is composed of local, regional, and national groups that include the Access Fund, American Whitewater, Friends of Indian Creek, International Mountain Bicycling Association, Public Land Solutions, Salt Lake Climbers Alliance, and Winter Wildlands Alliance. We envision a revised forest 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.

Outdoor Alliance supports the recently restored monument boundaries for Bears Ears National Monument. We participated in the Bears Ears National Monument-Monument Management Plans for the Indian Creek and Shash Jáa Units. While a large portion of the Bears Ears National Monument is managed by the Bureau of Land Management, there is a portion that overlaps with the Manti-La Sal National Forest's Monticello Ranger District. There are numerous rock climbing and trail resources in this region, and we encourage the Forest Service to consider how the restored monument boundaries may interact with existing human powered recreation in the area. We support ongoing Tribal access for traditional plant and firewood gathering and for ceremonial purposes, and we are dedicated to working with the Manti-La Sal National Forest on management strategies both within and outside the restored monument boundaries.

Forest-wide Direction (2.0)

Outdoor Alliance and partner organizations value fish and wildlife habitats, clean water, clean air, and diverse forests. We recognize that a positive recreation experience is dependent upon the quality of the surrounding natural resources, which provide for scenic viewsheds, environmental health, wildlife encounters, the feeling of solitude, and a natural experience. Population growth, technological advances, climate change, and many other variables will affect the Manti-La Sal National Forest (herein Forest or Manti-La Sal) in future years. We recommend that the Forest Service prioritize the long-term ecological health of public lands, wildlife, and watersheds, as well as the increased need for opportunities to sustainably enjoy the Forest. We support forest plan components and decision-making processes that focus on long-term solutions, preserve access to public lands, and protect natural environments and wildlife habitat in order to leave a legacy for future generations. This should also take into consideration the ongoing and accelerating effects of climate change. The following sections detail forest-wide policy and management recommendations to help the Forest Service reach consensus during the Manti La-Sal Forest Plan Revision process.

Research and Scientific Data

We support the use of best available science information throughout the forest plan decision-making process, including outdoor recreation data and analysis.¹ In cases where there is conflicting science or disagreement on best management practices, we support using the highest standards of accuracy, reliability, and relevancy. Examples of potential data sources include climate change research presented by the Intergovernmental Panel on Climate Change, watershed plans by local nonprofits, modern wildlife management research, and local and nationwide studies on human-powered recreation by outdoor recreation organizations such as Outdoor Alliance and Winter Wildlands Alliance.

¹ Outdoor Alliance maps and data, <https://www.outdooralliance.org/maps-and-apps>

Watershed and Aquatic Resources (2.1)

Community Water Sources (2.1.1)

Water quality and quantity is a significant point of interest for communities next to the Forest, and recreational opportunities are also reliant on adequate water quality and quantity. Negative impacts to water may result from unmanaged livestock grazing, recreation, vegetation treatments, timber harvesting, and mining. Source Water Protection Zones that provide drinking water must be properly delineated and activities in these zones should be managed to avoid potential contamination of ground and surface water.

Wildlife (2.7)

Throughout the Manti-La Sal, various seasonal closures affect trails and broader recreation zones. We recognize the need for closures to protect wildlife habitat and supports those closures where they have proven to be necessary. However, the Forest Service should work with state and federal agencies to reassess seasonal closures on the Manti-La Sal on an individual and recurring basis to ensure they are necessary, supported by current science, tailored as closely as possible to the needs requiring closure, and equitably applied across user groups. When a closure is necessary, the Forest Service should provide clarity and transparency on what wildlife indicators determine seasonal closures for individual areas and the science behind the chosen closure dates. Seasonal closures negatively impact the continuity of recreation opportunities and the recreation economy of local communities. Individual closures should be reassessed on a regular basis to ensure they continue to be relevant.

Wildlife, Plan Components

Guidelines

- Add, Use of best available scientific information throughout the forest plan decision-making process, including outdoor recreation data and analysis:
 - Climbing and Raptors: A Handbook for Adaptive Raptor Management²

² Access Fund, <https://www.accessfund.org/open-gate-blog/access-fund-releases-comprehensive-climbing-raptor-management-handbook>

- Environmental Impacts of Winter Recreation³
- Sustaining Wildlife With Recreation on Public Lands: A Synthesis of Research Findings, Management Practices, and Research Needs⁴

Areas of Tribal Importance (2.9)

To achieve a comprehensive forest plan, it is important that this planning process proactively engage in effective and meaningful Tribal consultation. Empowering and drawing from Tribal knowledge will seek to gain a perspective on the overlap between traditional and modern Indigenous practices and other public uses on the Manti-La Sal National Forest, as well as adjacent areas. These efforts should involve collaboration from any and all interested Tribal representatives, government officials, and Tribal members. Additionally, efforts should consider geographic locations where overlaps exist between various user group activities and Indigenous sacred sites or traditional resources (e.g. hunting, medicine collection, wood gathering, ceremonial sites, etc.). Finally, efforts should seek to identify management strategies that respect current needs, as well as historical practices of Tribal communities.

In striving to create the most effective, harmonious, and sustainable management plan possible, Outdoor Alliance 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, 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.

³ Winter Wildlands Alliance, <https://winterwildlands.org/environmental-impacts-of-winter-recreation-2021>

⁴ U.S. Forest Service Pacific Northwest Research Station, <https://www.fs.usda.gov/treearch/pubs/61721>

Areas of Tribal Importance, Plan Components

Goals

- Add, Identify, describe, and spatially convey (if approved by the Tribe(s)) existing conflicts and impacts. Also consider where Tribal values and attachments may influence Recreation Opportunity Spectrum (ROS) classifications, ROS subclass development, special area designations, and/or related management direction.

Recreation and Access (2.10)

Description and Values

The Manti-La Sal National Forest contains incredible and diverse recreation opportunities, including more than 880 miles of trails, 160 rock climbing sites, 27 miles of whitewater paddling, and 170,000 acres that are explored for backcountry skiing. In February of 2021, Outdoor Alliance shared a geospatial database of our recreation assets with the Forest Plan Revision Team. In sharing this data, our intent is to improve collaboration that results in sustainable recreation outcomes that are compatible with other uses, protect cultural and natural resources, and garner support, advocacy, and shared stewardship by the public. In addition, our recreation data can be explored through an interactive online web map.⁵

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 system 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, 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.

Canoeing, kayaking, and rafting are likely some of the oldest forms of travel and exploration. Even though technological advances have improved safety, the core elements of the activity remain – exploring natural areas by paddling a small boat through the

⁵ Manti-La Sal National Forest web map, <https://bit.ly/Manti-LaSal>

landscape on rivers. Each river is a “natural trail” through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and wilderness-compliant; it is exactly the kind of activity and experience covered under the requirement for “sustainable recreation” in the 2012 Forest Planning Rule.⁶ As such, paddling opportunities in the Manti La Sal National Forests should be recognized, and management measures should protect these recreation opportunities now and for future generations.

We recommend that a comprehensive inventory of dispersed camping areas be completed to identify areas that need additional management including: designated dispersed camping with accessible restroom facilities, developed/fee-based campgrounds, barrier installations or vehicle controls to restrict access, and/or prohibition of dispersed camping in certain areas to protect resources. Dispersed camping should be properly signed and located. Signage and enforcement are key to ensuring user education and compliance with new camping regulations, and we recommend that the Forest Service work with user groups, as well as tourism and media outlets (e.g. chambers of commerce, social media), to communicate with visitors.

Based on the wide spectrum of recreation activities that occur on the Manti-La Sal National Forest and the demand for outdoor recreation opportunities, we believe recreation management is needed to ensure the quality of diverse recreation opportunities and to protect the integrity of cultural and natural resources. The following section details forest-wide policy and management recommendations that may assist the Manti-La Sal National Forest in successfully and sustainably managing recreation. We support the Forest Service’s goal to develop and maintain volunteer programs and partnerships that engage the public in stewardship of natural and cultural resources.

Recreation and Access, Plan Components

In addition to the forest plan components outlined in the Draft Revised Forest Plan, we recommend the following:

⁶ FAQs on the 2012 Planning Rule, <https://www.fs.usda.gov/detail/planningrule/faqs/?cid=stelprdb5349628#24>

Goals

- Protect and enhance the many unique and valuable human-powered recreation experiences found on the Manti-La Sal National Forest.
- Complete a strategic partner assessment across the Manti-La Sal National Forest to determine the scope and scale of partnered efforts and gaps in support and identify the needs and issues related to Forest Service capacity.
- Coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.
- Promote effective communication with gateway communities to help foster partnerships, inspire volunteers, educate the public, and support stewardship that contributes to funding, implementation of projects, and long-term maintenance of facilities.
- In collaboration with the relevant stakeholders, develop strategies to make the Forest accessible and inviting to traditionally underrepresented user groups.

Desired Conditions

- The design, condition, function, and accessibility of recreation facilities and opportunities accommodate a diverse range of cultures and traditionally underrepresented user groups.
- Recreation opportunities provide a high level of visitor satisfaction. The range of recreation activities contribute to social and economic sustainability of local communities.
- Designated dispersed campsites provide resource protection and are minimally developed with rustic amenities.
- Preserve the wild and natural character of the Manti-La Sal National Forest by maintaining diverse recreation opportunities for solitude and primitive and quiet types of recreation.

Objectives

- Revise, FW-REC-OB-05: Install at least one informational kiosk, or interpretive sign, discussing the recreational impacts to alpine **wildlife** communities, at a trailhead that accesses alpine areas within ~~ten~~ **three** years of plan approval.
- Revise, FW-REC-OB-06: Designate motorized winter recreation opportunities across the Forest and develop a corresponding over-snow vehicle use map within ~~the life of the~~ **four years of forest plan approval**.
- Through a collaborative process, develop a Manti-La Sal National Forest climbing strategy that provides guidance on rock climbing and bouldering; guidance shall address climbing in general forest and designated areas within three years of plan approval, including strategies for wildlife seasonal closures, maintenance of fixed anchors, human waste management, cultural and natural resource protection, and erosion control.
- Conduct monitoring of high/moderate-use recreation areas to understand current visitor use, changes over time, and potential resource impacts from recreation within five years of forest plan approval. Determine needs for parking, bathrooms, signage, or other facilities.
- Develop an operation and maintenance guide for all designated dispersed campsites containing provisions for public health and safety and protection of water, aquatic, and riparian resources within three years of plan approval.

Standards

- Do not allow primitive or designated dispersed camping in areas where such use creates resource damage; mitigate impacts, relocate, and/or close and rehabilitate campsites.

Guidelines

- Use of best available scientific information throughout the forest plan decision-making process, including outdoor recreation data and analysis:
 - Climbing and Raptors: A Handbook for Adaptive Raptor Management⁷

⁷ Access Fund, <https://www.accessfund.org/open-gate-blog/access-fund-releases-comprehensive-climbing-raptor-management-handbook>

- Environmental Impacts of Winter Recreation⁸
- Joe’s Valley Bouldering Area Environmental Assessment (April 2017)⁹
- Use integrated resource planning when designing projects to address impacts to culturally sensitive areas and at-risk species habitat, and to address changing conditions in recreation settings.
- When locating new recreation facilities, do not adversely affect environmentally and culturally sensitive areas, such as at-risk species breeding habitat or at-risk plant species habitat.
- Create infrastructure that mimics the natural textures and colors of the surrounding landscape to be consistent with the recreation setting.
- Access Fund and The Wilderness Society have crafted guidance language together to assist in the future management of fixed anchors in wilderness. We recommend the following language—that Congress codified in the Dingell Act¹⁰ be included specific to fixed anchor management in wilderness:

RECREATIONAL CLIMBING. Nothing in this part 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 Act—

(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.

Management Approaches

The following are examples of management approaches and strategies that focus on connecting visitors and communities with their national forest.

- Develop a clear vision for partnership engagement.

⁸ Winter Wildlands Alliance, <https://winterwildlands.org/environmental-impacts-of-winter-recreation-2021>

⁹ Bureau of Land Management, <https://www.blm.gov/press-release/blm-seeks-public-comment-joes-valley-bouldering-plan>

¹⁰ See John D. Dingell, Jr. Conservation, Management, and Recreation Act, Section 1232(b), <https://www.congress.gov/bill/116th-congress/senate-bill/47/text>

- Work with communities and partners to develop strategies that engage youth with the unit's outdoor settings.
- Work with permittees and other partners to identify and remove existing obstacles for diverse and inclusive participation in recreation opportunities on the unit.
- Forge new partnerships with State, local, tribal, private, and non-profit partners to expand access to underserved populations, particularly those in the immediate vicinity of the forest.
- Use Conservation Education and Interpretation programs to share values that will motivate people to engage with the unit as co-stewards of their natural and cultural resources.
- Work with local communities and partners to assess and develop Accessibility Transition Plans for the unit's recreation facilities and programs. Transition plans will serve to integrate, prioritize, and implement accessibility-related improvements with other recreation facility and program-delivery needs.
- Employ minimum impact principles (e.g., Leave No Trace, Tread Lightly, Pack it in/Take it Home) to educate communities and visitors, while imparting a sense of pride and stewardship responsibility for the rich cultural and natural resources of their forest.
- Engage communities to explore partnerships that will achieve community goals, implement recreation objectives, and strengthen shared stewardship responsibilities for desired sustainable recreation outcomes.
- Work with federal, state, and local transportation/transit agencies to identify, create, and facilitate access between communities and the recreation settings and opportunities of the unit, while reducing emissions and other resource impacts.
- Use trailhead and camp hosts or volunteer patrollers to educate and interact with the public to promote responsible and sustainable public use practices.
- Redesign, restore, or rehabilitate recreation sites where recreation activities have caused unacceptable natural or cultural resource damage.

Recreation Opportunity Spectrum (2.10.1)

Description and Values

The Recreation Opportunity Spectrum (ROS) is a system for classifying and managing existing and desired recreation opportunities. The ROS framework integrates individual recreation setting characteristics (including access and scenic character) to function collectively in providing distinct recreation opportunities. Because setting characteristics may change by season, the resulting ROS class may also change by season. As a result, **we recommend that the Forest Service develop ROS classes for both summer and winter.** [Recreation opportunity spectrum suitability does not confer a travel management designation; site-specific travel planning in compliance with the Travel Management Rule is required to designate routes and areas for motorized use \(see Access\).](#)

At the forest scale, sustainable recreation is derived through an integrated planning process and emerges as the resultant set of desired ROS spectrum classes. The desired set of ROS classes is achieved by integrating other cultural and natural resource values, and by engaging and garnering the support, advocacy, and shared stewardship of the public. To help inform Manti-La Sal's niche or distinctive roles and contributions, we recommend the ability to assess, compare, and contrast the draft revised forest plan's ROS classes with those in the broader landscape. To do this, the Forest Service should develop ROS classes that extend beyond the boundary of the forest. At a minimum, all lands within the Manti-La Sal administrative boundary should be mapped (including non-forest service lands).

While ROS and other zoning frameworks lump various attributes and then categorize them into distinct settings that serve to sub-divide an area into management-focused polygons, place-based planning identifies values and attachment to a specific location within a landscape that are unique and specific to the place. By understanding the meanings that places have for individuals and groups, management direction and activities can be designed to preserve or enhance those characteristics that make a specific place valued (e.g. rock climbing in Joe's Valley). The Forest Service should gather input from the public and inventory important place-specific recreation uses (e.g. Outdoor Alliance's GIS data) to refine management direction and address specific features, opportunities, and values that are not addressed in broader zoning frameworks.

ROS, Plan Components

Desired Conditions

- Revise, FW-ROS-DC-05: Motorized route density in the Semi-Primitive Motorized classes ~~averages~~ should not exceed 1.7 miles per square mile ~~or less~~ to provide for wildlife security.

- Question, What best available science is 1.7 miles per square mile based on?
- Question, What methodology will be used to determine the 1.7 mile per square mile route density calculation?
- Primitive ROS settings (summer): encompass large, wild, remote, and predominantly unmodified landscapes. Primitive settings often provide secure wildlife habitat, naturally appearing vegetation, clean water, may contain the unit's most intact ecosystems and often coincide with designated wilderness. Primitive recreation opportunity spectrum settings contain no motorized recreation. They provide quiet solitude away from roads and people, are generally free of human development, and facilitate self-reliance and discovery. Historic structures such as administrative ranger stations are occasionally present. Signing and other infrastructure are not prevalent and constructed of rustic, native materials.
- Primitive ROS settings (winter): are large, remote, wild, and predominantly unmodified. Winter primitive recreation opportunity spectrum settings provide quiet solitude away from roads and people. There is no motorized activity and little probability of seeing other people. Constructed trails that are evident in the summer months are covered by snow, making these settings appear even more natural and untouched by human management.
- Semi-Primitive Non-Motorized ROS settings (summer): provide opportunities for exploration, challenge, and self-reliance in a naturally appearing landscape. Rustic structures such as signs and footbridges are occasionally present to direct use and protect the setting's natural and cultural resources. These rustic constructed features are built from native materials or those that mimic native materials. These settings are free of motorized transport, but mechanized transport may be present on appropriately designed and constructed routes.
- Semi-Primitive Non-Motorized ROS settings (winter): provide backcountry and Nordic skiing, snowboarding, and snowshoeing opportunities. Trails are generally un-groomed and not marked for winter travel. Some areas that have enough compaction may see fat tire bike use. Rustic facilities, such as historic cabins and yurts may exist but are rare. These settings are free of motorized transport, but mechanized transport may be present on appropriately designed and constructed routes.
- Semi-Primitive Motorized ROS settings (summer): provide motorized recreation opportunities in backcountry settings. Routes are designed for off-highway vehicles and high-clearance vehicles, including motorcycles, that connect to local communities, access key destinations and vantage points, provide short day trips on scenic loops or facilitate longer and even overnight expeditions. Visitors challenge

themselves as they explore vast, rugged landscapes. Mountain bikes and other mechanized equipment may also be present. Facilities are rustic and are used to protect the setting's natural and cultural resources. Bridges are sometimes present to accommodate foot, horse, and all-terrain vehicle traffic, but are built from native or natural appearing materials that blend with the surrounding landscape and maintain the semi-primitive character of the setting. There may also be nodes that function as portals for visitors to park their all-terrain vehicles and explore adjacent semi-primitive non-motorized and primitive settings on foot. Vegetation management may be present, but does not dominate the landscape or detract from the experience of visitors traveling throughout the semi-primitive motorized setting.

- Semi-Primitive Motorized ROS settings (winter) provide backcountry skiing and snowmobiling opportunities. Routes are typically un-groomed, but are often signed and marked. There are vast areas to travel cross-country, offering visitors an opportunity for exploration and challenge. Occasionally, historic cabins or warming huts are available for short breaks or overnight use.
- Roaded Natural ROS settings (summer): are often referred to as front-country recreation areas. This setting is managed as natural appearing with nodes and corridors of development that support higher concentrations of use, user comfort, and social interaction. The road system is well defined and can typically accommodate sedan travel. Sanitation, potable water, interpretive signing, and other amenities are strategically placed to serve as destination points and portals to adjacent backcountry settings. Signing, facilities, bridges and other infrastructure are constructed of native materials or natural appearing materials that blend with and complement the surrounding natural setting.
- Roaded Natural ROS settings (winter): support higher concentrations of use, user comfort, and social interaction. The road system is plowed and accommodates sedan travel. Winter trails are routinely groomed and may have ancillary facilities such as warming huts and restrooms. System roads and trails often provide staging to adjacent backcountry settings (primitive, semi-primitive non-motorized and semi-primitive motorized). Examples include snowmobiling, fat-tire bikes, dog sledding, skiing, and snowshoeing.
- Rural ROS settings (summer): often serve as a recreation destination and sometimes provide access to adjacent roaded natural and semi-primitive settings and opportunities. These areas are accessed from paved roads and are generally close to communities. Developed recreation facilities are designed for large groups and provide opportunities to socialize in both day-use and overnight sites.
- Rural ROS settings (winter): provide staging to adjacent winter settings and opportunities. These areas are accessed from paved and plowed roads and are

generally close to population centers. Warming huts or other shelters, sanitation, and information and education are commonly present. Parking areas are large and plowed. Entry points and routes are signed and lead snowmobiles to adjacent roaded natural and semi-primitive motorized settings. Non-motorized trails are also typically groomed for skate skiing and cross-country skiing. Rural winter settings provide quick and convenient access for communities and families to celebrate holidays, conduct racing events, walk their dogs, or simply get some exercise.

- Rural ROS settings (summer and winter): support use of alternative transportation and new technologies.

Objectives

- Sign five areas of wilderness boundaries near adjacent motorized settings per decade to better inform visitors of motorized restrictions within this quiet non-motorized primitive setting.
- Eliminate five existing unauthorized motorized travel incursions per decade to maintain the primitive setting.
- Eliminate five existing unauthorized motorized travel incursions per decade to maintain the semi-primitive non-motorized setting.
- Improve accessible design at three sites, such as toilets at trailheads or interpretive opportunities to support high concentrations of use and user comfort per decade.

Guidelines

- FW-ROS-GD-03: Resource management activities, including but not limited to timber harvests, livestock grazing, wildlife habitat improvements, vegetation treatments, mineral exploration and developments, and special uses should only occur in Semi-Primitive Nonmotorized class areas if they both meet the location's scenery integrity objective and maintain a high-quality nonmotorized recreation opportunity.
- To maintain the setting appropriate to the assigned recreation opportunity spectrum class, new recreation facilities should be designed to meet required direction for materials, development scale, on-site regulation signage, and density of sites, as well as consistent with the principles of the Forest Service Built Environment Image Guide, in terms of architectural character. Exemptions may occur on a case-by-case basis to reflect environmental conditions such as meeting snow loads.

Suitability

- Motorized transport is not suitable in primitive or semi-primitive non-motorized settings.
- Groomed trails are not suitable in winter primitive settings.
- Non-motorized trails and cross-country nonmotorized travel are suitable in winter primitive settings.
- Electric bikes (e-bikes) will not be permitted in areas with ROS settings of Primitive or Semi-Primitive Non-Motorized.

Access (2.10.3)

Description and Values

The Manti-La Sal offers extensive trail opportunities for mountain biking, hiking, trail running, and equestrian use. This plan should maintain opportunities for diverse non-motorized trail experiences, including use specific trails and new trail opportunities. Mountain biking is a very popular activity on the Manti-La Sal National Forest that should be managed sustainably to protect the resource and enhance the user experience. The plan should consider management actions that separate non-motorized biking activities from motorized recreation where appropriate and consider planning actions that authorize new non-motorized mountain biking trails, as well as other use specific non-motorized trails. We encourage the Forest Service to work with the local mountain bike community to develop an appropriate planning and management framework.

The quality of a user's outdoor experience, especially on shared terrain and on popular trails within a few-mile radius of multi-use trailheads, can be adversely affected by other users in high-use settings. For safety reasons, and to reduce conflicts between user groups, the Forest Service should consider providing separate trails or varied closure periods for different user groups in high-use recreation areas. The trailhead proximity issue could be exacerbated in the winter, when access to summer trailheads is not feasible. Additionally, high-use trailheads may also require more developed infrastructure including toilets, designated or developed campsites, parking improvements, and vehicle controls to minimize impacts to natural resources. Within five years of plan approval, the Forest Service should complete an inventory of all non-system trails (including social trails) and have the option of; utilizing erosion control/mitigation activities to sustainably manage non-system access trails where appropriate, adding non-system trails (to the system), or obliterating/naturalizing non-system trails that are not sustainable.

Because of recent changes in technology and the increased use of e-bikes, including e-mtbs, it is important that the Forest Service proactively consider how this technology will be managed. The revised forest plan should state that e-bikes should be permitted only on natural surface trails where those trails allow for motorized use. In some cases, it may be appropriate to re-categorize non-motorized trails to allow for Class 1 e-bike use (while continuing to exclude other classes of motorized uses, including Class 2 and 3 e-bikes). The revised Forest Plan should state that these decisions will exclusively be made through the travel management process, including full application of NEPA and robust public engagement, and that e-bikes will not be permitted in areas with ROS settings of Primitive or Semi-Primitive Non-Motorized.

The Manti-La Sal National Forest provides extensive opportunities for motorized recreation. The revised forest plan should consider existing uses, as well as new, emerging motorized recreation uses that may bring new impacts to the forest. Increased efforts should be considered to enforce rules that limit motorized uses in specific areas and to enforce speed limits on forest roads; limits that are regularly exceeded affect the experience of all forest users. As with all recreational activities, resource damage from motorized recreation should be monitored and adaptive management actions taken to limit such impacts. The revised forest plan should assess all existing trail stream crossings within the planning area within five years of plan approval to assess stream sediment impacts and reroute roads and trails as needed. All designated routes and areas for motor vehicle use made through travel management planning should be located to minimize resource impacts and conflicts with other recreational uses, in compliance with 36 C.F.R. § 212.55(b), "Specific criteria for designation of trails and areas." The Draft Environmental Impact Statement and Draft Forest Plan should clearly state that ROS settings do not preclude travel planning decisions. The final plans should explain that site-specific travel planning is needed to determine where motorized vehicle use will be allowed (including over-snow) within semi-primitive, roaded natural, and rural areas.

While we recognize that the forest will not make site-specific decisions during the forest plan revision process, we do recommend a comprehensive review of current and future winter recreation uses, suitability of over snow vehicle (OSV) use, and application of a Winter Recreation Opportunity Spectrum (ROS) in order for the revised forest plan to provide a solid foundation for future over-snow travel planning efforts. For example, establishing winter ROS settings for the Manti-La Sal will help build a framework for winter travel planning, required by the 2015 Over-Snow Vehicle (OSV) Rule (36 C.F.R. part 212), by identifying which areas of the forest are suitable, or not, for OSV designations. The winter ROS should be mapped so that non-motorized experiences can be easily enjoyed in both the front-country and backcountry.

In the revised forest plan, the Forest should also clearly identify seasons for off-highway vehicle and OSV use based on wildlife needs, water quality considerations, average snow depth figures, and other relevant information. Seasons are required in travel management planning, but can be addressed in forest plan revision as well. The Forest Plan should also specify that OSV travel within designated areas should only be allowed when consolidated snow depth at established, representative locations, measures at least 18 inches, regardless of the date. This dual approach of season dates and minimum snow depth will help the forest easily adapt OSV recreation management as the climate changes. The revised forest plan should also include an objective stating that winter travel management planning will be initiated within one year of completing the forest plan revision, with the goal of issuing an OSV Use Map within four years.

Access, Plan Components

Goals

- Consider transportation systems as a way to connect people to nature, improve personal health, and increase access for underserved communities and minorities.
- Provide accessible trails for individuals with mobility impairments.

Desired Conditions

- Recreation facilities, including trails and dispersed sites, and their use have minimal impacts on resources including ecological integrity and diversity, at-risk species, heritage and cultural sites, water quality, and aquatic species.
- Existing developed facilities, roads, and trails for both summer and winter recreation activities are adaptable for new recreation demands.
- At highly developed sites, well-maintained forest system roads and well-marked trails provide relatively easy access for users.
- Trailheads are appropriately designed for their intended use and well maintained.
- An ecologically, socially, and financially sustainable system of trails provides high quality recreation experiences across a range of settings for each use-type.
- Sustainable trail use occurs within the ability of the land to support it, with high visitor satisfaction, minimal conflict between users, and without impacts to ecologically and culturally sensitive areas.

- Partner organizations and communities are involved in sustainable trail planning and management efforts.
- Short connector trails enhance loop opportunities within the existing network, and, where appropriate, trails provide connections to communities or other public lands.
- Unsustainable trails are transitioned to a sustainable condition utilizing state-of-the-art trail design principles or are decommissioned and rehabilitated
- Unauthorized trails are closed and rehabilitated to prevent erosion and restore vegetation or are improved to meet trail standards and added as a National Forest System (NFS) trail through a collaborative planning process.
- Off-highway vehicle, equestrian, bicycle, and electronic-bicycle trail use occurs only on NFS trails designated for those uses or NFS roads where those uses are not in violation of regulation. Use of llamas, alpacas, mules or other pack stock only occurs where equestrian (pack and saddle) use is allowed.

Objectives

- Complete Trail Management Objectives (TMOs) for all Manti-La Sal National Forest System trails within three years, and schedule trail maintenance tasks according to frequencies identified in the TMO.
- Assess all trails with stream crossings to determine potential sediment and erosion impacts to stream within five years of forest plan approval. Reroute or rehabilitate trails as needed to reduce sediment and erosion.
- Within five years of plan approval, complete an inventory of all non-system trails (including social trails) and have the option of; utilizing erosion control/mitigation activities to sustainably manage non-system access trails where appropriate, adding non-system trails (to the system), or decommissioning/rehabilitating non-system trails that are not sustainable.
- Winter travel management planning, per 36 C.F.R. part 212, should be initiated within three years of completing the revised forest plan.
- Develop an OSV use map within four years of completing the revised forest plan.
- Within two years of plan approval, through mapping and collaboration with land owners, identify at least two opportunities for land acquisitions that would improve

public access to Forest Service lands, wildlife habitat connectivity, and/or improve watershed health.

Standards

- If unacceptable damage to natural or cultural resources is occurring or safety issues are identified on a section of trail, temporarily mitigate impacts, or close that section of trail until proper planning and implementation can occur to correct issues, relocate, or decommission the trail.
- Motorized trail use (Off-Highway Vehicles), including electronic bicycle use, is only allowed on NFS trails and roads designated or managed for that use as identified on published Motor Vehicle Use Maps, within the season of operation, and in compliance with any use fees that may exist.
- Designation of trails for electronic bicycle use shall only be done following the latest agency guidance and site-specific analysis supporting sustainable trail management.
- Relocation of unsustainable NFS trails to mitigate resource damage, safety issues, or user conflicts does not require a match in decommissioned trail miles, understanding the length of relocated and decommissioned trail segments may differ.
- Newly constructed or improved trails are compliant with Forest Service Trail Accessibility Guidelines.
- Consistency among signage at trailheads and intersections should be used so that users can quickly identify and recognize signage throughout the trail system

Guidelines

- Mixed use non-motorized trails are acceptable but should be accompanied by educational efforts to reduce user conflicts. All user groups should be encouraged to share responsibility and work together in supporting the trail.
- Use best practices to reduce landscape level habitat impacts when developing new trails to protect watershed health and sensitive wildlife areas, and minimize trails that cross waterways or are located in riparian/wetland areas and areas susceptible to erosion.

Management Approaches

- Priority of trail improvement or relocation projects shall be given to those trails with user safety or resource damage issues, recurring user conflicts, or needs identified through a trail strategy or other collaborative planning process.
- Prior to re-designating hike-only trails to allow bicycle, electronic bicycle, or equestrian use (or vice versa), collaborate with key representatives of affected partner organizations or maintainer clubs, and consider conformity with applicable Trail Design Parameters, social and ecological impacts, user conflicts, and trail suitability for the proposed use in the project analysis.
- Emphasis is placed on maintaining existing motorized trails to standard rather than creating new motorized trails. Trail improvements, relocation, and/or short connectors within an existing trail system may be constructed to more effectively address resource concerns, visitor safety, or improve alignment for sustainability.

Scenery Management (2.11)

The Scenery Management System (SMS) provides a systematic approach to inventory, assess, define, and monitor both existing and desired scenic resource conditions on national forest system lands. Specific components of the SMS include: scenic character, the degree of scenic diversity (scenic attractiveness), how and where people view the scenery (distance zones), the importance of scenery to those viewing it (concern levels), and the desired degree of intactness (scenic integrity objectives).

Public engagement can be built into all aspects of the Scenery Management System (SMS). Of particular importance is public input to determine concern levels. As the name implies, concern levels represent the level of concern people have for the planning area's scenery. Concern levels factor into decisions on which scenic integrity objectives (SIOs) are appropriate for specific landscapes. Public input can be used to determine where the existing scenic character and integrity is not meeting desired conditions, or at risk, due to other management activities and/or trending resource conditions.

The Forest Service should consider how the existing condition of the scenery (existing scenic integrity) interfaces with the unit's newly mapped existing ROS classes. Since an important characteristic of ROS classes is the scenery, it is important that the existing condition of the scenery is consistent with the types of recreation opportunities and experiences of each setting.

Livestock Grazing and Range Management (2.16)

Of particular significance on the Manti-La Sal National Forest are the impacts to water from livestock grazing. In several locations throughout the Manti-La Sal National Forest it is apparent that the management of livestock is inadequate, impairing the resource, and negatively impacting the recreation experience. For example, exclusion areas near Warner Lake in the La Sal Mountains (Wet and Dry Fork) are not being enforced, and throughout the La Sal Mountains many water sources are fouled by cattle manure and trampling, significantly impacting the water quality of springs, streams, ponds, and lakes. The revised forest plan should implement better livestock management practices, and enforce existing allotment management plans, to protect and enhance rangeland resources, not just for cattle operations, but also for recreational users. We also recognize that recreationists may have adverse impacts on grazing, including frightening livestock or leaving gates open. Potential conflicts between grazing and recreation should be identified and mitigated through planning and/or education of users. The Forest Service should assess the overlap between grazing allotments and recreational infrastructure (e.g. trails, campgrounds, dispersed camping areas) to identify potential conflicts, and implement mitigation strategies that help manage these conflicts where possible.

Livestock Grazing and Range Management, Plan Components

Objectives:

- Within three years of plan approval, use mapping and other tools to assess the overlap between grazing allotments and recreational infrastructure (e.g. trails, campgrounds, dispersed camping areas, recreational rivers) to identify potential conflicts and mitigation strategies.
- Within five years of plan approval, to mitigate recreational river hazards and avoid unauthorized cutting of private landowner fences, work with landowners and recreationists to replace hazardous fencing with boater-friendly fencing on recreational rivers.

Specific Area Direction (3.0)

As draft plan components for sustainable recreation are developed, they can be used to inform how the overall plan is sub-divided or zoned (e.g., Geographic Areas, Management Areas, Special Places). While some plan components apply across the entire plan area, others may only apply to areas zoned for a specific management emphasis (Management Area), specific land area (Geographic Area), Designated Area, or otherwise identified place.

The basic difference is that Geographic Areas are based on place, while Management Areas are based on purpose or overarching management emphasis.

In addition to informing the overall structure of a land management plan, it may also be necessary to refine forest-wide plan components to provide more discrete direction that aligns with the issues, concerns or opportunities of a specific area or zoning context. It is important to ensure that all plan components are clearly linked to the relevant allocation structure (e.g., forest-wide, Geographic Area, Management Area, Special Area, or other spatially explicit place).

Management Areas (3.3)

Since Management Areas (MAs) delineate specific management emphasis, desired ROS classes can be useful in describing and delineating MA boundaries. Both are zoning tools that provide management context within which specific plan components can be developed to achieve the desired management emphasis.

The physical, social, and managerial attributes of desired ROS settings and associated plan components (objectives, standards, guidelines, and suitability) should, at a minimum, be compatible with MA delineations. This does not necessarily mean MA, ROS, and SIO polygons will coincide with one another. It simply means that the direction associated with each polygon, functions together and does not contradict each other.

In addition to ROS and SIOs, other recreation information may be useful in delineating MAs. Developed recreation sites, cultural landscapes, visitor centers, and activity-based places (e.g. rock climbing areas, areas permitted for specific recreation special uses such as recreation residences, and others) can inform where different management emphasis areas should occur. MA's ensure consistent approaches to achieving desired conditions and objectives among the five ranger districts who will administer the revised forest plan.

Recommended Wilderness Management Area (3.3.1)

A Recommended Wilderness Area (RWA) is a designation that protects undeveloped land with wilderness characteristics, and it also supports many human-powered recreation opportunities. However, some wild backcountry areas contain high-value mountain biking trails or recreation equipment, such as bolted climbing areas, that may conflict with a wilderness recommendation. We are working with the Grand Canyon Trust, Pew Charitable Trusts, and other conservation organizations to assess RWAs for potential recreation conflicts. Access Fund and Salt Lake Climbers Alliance have provided detailed rock climbing site location information to the Forest Service during the 2017 Wilderness Inventory and Evaluation process. Our goal is to identify and resolve any potential conflicts, so that we can support RWA designations in the revised forest plan.

The Forest Service should work with recreationists to identify potential conflicts between non-conforming recreation uses and RWA designations early in the forest plan revision process to avoid creating or escalating conflicts. Existing bolt intensive climbing areas such as Mill Creek and Maple Canyon may not be compatible with an RWA designation. RWA boundaries should be drawn in a manner that minimizes effects to established recreation areas or uses. To properly assess RWAs for established recreation uses, the Forest Service should publish an updated Infra System Trails dataset that includes the “Allowed Terra Use” and “Allowed Snow Use” attributes.

RWA, Plan Components

Desired Conditions

- Revise, MA-RECWILD-DC-01: **Recommended wilderness areas maintain their existing wilderness characteristics**, ~~The opportunity for~~ to preserve opportunities for inclusion in the National Wilderness Preservation System. ~~is preserved~~
- System trails support wilderness experiences and preserve wilderness characteristics.
- Outfitter and guide recreation special uses support identified public need and provide service for realizing the recreational purposes of the recommended wilderness areas.

Standards

- Revise, MA-RECWILD-ST-03: Mineral or energy-related geophysical activity shall not occur in recommended ~~these~~ **wilderness** areas.
- Revise, MA-RECWILD-ST-05: Commercial timber harvest **or production** shall not occur. **Tree cutting may occur incidental to other management activities such as trail construction, trail maintenance, removal of hazard trees, or fireline construction.**
- New roads shall not be constructed.
- New commercial communication sites shall not be allowed.

Guidelines

- Management activities utilize minimal tool approach.

Suitability

- Not suitable for commercial timber activities.
- Not suitable for motorized travel.

- Not suitable for mineral leasing and sales.
- Not suitable for recreational and commercial drone launching and landings. Drone use may be allowed for administrative purposes or in approved research projects.
- Recommended wilderness areas are suitable for low impact restoration activities that move toward desired conditions (such as prescribed fires, active weed management, planting) and that protect and enhance the wilderness characteristics of these areas.
- Recommended wilderness areas are suitable for use of motorized tools (such as use of chain saws to clear trails) and mechanized transport to accomplish restoration activities.

Eligible Wild and Scenic Rivers Management Area (3.3.2)

To be eligible for Wild and Scenic designation, a stream must be free-flowing and have at least one “outstandingly remarkable value” (ORV) that is regionally or nationally significant. These ORVs are specific place-based values associated with recreation, scenery, geology, history, fisheries, culture, and other types of values.

Wild and Scenic river eligibility is important, as it ensures interim protection for these very special rivers and streams. The Wild and Scenic Rivers Act was signed into law in part to balance the nation’s dam building efforts. The Standards, Guidelines, and Suitability of Lands for river corridors with Wild and Scenic Eligibility status are outlined in the Wild and Scenic Rivers Act, the 2012 Planning Rule, and the Forest Service Handbook. Eligible river segments should be managed to protect their free-flowing character, their identified classification, and their ORVs. In addition, the Forest Service should consider dual protection for river corridors through Wilderness Designation and Wild and Scenic River Eligibility status where appropriate.

We appreciate the work that the Forest Service has done thus far on the Wild and Scenic River eligibility evaluation. However, the inclusion of a single eligible Wild and Scenic stream segment, totaling 1.2 miles, is disappointing. The Manti-La Sal Wild and Scenic River Report ignores numerous rivers that are both free-flowing and possess at least one Outstandingly Remarkable Value (ORV). The eligibility phase of the Wild and Scenic Rivers Act is designed to be broad, with only two qualifications. We ask that the Forest Service complete a more robust Wild and Scenic eligibility review and consider every river segment that is both free-flowing and has at least one ORV; there are many streams within the Manti-La Sal National Forest that meet these qualifications.

We support the identification of Duck Fork Creek as eligible for Wild and Scenic River designation. However, numerous stream segments that qualify for eligibility have been overlooked. We have included detailed segment-specific eligibility recommendations to inform the Wild and Scenic River Report and the Draft Revised Forest Plan for the Manti-La Sal National Forest in the Appendix.

Eligible Wild and Scenic Rivers, Plan Components

Desired Conditions

- The desired recreation settings range from Primitive in segments classified as Wild and Semi-Primitive Non-Motorized to Roaded Natural across the other segments. A variety of dispersed and developed recreational opportunities are available with typical uses including canoeing, fishing, hiking, kayaking, outfitting and guide use, and wildlife viewing.
- Wild classified river segments are essentially primitive with little or no evidence of human activity. Most visitors enjoy recreation activities without seeing many other visitors; however, the presence of a few inconspicuous structures, particularly those of historic or cultural value, may occur. The area is generally inaccessible, except by trail, with limited vehicular travel within the river corridor; however, a few existing system roads may be present. Disturbance is primarily caused by natural processes, except in the form of prescribed fire control activities to address pest outbreaks, trails, and river access facilities.
- Scenic classified river segments are mostly undeveloped; however, there may be occasional roads and/or bridges adjacent or crossing the river; designated parking areas; and trailheads. Visitors enjoy a natural setting, although the sights and sounds of other visitors and civilization may be present. The area may be accessible in places by road, and roads may occasionally reach or bridge the river. Disturbance is primarily caused by natural processes, and the landscape is mostly natural; however, both natural and human disturbance may be visible. Evidence of past or ongoing management activities, including timber harvest, is acceptable provided the forest appears natural from the riverbank.
- Recreational classified river segments may contain substantial evidence of human activity including residential and/or commercial structures. Visitors enjoy a wide variety of recreational activities in a natural setting; however, sights and sounds of other visitors may be present. Non-motorized trails may be highly visible and be highly developed with facilities such as parking areas and restrooms. Rivers are readily accessible by roads or railroads with the existence of parallel roads or railroads on one or both banks as well as bridge crossings and other river access points being present. The landscape is natural; however, both natural and human

disturbance may be visible. Adjacent lands may be developed for the full range of agricultural and forestry uses and may show evidence of past and ongoing timber harvest.

- Education and interpretative resources contribute to the understanding and appreciation of the GMUG's eligible rivers.

Goals

- Through partnerships with other agencies, organizations, and volunteers, eligible wild and scenic rivers maintain and enhance their Outstandingly Remarkable Values.

Standards

- Dams or other structures that impede the flow of the river are prohibited.
- Extraction of saleable mineral materials shall not be allowed.
- Management of Forest Service-identified eligible or recommended suitable rivers, are managed to protect outstandingly remarkable values.

Suitability

- Eligible wild rivers corridors are not suitable for timber production. Timber harvest may be allowed in eligible scenic and recreational river segments for purposes such as fuels reduction, restoration, or wildlife habitat enhancement if the current preliminary classification and the outstandingly remarkable values of the river segment are protected.

Geographic Areas (3.4)

Horn Mountain and Wildcat Knolls Geographic Area (3.4.2)

Description and Values

The Horn Mountain and Wildcat Knolls proposed Geographic Area encompasses many important recreation resources including a large portion of the popular Joe's Valley climbing area. To better protect wintering big game and sage grouse habitat and provide quality rock climbing opportunities, we recommend that the Horn Mountain and Wildcat Knolls Geographic Area be expanded or a new Geographic Area be created to manage rock climbing in Joe's Valley. We suggest extending this boundary further east to encompass the popular climbing area called New Joe's. See Outdoor Alliances web map for the specific location of rock climbing sites.¹¹

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

¹¹ Manti-La Sal National Forest web map, <https://bit.ly/Manti-LaSal>

(EA) in 2017 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 that the findings and management decisions of this EA be incorporated, as appropriate, into this Forest Plan.

In addition to fishing and climbing, Cottonwood Creek in Straight Canyon provides unique paddling opportunities for a diversity of craft types, including whitewater canoes, packrafts, and kayaks. Whitewater paddling opportunities are rare in the Manti-La Sal, and paddling Cottonwood Creek has been featured on multiple online forums and in American Whitewater's National Whitewater Inventory. The turquoise colored water elevates the popularity and unique value of the river for all types of river-dependent recreation.

Ferron Creek provides a scenic, intermediate paddling experience in a desert landscape that is accessible to more skill levels of the four boatable creeks in the Manti-La Sal. There are also historical petroglyphs in the Ferron Box section that are thought to be from the Fremont culture predating A.D. 1200.¹² Additionally, the bluehead sucker species has been identified to occur in Ferron Creek, and the species and habitat that support them is uncommon regionally and nationally.

Horn Mountain and Wildcat Knolls Geographic Area, Plan Components

Goals

- Revise, GA-HORN-DC-01: Forest users understand the multiple use mission of the forest service and how management activities including but not limited to livestock grazing, recreation, and fuels reduction, are part of the mission.
- Continue to partner with the Bureau of Land Management (BLM) to co-manage rock climbing and other recreation resources in Joe's Valley.
- Protect and enhance sustainable recreation opportunities in the geographic area, including rock climbing, paddling, hiking, and fishing.

¹² Ferron cultural resources, accessed here, http://www.emerycounty.com/archives/Archive_Photos/Ferron/Ferron.pdf

Desired Conditions

- Manage and improve existing recreation resource access. Coordinate with local and national partners early in project development to elicit collaborative input on sustainable recreation opportunities, needs, and potential conflicts.
- The Horn Mountain and Wildcat Knolls Geographic Area continues to provide quality rock climbing and paddling opportunities while preserving wintering big game and greater sage grouse habitat.
- User created trails to rock climbing sites are identified within five years of forest plan approval. Trails are rehabilitated or incorporated into the designated trail system if they can be maintained sustainably.
- Rivers are adaptively managed to support river-dependent wildlife, recreation, and other values.

Maple Canyon Geographic Area (3.4.3)

Description and Values

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 of monitoring data. 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.

Maple Canyon Geographic Area, Plan Components

Guidelines

- Use of best available scientific information throughout the forest plan decision-making process, including *Climbing and Raptors: A Handbook for Adaptive Raptor Management*.¹³

¹³ Access Fund, <https://www.accessfund.org/open-gate-blog/access-fund-releases-comprehensive-climbing-raptor-management-handbook>

Monitoring (4.0)

The 2012 Planning Rule identifies eight specific monitoring requirements. Of those eight, three are either directly related to sustainable recreation or can incorporate sustainable recreation questions and indicators. Each plan monitoring program must contain one or more monitoring questions and associated indicators addressing each of the following:

1. The status of visitor use, visitor satisfaction and progress toward meeting recreation objectives.
2. Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.
3. Progress toward meeting the desired conditions and objectives in the plan, including for providing multiple use opportunities.

Since desired conditions for sustainable recreation must include mapped desired ROS settings, one of the most useful indicators in measuring and monitoring sustainable recreation is the condition and trend of the unit's ROS settings. By comparing existing ROS settings with desired ROS settings, achievement or movement toward sustainable recreation can be accomplished.

Recreation objectives must also be monitored. These objectives are designed in the plan development phase to maintain or enhance the unit's distinctive roles and contributions, move existing conditions to desired conditions, and/or address specific issues, concerns, and/or opportunities identified through public engagement and integration with other resources. Tools and systems to measure desired conditions and objectives include the Scenery Management System to measure the integrity and stability of the desired scenic character, Special Uses Data to monitor compatibility of visitor services delivered through recreation special uses, and Infra to monitor the condition and trend of recreation facilities and access.

Caution should be used when using National Visitor Use Monitoring data to assess visitor use and visitor satisfaction across the forest. The limited survey periods conducted by the NVUM program do not adequately capture visitor use regarding seasonality, types of uses, new emerging uses, and volume. Moreover, some recreational activities (e.g., rock climbing) do not have protocols for data collection within the NVUM system. We encourage the Forest Service to expand upon its NVUM protocols and partner with universities, local stewardship groups, and other institutions that can assist with monitoring through formal programs and/or volunteer efforts.

Monitoring, Plan Components

Goals

- Enhance stewardship and monitoring through increased volunteer program activities and partner contributions.

* * *

Outdoor Alliance and our partners are invested in the Manti-La Sal National Forest Plan Revision process and we are available as a resource to the Manti-La Sal Planning Team. We look forward to continuing our work on the Manti-La Sal National Forest, engaging with Indigenous Tribes, and collaborating with other forest stakeholders. Please do not hesitate to contact us with any questions.

Levi Rose

Levi Rose
Land Use Planning & GIS Manager
Outdoor Alliance



Katie Goodwin
Policy Analyst
Access Fund

Outdoor Alliance member and partner organizations signing on to this letter include:

Access Fund
American Whitewater
Friends of Indian Creek
International Mountain Bicycling Association
Public Land Solutions
Salt Lake Climbers Alliance
Winter Wildlands Alliance

Appendix



December 29, 2020

Ryan Nehl
Forest Supervisor
Manti-La Sal National Forest
Submitted via online comment form and emailed to mlnfplanrevision@fs.fed.us

Re: Draft Revised Forest Plan for the Manti-La Sal National Forest

American Whitewater appreciates the opportunity to submit comments on the Forest Service’s Draft Revised Forest Plan for the Manti-La Sal National Forest. At this time, American Whitewater has limited our below comments to the Wild and Scenic River Report. We look forward to submitting additional comments on the preliminary draft plan later in the public comment period.

About American Whitewater

American Whitewater is a national 501(c)(3) non-profit organization with a mission “to conserve and restore our nation’s whitewater resources and enhance opportunities to enjoy them safely”. With over 6,200 individual and 100 affiliate club members, American Whitewater represents the interests of over 80,000 river enthusiasts. As conservation-minded whitewater recreationists, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our membership and the general public highly value our nation’s river systems and associated riparian zones, and we have a direct interest in maintaining healthy rivers for everyone to enjoy. There are multiple stream segments within the Manti-La Sal National Forest that attract our members from across the region and the country, and we support management actions that protect and preserve healthy riparian systems and support unique recreational opportunities on these streams.

Introduction

To be eligible for inclusion in the National Wild and Scenic Rivers System, a stream must be free-flowing and have at least one “outstandingly remarkable value” (ORV) that is regionally or nationally significant.¹ These ORVs are specific, place-based values associated with recreation, scenery, geology, history, fisheries, culture, and other types of values. On National Forests, eligibility is important as it ensures interim protection for these very special rivers and streams until they can be formally designated by Congress or by the Secretary of Agriculture.

The Wild and Scenic Rivers Act (WSRA) was signed into law in response to the nation’s dam building efforts. In Utah, there are over 380 significant dams, including numerous dams within the Manti-La Sal National Forest.² As climate change and population growth continues to stress water resources in an

¹ Wild and Scenic Rivers Act, § 1273 (b)

² <https://www.usbr.gov/projects/facilities.php?state=Utah>



already arid state, measures must be taken to ensure that the Forest's free-flowing and outstanding remarkable streams are protected in perpetuity. A robust inventory of each stream's eligibility for Wild and Scenic designation is both justified and required by law.

American Whitewater appreciates the work that the Forest Service has done thus far on the Draft Forest Plan and the Wild and Scenic River eligibility evaluation. However, the inclusion of a single eligible Wild and Scenic stream segment, totaling 1.2 miles, is disappointing and severely disregards the intent of the 1968 WRSA. The Manti-La Sal Wild and Scenic River Report fails to recognize numerous rivers that are both free-flowing and possess at least one ORV. The eligibility phase of the Wild and Scenic Rivers Act is designed to be broad, with only two qualifications. American Whitewater asks that the Forest Service complete a more robust Wild and Scenic eligibility review and consider *every* river segment that is both free-flowing and has at least one ORV; there are many such streams within the Manti-La Sal National Forest. In the following comments, we have identified broader issues with the Draft Wild and Scenic River Report and we offer specific recommendations for additional eligible river segments within the Manti-La Sal.

General Comments

Only eligibility and preliminary classification should be carried out by the Forest Service

The Manti-La Sal Wild and Scenic River Report (Draft Plan, Appendix D) states on Page 33 that the Forest "intends to conduct a suitability study at some time following the completion of this eligibility study." American Whitewater asks the Forest Service to focus their energy on producing a robust Eligibility Report supported by public input and strong data; a Forest Service Suitability Study is neither needed or required. The 2012 Forest Planning Rule requires forest plans to: 1) include an eligibility inventory³ and 2) protect both eligible and suitable (congressional study) rivers.⁴ Neither the 2012 Rule or the Wild and Scenic Rivers Act make any mention of a process to remove interim protections for streams that are determined eligible through the Forest Planning process. In fact, Suitability studies should only be completed under the direction of Congress.⁵

Stream segments previously found eligible should be determined eligible again

For reasons outlined above, the 2008 Suitability Study is not in line with the WSRA nor with the 2012 Planning Rule and should have no impact on the current eligibility evaluation on the Manti-La Sal. Stream segments found eligible in 2003 should remain eligible unless significant changed circumstances have been identified that cause the segment to lose its free flow character or ORVs. Rather, changed circumstances have occurred that support additional ORVs (see next comment). Therefore, instead of limiting the scope of the eligibility study it should be further expanded.

³ 36 C.F.R § 219.7(c)(2)(vi)

⁴ 36 C.F.R. § 219.10(b)(1)

⁵ Wild and Scenic Rivers Act, section 4(a)



All river segments studied in 2003 should be reassessed for the presence of any and all ORVs

The current eligibility study only reassessed Fish and Wildlife ORVs on river segments that were studied for eligibility in 2003. There is no justification for this limited scope and the Forest Service should reassess every 2003 study segment for all potential ORVs. Many other ORVs have had changed circumstances in the past 17 years, including the Recreational ORV. On Page 1-3, the Study Process report defines changed circumstances as “those in the river or corridor that have affected the free-flowing nature or the presence of an ORV... including recognizing the river for certain recreational opportunities”. Paddling on the Manti-La Sal has become significantly more popular since 2003. This is demonstrated by the addition of multiple Manti-La Sal streams to American Whitewater’s National Whitewater Inventory, including Cottonwood Creek, Ferron Creek, Left Fork of Huntington Creek, and Huntington Creek.⁶ Additionally, there has been increased discussions on online paddling forums including American Whitewater and Mountain Buzz regarding these creeks. These factors provide justification for a changed circumstance for the Recreational ORV and this is only considering the changes to the activity of paddling; many other recreational activities have increased in popularity in stream corridors within the Manti-La Sal and there have undoubtedly been additional changed circumstances that affect other ORVs.

Multiple scales should be used for the Region of Comparison (ROC) in order to recognize ORVs, not exclude them

The Manti-La Sal Final Eligibility Study Process report identified the ROC for the Recreational and Fish ORVs as the “HUC 6”. The use of this nomenclature is incorrect and should be clarified to read “6 digit HUC”, as HUC 6 commonly refers to the 12-digit sixth level HUC. The 6 digit HUC basin scale should not be the only ROC considered and additional geographic scales should be used. The 1999 Report from the Interagency Wild & Scenic Rivers Coordinating Council (IWSRCC) concludes that the region(s) of comparison needs to include multiple scales and that “In addition to regional or statewide comparison, values must also be considered from a national perspective. For example, while multiple species of anadromous fish are relatively common in rivers on the Mt. Baker-Snoqualmie NF this association of multiple species is uncommon nationally.”⁷ Guidance from the IWSRCC encourages using ROCs that support eligibility findings rather than limit them and given the importance of ROCs for ORV evaluation, it is imperative that the Manti-La Sal plan revision process use this guidance. While four river segments with paddling opportunities are located within the same 6-digit HUC, there are no other paddling opportunities on the Forest, making these recreation opportunities very unique and raising them all to the level of Outstandingly Remarkable.

Additional data resources should be used to evaluate the Recreational ORV

The list of data resources used to evaluate the Recreation ORV should be revised and expanded. The current list is limited in scope and excludes numerous recreational activities. American Whitewater’s National Whitewater Inventory is considered to be the most robust database for whitewater river segments in the United States and should be used as a direct reference for evaluating the Recreational ORV.⁸ In

⁶ <https://www.americanwhitewater.org/content/River/state-summary/state/UT/>

⁷ Interagency Wild and Scenic Rivers Coordinating Council. (1999). The Wild & Scenic River Study Process

⁸ <https://www.americanwhitewater.org/content/River/state-summary/state/UT/>



In addition to general internet searches, river segments and surrounding areas should be searched for on recreation specific websites, such as MountainBuzz. These more detailed searches are much more likely to discover reports and discussions about the river segments in the Manti-La Sal National Forest.

Comments on Individual River Segments

American Whitewater appreciates the identification of Duck Fork Creek as eligible for Wild and Scenic River designation and we support eligibility for the Duck Fork Creek segment. However, numerous stream segments that qualify for eligibility have been overlooked. American Whitewater provides the following segment-specific eligibility recommendations to inform the Wild and Scenic River Report and the Draft Revised Forest Plan for the Manti-La Sal National Forest.

Cottonwood Creek



*Kayaking Cottonwood Creek at low water with the bouldering route, “The Angler”, in the background.
Photo Credit: Greg Lee, American Whitewater Board Member*



Cottonwood Creek below Joe's Valley Reservoir has numerous ORVs, including exceptional recreation opportunities. The river corridor provides world class bouldering and unique whitewater kayaking opportunities. Between the reservoir and the Forest Service boundary the river is generally free-flowing with no impoundments, and in most years flows are sufficient to support kayaking. While there are no impoundments in the river segment, a state highway parallels the river corridor and there are multiple developed recreation sites. Cottonwood Creek should be determined eligible with a preliminary classification of Recreational and ORVs of Recreation, Scenery, Archeological, and Ecological.

- Segment: Joe's Valley Reservoir to USFS boundary
- Length: 2.8 miles
- Free-flowing: *Yes*. Cottonwood Creek is free-flowing between Joe's Valley Reservoir and the USFS boundary. There are no documented impoundments or manmade structures in the river and reservoir operations mimic the natural flow regime to the extent that flows are highest during spring runoff, decrease during the summer, and winter base flows exist the rest of the year.⁹
- Preliminary Classification: *Recreational*. Utah State Route 29 parallels the entire river segment and there are developed recreation sites in the vicinity of the put-in for the paddling segment.
- ORVs:
 - *Recreation*: Outstanding fishing, rock climbing, and paddling opportunities all support a Recreation ORV on Cottonwood Creek. The stunning turquoise waters support brown trout, cutthroat trout, and rainbow trout and the canyon has been acknowledged as one of the top five fall fishing destinations in Utah.¹⁰ Climbing on boulders directly within the river corridor has gained national attention in recent years. The boulder problems have been carved by the river and provide a very unique experience of bouldering from the river. The area has been featured in the Reel Rock film series and the national revolution of bouldering as a sport has been attributed to the boulder problems found in and around Cottonwood Creek.¹¹ The Creek provides unique paddling opportunities for a diversity of craft types, including whitewater canoes, packrafts, and kayaks (see Film section below). Whitewater paddling opportunities are rare in the Manti La Sal and paddling Cottonwood Creek has been featured on multiple online forums and in American Whitewater's National Whitewater Inventory.¹² The turquoise colored water elevates the popularity and unique value of the river for all types of river-dependent recreation.
 - *Scenery*: The river corridor is set within stunning canyons and alcoves framed by the Elk Ridge and Abajo Mountains. The river water is turquoise in color in contrast to many other muddy rivers in Utah, attracting paddlers, sightseeing tourists, rock climbers, and other visitors. While the river is in the vicinity of a state highway the canyon walls hide the road from view and provide a more remote viewscape.
 - *Archeology*: Pictographs and petroglyphs exist in the river corridor.

⁹ <http://www.ewcd.org/reservoirs/joes-valley-reservoir/>

¹⁰ <https://www.ksl.com/article/31306305/5-fall-destinations-for-fishing-and-outdoor-recreation>

¹¹ <https://www.redbull.com/us-en/episodes/reel-rock-s6-e3>

¹² <https://www.americanwhitewater.org/content/River/view/river-detail/1843/main>



- *Ecology*: The river and its corridor provide habitat for exemplary flora and fauna. The river supports multiple trout fisheries, including brown trout, cutthroat trout, and rainbow trout.
- Online Resources:
 - AW River Inventory Page/Photo Gallery: [Cottonwood Creek \(Straight Canyon\)](#)
 - Film:
 - [Packrafting, 2017](#)
 - [Kayaking, 2017](#)
 - [Kayaking, 2011](#)
 - [Canoe, 2016](#)
 - [Kayaking, 2013](#)
 - Online forums:
 - [Mountain Buzz](#):
 - Mountain Buzz is “A forum community dedicated to whitewater kayaking, boating, and rafting enthusiasts.” A search for “Joe’s Valley Cottonwood Creek Utah” produces over 460 discussion topic results.

Ferron Creek



Kayaking Ferron Creek

Photo credit: Becky Margraf

Ferron Creek provides a scenic, intermediate paddling experience in a desert viewscape that is accessible to more skill levels of the four boatable creeks in the Forest. There are also historical petroglyphs in the Ferron Box section that are thought to be from the Fremont culture predating A.D. 1200.¹³ Ferron Creek itself is free flowing and unimpeded upstream from Millsite Reservoir, which is uncommon for headwaters streams in the Mountain West region. Most of the river segment is paralleled by FR 022, however there is minimal development within the river corridor. Additionally, we disagree with the determination that the fish habitat does not rise to the level of ORV. Contrary to the Fish ORV evaluation for Ferron Creek in the Wild and Scenic Rivers Report, the bluehead sucker species has been identified to occur in Ferron Creek¹⁴ and the species and habitat that support them is uncommon regionally and nationally. If the USFS correctly employs multiple ROC scales then the occurrence of the bluehead sucker in Ferron Creek would qualify as an ORV. Currently, the ORV threshold for the Fish ORV is unrealistic and should be adjusted to favor eligibility rather than create additional barriers. Ferron Creek

¹³ http://www.emerycounty.com/archives/Archive_Photos/Ferron/Ferron.pdf

¹⁴ <https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=7421&context=etd>



should be determined eligible with a preliminary classification of Recreational and with ORVs of Recreation, Fish, and Archaeology.

- Segment: Steven’s Creek to USFS boundary
- Length: 3.5 miles
- Free-flowing: *Yes*. There are no documented impoundments or manmade structures on the river segment and although small reservoirs exist on tributaries to Ferron Creek, there are no reservoirs on the main stem Ferron Creek upstream or within the river segment.¹⁵
- Preliminary Classification: *Recreational*. Ferron Canyon Road (FR 022) parallels the river segment and there is a developed picnic area in the river corridor. However, there are no known diversion structures within this segment.
- ORVs:
 - *Recreation*: Whitewater kayaking opportunities on Ferron Creek elevate the river dependent recreation opportunities to the level of ORV. Whitewater recreation on the Forest is very rare, with only three other river segments supporting whitewater recreation. Ferron Creek provides the easiest kayaking of the four reaches, making it accessible to a greater diversity of recreationists.
 - *Fish*: Bluehead sucker populations have been identified in Ferron Creek, contrary to the information in the Wild and Scenic River Report, which states that bluehead sucker have not been found in the river corridor (Draft Plan, Appendix D, p. D1-18). The Wild and Scenic River Report also states that the river segment has not been identified as potential habitat for Colorado River cutthroat trout, however there is evidence that the Utah Division of Wildlife Resources has in fact identified Ferron Creek as potential habitat for conservation populations of pure Colorado River cutthroat trout with sterile rainbow trout and tiger trout components for sport fishing opportunities.¹⁶
 - *Archeology*: The Ferron Box petroglyphs are thought to be older than A.D. 1200 and are likely one of only a few places where Fremont culture petroglyphs can be found.¹⁷ The petroglyphs attract visitors and complement the existing recreation opportunities in the river corridor.
- Online Resources:
 - AW River Inventory Page/Photo Gallery: [Ferron Creek](#)
 - Online forums:
 - [Mountain Buzz](#):
 - Mountain Buzz is “A forum community dedicated to whitewater kayaking, boating, and rafting enthusiasts.” A search for “Ferron Creek Utah” produces over 490 discussion topic results.

¹⁵ <https://maps.waterrights.utah.gov/EsriMap/map.asp>

¹⁶ https://wildlife.utah.gov/public_meetings/info/2012-05_FerronDrainage_SERO.pdf

¹⁷ http://www.emerycounty.com/archives/Archive_Photos/Ferron/Ferron.pdf

Left Fork of Huntington Creek



Waterfalls on Left Fork of Huntington Creek

Photo credit: David Weber

- Segment: Miller Flat Creek to Huntington Creek
- Length: 4.5 miles
- Free-flowing: *Yes*. While there are multiple reservoirs in the headwaters of the Huntington Creek watershed, the lower Left Fork of Huntington Creek segment is free-flowing.
- Preliminary Classification: *Scenic*. There is a National Recreation Trail in the river corridor, but it is out of sight for the majority of the river segment.
- ORVs:
 - *Recreation*: The creek provides a variety of outstanding recreation opportunities, including fishing, hunting, backpacking, and challenging whitewater kayaking opportunities. This river segment has the most challenging whitewater rapids and waterfalls on the Forest in an exceptionally scenic corridor. The 2017 Wild and Scenic River Study Process report cites unique features such as waterfalls and Class V rapids as examples of factors supporting a Recreation ORV and this river segment has these features.

AW AMERICAN WHITEWATER

- *Scenery:* The Left Fork of Huntington Creek is surrounded by spruce and fir stands and there are sage flats in the lower portion of the segment.
- Online Resources:
 - AW River Inventory Page/Photo Gallery: [Huntington Creek, Left Fork](#)
 - [Riverfacts.com](#)
 - [Bivy.com](#): Segment is included in a list of the best kayaking in Utah

Huntington Creek



Upper Huntington Creek

Photo Credit: Jeffrey Steadman¹⁸

- Segment: Electric Reservoir to USFS boundary
- Length: 19 miles
- Free-flowing: *Yes*. While there are multiple reservoirs in the headwaters of the Huntington Creek watershed, the mean stem of Huntington Creek between Electric Reservoir and its confluence with the San Rafael River is free flowing.

¹⁸ <http://www.utahfishinginfo.com/utahrivers/huntingtoncreek.php>



- Preliminary Classification: *Recreational*. The river segment is paralleled by Utah State Route 31 most of the way and there are multiple developed campsites within the river corridor.
- ORVs:
 - *Recreation*: The whitewater on the main stem Huntington is known to have been “rediscovered” in 2011 and would not have been recognized in the 2003 eligibility evaluation. From the confluence with the Left Fork to downstream of the USFS boundary is an established whitewater kayaking segment that has unique water slides and rapids. There is also popular fly fishing on this river segment. The fly fishing is known to be excellent and it is the only stream in Utah regulated as “fly fishing only”, making the recreation opportunity particularly unique and special.¹⁹
 - *Fish*: There is a blue ribbon trout fishery on main stem Huntington Creek downstream of Electric Reservoir.
- Online Resources:
 - AW River Inventory Page/Photo Gallery: [Huntington Creek](#)
 - [Riverfacts.com](#)

Thank you for considering American Whitewater’s comments on the Manti-La Sal’s Draft Revised Forest Plan. Please reach out to us with any questions on the comments we have provided here. We look forward to providing additional comments on the plan revision process in the future.

Sincerely,

A handwritten signature in black ink that reads 'Kestrel Kunz'.

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A handwritten signature in black ink that reads 'Hattie Johnson'.

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¹⁹ <http://www.perfectflystore.com/whuntingtonc.html>