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Comments: Thank you for the opportunity to submit comments on the draft Environmental Impact Statement (DEIS) for the Custer Gallatin National Forest (CGNF) plan revision. Southwest Montana Climbers Coalition (SMCC) works to find solutions to access issues, promote communication and relations between climbers, land managers, landowners, and other land users, educate all public land users about local climbing issues, and promote climbing safety, trail improvement and maintenance, erosion control, and resource conservation projects in Southwest Montana. Our comments reflect our interest in ensuring that the Custer Gallatin Forest Plan recognizes and manages for rock and ice climbing as important component of the recreational landscape on the forest. In addition to these comments, as a member of Outdoor Alliance Montana, we support the comments they have submitted during this DEIS comment period, which touch on recreation issues more broadly. Please consider Outdoor Alliance Montana's comments as part of this letter, incorporated by reference. Finally, we have endorsed the Gallatin Forest Partnership (GFP) Agreement and would like to see the GFP Agreement reflected in the revised forest plan.

In our scoping comments we raised a number of issues that we would like to see the revised forest plan address. These include approach routes, bolt and anchor maintenance, and joint stewardship. We were pleased to see that the draft plan includes a goal specific to working with the climbing community. We are very supportive of including FW-DC RECDISP 01 in the final plan but we suggest the wording be revised to read "The forest engages with the rock, ice, and alpine climbing community to develop site-specific solutions to evolving issues with placement and maintenance of permanent bolts and anchors, designation of approach routes, and timing restrictions for wildlife protection."

We like that the revised forest plan will include a new designation for managing high-use recreation areas: Recreation Emphasis Area. We see this designation as an opportunity to provide guidance to meet the challenges and opportunities unique to each Recreation Emphasis Area. To achieve this, however, each Recreation Emphasis Area designation must be accompanied by specific plan components. The forest-wide recreation emphasis area plan components are a good first step but we suggest adding an additional plan component to this list:

[middle dot] FW-SUIT-REA 02: Permanent bolted climbing routes and anchors are suitable in Recreation Emphasis Areas.

Presently only a few Recreation Emphasis Areas (Hyalite, Hebgen Winter, Hebgen Lakeshore) have specific plan components in the draft plan. If the final plan does not speak to the specifics of each area, the CGNF will have lost an opportunity to proactively manage use in the most heavily visited areas of the forest. We are aware that Outdoor Alliance Montana and Montana Backcountry Alliance/Winter Wildlands Alliance have suggested plan components for some other Recreation Emphasis Areas. We have suggestions for plan components for those Recreation Emphasis Areas that contain important climbing resources. We support including all of the Recreation Emphasis Areas that we describe below in the final revised plan.

Hyalite Recreation Emphasis Area

As correctly noted in the draft plan and draft EIS, Hyalite Canyon is a world-class ice climbing destination. Maintaining winter access to Hyalite Canyon, via the plowed road, is of utmost importance to SMCC and the climbing community.

Although better known for its ice climbing, Hyalite also contains rock climbing, most notably at Practice Rock. Further up the canyon there are a number of more adventurous, less popular, rock climbing routes. The GFP Agreement includes management direction for Hyalite, which we endorse.

Main Boulder Recreation Emphasis Area

Natural Bridge is a climbing area on the CGNF that has recently seen significant growth in route development and users. SMCC has been working with the Yellowstone Ranger District for several years to address erosion concerns and other issues associated with approach routes and climbing route development at Natural Bridge. It is our sincere hope that we will eventually be able to work with the Forest Service to develop a climbing management plan for this area. Natural Bridge has a unique set of challenges, opportunities, and values given its importance in Crow spirituality, its natural beauty which attracts sightseers, and the high quality rock on the cliffs below the waterfall which attract climbers. In

order to prioritize, and guide, a future climbing management plan, the revised forest plan should include the following direction for the Main Boulder Recreation Emphasis Area:

[middot] AB-DC-MBREA 01: Recreation activities and uses do not detract from cultural values or activities within the Main Boulder Recreation Emphasis Area.

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* AB-OB-MBREA 01: Work with the climbing community to develop a climbing management plan for Natural Bridge within 5 years.

Gallatin River Recreation Emphasis Area

The Gallatin River Recreation Emphasis Area is the epicenter of rock climbing in the Bozeman-Big Sky area. There are dozens of crags and hundreds of climbs within the boundaries of this Recreation Emphasis Area. Many of these crags are collectively known to climbers as [ldquo]the Canyon[rdquo], but some fall within areas that are further differentiated as Scorched Earth (furthest north) and Red Cliffs/Buck Creek (furthest south). Gallatin Canyon is arguably the highest-quality rock climbing area near Bozeman and contains a mixture of traditionally protected and bolted (sport) routes. Due to the amount of use this Recreation Emphasis Area receives, there is a need to increase parking capacity at popular trailheads throughout Gallatin Canyon, including at Gallatin Tower and the 35 mph bridge. We recommend the following plan components for this area:

[middot] MG-DC-GRREA 01: Shared stewardship efforts between the Forest Service and partner

organizations enhance recreation opportunities, protect natural resources, and promote public safety.

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* MG-OB-GRREA 01: Develop one new trailhead or parking area within the Gallatin River Recreation Emphasis Area within 10 years.

* MG-OB-GRREA 02: Increase parking capacity at 5 pullouts within the Gallatin River Recreation Emphasis Area within 5 years.

The GFP Agreement includes additional direction for managing the Gallatin River corridor, which we also support.

Yellowstone River Corridor

Yankee Jim Canyon is a popular destination for bouldering - climbing routes on boulders where a rope is not required. While we do not have any suggestions for climbing-specific language for this Recreation Emphasis Area, we encourage the Forest Service to include plan components to address and manage the wide variety of recreation uses in the Yellowstone River Corridor.

West Fork Rock Creek

There is a small roadside crag at the junction of the West Fork and Ski Hill roads. This climbing area is frequently used by Beartooth Mountain Guides for teaching beginner rock climbing, and is a popular

climbing area for Red Lodge locals. Additional climbing routes have been established further up the West Fork road, near Wild Bill Lake. These routes are more advanced and offer a profoundly different climbing experience than the roadside crag. Both are of high value to climbers in the Billings-Red Lodge area. While we do not have any suggestions for climbing-specific language for this Recreation Emphasis Area, we encourage the Forest Service to include plan components to address and manage the wide variety of recreation uses in this area, such as the winter-specific plan components suggested by Montana Backcountry Alliance and Winter Wildlands Alliance.

Main Fork Rock Creek

The Main Fork Rock Creek Recreation Emphasis Area contains a mixture of traditionally protected routes, bolted routes, and bouldering problems. There is also a historically notable ice climb in this area

* Rock Creek Falls, which was the first route in the United States ever climbed with the modern ice climbing technique known as [ldquo]front pointing[rdquo]. Much of the bouldering in this area is along Forest Road 2421, which is also popular for dispersed camping. We recommend extending this Recreation Emphasis Area to

include all of the CGNF lands alongside Forest Road 2421, to the state line. Furthermore, because this road and the Main Fork of Rock Creek itself continue on to (or more appropriately, originate on) the Shoshone National Forest [ndash] a fact most visitors are unaware of - the CGNF should coordinate with the Shoshone to manage this area. The two forests should also coordinate their management efforts along Highway 212. We suggest the following plan components:

[middot] AB-GDL-MRREA 01: Coordinate management of the Main Fork Rock Creek corridor, along Forest Road 2421, with the Shoshone National Forest.

Although the above-mentioned Recreation Emphasis Areas encompass much of the climbing on the CGNF, not all climbing areas fall within Recreation Emphasis Areas. The Bridger Mountains and Absaroka-Beartooth Wilderness contain many high quality routes, many of which are several hundred feet long. Climbing in these more remote, less peopled, areas provide a sense of adventure and exploration that many climbers cherish. Maintaining the wild character of the areas surrounding these

climbs is essential to protecting these experiences. This should be easily done in the Absaroka-Beartooth Wilderness, as the Forest Service is legally obligated to protect wilderness character. The Bridgers, however, do not contain designated Wilderness. We want to stress to the Forest Service that it is important to the climbing community that the Bridgers remain undeveloped, as they are today.

Climbing has a long and storied history across the CGNF and it is our hope that the revised plan will set the stage for a long and productive future for all varieties of climbing on the forest. From the Wilderness to roadside crags, boulders to alpine routes, the CGNF is truly a climbers[rsquo] paradise.

Thank you for considering these comments. SMCC is an engaged and interested party in the Forest Plan revision process. Please do not hesitate to contact us with any issue concerning climbing on the Custer Gallatin National Forest.