

Data Submitted (UTC 11): 4/18/2023 9:14:55 PM

First name: Kate

Last name: Beezley

Organization: Boulder Climbing Community

Title: Executive Director

Comments: April 18, 2023

USDA Forest Service

Arapaho and Roosevelt National Forests

Boulder Ranger District

2140 Yarmouth Avenue

Boulder, CO 80301

Re: St. Vrain Forest Health Project

The Boulder Climbing Community (BCC) submits these comments on behalf of its approximately 1,000 members. The BCC is a stewardship organization devoted to promoting responsible climbing and resource protection from Estes Park to Canyon City. Our area of interest, and of our members, includes all of the climbing resources within the geographic scope of this Project.

We support the Project's goal of improving forest resilience and ecosystem health through fuels-based treatments where vegetation conditions have departed from historic conditions with a recognition that climate change is altering historic temperature and precipitation patterns. As climbers, we have a strong interest in the health of these forests, both for their ecological value and because wildfires can result in substantial closures of areas that include important climbing resources.

With respect to the proposed action, we understand the necessity of some closures to assure public safety during the mitigation work. But, such closures should be no broader (geographically) or longer (temporally) than is necessary to keep the public safe. It is vital that any such closures be well-publicized in advance. For areas that have climbing resources, we can help get the word out to climbers.

It is important to note that crags and boulders of interest to climbers are widely scattered throughout the Project area. This includes not only the obvious and better-known rocks in places like South St. Vrain Canyon or the Ironclads, but a great many others as well. As best we can determine, none of the Project documents list or map these rocks, so we cannot tell whether some of them may be unfamiliar to Project personnel. The guidebook "Rock Climbing St. Vrain Canyons" contains 400 pages of documentation of climbs principally in the Project area, illustrating the magnitude of the climbing resources; however, it is from 2009 and there has been further exploration of climbing resources since then. Guidebook author Bernard Gillett has offered to work with Project personnel to help them identify climbing resources and associated trails. The BCC has other knowledgeable people and we strongly encourage Project personnel to consult with the climbing community to be sure that impacts on climbers are well-understood and minimized before any on-the-ground actions take place in potential climbing areas. See Recreation 4, p.9 of Recreation Specialist Report (RSR).

The RSR contains numerous references to closures of social trails, decommissioning of roads and trails, non-system trail use and unauthorized trail construction, and steps to be taken where use "exceeds the area's capacity," pp. 2-7, 17. Some of these steps appear to refer to trails and roads solely created in connection with the fire mitigation, and we have no objection to their subsequent closure. Others appear to repeat guidance from the 1997 Forest Plan. If these statements merely reiterate current policy, we have no objection in principle but would emphasize the points in the prior paragraph, i.e., please consult with us beforehand to be sure USFS understands whether a trail or road is important to climbers and we have a chance to address the issue. However, if any of these references indicate a new and more aggressive approach to trail and road closures

unrelated to fire mitigation, we are unsure what is prompting the change in policy - at least from the climber perspective, and certainly would ask for a chance to discuss any particular trails or roads before any closures occur.

The RSR, p.18, mentions limiting trailheads in certain riparian areas to "day use only." Although this could adversely affect some visiting climbers who are making a multi-day trip, we are not opposed to this restriction. Climbers are not the source of the problem, but we recognize the need to control overnight camping so close to important riparian areas.

The RSR, p.19, mentions "discouraging additional recreational use" at Coffintop Mtn, which is an existing climbing destination. Current levels of climber use there are not causing any significant impacts, and should be allowed to continue.

Thank you for protecting our forest areas and please keep us informed about future steps that may impact climber use.

Sincerely,

Katherine K. Beezley
Executive Director
Boulder Climbing Community