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Title:

Comments: The Climbing Management Plan is a promising development for Ten Sleep Canyon, which is a world class sport-climbing area. It is good to see from the online meeting on November 13, which I viewed, that the USFS Powder River office view climbing as a valid use. It is especially good to hear that a pathway to future route development has been addressed.

It is appropriate that Ten Sleep Canyon climbing be identified as a sport climbing area, relying on bolts for protection and for anchors. Virtually no climbing would exist at Ten Sleep without bolts. This is to distinguish it from climbing areas known as "trad" areas, which rely on removable gear for protection. It is positive that the Management Plan seems to validate bolts, safely placed by climbers, for the canyon.

Management plans for parking, toilets, and trails are positively addressed by the USFS. Limitations to climbing along Leigh Creek, to preserve a natural area, are understandable. Also regarding trails, note that cattle contribute to erosion and braiding of some climber trails; I have encountered cattle right against the cliff at French Cattle Ranch. Climbers have always co-existed with cattle in those areas.

Wildlife closures are discussed in the Management Plan. Where possible such closures should be seasonal, not permanent. Recent seasons at Ten Sleep have had selective closures for Peregrine nesting, and climbers have respected those closures. Similarly, a seasonal voluntary closure to climbing at Indian Creek in Utah, by the BLM, is respected by climbers, and the program works well.

Closures to certain camping areas, such as along the lower end of the Old Highway, beside Ten Sleep Creek, are understandable though regrettable. The addition of toilet facilities elsewhere along the Old Highway are needed. Information from USFS about additional camping further up-canyon would be appreciated by climbers looking for camping.

The Management Plan addresses social concerns about areas being "too crowded" by limiting further new route development in certain popular areas. Another way to look at this issue is that the establishment of new routes in such areas would not necessarily attract more climbers but would dilute an existing number of climbers. It may be appropriate to allow for additional routes in those identified areas because opportunities for new climbs definitely exist on such cliffs.

The Management Action discussed in the table in Part 6 of the Management Plan indicates an intention to remove all hardware from routes established after the 2019 prohibition of new route development. I wonder what will be accomplished by this action? Is the intention to be punitive? Would a more magnanimous approach be to let such routes alone? If a climb is removed because it violated a previous prohibition, can it be re-established with the appropriate application?

The discussion of new route development returning to Ten Sleep via an application process (as presented by USFS in the online presentation) was heartening. Specifics for the application would, I hope, be liberal in certain regards. Certainly, establishing routes by blatant creation of unnatural holds is to be prohibited but judicious removal of loose rock should be accepted as part of the establishment of a route. The application should allow for the establishment of more than a single route at an area. If a climber finds more than one route to develop, though having stated an intention to develop just one route, there should be no penalty, as new route development is an organic process of discovery. New climbs should be developed with safe hardware.

Overall the Management Plan looks positive for climbing and for the relationship between climbers and USFS.

Greg Child