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Organization:

Title:

Comments: Dear Powder River District Forest Service Team,

I want to start by thanking you all for the incredible amount of time, effort, and energy that your entire team has put into creating this CMP scoping document.

I have written my comments below in bold under each category / proposed action for clarity.

Parking, Highway, and Road Safety

Currently, potential vehicle accidents and pedestrian safety are a concern especially during peak season and on weekends when parking is congested along the highway and roads. The Climbing Management Plan will increase public safety along U.S. Highway 16 and FSR 18 in Tensleep Canyon while continuing to provide services to visitors accessing the climbing area resources.

Proposed Action:

I. ?Improve the safety and structure of parking options on :U.S. Highway 16 and FSR 18, including the design and construction of a new parking area for the Mondo Beyondo area and additional parking signage (see attached Tensleep Climbing Plan Proposed Infrastructure map). Trailer and overnight parking would not be allowed in this specific parking area.

I strongly support the proposed action as it will greatly benefit multiple outdoor rec groups, local ranchers/businesses, and those traveling through the region by both increasing safety and additional access.

Trails and Climbing Access

Over the years, climbers have taken many paths to gain access to the various crags in Tensleep Canyon. The current trail system within the project area consists of a network of user-created trails, none of which are currently part of the Forest's official trail system and therefore are not formally maintained. Climbers in the area spent considerable effort designing and constructing the existing trails. The trails that are on the lower half of slopes are generally in good condition. As the trails get closer to the climbing walls, and onto steeper slopes, they are often poorly defined and split in a spider web fashion, with multiple trails leading to the same destination. The lack of adequate signage of clearly defined trails, along with increased use of the area, has led users to create additional trails as they try to find their climbing destination. The creation of more trails creates problems with erosion, soil compaction, and vegetation loss.

Proposed Actions:

1. Create an improved and uniform network of climbing access trails from parking areas to staging areas.
2. ?When creating a network of climbing access trails, use existing user-created trail locations where possible and re-route where necessary.
3. Remove and re-naturalize user-created trails that cause adverse impacts to cultural and natural resources.
4. Construct ADA accessible trails where appropriate.
5. ?Conduct trail maintenance and construction to decrease erosion and stabilize climbing access trails to sustain current and future use of climber traffic.
6. Improve signage for climbing access trails.

I strongly support these proposed actions. I believe they will help reduce negative impacts. The additional of clear trail systems and signage will help recreationists reach their destinations and will make trail maintenance /

stewardship much easier to execute in the future.

Staging Areas

Climbers organize gear and prepare to climb and belay at staging areas. Staging areas are generally within 20 feet of the base of a cliff. They are the concentrated areas of impact in the Tensleep Canyon climbing area and are typically more visible at high-use crags. Although the Forest Service has constructed several staging areas through prior analysis proposals, users created most staging areas with inadequate stabilization and these areas continue to erode over time. These erosive staging areas may be affecting wildlife or botanical species in ways that need mitigation. There is a need to prevent vegetation loss and stabilize erosion due to trampling by implementing erosion control measures at high use staging areas or those vulnerable to erosion.

Proposed Actions:

1. Construct hardened staging areas at the base of existing and future developed climbing crags to decrease erosion and minimize impacts to cultural and natural resources, soil, vegetation, wildlife habitat, and the spread of invasive plant species.
2. ?Remove and re-naturalize user-created staging areas that cause adverse impacts to cultural and natural resources.

I support proposed action #1. There are many staging areas around the canyon that need attention/work. I suggest that additional verbiage be added to PA #2 to clarify how this would be determined (what parameters) and whether the removal of / re-naturalization of a staging area would close access to any climbing routes or crags. Because the staging area encompasses the belay areas at the base of climbs the removal of a staging area seems as though it would be paired with restricting access to climbs. Are there any existing staging areas at existing crags in the canyon that are being considered for this? IF yes please identify and elaborate. IF no please change verbiage to identify that all existing staging areas have been evaluated and do not fall into this category and that the verbiage is specific to new staging areas at future developed crags within the canyon.

Leigh Creek Research Natural Area

The Forest Plan describes the desired condition for the Leigh Creek Research Natural Area under Management Area 2.2 (Forest Plan, 2-30). The desired condition emphasizes retaining a baseline ecological condition by limiting activities which threaten the values for which the Leigh Creek Research Natural Area was proposed or established. In order to retain the values of the Leigh Creek Research Natural Area and keep a baseline natural resource condition, rock climbing would not be allowed through much of the Leigh Creek Research Natural Area, existing user created trails could be removed, and existing climbing routes could be removed as needed.

Proposed Actions:

1. No new route development is allowed within Leigh Creek Research Natural Area.
2. ?Removal of existing routes within Leigh Creek Research Natural Area, except for routes on Godfather Boulder and Chem Trails Wall, which are located within the first one-tenth of a mile in the Leigh Creek Research Natural Area.
3. Remove 16 routes in the Twomey Town and Haunted Wall climbing areas. See Appendix A.
4. Rehabilitate existing trails within Leigh Creek Research Natural Area.

I'm very appreciative that the USFS was willing to allow continued access to the existing climbing near/ just inside the boundary of the LC RNA including Chem Trails Wall & Godfather Boulder. Because other non-motorized form of recreation are allowed within the RNA I suggest/ request that climbing within the area be viewed under the same microscope as the other recreational activities that are allowed to take place within the RNA. Would it be a possible compromise that climbing access remain to existing climbs unless further information is brought forward to support the closing of access to them per the guidelines of the RNA. If accessing and or climbing the listed 16 routes within the RNA area does in some way prove to be more impactful than the other allowed activities then I fully support the USFS Decision to remove the stated routes/close access to those crags in order

to protect the natural state of the area.

Camping

The frequency of camping has dramatically increased within Tensleep Canyon, specifically along FSR 18. Campsite inventories completed in 2018 revealed a total of 30 dispersed campsites along FSR 18. Many of the inventoried dispersed campsites on FSR 18 are within 100 feet of the municipal watershed of Tensleep Creek or within one-quarter mile of a developed campground. Guidelines in the Forest Plan state to evaluate existing dispersed sites within 100 feet of streams or lakes for hardening, closure, or other mitigation. (Forest Plan 1-56).

Proposed Actions:

1. Improve roadside safety and protect watersheds along FSR 18 and Tensleep Creek by prohibiting dispersed camping along FSR 18 for approximately 1.5 miles from the western intersection with U.S. Highway 16 to the east (See Tensleep Climbing Plan Proposed Camping Closure Area map).
2. Remove and rehabilitate dispersed camping sites within 100 feet of streams or lakes that impact cultural and natural resources.

The dispersed camping along the dirt section of FSR 18 is very special and is part of what makes spending time in Ten Sleep Canyon amazing.

I support proposed action #1 and recognize that the impacts of camping must be monitored/managed and must not negatively impact the ecology of the area and understand that safety for all user groups must be maintained.

I support proposed action #2 but would like to request that an updated inventory of the dispersed camping sites along the dirt section of FSR 18 be taken.

Health and Human Safety

Visitors and Forest employees have reported improper human and pet waste disposal concerns from the many recreation users within the project area, specifically along FSR 18 and below the more popular climbing crags. Since 2014, local climbing organizations have rented portable toilets and placed them in three different locations along FSR 18 from June 15 through the end of September to help reduce the amount of environmental impacts due to improper human waste disposal. These rented facilities are costly and require high maintenance because of the limited amount of storage capacity. Aside from the rented portable toilets and the vault toilet in Leigh Creek Campground, no other toilet facilities are available for human waste disposal within the project area.

Proposed Actions:

1. Address improper human waste and pet waste disposal by installing vault toilets and pet waste bag dispensers (see Tensleep Climbing Plan Proposed Infrastructure map).
2. Outside of vault toilets, solid human waste and used toilet paper must be packed out and removed from National Forest System land.
3. Install trailhead kiosks for maps and educational information to communicate issues. Signage and staff will provide education about Leave No Trace and Tread Lightly practices for the public.

I strongly support the proposed actions and am excited to see these additional resources added as they will SIGNIFICANTLY reduce negative impacts to the region and provide resources to multiple user groups.

Outfitter/Guide Use

The Forest strategy for outfitting and guiding states "continue permitting outfitter/guide services on National Forest System (NFS) lands" (Forest Plan, 1-6). Sport climbing instruction in the Tensleep Canyon climbing area is currently under temporary permits only. In coordination with members of local climbing clubs and other expert climbers, the Forest Service identified individual areas of concentrated use for rock and ice climbing on the Bighorn National Forest.

The Forest Service identified twenty areas, two of which are within this project area. A capacity analysis was completed in 2017 that will help the Forest Service determine what level of outfitted use is appropriate for each compartment.

Proposed Action:

1. Develop a process to issue commercial priority use permits consistent with Forest Service Special Uses Handbook direction (FSH 2709.11).

I support the proposed action and hope that guiding permits will be made available in a way that is affordable and accessible to all especially local services within the region.

Geological Resources and Current and Future Route Development

The development of sport climbs in Tensleep Canyon has resulted in widely publicized concerns about impacts to geological resources. Fixed anchor placements and some manipulation of the solid Ordovician dolomite of Tensleep Canyon cliff walls is necessary to safely establish and maintain climbing routes in the area. However, there are conflicts among the climbing community and resource managers about excessive removal of rock, gluing, attaching artificial holds, or using mechanical equipment to create holds where a natural hold did not exist. The Forest Service enacted a ban on placing bolts in the Bighorn National Forest in late 2019, stating its intent to enforce the existing national law 36 CFR 261.9: Damaging any natural feature or other property of the United State, to reduce conflict and to protect the geological resources.

Proposed Actions:

1. Allow route development to occur on cliff walls not in areas where route development is prohibited (See Tensleep Climbing Plan Proposed Areas of No Development map). The Tensleep Climbing Plan Proposed Areas of No Development map shows the maximum area of cliff walls available to route development. Additional areas of no development may be identified during the environmental analysis process or during implementation of the Climbing Management Plan if there are negative impacts to natural and cultural resources.

I support the proposed action. I would like to see verbiage added to this allowing the use of fixed climbing protection to ensure there is no conflict with the greater BNF moratorium on development.

2. Prohibit route development that removes rock from areas except where the rock in its natural position poses a risk to the climbing party or a future climbing party.

I support the proposed action and agree with the verbiage used.

3. Prohibit gluing, attaching artificial holds, or using mechanical equipment to create holds where a natural hold did not exist.

I think the verbiage around glue should be modified to allow the use of glue for the installation of permanent fixed protection because "glue / epoxy" is used for the installation of "glue in bolts" and is considered a modern best practice both for safety and longevity of hardware especially in softer types of rock such as limestone, sandstone, and dolomite. Aside from that these guidelines for new development of routes are in line with current best practices and the BCCs development best practices document. I would suggest considering adding verbiage specific to allowing the use of epoxy/glue/sika in the placement of fixed protection as well as to reinforce/stabilize a natural hold that was unable or unsafe to be removed during development but could either become dangerous to a current or future climbing party and in which case the removal of said natural hold would drastically change the nature of the climb and or create a dangerous scenario. This should only ever be done SPARINGLY and under the best discretion on an individual and hopefully rare basis.

4. Prohibit the placement of new fixed climbing protection on selected crags (See Tensleep Climbing Plan

Proposed Areas of No Development map). This prohibition will be located on crags where:

- * social concerns and route inventory have indicated that the crag is too crowded for additional route development.

I do not support the proposed action. Sectors like Valhalla would benefit from the addition of new routes. The most crowded walls have already had most of the potential routes developed, by adding more on the walls between individual existing crags would only provide additional routes and opportunity to spread parties out more between areas by providing additional and new routes for people to enjoy. Overcrowded crags that already have an extremely high density of established climbing routes tend to self-regulate regarding future development.

- * wildlife and botanical species or cultural resources are negatively impacted.

I support the proposed action but think that additional verbiage should be added to clarify the parameters that would determine this.

- * sections of rock wall that are not conducive to route development and where the removal of rock, gluing, attaching artificial holds, or using mechanical equipment beyond fixed climbing protection placements would be needed to develop a route.

I feel this bullet is redundant, and should be removed entirely or the verbiage changed for the following reasons. The second half is already described in Proposed actions 2 & 3 above and under the guidelines for development listed above will prevent the concern listed in the first half. Climbing is a widely varied activity, and it is almost always impossible to see from the ground whether a section of wall is "climbable". Climbing takes place and is done through the creative use of existing features and shapes of the rock that often at first glance may not appear to be climbable especially to a non-climber or a climber of a lower strength/skill level. I fear that the first half of this bullet places the power to make a uniformed decision about a section of wall and whether it is climbable in the hands of someone who simply may not have the knowledge or skill to make that determination.

- * crags that previously had gluing or attaching of artificial holds and use of mechanical drills to create holds.

I do not support the proposed action for the following reason.

1. Validity & Fairness. To prevent the future development of these crags and not allow these routes to be re-equipped with fixed/permanent protection is essentially holding past development to a set of standards that were not present at the time.

- a. There was no prior guideline for development and so to hold a past action to a new guideline or rule does not in my eyes represent a level of fairness one would hope to see regarding restricting access to an existing recreational area/activity/site.

- * crags located within the Leigh Creek Research Natural Area.

I support the proposed action.

- * along FSR 18 during seasonal wildlife closure.

I suggest the verbiage for this bullet be changed to be made clear that the statement is regarding the duration of time mid Nov-mid June when the gates to FSR18 close to prohibit motorized travel along this section of the "old highway".

I do not support the proposed action for the following reason.

- o All other recreational activities are allowed in this area during the seasonal road closure. The basis for not

allowing rock climbing development activities alone seems to lack foundation. I suggest monitoring for negative impacts once development is allowed to resume to see if development activities during this period pose a measured/observed negative impact.

- o Development of cliffs is often best done during the "off-season" for climbing. It is significantly safer during this time due to the lack of presence of or at least a much smaller presence of climbers and other recreational users in the area. For safety reasons alone I do not agree with the proposed action.

- o I do not agree with limiting access to one specific recreational activity without providing a definitive negative impact while allowing all other recreational activities to still take place.

- o I feel that development should be allowed during the seasonal road closure of FSR 18 at the walls/cliffs that are accessed from FSR 18.

* areas that are identified as having limited parking and access to the cliff face.

Parking has and always will be a mostly self-governing factor in selecting where to recreate. I would suggest that verbiage be changed to not limit development at areas that may see parking limitations but to consider ticketing or parking violations if done in a manner that restricts the right of way and or access for emergency response vehicles. Climbers will often choose to go to a different area if it is going to be overly crowded and there is no parking available when they arrive especially in an area with so many areas as options.

5. ?Provide process for route developers to notify the Forest Service of their plan to develop a cliff face in a bolting proposal form and manage areas with limited access by considering restrictions when necessary.

I support the proposed action for a voluntary notification process aimed at assisting the USFS team with monitoring and managing development activity in the Ten Sleep Recreation area. I do not feel this should be necessary or needed within areas outside the project area in the Bighorn National Forest.

6. ?Monitor the condition of routes in crags that have previously had gluing or attaching of artificial holds and use of mechanical drills to create holds or were damaged in 2019 and proceed with the following management action:

I do not support the removal of or limiting access to any existing climbing routes & crags established prior to the moratorium for the following reasons.

1. The actions taken in 2019 by the group of vandals were done against the consensus of the climbing community.

- a. Their judgment in doing so should be brought into question and with that the basis for which they made decisions on which routes to vandalize should also be brought into question.

- b. Routes of all kinds & conditions were vandalized regardless of whether they met the specific criteria that this group claimed to be standing against or not.

- c. The majority if not ALL the routes that were damaged were of 1 specific developer. It would appear this was an act of prejudice rather than the stated stance against a specific development ethic/tactic. This is easy to see as there are developers who were a part of the controversy and developers of the past whose routes of the same ethic/tactic were untouched by the vandals.

- d. These damaged routes and the crags they are located at should not be made an example as it only displays poor and biased judgement and relies on the decisions of a group who acted outside of the consensus of the climbing community and without adhering to their own stated mission.

2. To prevent the future development of these crags and not allow these routes to be re-equipped with newly placed fixed/permanent protection is essentially holding past development to a set of standards that were not present at the time.

- a. This shares scary similarities with the legal concept of Ex Post Facto.

- b. 36 CFR 261.9 could be interpreted in many ways even some that consider placing a fixed anchor or bolt as

breaking this CFR. I think it is important to acknowledge that there were no prior clear definitions or interpretations of how this CFR relates to rock climbing development and the gray areas of doing more comforting or removal of rock which started this community debate.

c. It stands to reason that to retroactively cast judgement on development prior to an established list of guidelines/rules would not be a fair process.

d. The re-opening of these routes and allowing future development in these areas would provide a much greater opportunity for educational signage and comparison between development tactics of the past vs modern development guidelines.

e. I fear that restricting access to existing climbing routes and closing existing crags to new development based on development tactics used predating any official development guidelines sets a dangerous precedent that could lead to the retroactive removal of or limiting access to hundreds of climbs across the Bighorn National Forest and Thousands of climbing routes and climbing areas around the United States if established as a precedent based on this document.

Current Condition

Recommended Action

Totally removed (no bolts, holds still there)

Identify and consider restricting development in areas with resource damage

Partially removed bolts with holds epoxied

Identify and consider restricting development in areas with resource damage and remove bolts and anchors with safety or resource damage concerns

Partially removed bolt/hangers holds not epoxied

Identify and consider restricting development in areas with resource damage and remove bolts and anchors with safety or resource damage concerns

Reestablished routes with glued and artificial holds

Identify and consider restricting development in areas with resource damage

Unaffected routes with some or entirely glued and artificial holds still intact

Leave as is, consider restricting development in areas with resource damage and add educational signage for areas with greatest amount of routes with

glued and artificial holds.

New established routes since 2019

Remove all hardware