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Organization:

Title:

Comments: Hello and thank you for making progress on the climbing management plan for Tensleep Canyon.

There are many positive aspects of the plan for which I would like to voice support. There is also some language that I believe should be removed for clarity, or because it conflicts with providing the recreation opportunities which so many enjoy in the BNF. I have done my best to provide alternative solutions that do not reduce access to recreation, and that still address the concerns put forth in the proposed climbing management plan.

Under the heading "Parking, Highway, and Road Safety," the proposed action of improving and expanding the parking will benefit both the climbing community and the non-climbing visitors by creating a safe parking area for climbers to stage. It also will improve the safety of motorists on the highway. Please consider that the total space for parking should not decrease, as the current parking area is often quite full. This proposed action should be included in the final plan, provided it increases the total parking for the "Mondo" area.

Under the heading "Trails and Climbing Access," please specify that there should not be a net reduction in the trails used to access the climbing areas. Any "removal and re-naturalization" of user created trails should be done only when an alternative trail to the same destination with similar distance/access to parking has been created.

Under the heading "Staging Areas," please specify that any "removal and re-naturalization" of staging areas should not occur if it prohibits user friendly access to climbing routes. If there are areas that are not used and can be rehabilitated, it should be done in a way that does not prevent climber access to routes.

Under the heading "Leigh Creek Research Natural Area," please remove language prohibiting new route development. Please remove language regarding the removal of routes in the Leigh Creek Research Natural Area. Please remove language regarding "rehabilitation" of existing trail within the area. I do not support removing recreation opportunities in the area, especially since no resource degradation has been specified as the reason for the closure. Local climbers visit the areas specified in the proposed action during the "off-season" when the Old Highway is closed and the weather is conducive to climbing in the sun. Removing recreation opportunities from local climbers living in the area is contradictory to the mission of the USFS. Consider setting seasonal closures during peak season to reduce impact, while allowing access during other times of the year.

Under the heading "Camping" please remove language prohibiting camping along FSR 18 within 1.5 miles of Highway 16. The "Leigh Creek Campground" (the pay campground) is located in the riparian habitat, and removing free camping opportunities in this sensitive area while still profiting off of outdoor users conflicts with both recreation and conservation aspects of the USFS mission. Instead of removing camping opportunities, which will concentrate environmental degradation in other areas, consider taking action to reduce environmental impacts of camping along the bottom of FSR 18 by designating and improving free camping in the area.

Consider posting signage to designate free campsites along FSR 18 within 1.5 miles of highway 16. Consider assigning the Climbing Ranger to work with Local Climbing Organizations to improve camping along FSR 18 in order to increase camping opportunities and prevent damage to the riparian area. Consider adding language that would lead to the removal of the "boulders" blocking camping access near the "road closure" gate on FSR 18 and improving and designating free campsites in that area for recreationist use. Consider installing a pit toilet in the area to reduce environmental impact.

In addition to improving camping opportunities, action should be taken to enforce the 16 day stay limit. Instead of closing camping and forcing climbers to travel further and trammel new areas, simply enforcing existing rules and improving existing campsites along the first 1.5 miles of FSR 18 will be more beneficial to users and the environment.

Under the heading "Health and Human Safety", Please include language to provide a means for Local Climbing Organizations to work with the Forest Service to install permanent vault toilets in the future as the need arises.

As climbing continues to grow in popularity, there will be a need to provide facilities for human waste disposal in the future. Recent history provides an example of how, despite available funding, a clearly defined need, and many viable options, the current USFS process for installing toilets is ineffective. Please specify how LCO's can

work with the BNF to install toilets in the future.

Under the heading "Geological Resources and Current and Future Route Development," thank you for including language that prohibits "manufacturing" of holds. Please specify language regarding the "process for route developers to notify the Forest Service" to include what restrictions would be considered and under what circumstances restrictions would occur. Please include language to specify that developers who previously used glue and mechanical drills should be prohibited from developing routes in BNF. These individuals have shown a propensity for disregarding commonly understood climbing ethics, and their actions have caused irreparable harm to Tensleep Canyon, BNF, and the climbing community at large. The risk of allowing these individuals to again damage the resource is too great. Please specify that routes that had been manufactured using glue and drills, were removed by concerned climbers, then "reestablished" during the bolting ban should be removed. There have been several comments seeking to include language specifying what type of hardware (bolts and hangers) should be allowed, specifically requesting that the USFS mandate that only glue in style bolts be permitted. These comments are made under the guise of "best practices" and "safety". Please do not include this language, as it is a misguided attempt by a few individuals to control who is and is not "allowed" to develop. In Tensleep Canyon, there are thousands of "mechanical" or wedge bolts that have caught thousands (if not millions of falls) over the past 30 years without failure. Mechanical bolts are safe and pose no danger to climbers, and also provide additional benefits. It is not uncommon for routes to need bolts removed and placed in a different location for safety or due to erosion. Holds break and routes need to be rerouted, especially on new routes. This is easily accomplished with mechanical bolts, and can be done with minimal damage to the rock, however removing a glue in bolt is much more damaging to the rock. "Glue-in" style bolts are perfectly acceptable for rebolting routes, and are acceptable if a developer chooses to use them (although the permanent nature of these bolts poses greater risk of damage to the rock). It is not advisable for the USFS to require the use of any specific types of hardware in Tensleep Canyon, and should be left up to experienced route developers to use best judgement on what each circumstance requires.

Additionally, please include language to remove the "bolting ban" for areas in the BNF outside of the Tensleep Canyon area. There are many areas that are unaffected by the problems facing Tensleep Canyon, and climbers and developers in those areas should be permitted to continue their responsible stewardship of the natural resources in the lesser visited areas.