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Title:

Comments: Trails/Climbing Access

I agree with the proposed actions regarding the climber trails in and around Ten Sleep Canyon. Regional trail maps (including rescue box locations, crag nomenclature and emergency response meeting points) should be available at parking areas to help users identify the correct trailhead and to help local search and rescue/first responders know where to go in case of an emergency.

The addition of trail kiosks at trailheads would help users know where the trail system goes, the distance to specific crags, and how to correctly approach a specific climbing wall. Adding a sign-in system at the major trailheads to indicate party size, where you are climbing, and your time of arrival would help both the Forest Service and recreational users to assess usage statistics for specific areas. This would give the Forest Service exact information on the total number of users at specific walls and it would help users make informed decisions on where to climb (i.e. not overcrowding one specific wall).

Staging Areas

I would like to see that staging areas are large/wide enough to accommodate both users who are actively climbing and users who are traversing the cliff-band to approach a different crag simultaneously.

Leigh Creek Research Natural Area

Please provide clear and definitive data with respect to this area's official classification as a Research Natural Area (or not). If the finalization of the area has not yet been completed, what is an expected time-frame for this? If the Leigh Creek (proposed) RNA is not finalized in concordance with this document, drastic proposed actions such as route removal in the area should be reconsidered. Who will be conducting this route removal? If the justification for route removal in this sector is to prevent further resource damage, what evidence do you have that route removal will cause less resource damage than just leaving the resource in its current state? The trails past the Godfather Boulder see notably more hiking traffic than climbing traffic; will these access trails be closed to hikers as well?

Camping

I support the proposed campsite closure areas from the lower Old Road (FSR 18) to just above the parking for Psychoactive Area. This will eliminate safety concerns for both drivers and campers along the paved high-traffic area of the Old Road, as well as reduce some of the congestion at parking/trail-head areas along the lower Old Road. It will also help to reduce potential impacts of recreational users on sensitive areas at the base of the canyon.

Health and Human Safety

The addition of at least one strategically placed vault toilet along the Old Road would reduce the need for portable toilets and lower the overall impact of human waste in the canyon. Alternatively, backcountry toilets (see: Alpine Lakes Wilderness area in Washington State) could be a good solution for high traffic crags (i.e. Mondo Beyondo area, FCR, Crag 6 and Waterfall area).

Outfitter/Guide:

Outfitter guides should abide by specific best practices outlined by the forest service (i.e. maximum group size, avoiding overcrowding popular areas, and guiding during less busy days of the week).

Geological Resource/Future Route Development

Proposed action 4:

Item 7 states:

"Areas that are identified as having limited parking and access to the cliff face".

There is very limited parking throughout all of Ten Sleep Canyon and this statement would cover nearly every crag in the canyon.

Proposed action 6 states:

"Current Condition: New established routes from 2019".

If new route development is to happen in Ten Sleep Canyon in the future this language needs to be altered.

Consider saying, "Current Condition: Illegally established routes between 2019 and the completion of the CMP."

New Action

Your proposed actions do a great job of prioritizing management of parking, human waste, dispersed camping and climbing access trails. While these items do well to address the management of the ongoing use of the climbing area from an end-user perspective, arguably the most important objective of a Climbing Management Plan is the management of the climbing resources themselves - both from a resource maintenance perspective and a resource development perspective.

There are several existing models which can be referenced to develop such a management protocol. Consider hunting...

Different "development areas" could be specified. Each area could be evaluated with respect to its ratio of developed to undeveloped rock (or other specifications), and a certain number of "new route tag"s could be issued per area per year based on this. A modest fee could be collected per new route tag (suggested: \$50-100), and upon completion of the new route the developer would supply information to the forest service along with a "receipt". A maximum number of new route tags can be purchased by each developer every year. If the demand for new route tags exceeds the supply for a given area, a lottery system could be adopted.

If anyone is caught illegally developing ("poaching") a route, the "Fair Chase" model can be referenced. A person caught violating this rule could be banned from purchasing new route tags in the future.

Also consider, from a route maintenance perspective, that incentives could be put in place to promote ongoing route and area maintenance. Perhaps the new route tag fee could be waived if the developer rebolts a route "in trade" for the new route tag.