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Comments: Route Development:

It is absolutely imperative that we tread carefully in this section. We must define manufacturing and illegal development in a way that is unambiguous, else we run the risk of misunderstandings in the future. Inclusion of the BCC's best practices guidelines is an excellent step toward outlining what constitutes ethical vs non-ethical development.

There needs to be restrictions on how many routes an individual can bolt a year. If not, certain individuals will develop the entire canyon in a few years. I think it would be wise and inclusive to restrict individual's development to 5 or less routes a year. This will provide an opportunity for EVERYONE to have a chance to develop, and increase the diversity and richness of development opportunities for all.

Limit the total number of routes that an individual can apply to develop in a year to 5 or less.

The forest service has the power to remove future illegally developed routes, as well as remove development privileges from individuals. This should be discussed in the plan. "If routes are illegally developed, there is possibility for revocation of development practices for individuals, and routes may be removed.

Without a set limit on routes developed per year (<5 per individual), then one individual will put up entire walls in a season. Some developers are industrious and will put up 30+ routes in a month at a good wall. Without protections to prevent this from happening, then the canyon will fill up with routes in 2-3 years, and the opportunity for all persons to develop will be squandered.

Development should be limited to some months of the year (April-October). That way it is easier for Ryan/FS staff to manage development as it is occurring, and to prevent local individuals from developing the entire canyon in one winter when everyone is gone.

I think the permit system for establishing a new route sounds fair. I think that this could even cost a few dollars, similar to firewood permits (5-10\$ per route) to help fund forest service projects in the canyon. Development is a privilege, and it's expensive. Use this to leverage enforcement and resources to help protect the canyon and work on projects to better the canyon.

"Several commenters requested an official permitting system for bolting and route development, such as an online form with associated fees. The responsible official carefully considered this idea; however, there is currently no framework or authority for the Forest Service to implement a permitting and fee system specifically for climbing route development."

- I understand that there is no framework, but I don't understand how this is very different from the proposed action. Require submission of a development permit to cost money, and make it an official mandate of the forest service.

Enforcement:

There needs to be a defined punishment for illegal development practices. Will these people be fined? Will they lose development privileges? Will they lose forest service access? This plan needs defined punishments written down to deter illegal and dubious development practices. This is the section to get into it.

Site CFR's that could be used to fine illegal development practices, discuss removal of routes, future punishments for continued malpractice, ETC. Without this written into the document, it makes the forest service seem powerless to enforce policy and ethical development practices.

Site SPECIFIC things that will happen to INDIVIDUALS if they illegally develop. Ban these people from ever developing again;

Give those individuals fines

Remove the routes that are illegally developed

Ban these people from using forest service land

The section that basically says "a moratorium is going to happen again if there is illegal development" is not ok.

The forest service needs to be ready to ban and punish INDIVIDUALS for illegal development, and be able to keep track of this development. Don't punish the entire climbing community for the negative actions of the few.

Prohibit individuals that have PREVIOUSLY DEVELOPED WITH ILLEGAL PRACTICES FROM DEVELOPING EVER AGAIN. Do not allow individuals with EXISTING CITATIONS from being able to obtain a permit to develop a route.

What happens to routes that go up that were not permitted? Say a developer fills out 4 proposal forms for a cliff, but 5 new routes were established, and that developer does not claim that route as theirs. How will this be handled? Will it be removed? Will people be able to develop it again after it has been removed with a permit? We need to get into the nitty gritty here, else we risk this happening in the future.

Parking, Highway, and Road Safety & Trails and Climbing Access Sections:

Establish and maintain educational signage at the major parking areas. Maps of current trail systems, as well as areas that are accessed from those parking areas is imperative. These signs also give opportunity to educate climbers on best practices.

Example: Large map at the "Mondo Beyondo" parking that describes the lots main access trails (Valhalla, FCR early season, Supererratic, etc) with a map of said trails. Describe the area's impacts, discuss ticks, invasive species, development best practices, dangers, and waste management. These "trailhead" signs are THE single best place to get information out to climbers. These are an opportunity to educate climbers on all of the best practices of the area.

Consider the use of donation boxes at trailheads. Along with the trailhead signage that should be available at these major parking areas, this is a great opportunity to place cash collection boxes for maintenance of vault toilets and trail systems. Consider the use of QR codes on the signs for "venmo" and other payment forms. The French Cattle Ranch approach is not sustainable. People continue to use the "river crossing" when the water is low. There needs to be an alternate parking area for this area, as well as a bridge established for approach to this area across the river. Otherwise, there needs to be some serious planning done to block climbers from using this access path. Using the upper "river crossing" approach significantly decreases approach time/distance, and climbers really prefer using that approach. Consider establishing a small parking area and a more permanent trail system/river crossing here.

Please define terms such as "overcrowding" or "at limit". This goes for all of the sections (camping, walls, etc).

The forest service discusses determining what these limits are, but it seems incredibly ambiguous. I think it would be wise to set number values to these words.

Put up signs at all illegal crags (funky town, trump tower, etc) that discuss illegal development and how it damages the natural resource.

Camping:

Although it does not seem like the FS is planning on closing camping along the "old road" as was originally proposed in 2019, it is important to maintain an adequate amount of camping for people in the canyon. Perhaps a revisitation to open back up the old campground at the end of the fish hatchery road (the bottom of FS 18 before it turns to gravel at the gate). Opening a campground at this area would help concentrate campers to a more manageable area, prevent obstruction of the road further up, and could be used to fund more projects in the canyon.

If the Forest Service does not plan on opening up this specific campsite, I think it would be wise to look into future campground (as opposed to specific sites) options as the canyon continues to grow..

Health and Human Safety:

The addressing of trailhead signage here is good, but should not be limited to this section.

Consider working with the BCC or Access fund to obtain "Wag Bag" dispensers at the popular crags. These

metal boxes are normally full of donated wag bags that climbers can use to pack out their human waste.

Traditionally, many climbers are lazy, and even if there are trailhead bathrooms, won't take the time to run back to the car from their project to use the restroom.

An example is the extremely busy area of "FCR" early season before the "river crossing" is open. Unfortunately, no climber is going to walk 40 minutes back to the car to use the vault toilet. A portable solution is required to stave off the impact of climber waste.