



March 8, 2021

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Submitted via email: [comments-bighorn@usda.gov](mailto:comments-bighorn@usda.gov)

**Re: Tensleep Climbing Management Plan**

Dear Plan Revision Team,

Thank you for considering the following feedback from Access Fund and Bighorn Climbers' Coalition (BCC) regarding the Tensleep Climbing Plan Scoping Notice. The February 18, 2021 virtual open house was well organized, and we genuinely appreciate the effort that the Tensleep Climbing Plan Planning Team has dedicated to this initiative. We are also grateful for the opportunity to provide this feedback on the Tensleep Climbing Management Plan Project and the February 2021 Scoping Notice.

***The Access Fund***

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

***Bighorn Climbers Coalition***

A 501(c)(3) nonprofit organization, the Bighorn Climbers' Coalition (BCC) mission is to preserve, promote and protect climbing resources and access to climbing resources throughout the Bighorn Mountains and basin. BCC intends to raise funds, obtain grants and organize efforts to improve local recreation areas. This will benefit the climbing community as well as other recreational user groups while decreasing potential negative environmental impacts from climbers. BCC has a history of constructive partnership with local land managers and other local organizations. For more information about the BCC, visit [www.bighornclimbers.org](http://www.bighornclimbers.org).

## Comments

### ***Intro***

Ten Sleep is considered a world-class climbing destination. Climbing opportunities range from beginner to cutting edge. There are over 1200 routes on over 30 crags (discrete cliffs) that offer a wide spectrum of climbing styles. Access Fund and BCC hope to help ensure that climbing activities are sustainable, and that the climbing system is resilient to support the growing climbing community into the future.

### ***Project area***

Access Fund and BCC recommend that the Tensleep Climbing Plan project area be expanded to include several cliffs to the north of the current Tensleep CMP project area (see figure 1). One of these cliffs already has several developed climbs, and the ones that do not will inevitably be explored by climbers in the future. They are just as easily accessed as some of the other cliffs within the currently proposed Tensleep CMP project area.

The cliffs outside the proposed project area will likely be considered part of the Tensleep climbing corridor in the future, just as other high-altitude areas such as Crag 6, and should be managed according to the same policies as the rest of Tensleep. The addition of the proposed project area extension (see figure 1) ensures that the cliffs have the potential to be developed in an ethical, environmentally-sensitive, and sustainable manner.

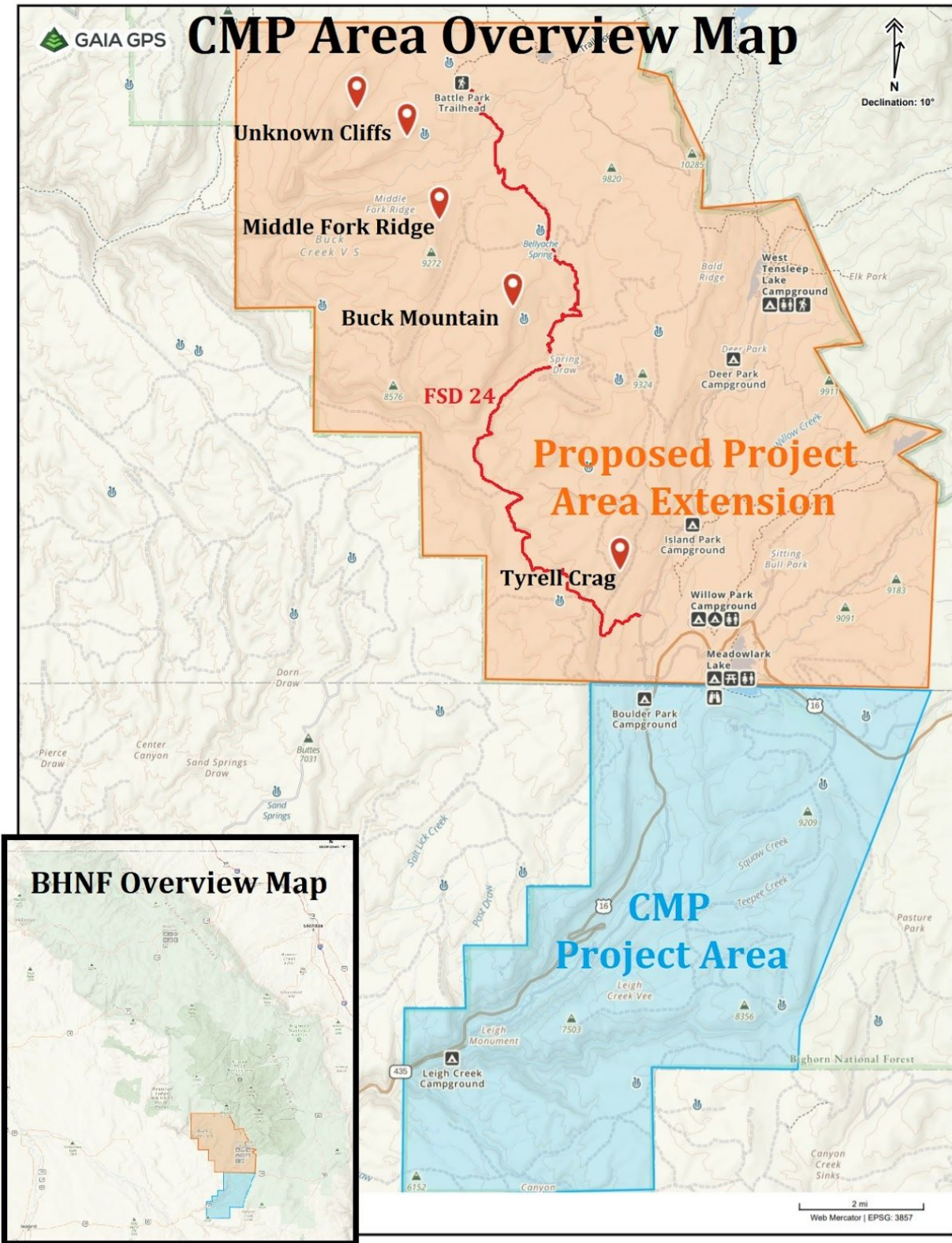


Figure 1. Proposed Project Area Extension to the Tensleep Corridor CMP Project Area

The Tensleep corridor sees significantly higher usage by climbers than anywhere else in the Bighorn National Forest. Nowhere else in the Bighorn National Forest experiences a fraction of the visitor use and climbing route development as Tensleep itself. Therefore, the areas within Bighorn National Forest that are outside of the Tensleep corridor do not justify the same new route authorization process that is adopted for the Tensleep Corridor climbing management area. In light of this situation, Access Fund and BCC request that the moratorium on new route development be lifted outside of the Tensleep Management Corridor.

### ***New climbing routes and fixed anchors***

Although the vast majority of climbers do not establish new climbing routes, exploring new rock and climbing first ascents is fundamental to the climbing experience. Access Fund and BCC support a programmatic authorization process to allow new bolted climbs at crags that have been previously evaluated for natural /cultural resources and access trails, and subsequently approved for new route development. A programmatic authorization process would limit administrative burden and allow for appropriate sport climbing routes that do not harm critical forest resources and stakeholders. Authorizing new route development at the cliff resolution (i.e. assess cliffs not individual routes) would streamline the authorization process yet protect the integrity of national forest resources.

Access Fund and BCC ask that Bighorn National Forest refrain from categorizing bolts as fundamental damage to natural/geologic resources and describing bolts in the same context as manufactured, chipped, drilled or glued artificial holds (July 24, 2019 Forest Supervisor Order and February 18, 2021 Public Meeting on CMP Scoping Notice). In fact, two court cases (U.S. Forest Service vs. Byrnes, 2006 and U.S. Forest Service vs. Craig, 2005) regarding the legality of climbing bolts on U.S. Forest Service Wilderness and non-Wilderness lands were dismissed. Several existing USFS plans provide allowances for bolt placement (e.g., Shoshone National Forest Plan and Inyo National Forest Plan). Despite that the USFS does not have a national policy on climbing or bolts, both the Bureau of Land Management and National Park Service do not interpret bolts as intrinsic damage to natural and geologic resources (BLM Instruction Manual 2007-084 and NPS Director's Order #41). Additionally, federal law (John D. Dingell Jr. Conservation, Management, and Recreation Act, 2019) clearly states that climbing activities, including placement, use and maintenance of fixed anchors in designated BLM Wilderness, are fundamentally lawful. A similar bill (Northwest California Wilderness, Recreation, and Working Forests Act included in the Protect America's Wilderness and Public Lands Act), which passed the House of Representatives in February, 2021, applies the same fixed anchor provisions to USFS land in California.

In the context of this planning process, the Bighorn National Forest's atypical interpretation of existing CFRs (36CFR 261.10(a) and 36CFR 261.9(a)) to include climbing bolts is predecisional, antithetical to federal law and USFS management norms, and obstructs the development of sustainable climbing management alternatives and bolt authorization processes that could be well-suited to this planning process.

It is important to note that Access Fund and BCC vehemently oppose the manufacturing

(including gluing, drilling and chipping) of climbing holds and support Bighorn National Forest's ban on artificial and manufactured holds. Manufacturing holds is not an acceptable practice at Tensleep or elsewhere. Placing manufactured holds in the same category as new bolt placements dilutes the importance of prohibiting manufactured holds and conflates a standard and normal climbing tool (bolts) with an illegal activity that damages natural resources and contradicts the basic tenets of climbing (manufacturing holds). This is an especially important topic to reconcile during the scoping phase of the Tensleep CMP planning process.

### ***Fixed anchor maintenance***

Fixed anchor (including bolts) maintenance is essential to sustainable climbing resources. Access Fund and BCC support a bolt maintenance authorization program that does not obstruct good faith efforts to replace antiquated and/or unsafe climbing hardware. Regardless of new route authorization, bolt maintenance should be allowed with minimal administrative burden in order to promote the safety and stewardship of Tensleep climbing areas. BCC recommends a bolt authorization process that follows the attached re-bolt authorization form (Appendix A).

While we appreciate the Forest Service's interest in tracking fixed anchor maintenance, several aspects of the existing Bighorn National Forest re-bolt authorization form are unnecessarily restrictive and will prevent safety-oriented maintenance work from being completed on the routes which need it most to protect climbing resources and climbers. The form proposed by the BCC addresses both accountability concerns by requiring crag identification and a signature of the volunteer doing the maintenance work, while also being minimally restrictive to the volunteers who perform this valuable and necessary work.

### ***Parking***

Due to the high visitation levels and increased use projections at Tensleep climbing areas, Access Fund and BCC recommend enlarging the capacity at the following parking areas (in partnership with WYDOT): Dry Wall, Circus, Mondo Beyondo/Valhalla, French Cattle Ranch, and Leigh Creek.

Access Fund and BCC also recommended adding signage to parking areas that clearly indicates which crags are accessible from each parking area. This will help users choose the correct lot, reduce resource impacts, and help emergency responders during SAR events. Many of the users of the parking areas are non-local visitors, so adding signage to parking areas will improve visitor flow by preventing backtracking and social trail proliferation. Delineating parking spaces with paint or concrete curbs will also facilitate organized parking practices.

Additionally, the legality of parking on some sections of the Old Highway is unclear to many visitors. In several areas, particularly near local lease-holders (e.g., The Ark, City of Gold), trailhead signs and parking signage is recommended in order to protect forest resources and alleviate potential conflicts with national forest stakeholders.

### ***Trails and staging areas***

Trails in the Tensleep management area must be inventoried, mapped, maintained, and signed. As stated previously, it is important that trail maps are located at parking areas to prevent users from creating new social trails from crag to crag.

The mapping, identification of need, as well as the maintenance of trails and staging areas can be completed through partnership between Bighorn National Forest, BCC and Access Fund. This is an opportunity to reach out to experienced members of the climbing community to identify the need for maintained trails and resilient staging areas. The sustainability of Tensleep climbing areas depends on trails and staging areas

### ***Human and pet waste***

To address the human and pet waste issue in Ten Sleep Canyon, it is imperative that managed toilet facilities, pet waste stations, and waste disposal sites be available to the climbers and other visitors to Ten Sleep Canyon. Permanent vault toilets or annual porta-potty style facilities could be used to contain human waste. Pet waste stations and small garbage cans should be available at major parking areas and trailheads to reduce loose waste in the national forest.

### ***Dispersed Camping***

Access Fund and BCC encourage Bighorn National Forest to consider dispersed camping in a manner that allows climbers to maintain the opportunity to camp in primitive, dispersed settings while protecting natural resources. Dispersed camping is essential to forest visitors yet resource impacts can result from unmanaged camping. We recommend signage at sites that are closed for restoration.

### ***Justice, Equity, Diversity, and Inclusion (JEDI)***

Access Fund urges the Forest to work with the local community to advance inclusive and equitable access to Tensleep. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. We encourage the Forest to address environmental justice issues and make similar efforts to engage with communities of color and other underrepresented demographics. Access Fund has staff dedicated to JEDI issues, and is available to offer our time and resources to assist the Forest in applying JEDI principles to this climbing management plan project.

### ***Access Fund and LCO Assistance***

The climbing community, the Access Fund and the Bighorn Climbers Coalition are ready, willing,



and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the Forest may require to provide for the outstanding opportunities found in the Bighorn National Forest. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team program which helps maintain<sup>1</sup> climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of these comments. Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. Access Fund looks forward to continuing to work with the Forest. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 552-2843 or via email ([erik@accessfund.org](mailto:erik@accessfund.org)) to discuss this matter further.

Sincerely,



Erik Murdock, Access Fund policy director



Alex Green, Bighorn Climbers Coalition president

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<sup>1</sup> See <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant> and <https://www.accessfund.org/pages/conservation-team>

# Appendix A

## BCC DRAFT Rebolting Authorization Form

### Rebolting Proposal

Prior to any re-bolting on Forest Service land, this rebolting proposal is required to be submitted to the Forest Service at least 5 days before the proposed project date. The Forest Service will review the proposal to determine any administrative authorization for the rebolting of existing fixed-anchors. Rebolting of routes must be accomplished in a manner least destructive to the natural resource. When applicable: re-bolt hole for hole/bolt for bolt, do not add bolts unless the safety of the route is jeopardized due to lack of usable hardware. Removal of loose rock and minimal cleaning is required to conserve the safety and quality of routes on a regular basis, although any sort of manufacturing, "comfortizing" of holds on the established route is strictly prohibited. Removal of rock not in the immediate vicinity of the established routes applicable "climbing area" is prohibited. The rebolting of an area will occur within (30) days of submission of the rebolting proposal form. After completion of rebolting, a second "follow up" survey will be completed to confirm routes rebolted, the hardware used, and any necessary changes to the route, as well as potential safety concerns. This information will be recorded and shared with the public. Rebolters will be held liable for the risk of rebolting, as well as any prohibited actions are taken on the route (manufacturing, chipping, gluing).

### Contact Information

Name (Printed):

Date:

Signature:

Proposed Re-bolting Date(s) (Example: We will be rebolting within 30 days of June first, 2021, between the dates of June 1st and June 30th.):

Email:

### Area Description

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### Area Details:

Formation Name:

Proposed Routes Being Re-Bolted:

Safety Concern on Routes:



Number of Expected Bolts to be Placed:

Rebolting Proposal Follow Up Form

Following any re-bolting on Forest Service land, this rebolting proposal follow up form is required to be submitted to the Forest Service at least 10 days after the proposed re-bolting project is completed. Information on this form MUST be accurate. Re-bolters may be held liable for reporting false information, as well as any prohibited actions on the rebolted routes.

Contact Information

Name:

Date(s) of the project (Example: June 2021):

Email:

Submitted Rebolting Form Authorization Reference Number:

Area Description:

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Area Details:

Formation Name:

Number of Routes Rebolted:

Names of Routes Rebolted:

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Any changes made to the routes for safety reasons:

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For each route, please list the number of fixed anchors replaced, the type of hardware used, and any safety concerns still present.

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