



September 27, 2011

Powder River Ranger District  
Attn: Ten Sleep Climbers' Comments  
1415 Fort Street  
Buffalo, WY 82834  
[comments-bighorn@fs.fed.us](mailto:comments-bighorn@fs.fed.us)

**RE: Access Fund Comments to Proposed Ten Sleep Canyon Climbing Plan**

Forest Service Planners:

The Access Fund welcomes this opportunity to provide input regarding Bighorn National Forest's request for "Ten Sleep Canyon Climbing Comments." In the mid-1980s, Ten Sleep Canyon was relatively unknown to climbers until Stan Price discovered the area's potential for outstanding new climbing routes. Now, Ten Sleep is one of America's premier sport climbing venues with approximately 800 routes attracting local, regional, and international climbers. We provide these comments with the goal of assisting the USFS design and implement appropriate and effective climbing management for this special and popular climbing area.

**The Access Fund**

The Access Fund is the only national non-profit advocacy organization dedicated to keeping climbing areas open and conserving the climbing environment. We represent over 2.3 million climbers with five core programs performed on the national and local levels: Climbing Management Policy; Stewardship and Conservation; Local Support and Mobilization; Land Acquisition/Protection; and Education. We currently hold memorandums of understanding concerning climbing management/resource conservation with the National Park Service,<sup>1</sup> the Bureau of Land Management,<sup>2</sup> and your agency the United States Forest Service.<sup>3</sup>

The Access Fund compiles and publishes the largest list of wildlife related closures in the country. We work with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country,<sup>4</sup> and have hosted several national climbing management conferences attended by hundreds of land managers from across the country.<sup>5</sup> In many instances, climbers actively assist<sup>6</sup> land managers by maintaining trails, removing trash,<sup>7</sup> and help locate, monitor, and report on species of concern.<sup>8</sup>

For twenty years the Access Fund has worked with federal, state, and private entities in Wyoming and across the country to promote climbing access while protecting and preserving sensitive resources for future generations. The Access Fund understands the challenges

involved with developing a climbing management plan. Accordingly, we publish a 78 page manual titled *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*. Wyoming is one of our larger member states, and the Access Fund has the interest, experience, and resources necessary to help develop an effective climbing management plan for Ten Sleep Canyon. To learn more about the Access Fund, see [www.accessfund.org](http://www.accessfund.org).

Given the popularity of climbing at Ten Sleep Canyon now is the time for the USFS to develop a climbing management plan. The Access Fund is in a position to assist in a variety of ways:

- Provide detailed site specific climbing management recommendations in consultation with local Ten Sleep climbers;
- Provide grants/funds for qualified projects related to climbing access and conservation;
- Organize volunteers and stewardship projects via an Adopt-A-Crag event; and
- Connect resource managers with Ten Sleep's most active climbers for advice on critical management needs.

### **Ten Sleep Canyon Climbing Management**

As early as 2002, Ten Sleep's popularity was on the rise and the need for a climbing management plan was apparent. At that time the Access Fund had discussions with Trish Clabaugh (former Bighorn Recreation Planner) about what was needed at Ten Sleep in regards to climbing management planning and how we could help. We provided Ms. Clabaugh a copy of the *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan*,<sup>9</sup> suggested starting a Ten Sleep Adopt-A-Crag stewardship event, and recommended that if the USFS formally acknowledged the existing climber-trails in the *Bighorn National Forest; Revised Land and Management Plan*<sup>10</sup> the USFS could avoid duplicative and time-consuming NEPA analyses.

More recently (in January 2010) the Access Fund communicated to Craig Cope (Wilderness Recreation, Special Uses, Powder River Ranger District) and noted that because Ten Sleep is a high priority to the Access Fund our grant program that provides funding for climbing related projects may be appropriate for some aspects of USFS climbing management needs.<sup>11</sup> At that time, Mr. Cope's priority was West Ten Sleep and he anticipated the climbing management planning process to be on a 2 to 3 year horizon.

In our experience a successful climbing management plan does the following:

- Complies with statutory and internal agency guidelines.
- Articulates climbing as a recreational experience, and describes the variety of climbing opportunities and values.
- Identifies management alternatives that address climbing impacts in a manner that is consistent with best management practices used elsewhere.
- Builds cooperative relationships between climbers and resource managers.

- Provides management direction necessary to protect resources and provide climbing opportunities.
- Provides information about status and contextual importance of resources values (including climbing activity), and provides information about use patterns and effects of climbing on identified resource values.
- Implements any necessary restrictions incrementally from indirect measures (outreach and education) to direct measures (specific access trail and climbing route closures).

## **Ten Sleep Climbers**

Based on conversations with several climbers intimately familiar with Ten Sleep, the climbing management plan should focus on human waste, camping, parking, and trails. Peak climbing usage generally occurs in the warmer summer months (June-September) with weekends and the entire month of July being particularly active.

In response to the Bighorn NF's mandate to develop a climbing management plan,<sup>12</sup> concerned climbers are in the process of forming a Ten Sleep Canyon stewardship and conservation organization. The organization's mission is to work in cooperation with the Bighorn NF in developing a climbing management plan that both preserves the current climbing experience at Ten Sleep, while conserving the resource for future generations.

### *Human Waste/Camping*

These two issues are intertwined, currently most climbers camp at sites dispersed along Old Highway 16 and the Forest Service road next to Ten Sleep Creek. This free dispersed camping makes Ten Sleep special and is a major draw to climbers. Free dispersed camping options should continue and the associated impacts on the land and water can be managed by: identifying all camping sites currently in use; determine site specific maximum occupancy limits; use signage to educate users about regulations and low-impact camping practices.<sup>13</sup>

Mitigating human waste is critical to protecting the area and installing a toilet centrally located in relation to the dispersed camping<sup>14</sup> would address health and sanitation concerns. A second toilet located at the main climber parking area (Mondo Beyondo Wall) would also mitigate climbers' impacts. In addition to installing the two toilets, wag bags could be offered as an additional means for campers/climbers to minimize their impacts.

### *Bolting*

Developing climbing routes at Ten Sleep Canyon requires bolts because the dolomite offers few opportunities for removable/traditional protection. The sheer volume and quality of the established and potential routes makes Ten Sleep one of America's best sport climbing destinations. In the 1970s, development of Ten Sleep began with a few sets of top anchors and a couple of bolted routes. In the mid 1980's, Stan Price began developing Ten Sleep in earnest, by 1995 he had bolted 70-80 routes.

Between 1995 and today, a core group of dedicated climbers developed some 700 additional routes. Developing bolted routes is an expensive, time consuming, and labor intensive process. The ever increasing popularity of Ten Sleep is a testament to the skill and vision of the individuals developing routes at Ten Sleep. Bolting new routes and replacing hardware on older routes should be allowed to continue with little to no involvement of the Forest Service.

*Trails/Parking*

The existing trails climbers currently use to access the various crags at Ten Sleep are generally well-constructed and in appropriate locations. The network of existing trails certainly would benefit from improvements designed to minimize erosion and resource damage. The climbing community and the Access Fund are ready, willing, and able to help the Bighorn NF identify and improve the climber related trail system. Climbers regularly volunteer their labor to construct and maintain trails, and the Access Fund has a variety of resources that could be used to improve the trail system.

Parking only becomes an issue during peak usage. The main climbers' parking at Mondo Beyondo Wall and the parking area approximately 1000 yards up the road provide ample parking for climbers. However, once the main area gets full, climbers tend to park along the road instead of utilizing the upper parking area. Signage directing climbers to use the upper parking and/or expanding the main climber parking area would eliminate climbers parking too close to or along the road.

\* \* \*

Thank you for your consideration of climbing management at Ten Sleep Canyon. The Access Fund looks forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email ([rd@accessfund.org](mailto:rd@accessfund.org)) to discuss this matter further.

Best Regards,



R.D. Pascoe  
Policy Director  
The Access Fund

Cc: Brady Robinson, The Access Fund  
Jason Keith, The Access Fund  
Joe Sambataro, The Access Fund  
Alli Rainey  
Aaron Huey

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<sup>1</sup> See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/AF%20NPS%20MOU.pdf>

<sup>2</sup> See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/AF%20BLM%20MOU.pdf>

<sup>3</sup> See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/2009%20USFS%20MOU.pdf>

<sup>4</sup> See generally <http://www.climbingmanagement.org>

<sup>5</sup> *Id.*

<sup>6</sup> The Access Fund sponsors approximately 130 Adopt a Crag events annually across the country. Adopt a Crag—the Access Fund’s signature stewardship program—exists to unite local climbing communities in partnership with land managers to conserve local climbing areas. Adopt-a-Crag events typically include activities such as litter clean-ups, trail construction and restoration, erosion control, and invasive weed removal. See <http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000889/k.166C/AdoptaCrag.htm>

<sup>7</sup> In July 2011, the Access Fund launched a new Conservation Team that will spend ten months a year travelling the country addressing conservation issues.

<sup>8</sup> *Examples include:* Luther Rock, Lake Tahoe, CA; Pinnacles National Monument, CA; Eldorado Canyon State Park, CO, Jefferson County Open Space, CO; Acker Rock, OR.

<sup>9</sup> For an updated edition of our climbing management document, see

<http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

<sup>10</sup> See [https://fs.usda.gov/Internet/FSE\\_DOCUMENTS/fswdev3\\_009068.pdf](https://fs.usda.gov/Internet/FSE_DOCUMENTS/fswdev3_009068.pdf)

<sup>11</sup> See [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5023595/k.98A2/Grants\\_Program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5023595/k.98A2/Grants_Program.htm)

<sup>12</sup> “Inventory existing rock climbing routed including approach, associated trail locations, and human impact. Within 10 years, develop climbing management plans for two areas on the Forest where routed are established or are being established.” *Bighorn National Forest: Revised Land and Resource Management Plan*, Chapter 1, Goal 2-Multiple Benefits to People, Objective 2.a, Strategy 11.

<sup>13</sup> See Note 11. The Access Fund has a grant program and other various means for raising funds that can be used to implement and maintain aspects of the climbing management plan.

<sup>14</sup> For the July 4, 2011 weekend, local climbers rented port-a-potties and placed them off Old Hwy 16 near the main climber camping areas. This may be an appropriate location for a toilet that would be used by the majority of climbers camping in the area.