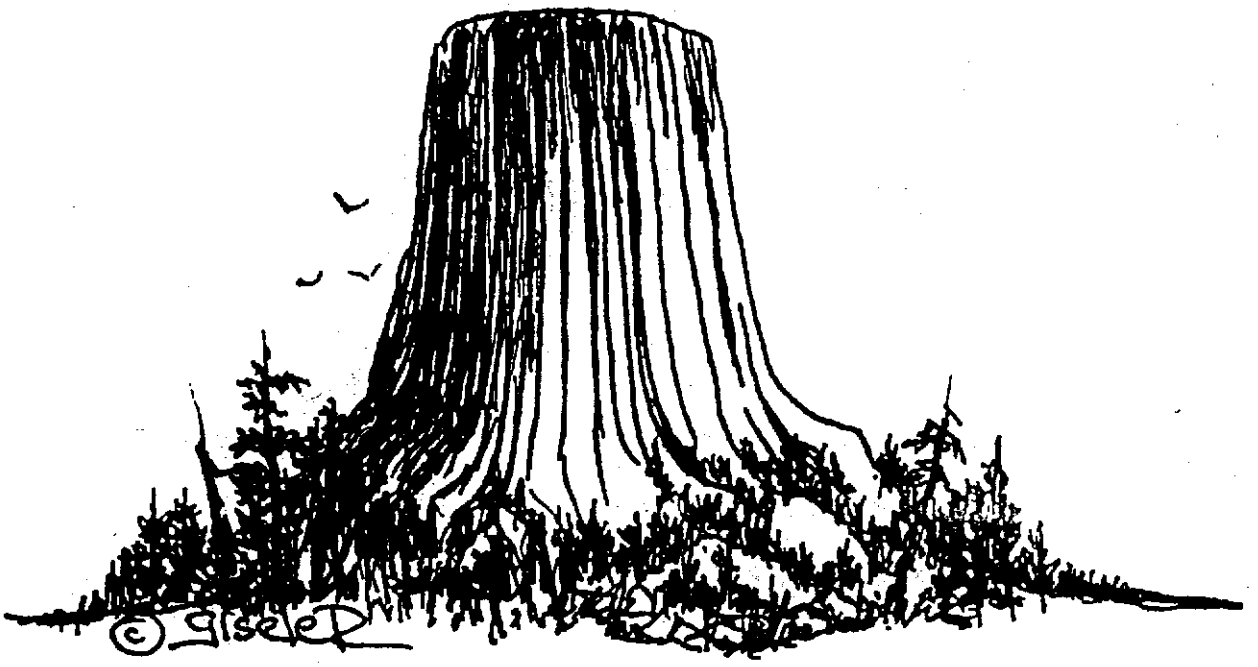
FINAL CLIMBING MANAGEMENT PLAN/ FINDING OF NO SIGNIFICANT IMPACT

February 1995



Devils Tower National Monument
Crook County, Wyoming

U.S. Department of the Interior National Park Service Rocky Mountain Region

Final Climbing Management/
Finding of No Significant Impact

Devils Tower National Monument
Crook County, Wyoming

This Final Climbing Management Plan (FCMP)/Finding of No Significant Impact (FONSI) for Devils Tower National Monument sets a new direction for managing climbing activity at the tower for the next three to five years. Its purpose is to protect the natural and cultural resources of Devils Tower and to provide for visitor enjoyment and appreciation of this unique feature. The tower will be managed as a significant natural and cultural resource. The National Park Service will manage Devils Tower as primarily a crack climbing site in such a way that will be more compatible with the butte's geology, soils, vegetation, nesting raptors, visual appearance, and natural quiet. Recreational climbing at Devils Tower will be managed in relation to the tower's significance as a cultural resource. No new bolts or fixed pitons will be permitted on the tower, though replacement of existing bolts and fixed pitons will be allowed. In this way, the NPS intends that there be no new physical impacts to Devils Tower.

In respect for the reverence many American Indians hold for Devils Tower as a sacred site, rock climbers will be asked to voluntarily refrain from climbing on Devils Tower during the culturally significant month of June. The monument's staff will begin interpreting the cultural significance of Devils Tower for all visitors along with the more traditional themes of natural history and rock climbing.

There are many benefits to the implementation of the FCMP. The environmental consequences of the FCMP will include increased protection for natural resources. No critical habitat for listed species will be negatively affected. Visitor experience will be enhanced by a more diverse and balanced interpretive program. In turn, improved communication and understanding among the monument's user groups will lead to greater respect and tolerance for differing perspectives.

The FCMP considered a full range of alternatives. In addition to Alternative D, the preferred climbing management plan, the other alternatives considered under the Draft Climbing Management Plan/Environmental Assessment (DCMP/EA) included: Alternative A, which allowed for virtually unlimited and unrestricted year around climbing and bolting, Alternative B, which proposed no change from current management, Alternative C, which proposed phasing in a voluntary June closure to climbing over three years and allowing for regulated new bolting, Alternative E, which included a mandatory June closure to climbing and prohibiting any placement of bolts, and Alternative F, which proposed to immediately close the tower to all climbing year around and called for the removal of all climbing gear from the tower. The official 90-day review period for this document ended on October 31, 1994. For further information about this document, contact Deborah O. Liggett, Superintendent, George L. San Miguel, Chief of Resources Management, or Jim Schlinkmann, Chief Ranger, at:

Devils Tower National Monument
Post Office Box 10
Devils Tower, WY 82714-0010

U.S. DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

FINAL CLIMBING MANAGEMENT PLAN/FINDING OF NO SIGNIFICANT IMPACT

DEVILS TOWER NATIONAL MONUMENT
CROOK COUNTY, WYOMING

SUMMARY

BACKGROUND

The unique geological formation known as Devils Tower annually draws nearly half a million visitors. Most visitors enjoy photographing the butte, hiking area trails, camping, picnicking, and wildlife viewing. A few thousand technical rock climbers annually travel from across the country and the world to scale the butte's nearly vertical cracks and columns. Devils Tower also is a sacred site to several American Indian peoples of the northern plains. Increasingly, American Indian groups travel to the monument to perform traditional cultural activities. Devils Tower has been determined eligible for inclusion to the National Register of Historic Places as a traditional cultural property.

Recreational climbing at Devils Tower has increased dramatically from 312 climbers in 1973 to over 6,000 annually. New route development in the last ten years resulted accelerated route development and bolt placement. Today the tower has about 220 named routes. Approximately 600 metal bolts are currently embedded in the rock along with several hundred metal pitons. Devils Tower is world famous for its crack climbing, which depends primarily on removable protection placed by climbers in cracks.

Activities performed by the numerous climbers on the tower during the spring through fall climbing season have affected nesting raptors, soil, vegetation, the integrity of the rock, the area's natural quiet, and the rock's physical appearance. Some American Indians have complained that the presence of climbers on the sacred butte and the placement of bolts in the rock has adversely impacted their traditional activities and seriously impaired the spiritual quality of the site.

ISSUES

In response to the many climbing issues at Devils Tower, the National Park Service began preparing a Draft Climbing Management Plan (DCMP)/Environmental Assessment (EA) in 1992. The DCMP's preferred alternative and five other alternatives addressed the monument's objectives to: 1) preserve and protect the monument's natural and cultural resources for present and future generations, 2) manage recreational climbing on the tower, 3) increase visitor awareness of American Indian beliefs and traditional cultural practices at Devils Tower, and 4) provide the monument with a guide for managing climbing use that is consistent with National Park Service management policies and other management plans at Devils Tower National Monument.

THE PREFERRED ALTERNATIVE AND THE OTHER ALTERNATIVES

The No Change Alternative and five other alternatives, including the Preferred Alternative, were analyzed in the DCMP. The anticipated effects of the alternatives informed management and the public of the potential impacts of the different strategies. The No Change Alternative was described in detail to provide a baseline from which the reader could respond to the issues and proposals. The other alternatives provided different management options that answered the above listed objectives with varying levels of success.

All proposed alternatives contained some common elements including: 1) developing a long-term resources monitoring program that will include conducting a Visitor Education and Resource Protection plan, 2) a cross-cultural education program that will interpret all historic uses of the monument, 3) revising the climber

registration cards, 4) promoting responsible and ethical climbing practices, and 5) completing the identification, evaluation, and nomination procedures for significant cultural resources, 6) incorporate the NPS service-wide climbing regulations.

Alternative A offered essentially unregulated climbing on the tower and allowed the greatest variety of climbing activities among the alternatives. Climbers would have been able to drill and hammer new bolts and pitons wherever and whenever they pleased. Mandatory climber registration would have ended. Both crack and face climbing use would have likely continued to grow. All types and colors of climber equipment would have been permitted on the rock. Only routes near raptor nest sites would have been closed during the nesting season and only after climbers reported finding the nest. Climbers would have been able to camp overnight on the tower.

Alternative B was the No Change Alternative. It would have been a continuation of the status quo in climbing management at Devils Tower. Climbers would have continued to climb year around by simply registering with the monument. Unlimited drilling of bolts and hammering of new pitons would have continued. Both crack and face climbing use would have continued to grow. All types and colors of climbing equipment would have been allowed on the butte. Only routes near raptor nest sites would have been closed during the nesting season and only after climbers reported finding the nest. Camping on the tower would still have been prohibited.

Alternative C contained many of the same elements as alternative D with some exceptions. As in Alternative D, under Alternative C, climbers would have been asked to voluntarily refrain from climbing on Devils Tower during the month of June. During the first year under Alternative C, however, the voluntary closure would have lasted one week. During the second year under Alternative C the closure would have lasted two weeks. Not until the third year (1997) would the voluntary closure have persisted through the whole month of June. Placement of bolts on the tower would have required separate registration or a permit. In order to better allow for free raptor nest site selection, climbing levels in March and April would not have been allowed to exceed current levels. Once climbers reported a raptor nest, routes within 50 meters of the confirmed raptor nest would have been closed for the duration of the nesting season.

Alternative D was the Preferred Alternative. With some minor modifications from the DCMP, it is the basis for the Final Climbing Management Plan (FCMP). Under the FCMP the voluntary June closure to climbing on Devils Tower will begin in 1995. The closure will immediately last the whole month of June. The 30-day closure could become mandatory if judged not successful. The determination of success for the voluntary June closure will take place after a three to five year evaluation period. No new bolts or fixed pitons will be allowed on the tower,

though replacement of existing bolts and fixed pitons could occur through a registration system (the language on pitons was not part of the DCMP). Rehabilitation of access trails and summit trails will help mitigate damage to soil and vegetation. Only camouflaged climbing equipment will be left on the tower and the leaving of webbing on the tower will be phased out. NPS personnel will identify falcon nest sites early in spring. Once an occupied nest is located, climbing routes within view of the nest site, or approximately 50 meters on either side of the nest, will be closed for the duration of the nesting season. In order to reduce stress to the adult falcons during the courtship and nest establishment period, the area around previously used nest sites will be closed each March 15. The closure are will be adjusted to cover the occupied nest sites once they are located by monument staff. In the DCMP, this element had been essentially the same as what was in Alternative C, but was changed to make it more effective and manageable.

Alternative E would have required a mandatory June closure to climbing on Devils Tower beginning in 1995. No new bolts or the replacement of existing bolts would have been permitted. Approach trails to the tower would have been developed, signed, and maintained. No ropes would have been allowed to be left on the tower. All other equipment would have been well camouflaged. The use of chalk and rosin by climbers would have been prohibited. All of Devils Tower would have been closed to climbing in March and April or until NPS employees located the falcon nest site(s). Once the nest was located, all climbing routes within 100 meters of the nest would have remained closed through the remainder of the nesting season.

Alternative F would have permanently closed Devils Tower to all climbing beginning in 1995. All bolts, pitons, and other climbing gear would have been removed from the tower. All trails to and on the tower would have been rehabilitated to a more natural condition.

ENVIRONMENTAL CONSEQUENCES

The potential environmental consequences of all the alternatives, including the Preferred Alternative, were addressed in the DCMP. Impact topics included geology, wildlife, soils and vegetation, natural quiet, visual aesthetics, and ethnographic, historic, and archeological resources.

Implementation of the Preferred Alternative under the FCMP will: improve the monument staff's knowledge of visitors, natural and cultural resources, and impacts to those resources; reduce physical impacts to the tower rock; improve the opportunity for prairie falcons to successfully nest on the tower; reduce soil erosion; reduce impacts to vegetation; reduce noise and visual impacts on the

tower; increase climber awareness of their resource impacts; encourage climber participation in mitigating resource impacts caused by climbing activities; and improve the level of cultural awareness and sensitivity among all monument visitors while reducing the potential for conflict by instilling mutual respect for different cultural perspectives. Adverse impacts will be few or of limited duration. Some recreational climbing activities will end and others will be curtailed during a part of the year. Additional NPS staff will be required to fully implement this plan.

REVIEW OF THE DRAFT CLIMBING MANAGEMENT PLAN

Approximately 1,200 copies of the plan were disseminated during the public comment period which ran from the date of release, July 15, 1994, to October 31, 1994. Late comments were accepted through November 9, 1994. A total of 286 letters and two petitions were received. All parties on the monument's DCMP mailing list, including those listed under "Consultation and Coordination," received a copy. Through the summer and fall of 1994, anyone who asked for a copy of the plan received one.

During the public comment period, six public meetings were held in the local and regional area. About 200 people attended the meetings. Public comments were recorded at each meeting.

1) August 27, 1994 - St. Paul, MN - 50 people
2) September 6, 1994 - Gillette, WY - 52 people
3) September 7, 1994 - Rapid City, SD - 41 people
4) September 8, 1994 - Denver, CO - 12 people
5) September 9, 1994 - Laramie, WY - 27 people
6) September 10, 1994 - Pine Ridge, SD - 14 people

All agency responses to substantive public comments from all meetings and letters are listed at the back of this document, the Final Climbing Management Plan (FCMP), as an attachment to the Finding of No Significant Impact (FONSI).

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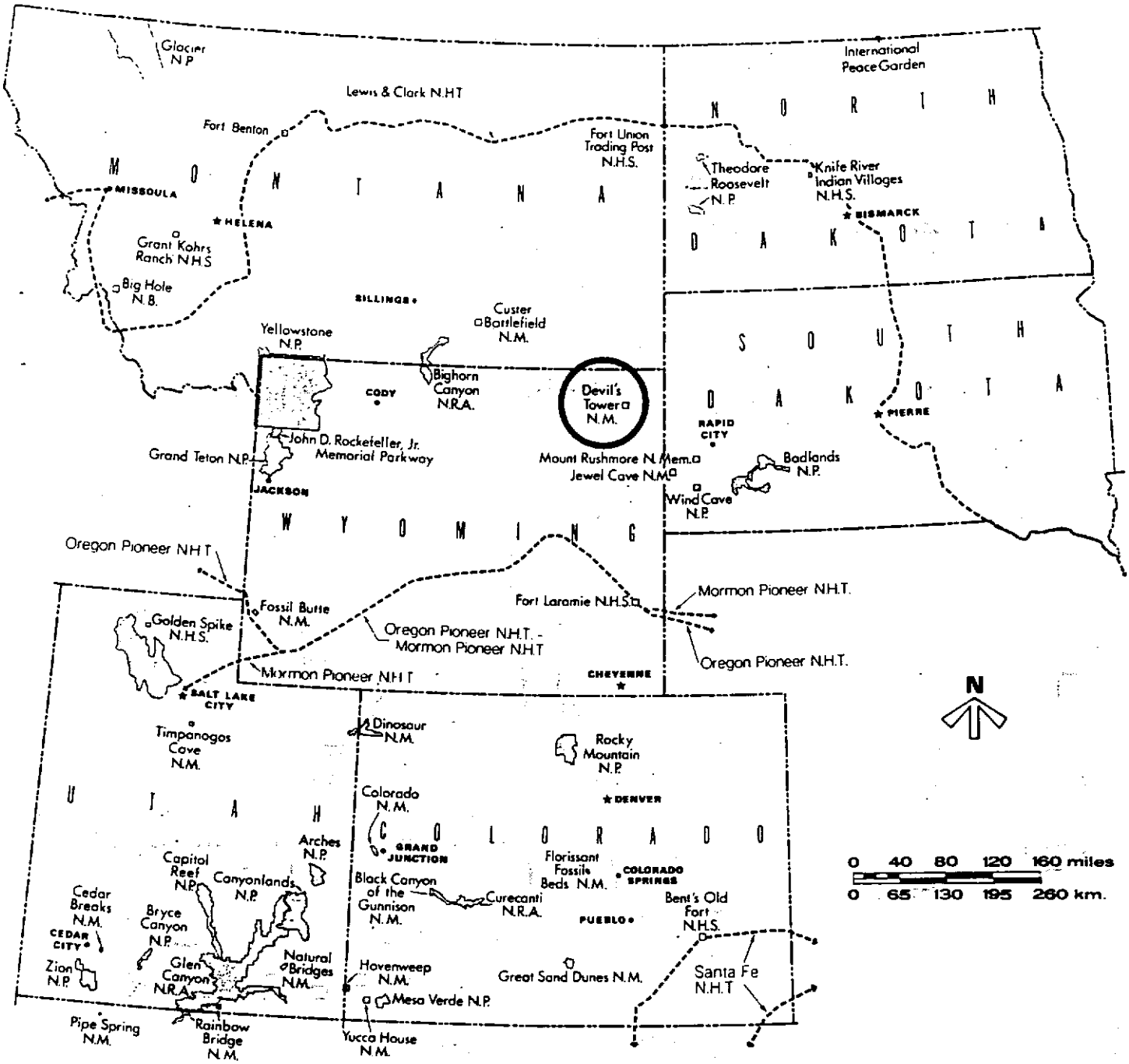


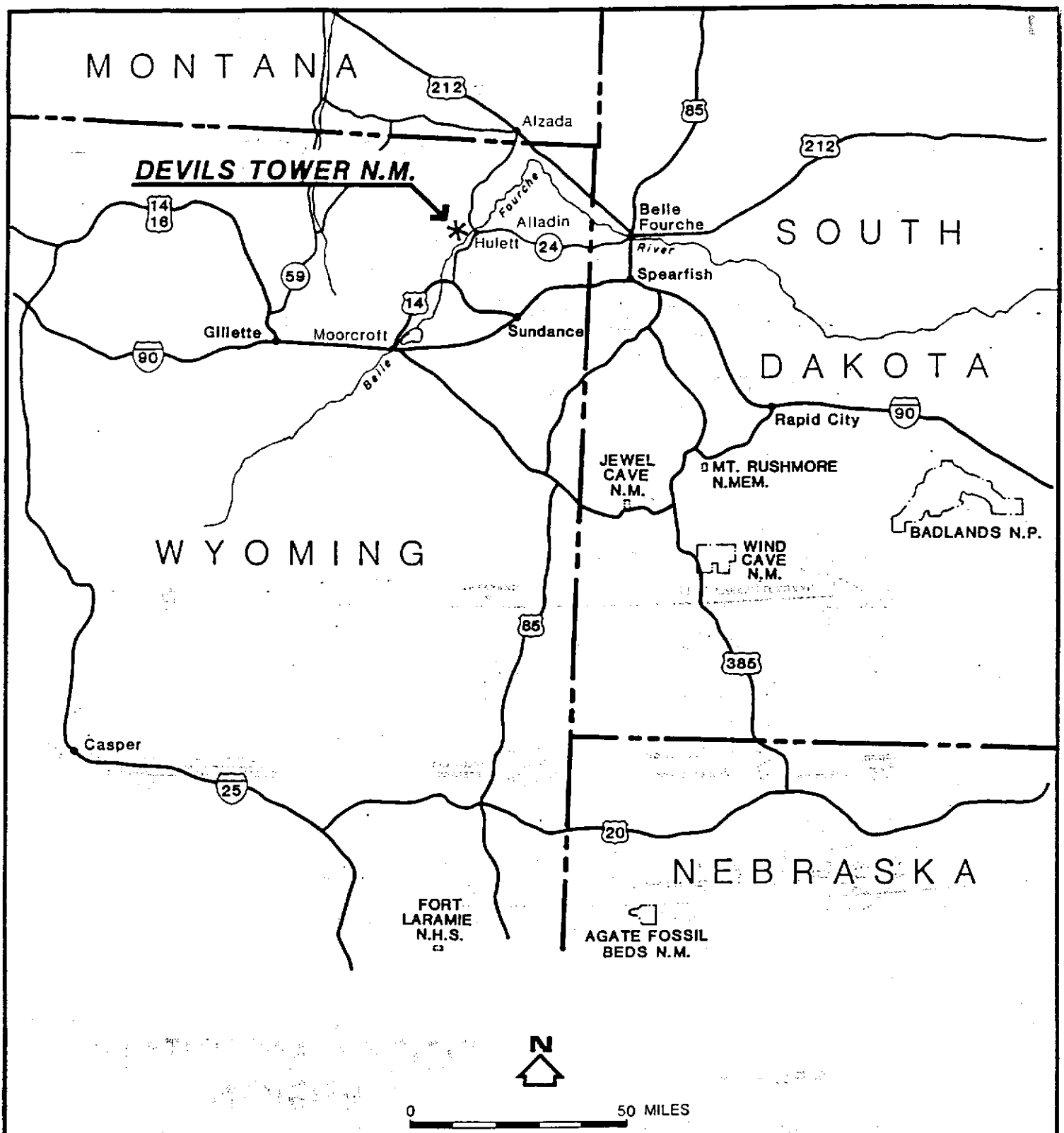
Legend

- Locations of Major Cities
- Locations of State Capitals
- State Boundary Lines
- National Park Service Areas
- National Park Service Historical Trails

ROCKY MOUNTAIN REGION

National Park Service

United States Department of the Interior



Vicinity Map

Devils Tower National Monument

United States Department of the Interior – National Park Service

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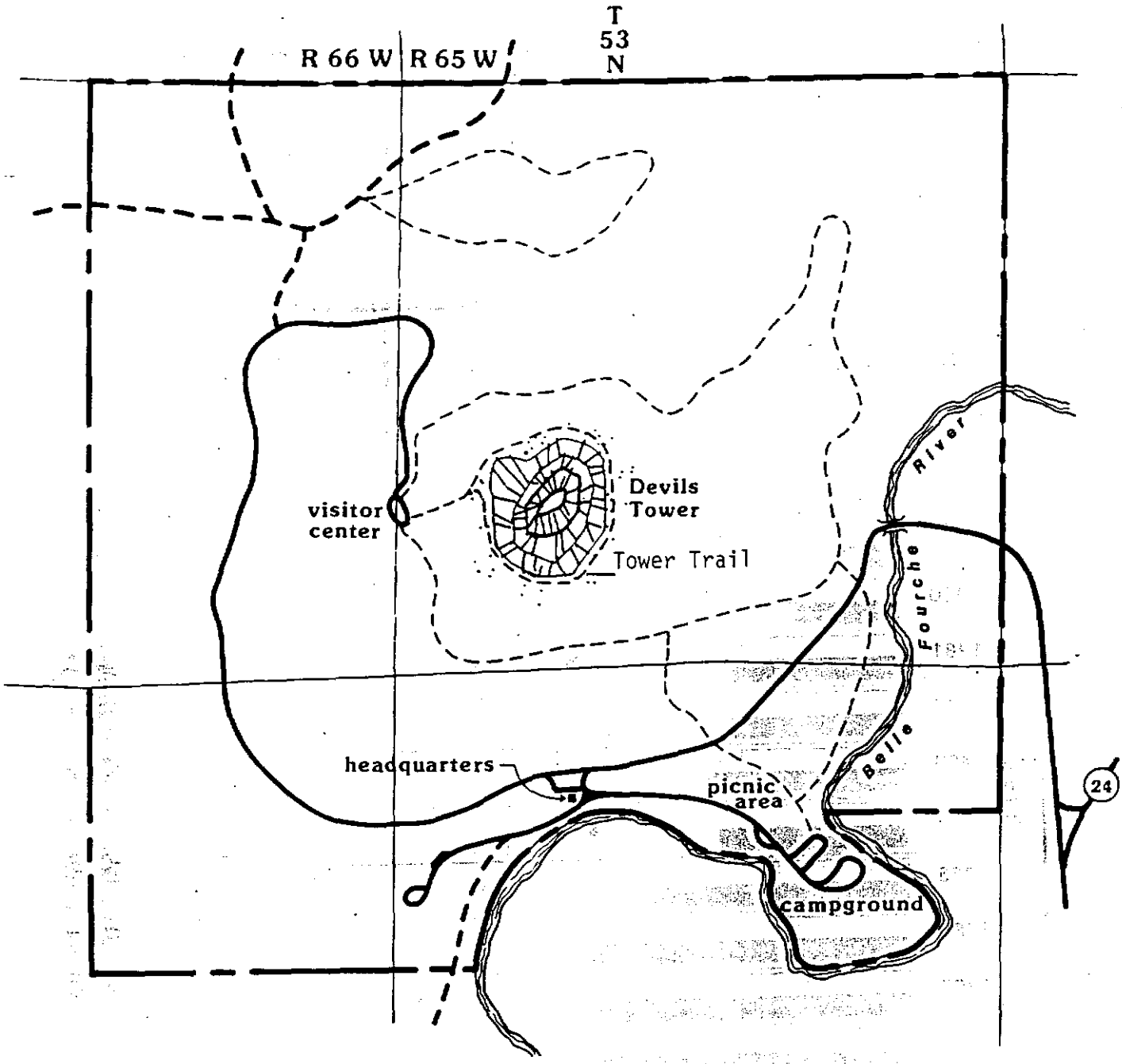

legend

- national monument boundary
- paved road
- unpaved road
- trail

N

0 1/4 1/2 mile

Boundary Map

Devils Tower National Monument

U.S. Dept. of the Interior - National Park Service

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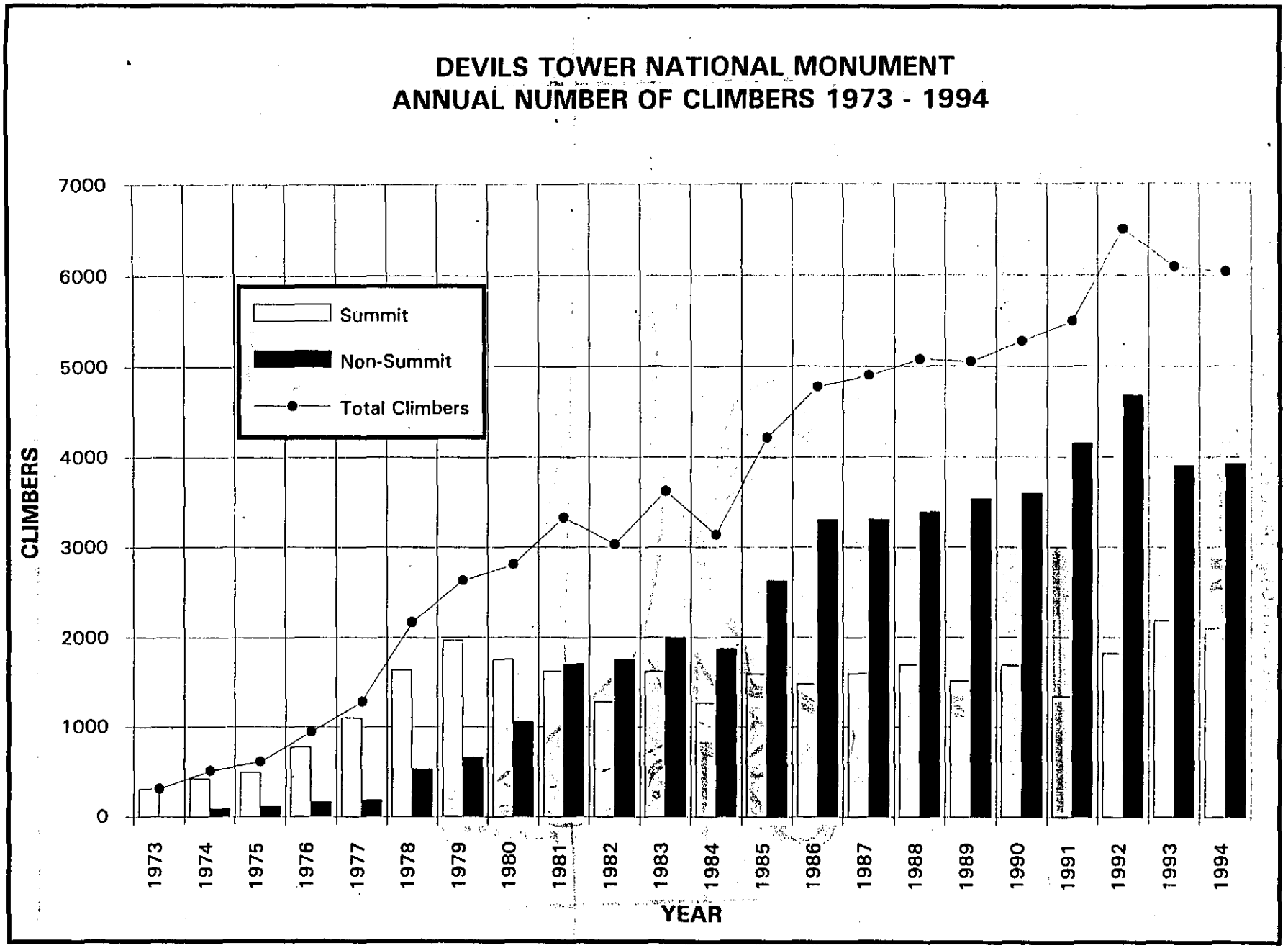
DEVILS TOWER NATIONAL MONUMENT
ANNUAL NUMBER OF CLIMBERS 1973 - 1994
CLIMBERS
7000
6000
5000
4000
3000
2000
1000
0
Summit
Non-Summit
Total Climbers
1973
1974
1975
1976
1977
1978
1979
1980
1981
1982
1983
1984
1985
1986
1987
1988
1989
1990
1991
1992
1993
1994
YEAR

PURPOSE AND NEED FOR THE PLAN

INTRODUCTION

There is a long history of recreational climbing activity on the butte known as Devils Tower. The first known recorded climb occurred in 1893 by William Rogers and Willard Ripley, who built a stake ladder up one of the tower's cracks. In 1937 the first free climb (using alpine mountaineering techniques) was made. In 1992 the tower had 164 established free routes and 26 aid routes. The latest published climbing guide for Devils Tower listed about 220 named routes (Guilmette, Carrier, and Gardiner 1995). Climbing on the tower has increased from three climbers in 1937 to a high of 6,505 climbers in 1992.

This increase in activity, coupled with new direction in National Park Service (NPS) policy, prompted the preparation of the Draft Climbing Management Plan (DCMP)/ Environmental Assessment (EA) to analyze the effects of the alternatives considered. The NPS at Devils Tower began the planning process for the development of the DCMP in September of 1992 by contacting representatives from American Indian, climbing, environmental, and county interests to assemble a work group. This work group, monument and regional office staff, and the general public provided input to the DCMP/EA.

Approximately 1,200 copies of the DCMP were disseminated during the public comment period which ran from the date of release, July 15, 1994, to October 31, 1994. Late comments were accepted through November 9, 1994. A total of 286 letters and two petitions were received. All parties on the monument's DCMP mailing list, including those listed under "Consultation and Coordination," received a copy. Through the summer and fall, anyone who asked for a copy of the plan received one.

During the public comment period, six public meetings were held in the local and regional area. About 200 people attended the meetings. Public comments were recorded equally at each meeting. Informational meetings were held in St. Paul, Laramie, and Pine Ridge where monument representatives fielded questions as a group and recorded comments from the whole audience. Formal public meetings were held in an open house format in Gillette, Rapid City, and Denver where monument representatives set up three information stations to answer questions and record comments from the public as they moved from station to station.

1) August 27, 1994 - St. Paul, MN - 50 people
2) September 6, 1994 - Gillette, WY - 52 people
3) September 7, 1994 - Rapid City, SD - 41 people
4) September 8, 1994 - Denver, CO - 12 people
5) September 9, 1994 - Laramie, WY - 27 people
6) September 10, 1994 - Pine Ridge, SD - 14 people

All agency responses to substantive public comments from all meetings and letters are listed at the back of this document, the Final Climbing Management Plan (FCMP), as an attachment to the Finding of No Significant Impact (FONSI). Refer to Appendix C, for a glossary with definitions of terms used in this document.

LEGAL AND ADMINISTRATIVE CONSIDERATIONS

The 1,347-acre Devils Tower National Monument, located in Crook County, Wyoming in the northeast corner of the state (see location map), was established under Presidential Proclamation No. 658, Stat. 3236 on September 24, 1906. The proclamation states:

> ...the lofty and isolated rock known as 'Devils Tower', situated upon the public lands owned and controlled by the United States is such an extraordinary example of the effect of erosion in the higher mountains as to be a natural wonder and an object of historic and great scientific interest and it appears that the public good would be promoted by reserving this tower as a National Monument...
>
> ...warning is hereby expressly given to all unauthorized persons not to appropriate, injure or destroy any feature of the natural tower...

Further guidance can be found in the act of 1916 establishing the National Park Service. Known as the NPS Organic Act, this law identifies the overall purpose for parks, monuments, and reservations:

> ... which is to conserve the scenery and the natural and historic objects and the wild life [*sic*] therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. (16 U.S.C. §1)

That purpose was later expanded as follows:

> ...That authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values for which these various areas have been established...(16 U.S.C. §1a-1)

National Park Service *Management Policies* recognize rock climbing as a legitimate recreational and historical activity in the park system (NPS 1988). The policies also provide that the activities may be regulated by restrictions and that activities will not be allowed if they involve or result in:

inconsistency with the park's enabling legislation or proclamation, or derogation of the values or purposes for which the park was established,

unacceptable impacts on visitor enjoyment due to interference or conflict with other visitor use activities,

consumptive use of park resources (does not apply to certain traditional activities specifically authorized by NPS general regulations),

unacceptable impacts on park resources or natural processes,

unacceptable levels of danger to the welfare or safety of the public, including participants. (8:2, NPS 1988a)

American Indian people have expressed concern over the management of climbing on the tower, which they revere as a sacred site. The American Indian Religious Freedom Act of 1978 states:

> ...it shall be the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites... (42 U.S.C. §1996)

Other federal laws applicable to the FCMP include: Antiquities Act; Historic Sites, Buildings, and Antiquities Act; National Historic Preservation Act; National Environmental Policy Act; and the Endangered Species Act.

CLIMBING HISTORY

In 1875 Lieutenant Colonel Richard Irving Dodge described the tower as "An immense obelisk of granite....Its summit is inaccessible to anything without wings. The sides are fluted and scored by the action of the elements, and immense blocks of granite, split off from the column by frost, are piled in huge, irregular mounds about its base." (Gardiner and Guilmette 1986)

Devils Tower's climbing history dates back to the late 1800s. In 1893 local ranchers Willard Ripley and William Rogers organized the construction of a stake ladder up on the tower. The continuously vertical crack in which native oak, ash, and willow pegs were placed is on the southeast side of the tower. The 350-foot ladder was built up to the current "Meadows" area. The remaining 175 feet was a hard scramble to the summit, which was accomplished by Ripley prior to the

inaugural climb by Rogers on July 4, 1893. The climbing event attracted nearly 3,000 people who ate, drank, and bought pieces of the American flag placed on the summit. This first commercial advertisement of the tower brought Ripley and Rogers approximately $300 for the day. (Gardiner and Guilmette, 1986)

The ladder was last climbed in 1927. The lower 100 feet of the ladder was then removed for visitor safety. Today the upper 250 feet remain as a memorial to the first recorded ascent of the tower. In 1994 the remaining stake ladder was determined to be eligible for listing on the National Register of Historic Places.

Many American Indian tribes of the northern plains refer to the tower in their legends and consider it a sacred site. American Indian oral traditions have passed on several accounts of Indians who have climbed the tower as part of a ritual ceremony. There is no written documentation that such climbing has occurred at Devils Tower.

In 1937 the first ascent of the tower summit by modern rock climbing technique was accomplished by Fritz Wiessner, Lawrence Coveney, and William P. House. This was the first recorded technical climb on the tower. The classic Durrance route, which has been used by a majority of tower climbers, especially first-time tower climbers, was established in 1938 by Jack Durrance and Harrison Butterworth. Only one route was established in the 1940s. From 1037 to 1973, 51 routes were established on the tower, all of which reached the summit. The total number of climbers to reach the tower summit in 1973 was 312.

Monument statistics reveal that in 1974 shorter climbs that did not reach the summit began to occur. By 1981 the number of non-summit climbers (1,700) exceeded the number of summit climbers (1,624). This trend has continued to the present. During the 1980s, 117 new routes were established on the tower. Today there are approximately 220 named climbing routes on Devils Tower and over 6,000 annual climbers. Through 1994, there have been 34,452 recorded climbers on Devils Tower.

CURRENT CLIMBING USE AND MANAGEMENT

The monument's average annual visitation from 1989 through 1994 was 433,233. The average number of climbers for the same period was 5,742 per year. Climbers accounted for approximately 1.3 percent of the annual visitation over the past six years. The climbing season generally runs from spring through early fall, however, all months of the year may provide weather suitable for climbing.

Climbing at Devils Tower is a recreational activity. Various motivations for climbing have been advanced among recreational climbers. Many climbers enjoy

the physical challenge, others have expressed a sense of psychological or even spiritual satisfaction, while others simply want to see what is on top and enjoy the view. According to oral tradition, some American Indians have climbed the tower for traditional spiritual purposes, such as a vision quest.

Climbers the world over consider Devils Tower a premier crack climbing area. Tower columns range from three to six sides and cracks formed where individual columns are separating. Some of the faces between cracks also provide climbing opportunities. Face climbing has become increasingly popular at the tower. Aid climbing with pitons is a traditional, but diminishing form of climbing at Devils Tower.

There are various forms of climbing activities that take place at the monument. All climbing activities above the boulder field require registration with a park ranger before and after climbing. Climbing activities are generally classified into three different categories. There is (1) the technical climber who ascends to the summit, (2) the technical climber who may complete a route or part of a route that does not ascend to the summit, and (3) the non-technical hiker/climber who scrambles above the boulder field to the base of the tower. Non-technical hiker/climbers who register and hike above the boulder field have been counted as climbers in the past. Hiker/climber impacts are not quantified, but will be monitored in the future as part of an overall impact monitoring program. As defined in this plan, a climber is a visitor who ascends an established and recognized route on the tower by means of technical ability and equipment.

The average annual number of climbers for the last six years was 5,742. About two thirds of these climbers choose to climb routes that do not reach the summit. The highest all-time yearly use occurred in 1992 with 6,505 climbers (see Annual Number of Climbers figure). The heightened popularity of sport climbing has likely led to some of the short route and face route establishment.

A 1992 study of registration cards by the monument's resource management staff indicated the following:

- The Durrance route is the most popular climb and had received 16,810 climbers, followed by Soler with 4,435 climbers.

- Overall, three-fourths of the routes on the tower have been climbed very few times.

- 80 percent of the total climbs on the tower have occurred on only 23 different routes.

The registration cards provide only approximate use of the tower and statistics may be underestimated due to some non-reporting, inaccurate reporting, illegible reporting, and missing registration cards (NPS 1993a).

Monument investigations indicate there were 164 established free climbing routes and 26 aid climbing routes on the tower as of 1992. The same study developed a method to estimate the climbed surface area of the tower, which roughly translates to about 14 percent of the total surface area. Not all areas over this 14 percent of the tower surface are equally influenced by climbing. On this 14 percent of the tower there are 580 bolts (NPS 1992). Several additional bolts have been placed on the tower since 1992. There are several hundred pitons on the tower. Also, the number of named climbing routes has increased to about 220 as of 1994.

There are five main approach trails used by climbers; the Durrance, west face, south/east face, northeast face, and the north face/northwest shoulder. Also, there are five main rappels off the tower; the Durrance, Meadows, summit (two on south-southeast edge), and the Bon Homme. Many other secondary rappel routes have been established by local climbers. None of the approaches or rappels are signed or maintained by the NPS.

In 1994 there were seven authorized commercial climbing guide companies operating in the monument under the management of NPS commercial use licenses.

The current policy under Title 36 of the *Code of Federal Regulations* (CFR) §7.30 requires every climber above the boulder field to register with a ranger before and after their climbing activities for the day. Climbers must report how many people are in their party, which route was used, and whether the ascent reached the summit or not. Any visitor may register to climb and climbers may climb any route they wish except those closed to protect nesting raptors and the route of the historic stake ladder.

The 1994 Compendium of Superintendent's Orders for Devils Tower National Monument established under the provisions of 16 U.S.C., Section 3 and Title 36, Code of Federal Regulations, Chapter 1, Parts 1-7 listed the following regulations pertaining to climbing:

Section 1.5 Closures and public use limits.

(a)(1) The following areas are closed to public entry:

3. The Old Stake Ladder Route on the tower
   closed year around
4. Falcon nesting areas on the tower
   closed when falcons are nesting

Section 1.6 Permits

In accordance with 36 CFR §1.7(b) the following activities require special permits:

2.1(a)(5) Installation of climbing bolts on the tower
7.30(a) Climbing

Section 2.1 Preservation of Natural, Cultural & Archeological Resources

(a)(5) Rock Climbing

The following climbing activities are prohibited:

1. The operation of a power drill or motorized equipment used to support the placement of climbing aides or otherwise to directly support a climb.

2. The gluing or chipping of rock, or the gluing, affixing, or placement of artificial hand holds on rock, or other damaging practices such as forcibly prying off rock or destroying vegetation to enhance a route.

3. Leaving fixed climbing ropes unattended on the tower.

The following climbing activity requires a permit issued by the superintendent or his or her designee. Conditions for this activity will be listed on the permit.

4. Installation of climbing bolts on the tower. The tower includes the southwest shoulder area below the southwest buttress.

OBJECTIVES

The climbing management objectives for Devils Tower National Monument are:

- To preserve and protect the monument's natural and cultural resources for present and future generations.

- To manage recreational climbing on the tower.

- To increase visitor awareness of American Indian beliefs and traditional cultural practices at Devils Tower.

- To provide the monument with a guide for managing climbing use that is consistent with NPS management policies and other monument management plans.

ISSUES ADDRESSED IN THE PLAN

Issues were developed through five scoping-type meetings with the climbing management plan work group. In September of 1992, Devils Tower notified groups that would be interested in the monument's development of a climbing management plan. Devils Tower approached different organizations that collectively represent a broad range of interests. The monument invited organizations to participate on a special work group and let each organization pick their individual work group members. The five work group meetings were held in Hulett, Wyoming in April 1993, Denver, Colorado in May and August 1993, Gillette, Wyoming in October 1993, and Denver, Colorado in April 1994. The work group identified issues and assisted the NPS in initial public scoping.

A more complete understanding of the issues was developed through the public comment process. Public comment was generated through the release of about 1,200 copies of the DCMP. During the summer of 1994, an informational handout on the draft climbing management plan was made available to the general public. Information requests were answered through the mail and over the telephone. Several nation-wide newspaper, magazine, radio, and television news stories further distributed information about the climbing issues and announced the availability of the plan. Additional input was received in six public meetings where public comments were recorded. Nearly 300 letters were received during this period. All agency responses to substantive public comments from all meetings and letters are listed at the back of this document, the Final Climbing Management Plan (FCMP), as an attachment to the Finding of No Significant Impact (FONSI). The major issues this plan addresses follow below.

Ethnographic Importance of the Tower

Some American Indians perceive climbing on the tower and the proliferation of bolts, pitons, slings, and other climbing equipment on the tower as a desecration to their sacred site. It appears to many American Indians that climbers do not respect their culture by the very act of climbing on the tower. Climbing during traditional ceremonies and prayer times is a sensitive issue as well. Elders have commented that the spirits do not inhabit the area anymore because of all the visitors and use of the tower, thus it is not a good place to worship as before.

The Dakota, Nakota, and Lakota Nations held a meeting in June, 1993 a developed the Summit V Resolution No. 93-11. The purpose of the mee to "support and demand tribal participation in the protection and decisio sacred sites." The following are portions of the resolution that relate to Tower.

> WHEREAS, the Dakota, Lakota, Nakota spiritual teaching has alwa included the MEDICINE WHEEL in Wyoming, DEVILS TOWER in Wy BEAR BUTTE in South Dakota, and HARNEY PEAK in South Dakota primary and significant sites to our religion, and...
>
> WHEREAS, the DEVILS TOWER has been subjected to similar dama an onslaught of rock climbers and now has hundreds of steel pins p into the face of this Sacred Site, and...
>
> WHEREAS, these sites and many others are vital to the continuation traditional beliefs and values, and
>
> WHEREAS, it is our legacy to protect these sites for the future gener so they too, may be able to enjoy these holy places for prayer and revitalization of Mother Earth, now...
>
> BE IT FURTHER RESOLVED, that this assembly does not support effor Federal Land Managers to allow further destruction to these Sacred Si tourists, hikers or rock climbers. (Dakota, Lakota, and Nakota Nations 1993)

In 1991 an ethnographic overview and assessment was completed for Devils Tower (Hanson and Chirinos 1991). Recommendations to the NPS included

> Nominate the tower and Sun Dance grounds to the National Register o Historic Places; prohibit people from climbing on the tower; allow Lak cut the center pole for the Sun Dance from monument property if ther would be no adverse affect on monument resources; encourage park not to remove or disturb prayer bundles or other offerings; include the protection and preservation of ethnographic resources in future manag statements and plans; subject to consent of the tribes, give the tower more ethnographically appropriate name.

In 1994 Devils Tower and the area within the loop of the Tower Trail were determined eligible for listing on the National Register of Historic Places as a traditional cultural property.

Geology and Integrity of the Rock

The volcanic formation called Devils Tower was considered such a highly significant geologic resource that it warranted its establishment as America's first national monument. The preservation of the rock and its associated resources is a primary monument goal. Any impacts to the rock surface are of paramount concern to the NPS.

Activities that scar or deface the rock include:

- the placement and removal of pitons and bolts
- the intentional chipping or gluing of hand and foot holds to enhance a route
- the intentional, forceful removal of rocks and vegetation to enhance a route
- the unintentional removal of rocks by hand, foot, or use of climbing equipment

Wear will occur on the rock due to repeated climbs on particular routes. Intentional enhancement of routes by chipping holds or removing rocks or vegetation is not allowed. These actions constitute damage to natural resources and are prohibited under 36 CFR §2.1a.

Bolts and Pitons

Bolt and piton placement causes permanent damage to the rock surface. Bolts, however, are necessary for safe climbing, especially on the tower where the only safe option for a descent is to rappel. Of the 580 known bolts on Devils Tower as of 1992, 274 are single bolts, and 306 are part of anchor systems. An anchor system on the tower is usually comprised of two bolts and two chains or slings used for belaying and rappelling. An inventory and analysis study of the tower revealed that the entire tower has approximately one bolt per 169 square meters (NPS 1992).

The first piton was hammered into the rock in 1937 during the first ascent of the Wiessner route. It is not known how many fixed pitons exist on the tower at this time, but it is estimated to number in the hundreds. The Durrance and Meadows rappel anchors were installed by the NPS in the 1960s and 1970s. The use of bolted rappel stations is essential for safe descent off the tower. Most descent routes use these stations.

The maintenance of pitons, bolts, and anchor systems is the responsibility of the climbing community. The wear and need for replacement of climbing hardware varies according to an area's climate, quality of rock, the amount of use the particular bolt or anchor system receives, the quality of hole drilled and placement of the bolt, and the quality of the bolt. Areas that receive much rain and sites that experience frequent freeze and thaw activity will require more frequent bolt

maintenance. Rock integrity and bolt length and diameter are also important factors to consider. Historically, 1/4-inch diameter expansion bolts were used and still exist on the tower. The modern minimum bolt standard is 3/8-inch stainless steel. The rock type at Devils Tower is very hard phonolite porphyry which is better for holding a bolt in place than sandstone. The NPS prefers replacement bolts be inserted in the same hole as the old bolt where possible. It may be possible to dismantle a bolt and replace it with a new one in the same hole if the hole is drilled cleanly to begin with and it is replaced with a bolt of the same size or larger.

Pitons also damage rock resources when they are placed and removed, often times causing flaking or the expansion of a crack. Some pitons are left fixed on the tower while others are placed as temporary protection during aid climbing and, thus, are removed shortly after placement. For the purposes of the FCMP, bolts and fixed pitons are treated as the same impact.

Preservation of Historic Resources

Devils Tower, which includes all areas between the tower and the Tower Trail, is eligible for listing on to the National Register of Historic Places as a traditional cultural property. Traditional in this context refers to "those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice." The word culture in the National Register program is understood to mean "the traditions, beliefs, practices, lifeways, arts, crafts, and social institutions of any community, be it an Indian tribe, a local ethnic group, or the people of the nation as a whole." (Parker and King 1990).

A traditional cultural property is generally defined as one that is eligible for listing on the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1990).

The stake ladder on Devils Tower also is eligible for inclusion on the National Register as a historic structure because it is part of the tower's history. The ladder represents over 100 years of climbing history.

Type and Level of Climbing Use

Devils Tower is recognized world-wide for its crack climbing, yet it has been new route establishment on its faces that has increased in recent years. Face climbing that relies on the use of numerous bolts for protection on faces is a conflicting use among some climbers. Many climbers consider the proliferation of new bolts to be contrary to the spirit of Devils Tower as a crack climbing area.

Most natural lines (cracks) on the tower have been climbed. Climbers seeking new challenges have turned to face routes on the tower. Prior to 1991, the year power drills were banned at Devils Tower, power rock drills aided in the development of new routes that previously were considered "unclimbable." Power drills allowed for the efficient and dependable placement of bolts for protection.

The tower is a limited resource and provides the only source of technical climbing opportunities in the monument. The NPS feels that the approximately 220 named routes on the tower as of 1994 are enough to meet climber needs and expectations. There are many other areas in the country that offer a multitude of face climbing opportunities such as the Needles in South Dakota, Yosemite National Park and Joshua Tree National Park in California, and Rocky Mountain National Park in Colorado, to name a few. At Devils Tower, new route development will be restricted to those that can be established without the use of new bolts or fixed pitons. Thus, new face route development probably will not take place.

Natural Quiet

Devils Tower National Monument is in a relatively remote region of northeastern Wyoming. Visitors may enjoy the monument by camping, sightseeing, hiking, viewing wildlife, climbing, and listening to natural sounds. Because of the small size of the monument, climbers communicating with each other on the tower may be heard by visitors on any of the trails. The placement of new bolts and pitons with a hammer may be heard by visitors. Natural quiet is a resource that must be preserved for future generations just as other monument resources. Disturbance of natural quiet also may affect traditional cultural practices of American Indian groups. Noise associated with climbing activities is relatively small in comparison with the many other sources in and around the monument, such as vehicle traffic. The main concern with noise generated during climbing activities is that climbing occurs on the tower which is the prime resource of the monument.

Vegetation and Soils

Undefined, unsigned, and non-maintained climbing approach paths impact vegetation and soils. The majority of climbers use established approach trails to the base of the tower. Occasionally, climbers and hikers may approach the base of the tower by the quickest means possible, which can be in a straight line. At Devils Tower, four main approach trails branch off the main Tower Trail. The trails are defined in Devils Tower climbing guidebooks. These approaches are not well defined, thus social trails are developing to access the tower base.

Trampling and loss of vegetation and soil at the base of climbs is occurring. The most popular summit access (Meadows route) to the summit cairn trail is not maintained and soil and vegetation are being lost.

Visual Aesthetics

Viewing the tower and its associated resources is the main objective for many visitors. Although some visitors may enjoy looking at climbers, some are disturbed by their presence on the tower and the visual distraction of slings, ropes, anchors, and possibly chalk. Climbers themselves are readily visible to visitors throughout the monument. Slings and ropes may be obvious to the naked eye, especially those that are brightly colored. Slings are sometimes left on the rock and may occur in abundance at rappel stations. Belay and rappel stations and bolts detract from the natural appearance of the tower, although they are sometimes hard to detect without binoculars. Chalk used by climbers to dry sweaty hands may be hard to detect with the naked eye, but on the more popular routes may be noticeable on the rock from the ground below the route.

Other visual impacts include litter and human waste. Currently, human waste and litter do not appear to be a significant problem. There are restroom facilities within 1/4 mile of the tower base. Small amounts of litter associated with climbers and hiker/climbers is most commonly found at the base of climbing routes or rappel stations.

Wildlife Species of Concern

The tower is a relatively small resource where climbers and raptors compete for space. Prairie falcons (*Falco mexicanus*) nest on the tower. There have been reports of falcons attacking climbers on the tower that get too close to the nest.

In general the following statements may apply to climber and raptor confrontations on Devils Tower.

> Rock climbing possesses the three characteristics of human presence that have been consistently shown to affect behavior among cliff nesting birds, especially raptor species. These are: a) activity in close proximity to nest sites; b) activity of significant duration; and c) presence above nest sites. Responses elicited from disturbed raptor species include calling out, temporary displacement from nests or perches, defensive or territorial displays, and direct attack upon the intruder (DeBenedetti 1990).

ISSUES OUTSIDE THE SCOPE OF THE DCMP

Continued Consultation Between Devils Tower National Monument and American Indian Nations that Use the Monument for Traditional Cultural Practices

Since 1984 there have been some organized traditional activities by American Indian groups at Devils Tower that have included the extended use of monument facilities and areas. The superintendent issues special use permits for the use of monument facilities.

In order to properly address issues that do require formal consultation, Devils Tower will work to develop such a process with American Indian groups. American Indians do not need to consult with the superintendent or obtain any type of permit prior to their entering the monument for the sole purpose of performing traditional cultural activities.

Name Change of Devils Tower and the National Monument

Several published sources have acknowledged the inaccurate naming of the butte now called Devils Tower in 1875 by Colonel Dodge. The earliest map of the region labeled the butte "Grizzly Bear Lodge," or Mateo Tepee to some local Indians (Mattison 1956). The erroneous name of Devils Tower stuck, however. American Indians feel the name is inappropriate and disrespectful of their culture. Some members of the climbing management plan work group have repeatedly urged the monument to rename the butte to a more culturally significant name. Though not within the scope of the FCMP, the NPS recognizes the legitimacy of this request. This issue will be considered separately at a later date.

Suggestions Received as Public Response to the DCMP

A long list of additional suggestions beyond what is presented on this page and other substantive comments were received in public response to the DCMP. Components of some of these comments have been incorporated into the FCMP, but were not available for consideration under the DCMP. All of these comments and suggestions were considered and answered. They are listed at the end of this document as an attachment to the FONSI.

ALTERNATIVES FROM THE DCMP INCLUDING THE PREFERRED ALTERNATIVE

Six alternatives were considered in the DCMP to resolve the issues previously identified during the scoping process. Actions common to all alternatives are described first. The order of the alternatives covered a range of management actions from the least restrictive to climbing activities to the most restrictive to climbing activities. Specific actions for each alternative were described in detail in the DCMP, so they will not be covered again here. Please refer to the DCMP for the complete descriptions. A summary of the differences between the alternatives are listed in a table instead.

ACTIONS COMMON TO ALL ALTERNATIVES FROM THE DCMP

This section defines those actions necessary to meet management goals and objectives. All of the actions listed here are included as part of the FCMP.

Develop a Long-term Natural and Cultural Resources Monitoring Program

Information on natural and cultural resources and their condition as well as visitor use is needed to make informed management decisions about rock climbing and other uses. Resource monitoring becomes an integral part of this process. Some monitoring efforts are already underway or completed, including a bird survey, the tower base vegetation impact study, the litter inventory, the tower summit vegetation survey, the ethnographic overview, and an assessment of climber registration data. A process will be developed to set standards for desired conditions, monitor changes, and take action if conditions change unacceptably. A Visitor Education and Resource Protection (VERP) plan will be conducted for Devils Tower National Monument when funding is available. In the interim, a Visitor Services Project will be conducted at Devils Tower National Monument in 1995 which will survey a cross section of monument visitors and measure their perception of the monument and their visitor experience.

Improve Education and Information on All Historic Uses of the Monument

A cross-cultural educational and interpretive program will be developed to inform the public about the significant relationship between the tower and the American Indians of the northern Great Plains. This program may include, but not be limited to:

- Outdoor exhibit similar to the current climbing display
- American Indian demonstrations such as food preparations, pottery making, basket weaving, and uses of native plants
- Interpretive programs about American Indian lifeways

- Ethnographic information in the monument brochure or informational handouts about the ethnographic importance of the tower
- Cultural awareness day or week including demonstrations, food booths, art and crafts, and dancing activities
- Update and maintain as needed the "Do Not Disturb Prayer Bundles" signs
- Develop a long-term interpretive strategy for dealing with American Indian issues
- Develop a video dealing with American Indian issues
- Hire American Indian interpreters to the monument staff
- Assure interpretive programs offer balanced views of history
- Update monument publications to include American Indian themes

To improve information on climbing and enhance relationships between the climbing community and the NPS, the following will be implemented:

- Develop a climber brochure similar to those used at Joshua Tree National Park, Rocky Mountain National Park, and Yosemite National Park. The Joshua Tree and Yosemite brochures were funded by the Access Fund and local climbing businesses. The brochure will include the following: brief history of the monument and climbing, importance of cultural resources, importance of natural resource protection, ethics or "climber's code," climbing regulations, ways to preserve climbers' freedom, litter and human waste, safety, and general visitor services available
- Work with local climbing groups and national and international magazine editors to inform the public about climbing at Devils Tower
- Continue to involve the climbing community with the climbing management planning processes
- Involve the climbing community with work projects, i.e., trail rehabilitation and raptor monitoring
- Use the required registration as an opportunity to discuss the climber brochure, hand out the brochure, and obtain accurate information about tower use
- Continue to perform interpretive programs on climbing

Continued climbing at Devils Tower may depend on the willingness of the climbing community to abide by their own code of climber ethics in conjunction with NPS policies and regulations.

Revise the Climber Registration Card

The current registration system has not allowed the monument staff to collect all the information we would like. An improved climbing management card has been developed. The Devils Tower climbing permit will be revised to appear similar to a backcountry use permit (see Appendix A, Example Climbing Use Permit Form). A

database management system (dbms) may be used to track the necessary information and produce monthly summaries, reports, and trend data.

Climbing permits will be available at a convenient location for climbers who may arrive very early or late. Complete, simple directions will be posted for self-registration after NPS working hours. Information will be distributed on the monument's climbing regulations and climbing ethics at registration time.

Plan Review and Update

Criteria will be developed for determining the success of each element in the FCMP. The entire FCMP will be reviewed and updated as needed. This will allow for the plan to reflect any changes in climbing management policies, new research and monitoring results, and changes in climbing trends. The effectiveness of some individual elements of the FCMP may need to be evaluated after two, three, or more years and appropriate adjustments made. Overall evaluation of the FCMP is expected in three to five years.

Promote Responsible and Ethical Climbing

The NPS will promote waste removal, climber safety, and minimum impact climbing through education programs. Portions of the following paragraph may be adopted into a climbing information brochure. The information was gathered from the climbing policy of the Mohonk Preserve in New York.

> Climbers must exercise their freedom to choose their own routes and climbing styles, within the limits necessitated by the uniqueness and fragility of the environment and the rights, needs, and safety of other climbers and users of the monument. Responsibility for safe climbing rests solely with the individual climber.

The NPS does not maintain the tower routes or the associated climbing "hardware" and "software" (see Glossary), does not provide supervision or instruction, and is not responsible for the condition of the climbing terrain or the acts of persons who may be on the tower. The NPS explicitly disclaims all responsibility for the safety of bolts, pitons, and anchor systems as may be found in place on the tower.

To maintain the natural and scientific values of the tower, the FCMP prohibits environmentally damaging climbing practices such as the installation of new bolts or fixed pitons. Also prohibited are chipping or gluing new holds, removing vegetation, and climbing near a raptor nest. Specific provision of the FCMP are presented below under in the chapter "Action Elements of the Final Climbing Management Plan."

Complete Identification, Evaluation, and Nomination Procedures for Cultural Resources

The appropriate steps will be taken under §110 of the National Historic Preservation Act to determine the eligibility of the monument's cultural resources for listing on the National Register of Historic Places. The NPS will follow 36 CFR Parts 60 and 63 as well as pertinent National Register bulletins. Resources will be evaluated as a traditional cultural property, archeological resource, historic resource, or cultural landscape as appropriate. If considered as a traditional cultural property, appropriate consultation will be conducted with American Indian tribes.

SUMMARY OF THE DIFFERENCES BETWEEN THE ALTERNATIVES FROM THE DCMP

Alternatives	Close Climbing for Cult. Res.	Bolting: New and Replacement	Type of Climbing	Drills and Hammers	Software left on the tower	Seasonal Raptor Closure
A	No closure	Unlimited bolting	All Types, including new routes	Both allowed	Any Type	Only routes near nests, based on climber reports
B No Change	No closure	Unlimited bolting, no power drills	All Types, including new routes	Both allowed	Any Type	Only routes near nests, based on climber reports
C	Voluntary June closure with 3 year phase-in	Both new and replacement bolting allowed by permit	All types, including new routes	Both allowed	Any Type	No climbing within 50 m. of occupied nest, based on climber reports, maintain climbing levels near 5-year March and April average
D Preferred Alternative	Voluntary June closure with no phase-in	Replacement bolting by permit, no new bolting	No new face or crack routes that require bolts	Hammers allowed, drills only by permit	Replace slings with neutrally-colored ones or chain	No climbing within 50 m. of occupied nest, i.d. by NPS in April, maintain climbing levels near 5-year March and April average
E	Mandatory June closure with no phase-in	No bolting allowed	No new face or crack routes that require bolts	No drills or hammers allowed, thus no pitons	None	Prohibit climbing in March and April until NPS i.d. occupied nest, then no climbing within 100m. of occupied nest
F	Entire tower year-round	all bolts and pitons removed	No climbing	No drills or hammers allowed.	None	No climbing at all, nest i.d. by NPS in April

This chart summarizes the alternatives from the DCMP. Some issues and elements described under Alternative D have been changed in the FCMP including:

1) No new "fixed pitons" has been added to the bolting issue
2) Maintaining climbing levels at the 5-year March and April average has been changed in favor of area closures beginning on each March 15.

REGISTERED CLIMBERS AT DEVILS TOWER FROM 1989 TO 1994

	1989	1990	1991	1992	1993	1994	Total	Average
January	9	0	3	23	6	7	48	8.0
February	0	0	20	49	10	12	91	15.2
March	113	55	112	68	12	69	429	71.5
April	196	342	144	243	286	318	1,529	254.8
May	1,069	1,100	824	1,121	1,000	918	6,032	1,005.3
June	803	1,221	1,120	1,136	1,148	1,293	6,721	1,120.2
July	809	783	1,054	1,124	1,087	1,051	5,908	984.7
August	907	807	1,144	1,180	1,288	1,246	6,572	1,095.3
September	820	725	772	1,206	800	726	5,049	841.5
October	288	202	288	336	403	358	1,875	312.5
November	26	29	5	18	47	10	135	22.5
December	10	10	10	1	5	27	63	10.5
Annual Totals	5,050	5,274	5,496	6,505	6,092	6,035	34,452	5,742

OTHER SUGGESTIONS CONSIDERED BUT ELIMINATED FROM THE DCMP

Removal of the Historic Stake Ladder

A suggestion was made to remove the stake ladder at Devils Tower. Removal of the ladder would adversely affect this cultural resource and removal is not necessary to reduce climbing impacts.

Establish a Recreational Carrying Capacity on the Tower

Recreational carrying capacities are determined by the physical, social, and ecological carrying capacities for a specific area. The term carrying capacity is infrequently used today. A relatively modern technique for managing visitor use is the Visitor Experience Resource Protection (VERP) concept. The VERP concept is preferable to the NPS and is mentioned previously in this plan under Actions Common To All Alternatives.

Total Elimination of the Use of Power Drills

The use of motorized equipment in wilderness areas is a very controversial issue in the climbing world. Devils Tower has no designated or potential wilderness, thus it is within the superintendent's authority to establish policies regarding the use of motorized equipment in the monument including power drills. However, this issue may be moot since proposed nation-wide NPS climbing regulations soon may ban the use of power drills in all park units. From 1991 to the present, power drills have not been allowed on the tower, which was defined as an undeveloped area. It appears that total elimination of power drills may not serve the monument resources as well as limited use. A controlled system for the use of power drills for the replacement of existing bolts as identified in the Preferred Alternative would provide less impact to the rock, less impact to the natural quiet as a result of quicker bolt placement, and potentially a stronger, safer, quicker, and more enduring bolt placement. Unless the service-wide regulations allow for power drills, however, they will continue to be prohibited at Devils Tower.

Suggestions Received as Public Response to the DCMP

A long list of additional suggestions beyond what is presented on this page and other substantive comments were received in public response to the DCMP. Components of some of these comments have been incorporated into the FCMP, but were not available for consideration under the DCMP. All of these comments and suggestions were considered and answered. They are listed at the end of this document as an attachment to the FONSI.

ACTION ELEMENTS OF THE FINAL CLIMBING MANAGEMENT PLAN

The following actions are the chosen elements of the FCMP. These action elements were derived from Alternative D, the Preferred Alternative from the DCMP, though some modifications have been made as a result of public comments and other factors which the NPS has taken into consideration.

A VOLUNTARY CLOSURE TO CLIMBING IN JUNE

A voluntary closure to climbing at Devils Tower for the entire month of June will be encouraged beginning in 1995. The NPS will not enforce the closure, but will rely on (a) climbers regulating themselves and (b) a new educational program to motivate climbers and other park visitors to comply. The closure zone will include all areas inside the loop of the Tower Trail. Efforts will be made to encourage climbers, hiker/climbers, and anyone else from approaching the tower or wandering off the Tower Trail each year from June 1 through June 30.

The value of a voluntary closure is that individuals can make a personal choice about climbing. Climbers can regulate themselves by deciding if they want to refrain from June climbing out of respect for American Indian cultural values.

The voluntary closure gives the NPS time to conduct an intense cross-cultural education program as part of the broader goals of the FCMP. We are hopeful that a successful cross-cultural education program will lead to better understanding about climbing and the sacred site issue and the values of American Indians, climbers, and the general public. A significant aspect of a successful educational program is developing a better understanding, among all visitors, of the tower as a sacred site and as a recreational resource.

Because the NPS plans to fully comply with the June closure, NPS staff will not climb on the tower in June except to enforce laws and regulations or to perform emergency operations. In 1994, Devils Tower had seven climbing guide services under commercial use licenses in the monument. Commercial use licenses for climbing guides have been issued for June 1995. The NPS plans to fully comply with the June closure. For this reason, commercial use licenses for June climbing guide activities will not be issued for June 1996 and beyond.

A set of quantitative benchmarks for determining the effectiveness of a voluntary closure will be developed by the NPS. The NPS will determine the exact criteria for defining success for the voluntary June closure after observing conditions during June 1995. The NPS will seek input in defining success from members of the climbing management plan work group and other monument user groups.

The current climbing registration system will be used to measure compliance with the closure. Generally, closure success is expected to be determined by evaluating climber registration data and conferring with the work group members and other monument user groups including climbers and American Indians. The following factors will be considered in evaluating success.

- Some elements of a successful voluntary closure will include:

  a) a continuous, significant reduction in the number of climbers on Devils Tower each June in comparison to the number of climbers from the previous June
  b) an increase in awareness among all monument visitors of the cultural significance of Devils Tower to American Indians and the conflicting values between recreational climbing and the sacred site

The voluntary closure will be fully successful when every climber personally chooses not to climb at Devils Tower during June out of respect for American Indian cultural values. This is the ultimate goal of the voluntary June closure.

- Some elements of an unsuccessful voluntary closure will include:

  a) an increase, no change, or insignificant decrease in the number of climbers on Devils Tower each June in comparison to the number of climbers from the previous June
  b) an increase in the number of unregistered climbers at Devils Tower
  c) an increase in conflicts between user groups
  d) disruptions of park activities

- A determination of success by the NPS for the voluntary June closure is not expected for at least three years or as long as five years. Time is needed to insure the concurrent educational program has a chance to perform its mission. If the voluntary closure is determined to be unsuccessful, several actions by the NPS could take place including, but not limited to the following:

  a) revise the climbing management plan
  b) reconvene a climbing management plan work group
  c) institute additional measures to further encourage compliance
  d) change the duration and nature of the voluntary closure
  e) convert the June closure to mandatory
  f) write a new definition of success for the voluntary closure

The language regarding the voluntary closure has changed between the DCMP and the FCMP. The DCMP stated that the June closure "would become mandatory" if

unsuccessful. This has been changed here in the FCMP to read "could" become mandatory. This will provide the NPS more management flexibility in the future.

It is within the existing authority of the monument superintendent to close areas to certain activities to protect natural and cultural resources. The NPS believes that self-regulation by climbers, augmented by the cross-cultural education program, is a preferable course of action. Neither the NPS or the Department of the Interior's Office of the Solicitor believes the FCMP will violate the constitutional rights of any citizen.

The closures described in the FCMP are for managing an activity, climbing, not general access to national park land. The NPS maintains that future management actions could take place including a mandatory closure. The mandatory closure language is present to show that we are seriously committed to protecting a cultural resource and to acknowledge American Indian concerns. The NPS has the authority to implement a mandatory June closure, but hopes this will not be necessary. The climbing community has repeatedly asked that they be permitted to self-regulate. The FCMP gives climbers the opportunity to do so.

The reasons for the June closure are not tied directly to religious ceremonies at Devils Tower, however, the summer solstice, which occurs in June, is a very culturally significant time to American Indians. The 30-day June period was selected as a compromise in the modern world. A predictable voluntary closure fixed on a modern calendar month has a better chance to be communicated and understood and to be successful than dates based on a shifting lunar calendar.

The reason why the NPS has decided to advocate a voluntary June closure to climbing is to promote understanding and encourage respect for the culture of the American Indian tribes who are closely affiliated with Devils Tower as a sacred site. Until very recently, the importance of American Indian cultural values at Devils Tower has been neglected by the NPS. Recreational climbing, which has been highlighted here in the past, derogates these cultural values to many. The closure period is a time when the monument's interpretive program emphasizes American Indian culture. The monument will present a balanced interpretive program on a year around basis. In so doing, the NPS hopes to help preserve a part of America's cultural heritage and promote amicable relations between American Indian societies and the prevalent western society in America.

NO NEW BOLTS OR FIXED PITONS

No new bolts will be permitted on Devils Tower and its adjoining rock formations, but the replacement of existing bolts will be allowed. It is the intent of the NPS to not allow an increase in the number of bolts on the tower beyond the 1994 level. The NPS will allow for the replacement of all existing bolts including rappel

anchors, belay anchors, and fixed protection points. A registration system will be implemented to monitor and regulate bolting activities. The intent of the FCMP is to insure there will be no new impacts to the tower from bolts and fixed pitons. Though pitons were not included in the DCMP's discussion of bolting, the FCMP treats fixed pitons and bolts as the same. Piton use in aid climbing will still be allowed, but the pitons must be removed after placement. Since aid climbing is infrequent at Devils Tower and diminishing, this is not expected to result in any significant new impacts to the rock.

In three to five years, all climbing management actions will be analyzed including bolting, and adjustments will be made, if needed. Future modifications could be more restrictive. Bolting activities will be monitored and regulations enforced. In reality, very few climbers install bolts or perform aid climbs at Devils Tower.

The NPS intends to remove all illegally placed bolts where feasible and enforce regulations. One of the unfortunate consequences of removing bolts from rock is that it can cause significant resource damage. If the bolt can not be removed without causing unacceptable resource damage, the bolt will be rendered inoperative. As with illegal bolts, new pitons placed illegally (permanently) also will be removed. The NPS will perform an inventory of all bolts, anchor stations, and pitons on the tower to set the baseline from which to judge the legality of any particular bolt or piton.

Effective with the FCMP, the NPS will not maintain any hardware on the tower including all rappel station bolts. The decision to replace a bolt is a safety decision that rests with the individual climber. Guidelines with suggestions for the replacement of bolts at the tower will be developed by the NPS in consultation with climbers, but ultimately, the decision to replace a bolt or the choice of equipment is a responsibility the climber assumes. Climbing is an inherently dangerous activity. Climbers must be aware that it is their choice whether to climb, how to climb, and what legal equipment to use. If a bolt, fixed piton, or anchor station needs to be replaced, it can be in accordance with a permit issued by the superintendent or designee.

Replacement bolts should go into the same holes as the old bolts whenever possible. Replacement bolts, pitons, and anchor stations should be camouflaged or concealed so as not to be seen by visitors on the Tower Trail. Specific guidelines for the replacement of existing bolts and pitons will be developed by the monument with input from the local climbing community.

NOMINATION OF DEVILS TOWER TO THE NATIONAL REGISTER OF HISTORIC PLACES

A determination of eligibility has been completed with concurrence from the Wyoming State Historic Preservation Office (SHPO). The tower is eligible for listing on the National Register of Historic Places as a traditional cultural property. National Register listing does not preclude climbing at Devils Tower.

The decision to nominate or not will occur only after proper consultation has occurred with affiliated American Indian tribes and the tribes approve of the nomination. The NPS protects a site that is eligible for the National Register in the same way as if it were actually listed.

Based on ethnographic research conducted to date, we know Devils Tower is a sacred site of great importance. For now, the perimeter of the traditional cultural property includes all areas within the loop of the Tower Trail, the same area used to define the geographical limits of the voluntary June closure to climbing. The NPS recognizes that this small area may not be all that is significant within the monument. Additional research will be conducted to determine the ultimate outer perimeter of the traditional cultural property around the tower.

NEW CLIMBING ROUTE DEVELOPMENT

Crack and face climbing will be allowed at Devils Tower, but since new bolts will not be permitted, new face routes requiring new bolt installation will not be permitted. "Clean climbing" techniques will be encouraged. Any face routes established illegally will be removed.

It is not the intent of the NPS to allow development at Devils Tower of new climbing routes that require new bolts. Devils Tower is renowned as a crack climbing area and not a sport climbing area. In maintaining consistency with the local climbing tradition, the NPS will manage Devils Tower as a predominantly crack climbing area.

POWER DRILLS

Once the new NPS service-wide climbing regulations are released, the power drill policy at Devils Tower will be modified so that the policy is consistent with the new regulations. The NPS at Devils Tower National Monument feels that the replacement of a bolt with a power drill has less overall auditory impact to park visitors, raptors, and other wildlife than placement by hammer. Power drills allow for quicker, more efficient placement of replacement bolts and may allow existing bolt holes to be used over again, thus minimizing impacts to the rock. This issue, however, may be moot since proposed service-wide NPS climbing regulations may

ban the use of power drills in all park units in the near future. Current regulations at Devils Tower prohibit power drills on the tower. If future NPS service-wide regulations allow, we will permit power drill operation by climbers for the replacement of existing bolts. Until such time, however, power drill operation will continue to be prohibited at Devils Tower.

SUMMIT AND APPROACH TRAILS

Mitigation of vegetation trampling and soil erosion will occur by rehabilitating and maintaining the Meadows and summit trails and signing and maintaining four approach trails from the Tower Trail to the base of the tower. All work will be coordinated and supervised by the NPS. Rehabilitation of the trails will be a cooperative effort between the NPS, climbing organizations, and local groups. The trails will avoid crossing the two lithic scatter archeological sites between the tower base and the Tower Trail. In order to protect the fragile soil and vegetation on the tower summit, climbers are requested to:

a) stay on the summit trail if it will take them where they are going, otherwise
b) only walk on solid rock when traveling on the summit
c) never drag rope and other equipment along the ground
d) respect all areas of the summit that are marked as closed

WEBBING AND CHALK

The goal for Devils Tower National Monument is that no climbing equipment left on the tower be visible from the Tower Trail. The addition of new hardware left on the tower will not be permitted unless absolutely necessary for safety reasons. The replacement of old webbing with camouflaged webbing or chain will be phased in.

Chalk's effect on rock or the leaching effect it may have on nearby vegetation or soil is unknown. Further research of this issue is needed. Concern was expressed in public comment over the staining of rock by the oils in colored chalk. For these reasons, the NPS will encourage climbers to use the minimum amount of chalk necessary to climb safely. Chalk is not a compelling issue at Devils Tower at this time. Rainfall washes much of the chalk off and the distance of the Tower Trail to the tower is enough to make chalk unnoticeable in most cases.

RAPTOR NEST PROTECTION

The threat of climbers to raptors is clearly demonstrated by the behavior of the birds when climbers are in the vicinity of a nest. At Devils Tower, falcons have screamed at and dived at climbers which is a clear indication of disturbance and distress. Raptor biologists feel that human presence in the proximity of a nest is

stressful to birds of prey and can lead to the failure of the nesting effort. In most situations, raptors tolerate human activity at some distance below at ground level. There is less tolerance directly below the nest, but none above or at nest level.

The goal of the raptor nest protection strategy at Devils Tower is to allow falcons to freely select and establish nest sites and occupy their nest for the duration of the breeding season without being stressed by climbers on the tower. The basic objective for closing certain areas during the falcon breeding season is to keep climbers out of view of the nest sites and far enough away that there is little risk the falcons will feel threatened. Generally, all climbing routes on Devils Tower that approach to within 50 meters of an occupied raptor nest will be closed. This is the minimum distance recommended. The 50 meter distance will extend on both sides of the nest and range vertically from the tower's base to summit.

The criteria for establishing the closure areas are flexible enough to make judgements based annually on the actual nest sites. The guideline for which each closure will be decided will be based on the distance of 50 meters. Potentially, closures could be less or more than 50 meters depending on the configuration of the tower around each nest site. The NPS at Devils Tower will make annual determinations of which routes will be included in the closure zones.

A portion of the summit edge above the nest sites will be closed each year for raptor protection as well. NPS staff at Devils Tower will mark the closure areas each March. Climbers will not be permitted to approach the closed summit edges.

Occupied nest sites will be identified by NPS personnel from the ground prior to the busy climbing season and early in the nesting season, probably in early April. Once the active nest is located, any routes within the determined closure zone will remain closed until after the fledged young have had a few days to practice their flying skills. Fledging usually takes place between mid-June and mid-July. All other routes on the tower will remain open during the nesting season unless closed for other reasons. Unlike the voluntary June closure, all closures for raptor nest protection are mandatory.

The NPS will continue to monitor individual populations at the tower while closures are in place. Nesting attempts will be monitored by NPS staff to determine whether the closure areas are sufficient to prevent disturbances by climbers. Closures zones could be enlarged if necessary.

As with the Lumpy Ridge area of Rocky Mountain National Park in Colorado and many cliffs in Zion National Park in Utah, the NPS at Devils Tower will initiate the raptor closures during the courting and nest site selection period. This will allow for free nest site selection. The proposal in the DCMP to limit climbing levels in

March and April to a 5-year average would have been very difficult to manage, so this idea was abandoned in favor of area closures.

The west face area of Devils Tower is where nests have been most frequently established in recent years. Part of the west face will close annually starting on March 15 and continue until shortly after fledging or the monument's resources management specialist determines that a nest does not exist or it exists somewhere else. Since falcons commonly change nest sites from year to year within their breeding territory, it is anticipated that there will be times when the Devils Tower falcons choose to nest somewhere other than the west face even with the early closure in place. If this happens, the nest closure area will be transferred to the occupied sites.

At this time the NPS knows of only one documented and frequently used nest site on Devils Tower. It is located on the west face. For this reason, beginning in 1995, only the affected area of the west face will be closed on March 15. As more nest sites are used through the years, the number of nest site closures being established in March could increase as well. Despite these new restrictions, most of Devils Tower will continue to be open to spring climbing for the foreseeable future.

This recommendation is supported by raptor biologists. Along Lumpy Ridge in Rocky Mountain National Park, entire cliffs much wider than the areas of closure for Devils Tower have been closed in the spring annually since 1988. Each cliff with a documented, historic nest site used by eagles, hawks, and falcons has been closed to climbing before nests are actually selected. Once nests are occupied, cliffs with unoccupied nests are reopened to climbing. Zion National Park in Utah uses the this strategy. Under the FCMP, the NPS at Devils Tower will utilize the same strategy.

The U.S. Fish and Wildlife Service will be consulted over nest protection strategy should endangered peregrine falcons return to the Devils Tower.

ENVIRONMENTAL CONSEQUENCES

The environmental consequences for each of the six alternatives were described in detail in the DCMP. Only the impacts from elements selected in the FCMP will be described here. This section is divided by resource type, with a description of the affected resource followed by effects common to all alternatives.

NATURAL RESOURCES

Geology

Affected Environment. The summit of Devils Tower reaches an elevation of 5,117 feet, 1,270 feet above the Belle Fourche River. The tower is approximately 600 feet from base to summit, with a base diameter of about 800 feet. The top of the tower is relatively flat, although the center has a high point. The summit is 300 feet from north to south, and 180 feet from east to west. The horizontal layers of sandstone, shale, gypsum, and siltstone surrounding the tower were deposited under ancient seas about 70 million years ago. The tower itself was formed by molten rock (magma) that hardened either at the surface or just beneath it about 54 million years ago. Erosion of the surrounding sediments then exposed the tower. The tower is formed of phonolite porphyry, a very hard igneous rock with large crystals of white feldspar (Gardiner and Guilmette 1986).

The Sundance formation contains clams, oysters, belemnites (squid), and other marine fossils of the Late Jurassic Age. No fossils have been found in the Spearfish or Gypsum Spring formations. No remains or signs of ancient vertebrates have been found in the monument (NPS 1991b).

As previously described, the use of the tower by climbers and, in particular, the permanent placement of bolts and pitons has affected the geologic integrity of the tower. How this integrity is affected and to what extent is unknown. It should be noted that the vast majority of climbers do not place permanent bolts and pitons when climbing the tower.

Impacts Under the FCMP. A long-term monitoring program will help identify climbing impacts on the tower's geology and to what extent those effects are acceptable or unacceptable. The data and trends that monitoring reveals will determine whether climbing needs to be restricted.

The availability of a climber brochure will educate climbers on environmental effects caused by climbing and may help reduce impacts to the tower geology.

Rock faces that are currently free of bolts will remain that way. Currently bolted areas will remain as permanent impacts to the rock. Replacement of bolts and fixed pitons will only be allowed under certain conditions outlined by the NPS. Little new damage will occur to the rock with the proper removal of old bolts and fixed pitons and the installation of replacements. Some rock damage will continue as a result of the placement and removal of temporary pitons during aid climbs.

Some new rock damage may occur if illegally placed bolts are removed by the NPS. This damage may be mitigated by filling holes with a mixture of rock dust and epoxy. The NPS will investigate the efficacy of this measure before endorsing it. If an unacceptable amount of damage would occur as a result of bolt removal, the bolt will be left in place, but rendered inoperative.

Floodplains and Wetlands

The Devils Tower FCMP does not impact any floodplain or wetland areas. The tower area is outside the 100-year and 500-year floodplain. There are no wetlands on the tower or surrounding its base.

Threatened and Endangered Species

There are no known threatened or endangered plants or animals that would be affected by any of the proposed actions. In the winter, bald eagles (*Haliaeetus leucocephalus*) are observed although they are not known to nest in the monument. The monument is within the historic range of the black-footed ferret (*Mustela nigripes*), however, the species does not currently exist at Devils Tower.

There are very few and unconfirmed sightings of peregrine falcon (*Falco peregrinus*) within the monument. Currently there are no known nesting peregrine falcons in eastern parts of either Wyoming or Montana or in the western Dakotas. The tower is one of the few large outcrops in the Black Hills and in the Great Plains that provides potential nesting habitat for peregrine falcons. When peregrine falcons recolonize the plains, Devils Tower and the nearby Little Missouri Buttes would be very important to the regional population. Unregulated climbing at the tower could prevent them from nesting (Britten 1992).

The provisions instituted by the FCMP will provide an environment that is more attractive to peregrine falcons than what has existed in the recent past. Raptor biologists believe it is probably only a matter of time before the expanding western population of peregrine falcons recolonizes the Black Hills and nesting begins at Devils Tower.

Wildlife

Affected Environment. Animal species that normally inhabit the monument include whitetail deer, mule deer, black-tailed prairie dog, red squirrel, porcupine, cottontail rabbit, least chipmunk, various birds, and an occasional red fox, bobcat, bullsnake, and prairie rattlesnake. None of the mammals or reptiles would be affected by the FCMP. Birds observed to use the tower that may be effected by climber use include turkey vulture, rock dove, American kestrel, prairie falcon, and white-throated swift.

Prairie falcons are the only known raptor to nest on the tower crags and ledges. The first recorded prairie falcon nesting site was found in 1972 or 1973. It is believed that the tower may support only one pair of ecologically or morphologically similar species because of territoriality and space limitations (Britten 1993). Climbing activity begins to increase in May and generally peaks in June and again in August. Falcon courtship and nest site selection occurs in March. Falcons may begin nesting as early as April and fledge young some time from mid-June to mid-July.

Since 1988, Rocky Mountain National Park has closed numerous cliffs each spring along Lumpy Ridge that have known nest sites for various raptor species. Once the chosen nest sites for that year are occupied, the unoccupied cliffs are reopened to climbing. This strategy is designed to allow the raptors to freely select from the several nest sites within their breeding territory. A similar strategy under the FCMP will be beneficial to the falcons nesting on Devils Tower.

General Impacts. Although there is little information concerning recreational use impacts on animal species, some generalizations may be made in light of wildlife behavior and monitoring research.

"Visitor Impact Management, A Review of Research" (Kuss, et. al. 1990) summarizes the complex variables related to recreation impacts on wildlife as follows:

> There is no uniform relationship between the amount of recreational use and wildlife population variables. Many statements can be found in literature to the effect that wildlife will be displaced if human intrusion becomes "too great" (Ream 1980), but little evidence exists to show when the level of disturbance becomes too great. Larger game species tend to be affected more by direct contact with people, while smaller forms of wildlife appear to be more susceptible to indirect impact on habitats.

> Some types of recreational activities have greater impacts on wildlife than other types of activity. Impacts can vary according to the type of transportation used (vehicular versus pedestrian), the extent to which an activity is concentrated or dispersed, and various characteristics of visitors such as party size and behavior. Setting attributes that can affect the outcome of human-wildlife interactions include elevation, topography, weather, amount of vegetation and escape cover, and food availability. It is well-established in the literature that human-wildlife interactions should be avoided at fundamental and critical habitat areas and seasons.

There is very little scientific information available that addresses climbing disturbance to nesting prairie falcons. Research conducted at Pinnacles National Monument by Cymerys and Walton, 1988 concluded:

> In the future, climbing at active nesting sites can be expected to increase territoriality or nest defense, followed in subsequent spring breeding seasons with shifts first to different ledges, then different cliffs, then abandonment of territories. The end result would likely be a significant reduction in raptor population density and size. Raptor/climber interactions could result in loss of eggs or young if conflicts are frequent, or of extended duration (Call 1979, Snow 1973).

Pinnacles National Monument is different from the tower in that there are a variety of cliffs and ledges available for nesting territory and climbing opportunities at Pinnacles. Conversely, Devils Tower is a small, limited resource. A preliminary survey and literature search on avifauna and climbing at Devils Tower was conducted by Britten in 1992. A summary of results include:

> Climbers on Devils Tower do disturb nesting prairie falcons as indicated by climber reports of being attacked by the birds. It is likely that climbers cause prairie falcons to fail to successfully fledge young from Devils Tower in some years.
>
> Climbing appears to have minimal disturbance on turkey vultures roosting on and near the tower because the birds seem to be habituated to people.
>
> The effects of climbers on other birds using the tower is unknown. There may be some effect on all species using the tower.
>
> While the tower is not important to regional or continental populations of prairie falcons, golden eagles, or any other raptors, it may be important to a visitor's experience at Devils Tower to see raptors on the tower or to know that they nest on it.

Climbing guidebooks also have acknowledged the conflict at Devils Tower between nesting falcons and climbers. They describe attacks upon climbers that have come too close to the nest.

Impacts Under the FCMP. Consistent and long-term monitoring of raptors on and nearby the tower would provide necessary data to make informed decisions regarding the protection of bird species.

Educating climbers through the climber brochure, magazines, and guide books about raptor use on the tower would help reduce potential adverse impacts to nesting birds.

The strategy instituted by the FCMP will provide an environment that is more attractive to prairie falcons than what has existed in the recent past. Prairie falcons will have a good opportunity to fledge young and will not have to compete with climbers for space.

In the long-term, peregrine falcons likely will colonize the tower and drive off the prairie falcons, assuming the peregrine falcon population continues to increase. The provisions of the FCMP will protect peregrine falcons the same way they protect prairie falcons.

Soils and Vegetation

Affected Environment. The monument supports three of the four distinct vegetation complexes that characterize the Black Hills. These include: (1) Rocky Mountain coniferous forest complex dominated by ponderosa pine, (2) grassland complex of the northern Great Plains, and (3) deciduous forest complex. A fourth complex would include the rocky tower top and sides that support a limited variety of bushes, lichens, grasses, and forbs. (NPS 1991b)

The four main soil and vegetation impact areas of concern are the approach trails from the Tower Trail, the base of climbs, the Meadows trail, and the tower summit. Data does not exist to show if and how climbers are impacting the area between the Tower Trail and the tower base. Hiker/climbers also use this area and cause trampling and soil erosion to some extent.

General Impacts. A basic study of impacts to tower base vegetation was conducted by monument personnel in the summer of 1992. The study showed that the more popular climbs were the most impacted at their base or staging area.

A study conducted by Driese and Roth (1992) concerning the effects of human disturbance on the summit of Devils Tower concluded:

The most severe resource damage, including trail erosion and soil loss, is found along the trail connecting the top of the scramble from the Meadows on the east margin of the tower to the summit cairn. This is the main route access to the summit and can expect to see more erosion.

The summit vegetation community is fragile, thus travel should be restricted to the existing trail and to bare rock. Bare rock covers over 31 percent of the summit.

Moderate vegetation disturbance was found along the northeastern edge of the summit and from the north summit route and south summit route to the summit cairn.

In general, with the exception of the main Meadows to summit trail, the summit community on the tower is not seriously damaged at this time.

Among the 21 species of plants located by Driese and Roth, the study also found leafy spurge (*Euphorbia esula*) to exist on the tower summit. It is not known how seed establishment of this exotic species occurred on the summit, possibly high winds or potentially it was carried in a climber's shoe, pack, or clothing after they had walked through the monument. Leafy spurge is a common noxious weed in Wyoming and the monument. Efforts to remove leafy spurge from Devils Tower have been ongoing for about 50 years.

Areas in and around trails and climbing routes could be affected by foot traffic. The primary impact on soils will be compaction, which decreases permeability, locally alters the soil moisture, and diminishes the water storage capability. This could result in slower rates of water transmission within soils and increased runoff on the surface, increasing soil erosion. Prolonged trampling could gradually decrease vegetation and increase exposure of bare ground to the direct erosive impact of rainfall. Erosion could take the form of channelization on barren areas of even a slight slope angle. Compaction of the soil could be minimized in some areas due to frost action, which expands the soil.

Foot traffic could also change the amount of moisture available to plants which, in turn, could alter the relative abundance of some species. Plants that invade disturbed areas could become more common. Increased erosion could lead to exposure of root systems and the subsequent death of more water sensitive plants. Germination of some plant species may be inhibited by soil compaction resulting from foot traffic. The impacts of trampling could range from complete exclusion of vegetation to slight shifts in species composition. In shrublands, the amount of grass and the number of low plants between the shrubs would be reduced. In grasslands, the proportion of annuals and quick-spreading perennials could increase.

Impacts Under the FCMP. The long-term monitoring program should help determine the type and extent of impacts occurring in climbing areas. Impacts around the base of climbs are caused by both hikers and climbers while impacts on the summit are caused only by technical climbers.

Improved education will help keep monument visitors on the trails and will protect soil and vegetation. The climber brochure will also help keep climbers and other visitors from removing vegetation and clearing lichen off the rock to enhance a climb.

The amount of soil and vegetation loss on climbing approach trails and the tower summit will be reduced. Also, climbers will be actively involved with the rehabilitation and maintenance of the approach trails and staging areas, further sensitizing them to the need to reduce impacts.

Natural Quiet and Visual Aesthetics

Affected Environment. Visitors' expectations of their experiences in the monument and their perception of what constitutes impairment of natural quiet and visual aesthetics may help determine the level of impact on these resources. These expectations and perceptions vary dramatically with various types of monument users, thus these resources are the most difficult to evaluate for impacts.

The only intrusions on natural quiet and visual aesthetics on the tower itself come from the presence and sounds of technical climbers and their gear on the tower. Intrusions include the use of drills and hammers and the permanent placement of shiny climbing hardware and brilliantly colored software. White gymnastics chalk also looks unnatural on the rock and causes a visual impact, though most monument visitors do not get close enough to notice. At the base of very popular routes, litter and human waste may be a visual as well as a health concern.

At the end of June, July, August, and September of 1992, litter was collected from the base of climbing routes by monument personnel. The results of this study concluded the following.

- Athletic tape used to protect hands and fingers when climbing or colored tape to mark ownership of equipment was the most common item found.
- No human waste sites were found during the litter search.
- The amount of litter found was not of large quantities and the pieces were fairly small. Therefore, litter may not be noticed by the casual observer. It appeared that climbers were cleaning up after themselves and others. (NPS 1993a)

Although climber-caused litter did not appear to be a significant visual impact during this study period, the litter inventory and monitoring program has continued. The data shows that from May to October, a total of 120 items were found in 1993 and 84 items were found in 1994 from the bases of five popular climbs. During the July 1, 1993 inventory one human waste site was found as well.

Impacts Under the FCMP. The educational program will help climbers become more aware of their responsibility in protecting monument resources and help them adopt a low impact climbing ethic. The continuance of a litter monitoring program, plus the monitoring of hardware and software placement and replacement, will help determine whether visual impacts are being reduced or increased.

Noise impacts will be reduced due to less hammering in the placement of bolts and fixed pitons. Visual impacts will be reduced by encouraging minimal use of chalk, by replacing colorful slings with camouflaged slings or chains, and by not allowing the further permanent placement of bolts, anchor stations, or fixed pitons.

CULTURAL RESOURCES

Ethnographic Resources

Affected Environment. Observation, literature searches, interviews with American Indians, public scoping for the DCMP, and public response to the DCMP indicate that the butte known as Devils Tower is a sacred site to many American Indians of the northern plains. Some known activities that occur in the monument today include prayer offerings, vision quests, the leaving of prayer bundles, sweatlodge rites, and the Sun Dance. During modern times, the Sun Dance has been held at Devils Tower by some Lakota people since 1984.

A preliminary ethnographic overview and assessment of Devils Tower was completed in 1991 by Hanson and Chirinos. According to that report, six nations inhabited the Devils Tower region at some point in history and all believe it to be a sacred site. The six nations include Wind River or Eastern Shoshone, Kiowa, Crow, Cheyenne, Arapaho, and Lakota. As many as 23 tribes have been identified that may be culturally affiliated with Devils Tower.

The Lakota ethnohistoric data reveals a strong ancient and sacred relationship between their nation and the Devils Tower and Black Hills region. The region is a place to fast, pray, and worship the Great Mystery. The Lakota also performed renewal of life ceremonies at the tower, referred to as the Sun Dance. Data also indicates that the Lakota conducted sweatlodge ceremonies and left offerings. (Hanson and Chirinos 1991)

Other traditional American Indian activities that may have been conducted in the monument include winter camps, hunting activities, vision quests, and burials. American Indians are very private about their traditional cultural practices, including religious ceremonies. There is insufficient research to indicate one band affiliation with the monument to be stronger than another. All the American Indian activities performed are not completely known, neither are the times and locations of those activities.

The tower was evaluated in 1994 and was determined to be eligible for the National Register of Historic Places as a traditional cultural property for its American Indian relationships.

A thorough ethnographic study is needed to implement the long-term natural and cultural resources monitoring program and cross-cultural interpretive program. This research also will help identify American Indian lifeways and address their concerns more accurately and reasonably.

Impacts Under the FCMP. Some adverse effects that an ethnographic study and interpretive program may have is the feeling by American Indians that their private ceremonies are being exploited and put on display. Concern was expressed by some American Indians during the scoping process that National Register listing for Devils Tower could bring increased public attention to their sacred site. Prior to any NPS ethnographic study, cross-cultural interpretive program, or National Register nomination, appropriate consultation with American Indian people will occur to alleviate as many impacts to traditional cultural beliefs and practices as possible.

A cross-cultural interpretive program is intended to broaden the respect and understanding of diverse user groups at Devils Tower.

Climbers will affect American Indian traditional beliefs less and less through the years. In time, climbers will not impact American Indian traditional cultural practices during the month of June. Climbers will show respect for American Indian concerns through their willingness to avoid climbing the tower in June.

Overall, the FCMP will help preserve our cultural heritage and help promote amicable relations between Indian societies and the prevalent western society in the United States.

Historic Resources

The historic stake ladder was evaluated in 1994 and was determined to be eligible for the National Register of Historic Places. About 170 feet of the 1893 climbing

ladder remain. No impacts to this historic resource are expected under the FCMP since the route in which it is located will remain permanently closed to climbing.

Archeological Resources

There are two small lithic scatter sites between the Tower Trail and the base of the tower. It does not appear that climbers are impacting these areas. Any trail work conducted will avoid these lithic scatters.

VISITOR USE

Affected Environment. The primary focus of visitor use occurs on the 3-mile road leading to the tower base, on the tower itself, and at the prairie dog town. Visitors enjoy picnicking, camping, or hiking the monument's eight miles of trails. The most popular trail is the paved 1.25-mile Tower Trail that encircles the tower, providing visitors with views of the tower, associated natural features, and climbing activities. Photography, wildlife viewing, and interpretive programs and exhibits are other opportunities visitors enjoy. Though most visitors probably do not know prior to their visit that climbing occurs on the tower, many (and maybe most) who find out when they get here do enjoy watching climbers. Some visitors, however, do not believe climbing should occur at Devils Tower.

The visitor activity on which this plan focuses is climbing. Climbers come to Devils Tower from all over the world. Previous sections describe the history and current climbing use in the monument. Devils Tower technical climbing history began in 1937. The popularity of climbing has increased to over 6,000 annual climbers since 1992. The type of climbing at Devils Tower has also changed dramatically over the years.

The type and level of climbing at Devils Tower does have an effect on other visitors as well as on climbers themselves. The climbing community is divided over many issues such as power drills, bolting, and several other environmental concerns.

Impacts Under the FCMP. A cross-cultural education program will help various visitors groups understand each other better and respect each other's uses of the monument. Conflicts between differing philosophical groups within the climbing community will be reduced through education and continued sharing of the tower. Conflicts between climbers and other visitor activities, including those of American Indians, also will be reduced through education.

Currently used routes will continue to be available for use, but new bolted routes will be prohibited. Therefore, no new face climbing routes may be established.

New route establishment will occur only where removable protection is used exclusively. Since new routes usually require bolts at belay stations, climbers wishing to establish new routes at Devils Tower most likely will be denied the opportunity to do so unless the route can reach the summit.

Climbers will continue to be responsible for their own safety and will be allowed to replace worn out and unsafe bolts and fixed pitons. Replacement of bolts will continue to offer climbers a potentially safer climbing experience.

Through time, fewer climbing routes may be available for early spring climbing as a result of additional, early season closures for protecting falcon nest sites. Climber safety will be enhanced, however, since the chances of climbers being attacked by falcons defending their nesting territories will be greatly diminished.

SOCIOECONOMIC RESOURCES

Both climbers and American Indians that visit Devils Tower contribute to the local economy. At Devils Tower, climbers are more numerous than American Indians so climbers may be contributing more to the economy. Climbers traveling to Devils Tower from farther away typically spend more money than those from more proximate locations.

It should be noted that many climbers who visit Devils Tower camp in the campground and are self-sufficient. Also, climbers made up only about 1.3 percent of the monument's visitation on an annual basis over the past six years. The average number of June climbers is about 1,100 or about 0.26% of annual visitation for the same time period. A more in depth sociological study needs to be conducted to provide the monument with a representative sample over a long time period. A Visitor Services Project will be conducted at Devils Tower National Monument in 1995 which will survey a cross section of monument visitors and measure their perception of the monument and their visitor experience. This study could be identified as part of the long-term monitoring program.

Any restrictions or prohibitions of climbing at the tower will affect the local economy to some extent. Some entrepreneurial opportunities will be diminished among the monument's commercial use climbing businesses, the Devils Tower climbing guidebook authors and publishers, and the sales outlets that carry these books. The provisions of the FCMP will not significantly increase or decrease the monument's economic contributions to the local or regional community. Many climbers may reschedule their planned visits to months other than June or other Black Hills climbing areas. An increase in visitation in June for cultural purposes could have a positive influence on the local economy that could offset some of the slightly smaller number of climbers. Both the level of climbing at Devils Tower

during months other than June and some climbing-related resource impacts in other Black Hills climbing areas may increase slightly during future June periods.

Climbing guide services at Devils Tower will not be able to schedule June trips to the monument beginning in 1996. Some guides may be impacted by an increasing number of closed routes during the spring season for protecting raptors though there will be alternate routes that will be open. To date there is very little commercial climbing guide activity at Devils Tower in the spring.

PARK OPERATIONS AND ADMINISTRATION

Affected Environment. The current climbing management program requires some administration. Registration cards are filled out with the supervision of an NPS employee, statistics are compiled, and reports and graphs are produced. Raptor nesting sites are monitored and closed to nearby climbing. Rangers also interpret climbing and climbing history and patrol the tower area. From time to time, rangers respond to climbing accidents on the tower. Climbers sometimes fall or are struck by falling rocks dislodged by other climbers. These emergencies require a high level of preparedness, occasional technical rescues and evacuations on steep or vertical rock walls, the application of emergency medical services, and a considerable amount of administrative overhead.

Impacts Under the FCMP. An education and monitoring program will add time and effort required by NPS staff to produce a high quality climber brochure, various interpretive programs, displays or exhibits, and to coordinate, supervise, and implement research projects and long-term monitoring protocols. Program administration costs will increase substantially when the FCMP is fully implemented.

The FCMP will require additional time and commitment by NPS staff to implement various actions. A substantial cost increase is expected in order to develop and operate a new cross-cultural education program.

The development and implementation of a bolt replacement by permit system will require some administration, but will assist the monument in tracking bolt replacement data including the type and size of bolt, placement method used, location, and whether it is a single bolt or part of an anchor system. Also, a bolt and piton inventory will need to be conducted.

Staff will need to be dedicated to the rehabilitation and maintenance of the approach, Meadows, and summit trails and the coordination and supervision of any volunteer work. Volunteer work for approach trail maintenance could free up NPS employees to perform other duties.

A voluntary June closure to climbing will not require any enforcement because it will be solely the climbers' responsibility to not climb. Rangers will need to patrol the tower for any violations of the new bolting and piton use regulations and the closures meant to protect breeding falcons. Illegally placed bolts and pitons will need to be removed or rendered inoperative.

Administration of a climber registration system will continue.

Benchmarks for determining the success of a voluntary closure will need to be established. The staff will measure compliance rates, document the level of acceptance of the FCMP among park users, determine if the voluntary closure is successful, and publicize their findings and decisions.

FINDING OF NO SIGNIFICANT IMPACT
Final Climbing Management Plan
DEVILS TOWER NATIONAL MONUMENT
February 1995

The National Park Service (NPS) has prepared a management plan to detail specific actions for managing technical rock climbing at Devils Tower National Monument. An Environmental Assessment (EA) that analyzed alternatives for managing climbing was released to the public in July 1994. A preferred alternative was identified in the document. All alternatives discussed in the EA are summarized below.

PROPOSAL

All proposed alternatives, including the preferred alternative, contained these five common elements: 1) developing a long-term resources monitoring program that will include conducting a Visitor Education and Resource Protection plan, 2) improving education and information on all historic uses of the monument, 3) revising the climber registration cards, 4) promoting responsible and ethical climbing practices, and 5) completing the identification, evaluation, and nomination procedures for significant cultural resources.

A voluntary closure to climbing at Devils Tower for the entire month of June will be encouraged beginning in 1995. The NPS will not enforce the closure, but will rely on (a) climbers to self-regulate and (b) the new cross-cultural educational program to motivate climbers and other park visitors to comply. The closure zone will include all areas inside the loop of the Tower Trail. Efforts will be made to encourage climbers, hikers, and anyone else from approaching the tower or wandering off the Tower Trail each year from June 1 through June 30.

No new bolts or fixed pitons will be permitted on Devils Tower and its adjoining rock formations, but the replacement of existing bolts and fixed pitons will be allowed. It is the intent of the NPS to not allow an increase in the number of bolts or fixed pitons on the tower beyond the 1994 level. The NPS will allow for the replacement of all existing bolts including rappel anchors, belay anchors, and fixed protection points. A registration system will be implemented to monitor and regulate bolting activities. A registration system will be implemented to monitor and regulate replacement bolting. The intent of the plan is to insure there will be no new impacts to the tower from bolts and fixed pitons.

Though pitons were not directly included in the draft plan's discussion of bolting, the final plan will treat fixed pitons and bolts as the same. Piton use in aid climbing will still be allowed, but the pitons must be removed after placement. The NPS intends to remove all illegally placed bolts and pitons or render them inoperative if too much resource damage would occur by removing them. The NPS will perform an inventory of all bolts, anchor stations, and pitons on the tower to set a baseline.

Current regulations at Devils Tower prohibit power drill use on the tower. If future NPS service-wide regulations allow, we will permit power drill use by climbers for the replacement of existing bolts. Until such time, power drills will continue to be prohibited at Devils Tower.

Mitigation of vegetation trampling and soil erosion will occur by rehabilitating and maintaining the Meadows and summit trails and signing and maintaining the four approach trails from the Tower Trail to the base of the tower. In order to protect the fragile soil and vegetation on the tower summit, climbers will be requested to stay on the summit trail if it will take them where they are going, otherwise only walk on solid rock when traveling on the summit, never drag rope and other equipment along the ground, and respect all areas of the summit that are marked as closed.

The goal for Devils Tower is that no climbing equipment left on the tower be visible from the Tower Trail. The addition of new software and hardware left on the tower will not be permitted unless absolutely necessary for safety reasons. The replacement of old webbing with camouflaged webbing or chain will be phased in.

The goal of the raptor nest protection strategy at Devils Tower is to allow falcons to freely select and establish nest sites and occupy their nests for the duration of the breeding season without being stressed by climbers on the tower. The basic objective for closing certain areas during the falcon breeding season is to keep climbers out of view of the nest sites and far enough away that there is little risk the falcons will feel threatened. Generally, all climbing routes on Devils Tower that approach to within 50 meters of an occupied raptor nest will be closed. The criteria for establishing the closures will be kept flexible enough to make judgements based annually on the occupied nest site. The guideline for which each closure will be decided will be based on a distance of 50 meters. Potentially, closures could be less or more than 50 meters depending on the configuration of the tower at each nest site. A portion of the summit edge above the nest sites will be closed each year as well.

The west face area of Devils Tower is where falcon nests have been most frequently established in recent years. The area closure on the west face will begin annually starting on March 15 and continue until shortly after young fledge or the monument's resources management specialist determines that a nest does not exist or it exists somewhere else. If the falcons choose a different nest site, the nest closure area will be transferred to the occupied site. In subsequent years, all documented raptor nest sites will receive the same level of protection beginning on March 15. The U.S. Fish and Wildlife Service will be consulted over nest protection strategy should endangered peregrine falcons return to Devils Tower.

Devils Tower is eligible for listing on the National Register of Historic Places as a traditional cultural property. The decision on whether to prepare a formal nomination will occur only after consultation has occurred with affiliated American Indian tribes and the tribes approve of the nomination.

ALTERNATIVES CONSIDERED

Alternative A offered essentially unregulated climbing on the tower and allowed the greatest variety of climbing activities among all the alternatives.

Alternative B was the No Change Alternative. It would have been a continuation of the status quo in climbing management at Devils Tower.

Alternative C contained many of the same elements as alternative D with the following exceptions. Under alternative C, voluntary June climbing closure on Devils Tower would have been phased in over three years. New and replacement bolts on the tower would have been allowed with registration or a permit.

Alternative D was the Preferred Alternative. With some minor modifications, it is the basis for the Final Climbing Management Plan (Proposal) as described above.

Alternative E would have required a mandatory June closure to climbing on Devils Tower beginning in 1995. No new bolts or the replacement of existing bolts would have been permitted. All of Devils Tower would have been closed to climbing in March and April or until NPS employees located the falcon nest site. Once the nest was located, all climbing routes within 100 meters of the nest would have remained closed through the remainder of the nesting season.

Alternative F would have permanently closed Devils Tower to all climbing beginning in 1995. All bolts, pitons, and other climbing gear would have been removed from the tower.

ENVIRONMENTAL CONSEQUENCES

Impacts of the proposal are described in the EA. Impact topics included geology, wildlife, soils and vegetation, natural quiet, visual aesthetics, and ethnographic, historic, and archeological resources. Implementation of the Preferred Alternative under the final plan will: improve the monument staff's knowledge of visitors, natural and cultural resources, and impacts to those resources; reduce physical impacts to the tower rock; improve the opportunity for prairie falcons to successfully nest on the tower; reduce soil erosion; reduce impacts to vegetation; reduce noise and visual impacts on the tower; increase climber awareness of their resource impacts; encourage climber participation in mitigating resource impacts caused by climbing activities; and improve the level of cultural awareness and sensitivity among all monument visitors while reducing the potential for conflict by instilling mutual respect for different cultural perspectives. Adverse impacts will be few or of limited duration.

PUBLIC INVOLVEMENT

Approximately 1,200 copies of the draft plan were disseminated during the public comment period which ran from the date of release, July 15, 1994, to October 31, 1994. Late comments were accepted through November 9, 1994. A total of 286 letters and two petitions were received. During the public comment period, six public meetings were held in the local and regional area. About 200 people attended the meetings. The meetings were held on August 27, 1994 in St. Paul, MN, September 6, 1994 in Gillette, WY, September 7 in Rapid City, SD, September 8 in Denver, CO, September 9 in Laramie, WY, and September 10, 1994 in Pine Ridge, SD.

The vast majority of the letters received came from people or organizations who could be clearly identified as climbers. A small percentage of the letters came from people or organizations that were clearly American Indian. The remaining letters came from people, organizations, and agencies that were neither climbers, Indians, or could not be clearly identified as either. The organizations and agencies that responded to the draft plan included: 1) National Parks and Conservation Association, 2) Sierra Club Wyoming Chapter, 3) The National Outdoor Leadership School, 4) American Mountaineering Guides Association, 5) Climber's Conservation Alliance, 6) Jackson Hole Mountain Guides, 7) The Access Fund, 8) Black Hills Climbers Coalition, 9) Medicine Wheel Alliance, 10) Medicine Wheel Coalition for Sacred Sites of North America, 11) U.S. Fish and Wildlife Service, 12) Wyoming State Historic Preservation Office, and 13) Wyoming Game and Fish Department. A list of substantive comments received from the letters and recorded during public meetings and the NPS responses is attached to this FONSI.

Informal consultation under §7 of the Endangered Species Act with the Wyoming office of the U.S. Fish and Wildlife Service occurred during drafting of the plan. This proposal is not likely to adversely affect a listed species. The U.S. Fish and Wildlife Service recommended that we provide a contingency plan to increase the buffer zone for protecting raptor nests in case the measures described in the preferred alternative were unsuccessful. This flexibility is incorporated into the final plan.

This proposal is in compliance with §106 of the National Historic Preservation Act. The Wyoming SHPO was given the opportunity to comment on the proposal. The Wyoming SHPO advocated that the climbing route to the historic stake ladder remained closed. Such is and will continue to be the case at Devils Tower. The Wyoming SHPO also asked that additional consideration be given to expanding the size of the traditional cultural property encompassing Devils Tower and establishing a historic district within the monument. The NPS has agreed that these options will be considered after additional historic and ethnographic research has been conducted. Before any undertakings resulting from the plan are initiated, consultation will be performed under 36 CFR 800.

CONCLUSION

The proposal does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The proposed actions will not have a significant effect on the human environment. Negative environmental impacts that could occur will be minor and temporary in effect. There will be no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing on the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local law.

Based on the foregoing, it has been determined that an Environmental Impact Statement is not required for this project and thus will not be prepared.

Recommended by: _____ 2/21/95
Superintendent, Devils Tower National Monument — Date

Approved by: _____ 2/21/95
Regional Director, Rocky Mountain Region — Date

RESPONSES TO PUBLIC COMMENTS ON THE DCMP/EA

The following list represents the substantive comments received by the NPS during the public comment period for the DCMP/EA. Written comments were received in the mail and others were recorded during public meetings. For clarity, the comments are organized into ten categories and presented in bolt lettering. The NPS responses are highlighted with italicized lettering. Similar or related comments are grouped together and answered once.

A) AREA OF CLOSURE AND SCOPE OF THE CLOSURE

1 **The NPS should solicit feedback from climbers who choose to climb during the June closure and those who do not.**
We think this is a good idea. This information would help us analyze the success of a cross-cultural education program and the final climbing management plan (FCMP) at Devils Tower. Though not part of the plan, we will try to develop a way to obtain this information. We can easily count June climbers through the registration system. We will have a comment section on the climber registration card where climbers who choose to climb in June can express their reasons or climbers may express how they feel about the plan in general.

2 **The route of the historic stake ladder must remain closed to protect it.**
The historic stake ladder has been determined eligible for the National Register of Historic Places. The tower crack where the historic stake ladder is located is already closed to climbing. We intend to keep the ladder's route, called "Carpenter's Caper," closed permanently.

3 **There are no alternatives to climbing at Devils Tower because there is no way to walk to the top. This is the only place in the region where this type of climbing is possible.**
Devils Tower is a unique, singular feature and the only way to the summit is by technical climbing. Devils Tower does offer climbing unique to the area. The FCMP does not deny anyone the privilege of climbing the tower. We only require that climbers not enter areas closed for protecting falcon nests and the historic stake ladder and request that climbers self-regulate by voluntarily complying with the June closure.

4 **The plan will lead to more and longer closures.**
We are hopeful that successful implementation of the FCMP will negate the need for more and longer closures by protecting raptors, reducing physical impacts, and protecting cultural resources. More closures will not be needed if the plan is successful unless conditions change in the future. There is legislation pending in Congress for protecting sacred sites that could influence climbing management at Devils Tower, but that is independent of the FCMP.

5 **Conflicts between climbers and Indians will decrease without climbing restrictions if there is a education program.**
A cross-cultural education program should be tried before any closures occur.
We, too, believe in the power of an educational program and hope it is one of the elements that makes the FCMP successful. This plan puts a lot of faith in an educational program and the hope that climbers will comply with the voluntary June closure. The federal government has a trust obligation with American Indian people and we desire more immediate results than would be obtained by waiting until after an educational program has been in place for a few years.

6 **A June closure will lead to more conflict between climbers and Indians, not less.**
The value of a voluntary closure is that people can make a personal choice about climbing. We are hopeful that a successful cross-cultural education program will lead to better understanding about climbing and the sacred site issue and the values of American Indians, climbers, and the general public.

7 **The 1991 ethnographic report by Hanson and Chirinos never recommended closing the tower to climbing.**
On page 68 of the 1991 report it states "Since Devils Tower is clearly a sacred site for many tribes, it is recommended that the National Park Service prohibit people from climbing on it."

8 **Climbers are the only user group targeted.**
It is not the intent of the NPS to target any group or individual. Because of the nation-wide increase in climbing, the NPS directed all parks with climbing to develop site-specific climbing management plans. The closures described in the FCMP are for managing an activity, climbing, not general access to national park land. The NPS is managing climbing activities because this is specifically a climbing management plan. Similarly, a backcountry management plan would affect backcountry users. The plan actually includes all monument visitors because of the educational program and the geographic extent of the voluntary closure perimeter which includes all areas within the loop of the Tower Trail. A significant aspect of a successful educational program is developing a better understanding among all visitors of the tower as a sacred site and as a recreational resource.

9 **Ban everyone from the park during June except climbers.**
Close the Tower Trail in June too.
Any closure should be for everyone.
Close all vehicle traffic in June past the administration building.
The FCMP is intended to manage climbing, although it is our hope that all visitors will develop a better understanding of the issues. Because visitation has doubled

in the last decade, we recognize the need to better manage general visitation. The FCMP is not the appropriate place to plan for managing general visitation. Initial scoping and planning has begun for a Devils Tower transportation system for the peak visitor season.

10 **Close half of the tower in June, one half for climbers, one half for Indians.**
This was a suggestion that was brought up in the work group scoping meetings. For cultural reasons the tower cannot be divided. The butte is a singular place. American Indians view it as a disrespectful if the act of climbing is taking place on the tower, even if it is out of their view.

11 **Explain exactly why June was chosen for the closure in the final plan. The closure should be based on annually determined ceremonial time periods, no longer than that, and published annually.**
The reason for the closure is not tied directly to ceremonies, although June is a very culturally significant month to American Indians. The summer solstice occurs in June and this is traditionally the time when Sun Dances and other traditional ceremonies occur. For many Indian cultures, a series of ceremonies culminate with the summer solstice. The 30 days of June are a compromise in the modern world. A regular voluntary closure fixed on a modern calendar month has a better chance to be understood and to be successful than a shifting closure based on a lunar calendar.

12 **If June is closed, then there should be specific language in the final plan insuring it is always open for the other 11 months in the future.**
The FCMP is a plan, a set of dynamic guidelines, and not a law or a regulation having the force of law. The plan may be revised in three to five years. Adaptive management allows for decisions to be modified as new conditions occur or new information becomes available. Based on the relative success of the individual elements in the FCMP, some climbing restrictions could be increased or decreased, but some modifications likely will be made. The intent of the plan is to protect natural and cultural resources. We may adjust the plan in the future to do this.

13 **Close the tower to climbing from mid-October to mid-April. Close the tower during a winter month, not June.**
The voluntary closure is intended as an act of respect during June, a culturally significant time. A winter month closure would not be seen as respectful.

14 **The plan should have offered an option to close the tower for from two to six months.**
The National Park Service (NPS) tried to present a full range of alternatives in the DCMP, including Alternative F which had a year around closure to climbing.

Under the FCMP, individual climbers could voluntarily choose to not ever climb on the tower. It is a personal choice.

15 **Shorten the closure duration.**
Close the tower in June for two weeks, but for everyone.
A one month voluntary closure was something of a compromise within the full range of alternatives offered in the DCMP. The closure periods considered ranged from twelve months to no months. The June closure is a compromise based on Indian cultural significance and the need to use a modern calendar to communicate with climbers.

16 **June closure should be intermittent, only a few days per week in June.**
This option would be impossible for us to manage and difficult for climbers who plan in advance and come great distances. Also, commercial climbing guides at Devils Tower plan their schedules well in advance of the season. A set closure period each year is easier to communicate and plan for than intermittent or unscheduled closures.

17 **Closure should be mandatary for 3 to 10 days.**
A voluntary June closure will give climbers time to adjust to not climbing at Devils Tower in June and let them freely choose whether or not to climb. Climbers can decide if they want to refrain from June climbing as a act of respect for American Indian cultural values. A voluntary closure gives the NPS a few years to conduct an intense cross-cultural education program as part of the broader goals of the FCMP.

18 **Close the whole park to everyone in June except the Indians.**
Close the park in June to all non-Indians except park staff.
The closure should include everyone except members of the Northern Plains tribes.
It is not our intent to make Devils Tower National Monument an exclusive property for American Indians, unless Congress acts to change the law. The American Indian Religious Freedom Act requires all federal agencies to provide access to American Indians. The NPS has the authority to manage and restrict activities in the monument. The closures described in the FCMP are for managing an activity, climbing, not general access to national park land.

19 **Any climbing closure should be exempted for Indians climbing for spiritual purposes.**
Under the voluntary closure of the FCMP, if anyone feels compelled to climb for any reason, they can personally choose to do so. Our scoping indicates it is unlikely that American Indians would exercise an option to climb on the tower for spiritual purposes.

20 **The general public must be controlled from entering the voluntary closure zone in June.**
The perimeter of the voluntary closure area is marked by the Tower Trail loop, but does not include the trail. The voluntary closure applies to everyone. Through our cross-cultural education program we intend to inform the general public about the voluntary closure and the reasons for it. Compliance will be up to the individual.

21 **A voluntary closure with a threat of mandatory closure is not an equitable attempt at mediating the competing interests.**
A voluntary closure is not voluntary if there is a threat that it becomes mandatory.
The language on the voluntary closure has changed between the DCMP and the FCMP. The section that said the June closure "would become mandatory" if unsuccessful now reads "could" become mandatory. The real value of having a closure voluntary is that it gives climbers time to self-regulate. Climbers have insisted that they do not need to be regulated by land managers. This is an opportunity for climbers to regulate themselves. It gives our education program a chance to be successful. The FCMP says that future management actions could take place including a mandatory closure. The mandatory closure language is in the FCMP to show that we are seriously committed to protecting a cultural resource and to acknowledge American Indian concerns.

22 **Close the tower to piton and bolt placement in June, don't close access.**
The FCMP is an attempt to manage all climbing activities, not just bolt and piton placement. American Indians do consider the placement of bolts and pitons a desecration of their sacred site. The FCMP will restrict bolt and piton use for cultural and natural resource protection purposes year around. The presence of climbers on the tower offends American Indians, not just the use of bolts and pitons.

B) BOLTING, DRILLS, AND PITONS

1 **Limit new bolting to new rappel and belay anchors.**
Devils Tower should allow belay anchors to go in on faces to permit new face climbs without simply bolting the entire face.
The intent of the FCMP is that there will be no new impacts to the tower including bolts and pitons. Replacement of existing anchor systems, bolts, and fixed pitons will still be allowed.

2 **No fixed protection should be allowed except for one set of rappel anchors for safe descent.**
This is not practical since it would drastically reduce the number of climbable routes and this is not the intent of the FCMP. Many routes and descent points exist and are used on the tower. Many tower routes don't go to the summit and individual rappel anchors are necessary to descend these routes. Some fixed protection, including bolts and pitons, are necessary for safe ascent of some tower routes including a few popular face climbs.

3 **Make it clear in the final plan that any non-compliance with bolting restrictions would lead to tighter restrictions.**
In three to five years, all climbing management actions will be analyzed, including bolting, and adjustments will be made, if needed. Future modifications could be more restrictive if the FCMP is unsuccessful in protecting resources. Bolting activities will be monitored and regulations enforced. In reality, very few climbers install bolts at Devils Tower.

4 **The NPS is making sport climbing more dangerous by restricting bolting. Bolting is needed to make new climbing routes safe.**
Devils Tower currently has about 220 routes with less than 1/4 of them climbed regularly. Based on scoping, climbers have told us that there is not a lot of new crack route development potential on the tower. The development of new face routes requiring bolts will not be permitted. It is not the intent of the FCMP to allow development at Devils Tower of sport climbing routes that require new bolts. Devils Tower is renowned as a crack climbing area and not a sport climbing area. We want to manage Devils Tower as a predominantly crack climbing area. Safety is the responsibility of individual climbers.

5 **The NPS needs standards for replacement bolts such as size, depth, sealants, and camouflage paint color.**
Replacement bolts should go into the same holes as the old bolts, no new holes.
We will encourage climbers to reuse bolt holes when they can. This may not always be possible, however. Guidelines for the replacement of bolts will be developed by the monument's chief ranger with input from climbers.

6 **The NPS should never chop bolts, even if illegally placed.**
Illegally placed bolts should stay up.
Remove all illegally placed pitons and bolts.
Non-compliance with bolting restrictions should be followed by more restrictions on climbing.
The NPS will not tacitly endorse illegal activities and intends to remove all illegally placed bolts where feasible. Rules and regulations will be enforced. One of the unfortunate consequences of removing bolts from rock is that it can cause

significant resource damage. If an illegal bolt can not be removed without causing unacceptable resource damage, the bolt will be rendered inoperative.

7 **Holes can be filled with a mixture of rock dust and adhesive to mask damage.**
Although there is little scientific data available on the effects of this process, we will investigate this and other methods for filling bolt holes in the rock. We are not sure of all the considerations involved. Guidelines for the replacement of bolts will be developed by the monument's chief ranger with input from climbers and this issue will be considered.

8 **Allowing bolt replacement with power drills will preclude the need for making new holes.**
Replacement bolts should be placed without power drills.
Power drills should only be used by NPS personnel to replace rappel stations when needed.
Power drills allow for quicker, more efficient replacement of bolts and may allow existing bolt holes to be used over again. We feel the replacement of a bolt with a power drill has less overall auditory impact to park visitors, raptors, and other wildlife. This issue, however, may be moot because proposed nation-wide NPS climbing regulations may ban the use of power drills in all park units. Current regulations at Devils Tower prohibit power drills on the tower and this will continue under the FCMP. If future NPS service-wide regulations allow, we will permit power drill usage by climbers for the replacement of existing bolts. The NPS does not maintain or intend to maintain rappel stations on the tower. The need to replace a bolt is an individual safety decision made by climbers.

9 **All bolting should be done by hand and only to replace rappel anchors.**
The FCMP will allow replacement of all existing bolts including rappel anchors, belay anchors, and fixed protection points. Climbers may want to replace non-rappel bolts on some climbs for safety and this would be allowed under the FCMP. Replacement of only rappel anchors would mean that, over time, some existing routes with bolts would become unsafe to climb. Some tower climbing routes are protected primarily by bolts.

10 **Any bolting or drilling must be done for a very good reason by qualified people only and not just by permit.**
Bolting equipment should be checked for adequacy at the time the permit is issued.
The decision to replace a bolt is a safety decision that rests with the individual climber. The NPS will provide bolt replacement guidelines, but ultimately, the decision to replace a bolt or the choice of equipment is a responsibility of the individual climber.

11 For climber safety, the replacement of existing bolts (and fixed pitons in some cases) should continue.
Replacement of bolts for safety is fine, but ban the use of pitons.
The FCMP treats fixed pitons and bolts as the same. In the FCMP, only the replacement of existing fixed pitons and bolts will be allowed. Piton use in aid climbing will still be allowed, but the pitons must be removed after placement. At present, only 26 aid routes exist on the tower that require pitons. Banning pitons altogether would not allow these aid routes to be climbed safely. As with illegal bolts, pitons placed illegally (permanently) will also be removed.

12 Pitons that are left in the rock pose a serious safety hazard to climbers.
Climbing is an inherently dangerous activity. Climbers must be aware that it is their choice on whether to climb, how to climb, and what legal equipment to use. If a fixed piton needs to be replaced, it can be by obtaining a permit from the superintendent or designee.

13 Climbers are pre-drilling holes in the tower right now.
This is an illegal activity now. Holes that were predrilled before the summer of 1994 were legal. Predrilled holes can no longer be bolted under the FCMP.

14 Bolting should only be done under special circumstances and permitted by the NPS. Old hardware on the tower should be removed gradually.
We agree with the basic concepts of this statement. This is essentially what the FCMP prescribes with our bolting restrictions and bolt replacement registration and guidelines.

15 Bolt by permit from the superintendent.
There are currently more than 600 bolts on the tower and several hundred pitons. Our intention is to not allow an increase in the number of bolts on the tower. Replacement bolts can be installed through a registration system.

16 Any new route requiring bolts must be proposed in detail and approved by a committee of climbers, Indians, and rangers.
New routes requiring bolts will not be permitted in the FCMP.

17 The NPS needs to address the maintenance of the bolts it placed on the tower.
Climbing is an inherently dangerous activity. Effective with the FCMP, the NPS will not maintain any hardware on the tower including the NPS rappel station bolts placed in the 1970s. It is the decision of an individual climber to use, not use, or replace any suspect anchor.

18 **A special fee per bolt should be charged with the money to go to an education fund for Indians.**
Since new bolting will not be permitted at Devils Tower, a special fee for bolts would not be worthwhile. It is within the authority of the NPS to charge a recreational use fee for an activity such as climbing.

19 **The names of people who put in bolts should be publicized in guidebooks so climbers can judge the quality of the bolt placement by the person's reputation.**
The NPS does not control the content of climbing guidebooks. The decision to use a bolt is an individual climber's safety decision.

C) CLOSURES FOR PROTECTING RAPTORS

1 **The NPS needs to conduct a research study on raptors at Devils Tower before any closures are imposed.**
There is no research or data suggesting that raptors need protection from climbers at Devils Tower.
There is no reference in the climbing management plan that indicates there is a current problem between climbers and raptors.
Climbers are not a threat to raptors.
The number of falcons has increased with increasing climbing, therefore, climbing is good for falcons and should be increased.
The statement that nests found on the ground by the NPS from the ground would be disturbed less than those found by climbers on the rock has no merit. There is no evidence that nest disturbances cause fledgling problems.
There is evidence that climbing has already impacted falcons at Devils Tower and that restricting human activity around nesting areas will diminish these impacts. Additional study is not needed. The threat of climbers to raptors is clearly demonstrated by the behavior of the birds when climbers are in the vicinity of the nest. At Devils Tower, falcons have screamed at and dived at climbers which is a clear indication of disturbance and distress. NPS investigations of similar conflicts between human activities and raptor nests indicate that biologists consider human presence in the proximity of a nest to be stressful to birds of prey and can lead to the failure of the nesting effort (see page 13 and 32-34 of the FCMP). In most situations, birds tolerate human activity at some distance below at ground level, less so directly below the nest, but certainly not above or at nest level.

2 **There is no basis for claiming that limiting March and April climbing levels will protect raptors.**
This element of the Preferred Alternative was removed because it would have been too difficult to manage. Limiting spring climbing in know falcon nesting areas is supported by raptor biologists. Along Lumpy Ridge at Rocky Mountain National Park, entire cliffs much wider than the areas of closure for Devils Tower, have been closed in the spring annually since 1988. Similar closures occur at Zion National Park. Each cliff with a documented historic nest site used by eagles, hawks, and falcons has been closed to climbing before nests are actually selected. Once nests are occupied, cliffs with unoccupied nests are reopened to climbing. The FCMP will utilize this basic strategy.

3 **Explain how the March and April quota will be allotted, first come first serve, or lottery.**
The spring season climber quota is arbitrary because climber use depends on weather at that time of the year.
We agree that a quota as specified in the DCMP would be difficult to manage. Rather than a quota, the FCMP includes an area closure on documented falcon nest sites while courtship and nest site selection takes place. The west face area is where nests have been most frequently established in recent years. The area closure on the west face and each subsequently determined nest site will occur annually starting on March 15 and continue until fledging or the resource management specialist determines that a nest does not exist or it exists somewhere else. Research suggests that Devils Tower can only support one pair of nesting falcons each year.

4 **Significant evidence suggests that raptors only need a 100 foot radius of protection.**
There is no basis mentioned for establishing a 50 meter limit for raptor protection.
Raptor closures should be based on the visibility of climbers, not fixed distances.
A raptor expert should determine if 50 or 100 meters is enough.
50 meters should be a minimum, plus whatever else might be needed to keep climbers out of sight from the nest. Expand the closure distance if needed.
50 meters is excessive. It should be judged individually each year.
Raptor biologists recommended to the NPS that 50 meters is the minimum distance needed for falcons on Devils Tower. The NPS will use 50 meters as the guideline for which each closure will be decided. Scientific literature supports area closures for protecting nesting raptors. The FCMP is flexible enough to make judgements on an annual basis. Potentially, closures could be less or more than 50 meters due to the shape of the tower. The resource management

specialist will make annual determinations of which routes will be included in the closure.

5 **A closure of 50 meters radius around the nest would be enough.**
NPS raptor biologists have found that disturbance above and to the sides of the nest are particularly stressful. Also persons climbing at the base of the tower would be clearly visible from the nest sites. Because the tower is much taller than 50 meters, the professional recommendations we have received indicate that a closure area of 50 meter radius is not sufficient at Devils Tower.

6 **A contingency plan is needed to increase the closure distance if 50 meters proves to be insufficient.**
The FCMP is flexible enough to provide for additional protection if evidence so indicates.

7 **None of the birds nesting at the tower are rare or endangered so the degree of protection proposed is excessive.**
Prairie falcons are not endangered so they do not need protection.
Closures should only be for birds protected under federal law.
Prairie falcons are protected under federal law in the Migratory Bird Treaty Act. Also, 36 CFR §2.2 protects wildlife in national park units and states under (a)(2) that it is prohibited to frighten nesting or breeding wildlife. The NPS will protect prairie falcons accordingly.

8 **Explain whether the 50 meter closure satisfies the Migratory Bird Treaty Act.**
The Migratory Bird Treaty Act deals primarily with protection for native species from shooting, collecting, and trading, none of which are permitted in the monument. Management actions in the FCMP will have no adverse effects on species protected under the act and will reduce the level of impacts on nesting falcons on the tower from what previously existed. The U.S. Fish and Wildlife Service (USF&WS) has approved the provisions in the DCMP's preferred alternative for protecting nesting raptors. The FCMP further strengthens these provisions.

9 **Peregrine Falcons should be reintroduced to the tower.**
Although the tower is in the historic range of the peregrine falcon, reintroducing the species is beyond the scope of the FCMP. If peregrine falcons come back on their own, we will consult with the USF&WS over the possible need for additional protection. Peregrine falcons are likely to recolonize Devils Tower on their own, so reintroduction is not needed.

D) IMPACTS TO THE ROCK, SOIL, AND VEGETATION OF DEVILS TOWER

1 **No significant damage is occurring to the rock.**
There has been insufficient damage to the rock to warrant banning bolting.
Any limits on bolting should be based solely on impact to the rock.
There is no documented evidence that bolting impacts the rock.
The presence of 600 bolts and hundreds of pitons are a self-evident impact that has occurred to the tower. The intent of the FCMP is that no new impacts occur to the tower. The NPS does not consider physical effects to the rock alone when determining what impacts bolts have to the tower. Devils Tower is eligible for the National Register of Historic Places as a traditional cultural property. Bolting impacts the tower as a traditional cultural resource and as a unique geologic feature.

2 **Asphalting the Tower Trail was done for tourist convenience. It impacts the tower more than bolts do.**
The Tower Trail was hardened with asphalt to mitigate severe soil damage caused by heavy foot traffic, not for convenience. The presence of the trail itself does not impact the tower directly.

3 **Limit access on the summit to the trail and bare rock areas.**
The summit trail is entirely rock, there is no soil or vegetation to impact.
The summit trail is not entirely rock. Soil loss from the summit trail has been documented (see page 35 of the FCMP). Only about 31 percent of the summit is bare rock. There is vegetation on the summit and it is fragile. The FCMP requests that climbers restrict their travel on the summit to the trail and areas of bare rock.

4 **The NPS should resist petitions by climbers to remove loose rocks from the tower.**
There are inherent safety and resource protection reasons why this activity is not encouraged by the NPS. Although not covered in the plan, we will continue to work with climbers to address these concerns on a case by case basis.

5 **Colored chalk has oils which stain the rock, which is a greater impact than the visibility of white chalk that washes off.**
To date we have no conclusive evidence on the chalk color issue and the impact to the rock at Devils Tower. We will continue to endorse minimum impact climbing techniques including the minimal use chalk. The reason chalk is not a compelling issue at Devils Tower is that rainfall is sufficient to wash much of it off and the distance of the Tower Trail to the tower is enough to make chalk unnoticeable in most cases.

E) CULTURAL RESOURCES

1 **There is no theological or ethnographic evidence that closing Devils Tower to climbing is important to Indians.**
Climbing does not desecrate sacred ground.
There is nothing sacred about Devils Tower, it is only an extinct volcano.
Climbing is not disrespectful to Indian beliefs.
Geologic research indicates that Devils Tower is an extinct volcanic feature. Many American Indians, however, revere the tower as sacred and view recreational activities on the tower as inappropriate and insulting. Some have described it as a desecration or as sacrilegious. Some American Indians compare climbing and bolting on the tower to bolting and climbing on a cathedral. The sacred nature of the tower is supported by the ethnographic study conducted at Devils Tower (See pages 8 and 9 in the FCMP), the comments received during the scoping process of the DCMP, and several letters received in response to the DCMP.

2 **There is no proof that Indians ever climbed Devils Tower before modern times.**
Indians have not climbed the tower for vision quests.
American Indian oral tradition indicates that some American Indians have climbed the tower for traditional spiritual purposes, such as a vision quest.

3 **Indians do not worship in the Black Hills. They are afraid of evil monsters in the hills. Most have never seen Devils Tower and do not want to.**
We are aware of no ethnographic or sociological evidence to justify these statements. Our investigations and contacts with local tribes indicate the opposite is true. Many Indians make pilgrimages to the sacred butte to conduct traditional cultural activities. The sacredness of the tower is not determined by whether Indians visit the site.

4 **Rock climber use is older than Indian ceremonial use at the tower.**
Our ethnographic investigations indicate that several tribes have held traditional ceremonies at the sacred butte for hundreds of years before the stake ladder was built in 1893. Aspects of American Indian religion were actively suppressed by the federal government until the American Indian Religious Freedom Act (AIRFA) was passed in 1978. Before then, these activities were held quietly away from public and government view. This may be why many non-Indians consider the resurgence of traditional cultural activities at Devils Tower as a recent phenomenon.

5 **There is no archeological evidence that the tower was a sacred site in historic times. The sacred nature of the tower is of modern origin.**
The sacred nature of the tower to northern plains tribes is verified by recent ethnographic research. We do not claim that any of the archeological sites are the basis for concluding that Devils Tower is a sacred site.

6 **Bolting Devils Tower, a traditional cultural property, is an adverse effect under NHPA.**
An archeological site survey needs to be done by a professional archeologist to comply with the National Historic Preservation Act (NHPA). All other parts of NHPA must be complied with.
An archeological survey of the monument was conducted in 1979. We have consulted with the Wyoming State Historic Preservation Office (SHPO) over the DCMP. Obligations under §110 of the NHPA are complete although additional ethnographic research will be conducted. The SHPO has commented on the DCMP and endorsed in concept the preferred alternative. The FCMP is in compliance with §106 of the NHPA. Before any undertakings resulting from the FCMP are initiated, consultation will be performed under 36 CFR 800.

7 **Devils Tower is culturally significant to more than just Indians, climbers too.**
We feel that the tower is a part of America's heritage in which we all share and in which we all can take pride. We hope that the tower is culturally significant to many people.

8 **Devils Tower is a place to pray, not for sight seeing or sporting events.**
The intent of the FCMP is to protect natural and cultural resources at Devils Tower and to foster respect for all legitimate uses of the tower. The NPS has a special responsibility under AIRFA to provide access to American Indians for traditional cultural activities, but the monument also was established for enjoyment and education. There are secluded places in the monument available for prayer, meditation, or other contemplative activities.

9 **Placement on the National Register could impact access to climbers.**
A determination of eligibility has been completed with the SHPO's concurrence. The tower is eligible for inclusion to the National Register of Historic Places as a traditional cultural property. The FCMP states that the decision to nominate will occur only after consultation with American Indian tribes. National Register listing alone does not preclude climbing at Devils Tower.

10 There is already enough government central control at Devils Tower that National Register status is not needed.
If a place is worthy of being on the National Register, it must be.
To take management actions the NHPA requires that the NPS complete a determination of eligibility on all cultural resources in the monument. Once a property has been determined eligible, actual nomination is optional on the part of the land manager. The NPS protects a site that is eligible for the National Register in the same way as if it were actually listed. The FCMP states that, in the case of the tower, the NPS will complete consultation with American Indians before a decision to nominate is made.

11 The Devils Tower area should be designated a historic district along with all historic and prehistoric sites.
One of the responsibilities of every federal agency is to identify and evaluate all cultural resources under its jurisdiction. That process is underway at Devils Tower. A National Register nomination of the historic Civilian Conservation Corp era structures in the monument is being prepared. Separate consideration of the tower as a traditional cultural property has been made. As the FCMP states, Devils Tower could be nominated to the National Register after consultation with American Indian tribes. Additional research will be conducted to determine the outer perimeter of the traditional cultural property around the tower.

12 Indians should perform their ceremonies during the winter when there are few tourists and fewer climbers.
Plains Indian cultural tradition places great emphasis on the summer solstice which occurs in June. It would be inappropriate to suggest that Indians move the timing of their traditional summer ceremonies. It would be meaningless for Indians to perform summer ceremonies in winter. The NPS can not dictate when Indians hold ceremonies for the sake of convenience. Under AIRFA, the NPS needs to facilitate reasonable access.

13 The NPS should give Indians someplace else to worship.
The NPS does not determine what is sacred to American Indians. There is a clearly documented cultural affiliation between several northern plains tribes and Devils Tower. Because of the natural and cultural significance of the tower, the NPS feels fortunate to manage this important part of America's heritage and interpret it to the public.

14 Prevent Indians from leaving prayer bundles.
Prayer bundles are considered sacred offerings, not litter, and the NPS does not disturb them. Leaving prayer bundles in the monument is protected under AIRFA. The NPS intends to consult with appropriate Indian traditional leaders to develop a plan for the respectful treatment (and possible removal) of old prayer bundles.

F) CONSISTENCY TO LAWS, POLICY, GUIDELINES, PLANS, AND OBJECTIVES

1 **Under the Archeological Resource Protection Act (ARPA), anyone bolting on the tower should be required to obtain a [archeological collecting] permit.**
The tower itself is not an archeological site so ARPA does not apply to bolting on it.

2 **The NPS violated the Antiquities Act when it began allowing climbing at the tower.**
The primary intent of the Antiquities Act was to protect ancient ruins of the American Southwest on federal lands. The act also provides that objects of antiquity located on federal land may be gathered only by permit and that any items collected must be displayed in public museums. It also gave the President the power to establish national monuments on federally-owned lands by executive order. Climbing does not of itself violate the act.

3 **Placing bolts and pitons is contrary to the presidential proclamation that established the monument and should be illegal.**
Theodore Roosevelt intended Devils Tower to be managed for multiple use, climbing included.
Closing the tower to climbing is contrary to the original intent of the monument.
There is no language in the 1906 presidential proclamation that mentions bolting, climbing, or recreational activity. Although climbing in many NPS areas has been a permitted activity, there is no legislative authority for climbing. The NPS Organic Act of 1916 calls for conservation and public enjoyment, not multiple use. The U.S. Forest Service does have an organic act and mission is based on multiple use which allows for many extractive uses on federal lands they administer.

4 **§106 of the NHPA has not been performed. Rock climbing at Devils Tower is an adverse act, thus the NPS must develop a memorandum of agreement with the State Historic Preservation Office (SHPO) to mitigate the impact of climbing.**
§106 compliance had not been completed when the DCMP was released. The FCMP is in compliance with §106 of the NHPA. Before any undertakings resulting from the FCMP are initiated, consultation will be performed under 36 CFR 800. The NPS will continue to work closely with the SHPO to make sure cultural resources are protected at Devils Tower.

5 **The plan is in violation of the NHPA with respect to tribal consultation and with traditional communities within the tribes.**
Both by the spirit and the letter of the law, the NPS complied with the NHPA and will continue to consult with tribes before considering the nomination of Devils Tower to the National Register. Satisfying the requirements of §106 and §110 of the NHPA may be carried out through the NEPA process according to 36 CFR Part 800.14(a) and (b). The regulations for §106 of the NHPA encourage coordination of these and other regulatory processes whenever possible.

6 **The South Dakota SHPO should be consulted on the climbing plan.**
Since Devils Tower National Monument is located entirely within the state of Wyoming, only the Wyoming SHPO has jurisdiction to officially comment on the DCMP.

7 **The NHPA provides public land managers the authority to close public areas to protect cultural resources.**
We concur that it is within the authority of the monument superintendent to implement closures to protect cultural resources.

8 **Without a cultural resources management plan, Devils Tower can not make decisions that affect cultural resources, i.e. Devils Tower.**
Devils Tower National Monument does have an approved resources management plan with a cultural resources component.

9 **The closure is contrary to NPS policy on relations with Indians and NPS management policy.**
Because the NPS is making special arrangements for Indian religions, they will have to do the same for any other religion that asks.
Under federal law, American Indians are given special rights and recognition under AIRFA, which guarantees them access to sacred sites. (See the FCMP on page 3) NPS Management Policies under 5:11 recognize that American Indians do have certain rights and privileges in units of the National Park Service that are not offered to other ethnic groups. Chapter 8:8 states "The National Park Service, to the extent consistent with each park's legislated purposes, will develop and execute it's programs in a manner that reflects knowledge of and respect for the cultures, including religious and subsistence traditions, of native American tribes or groups with demonstrated ancestral ties to particular resources in parks." Also, chapter 8:9 states "The National Park Service will be as unrestrictive as possible in permitting native American access to and use of traditional sacred resources for customary ceremonials;" and "The NPS will protect sacred resources to the extent practicable and in a manner consistent with the goals of the traditionally associated native American tribe or group." The voluntary June closure to climbing is intended as an act of respect and is consistent with NPS policy.

10 **Favorable treatment of Indian religions at the expense of others is contrary to AIRFA.**
Climbing is not a religion, nor is it protected under AIRFA. Indian religions have a preempted right.
Under AIRFA, Congress has recognized special status for American Indian religions. Actions taken under the FCMP, however, are based on the protection of cultural resources.

11 **NAGPRA (Native American Graves Protection and Repatriation Act) and AIRFA protect sacred sites.**
NAGPRA does protect American Indian objects and human remains, but does not address access to or protection of sacred sites. AIRFA does protect access to sacred sites. Sacred sites on public lands are protected under specific legislation or agency authorities.

12 **Closing the tower to climbing violates 16 USC 1a-1.**
This section of the NPS enabling legislation directs the NPS to ensure its management actions do not derogate "...the values for which these various areas have been established..." Since climbing on Devils Tower never has been mentioned in any legislation or executive order, the FCMP does not violate this law.

13 **Closure by one ethnic group will lead to more closures for other ethnic groups.**
The voluntary June closure to climbing is not based on ethnicity. The intent of the FCMP is to protect and respect natural and cultural resources and values.

14 **By allowing climbing, the NPS is violating all of the laws mentioned in the plan.**
This issue belongs at a national level, government to government.
The NPS is within its authority to manage climbing at Devils Tower. The actions proposed do not violate law. The federal government has a trust obligation to tribes and must maintain a government to government relationship with these entities. We have begun consultation and will continue to consult over the issues in the FCMP and other issues at the tower. Legislation for the protection and management of sacred sites has been introduced in Congress. If new laws are enacted, the NPS will comply with them.

15 **The 1868 Treaty is still intact through the precepts of U.S. treaty law. Devils Tower National Monument is Indian land.**
The NPS recognizes there are extant claims for federal lands in the Black Hills, but this issue extends far beyond the scope of this plan. The 1868 treaty is under discussion in Congress and the courts. The NPS would fully comply with any change of jurisdiction. In the meantime, it is our intent to manage the

monument in such a way that will protect its resources and values for all Americans.

16 **The plan ignores the rights of climbers.**
Recreation activities in parks are privileges not rights. Devils Tower is in public ownership for all Americans. No law guarantees a right to climb on Devils Tower.

17 **You can't close public lands for religious purposes.**
Closure is unconstitutional.
The closure would set a legal precedent challenging the first amendment of the U. S. Constitution.
The NPS does not have the authority to close Devils Tower to climbing.
Through the FCMP, the NPS is protecting cultural resources, not closing Devils Tower for religious purposes. We are asking visitors to voluntarily not perform a particular activity in order to emphasize the significance of American Indian culture. The monument superintendent has the authority to close areas of the monument, limit activities, etc. under 36 CFR §1.5 "Closures and public use limits." NPS Management Policies under chapter 8:2 states "Appropriate tools for managing for recreational activities may include general or special regulations; permit and reservation systems; and local restrictions, public use limits, closures, and designations implemented under the discretionary authority of the superintendent."

18 **The NPS prohibits climbing if it has unacceptable impacts on resources or natural processes. The DCMP says that this is happening, so climbing should not be allowed.**
We concur that continuing the status quo of climbing activities at Devils Tower would have resulted in unacceptable impacts, thus we are implementing the FCMP. Elements of the FCMP will mitigate or prevent climbing impacts from becoming unacceptable.

19 **Increasing Indian cultural awareness as a goal in the climbing plan is inappropriate.**
Closing climber access in June would defeat your goal of instilling respect among climbers for Indian culture.
We think a voluntary closure offers the opportunity for climbers to personally choose to comply out of respect. This is an opportunity to comply by choice. Through an educational program, monument visitors will learn about another culture and new reasons to honor this unique national resource. The voluntary closure goes hand in hand with a cross-cultural education program. We think both actions are needed. Instilling cultural awareness through education is an integral part of the whole plan.

20 Closing the tower to climbing does not meet the plan's objectives.
The voluntary June closure is one element of managing recreational climbing at Devils Tower and is consistent with the four objectives stated in the FCMP.

G) THE PLAN, PLANNING PROCESS, AND PUBLIC REVIEW

1 The planning process was inadequate, there is missing information.
We have met all NEPA and NPS planning requirements. Extensive scoping and public meetings as well as the 90 day public review provided ample opportunity for the public to participate. Scoping with the climbing management plan work group produced excellent results. Few issues were brought out in public comment that were not brought up in the work group. We distributed over 1,200 copies of the DCMP and conducted six public meetings in four states. The DCMP's contents were published in climbing magazines and newspapers around the nation and received extensive television and radio attention. An important part of the FCMP is to increase our information base on such issues as raptors, visitors, climbing hardware, and more. We designed the FCMP to be flexible enough to allow for modifications when needed and revision in the future.

2 The plan does not establish a need for managing climbing at Devils Tower.
In 1982, about 3,000 people registered to climb at Devils Tower. In 1992, that number jumped to about 6,500. During the 1980s, 117 new routes were established on the tower. Today there are approximately 220 named climbing routes, 600 bolts, and hundreds of fixed pitons on Devils Tower and with over 6,000 annual climbers. Through 1994, there have been 34,452 recorded climbers on Devils Tower. Numerous environmental impacts have resulted from climbing activities. Further detail can be found in the "Purpose and Need for the Plan" chapter of the FCMP.

3 Spell out how success of a voluntary closure is defined.
There is no definition of when or how success of a voluntary closure will be evaluated.
The FCMP was revised to conceptually define success for the voluntary June closure to climbing and how it will be achieved. A participatory process is planned to develop specific benchmarks for establishing the specific elements of success.

4 **The success of the voluntary closure should be based on a reduced rate of climbing after one year and increased American Indian use must occur at the tower, not somewhere else.**
Success criteria should not include traditional cultural activities.
Success criteria should require no climbing in June within one or two years.
We think a successful voluntary closure includes a reduced rate and a significant, steady, and permanent downward trend in June climbing over several years. We anticipate increased American Indian visitation at the tower, but it is not part of the success formula. The reasons for the voluntary closure are not tied directly to religious ceremonies occurring at Devils Tower. The tower has cultural significance whether people are present on-site or not. We would like to see a strong trend toward everyone choosing voluntarily not to climb in June out of respect for American Indian traditions and cultural values.

5 **The data from the 1993 Hanson report on monument visitors should have been used in the CMP/EA.**
Though the information in this report is useful, the NPS feels that the methodology used to generate this report was inadequate and the data was incomplete. The report was based on a class field exercise by college students. Therefore, we chose not to reference the results of this report in the DCMP. The NPS will perform a statistically significant visitor survey in 1995 and additional ethnographic investigations in the future.

6 **Local ranchers were not represented.**
A Crook County Commissioner, who is also a rancher, was an active member of the climbing management plan work group and participated in all meetings. The DCMP was distributed to monument neighbors including ranchers. Ranchers, monument neighbors, and the general public were given many opportunities to participate in the planning process during public review.

7 **The final plan must be written with additional input from climbers.**
During solicitation of public comment, both through public meetings and extensive written comment, the majority of respondents were climbers. Substantive comments were considered in the writing of the FCMP.

8 **The CMP/EA should be rewritten accurately.**
Any inaccuracies or errors identified in the DCMP were corrected in the FCMP.

9 **The plan is full of errors and will set a bad example for others wanting to write climbing plans and will be detrimental to the sport of climbing.**
The DCMP is unique to Devils Tower. It is the first climbing plan that deals with conflicts between recreational and traditional cultural values. We worked very hard to produce a quality document. The FCMP has been refined with the help

of public comments. We recognize conditions will change in the future and new information will become available.

10 **The Devils Tower N. M. report (1992) on climbing area of impact is faulty. The studies are inaccurate and based on speculation.**
Impact studies are speculative and unscientific.
The degree of impacts by climbers is exaggerated and taken out of context to the size of the rock.
As with the climber litter survey, the climbing area and bolt inventory was conducted by monument staff and used as a baseline from which to judge future changes. Surface area surveys have been done in other parks and can be used to compare conditions between parks. This report provided one piece of information to help us complete a bigger picture. The vegetation study, raptor report, ethnographic report, archeological survey, etc. were reputable studies performed under contract by professional researchers. All of this information was considered, as were studies done in other climbing areas such as Joshua Tree National Park. The conclusions drawn from each of these sources were carefully considered and are appropriate.

11 **The statement that climbers make up 1.3% of visitation and less in any given month is confusing.**
We concur. Climbers make up 1.3 percent of annual visitation and much less than this during the month of June. Over the past six years, June climbing has made up about 0.26 percent of the monument's annual visitation. The statement in the DCMP was made to illustrate that the total number of monument visitors directly affected by the voluntary June closure to climbing is very small.

12 **Sport climbing is not the same as non-summit climbing.**
We understand the difference. Both sport climbing and non-summit climbing occur at the tower and are different. We also know that most sport climbs are non-summit climbs. The heightened popularity of sport climbing has likely led to some of the short route and face route establishment at Devils Tower.

13 **It is a lie to claim that most of the natural lines (cracks) have already been climbed at the tower.**
There has not been a systematic survey conducted that would definitively answer this question. By studying the tower's climbing guide publications, however, it is readily evident that most cracks on the tower have been climbed by either free or aid climbing techniques. There are some cracks at the tower that have, indeed, not been climbed due to technical difficulty or inaccessibility.

14 **The plan ignores the positive aspects of climbing enjoyed by climbers and the general public.**
The whole plan is anti-climber and obviously discriminatory against climbers.
Visitor access [including climbing] should be handled in a General Management Plan, not a climbing management plan.
A comprehensive management plan should deal with Indian rights and general visitor use without singling out climbers.
The DCMP is not a comprehensive management plan, nor is it intended to be. It is a climbing management plan only, so it is understandable that some climbers may feel they have been singled out. In any environmental assessment, the impacts of an activity or project must be pointed out and examined. That is what EA's are supposed to do. It was not, nor was it meant to be discriminatory. Under the FCMP, climbers will continue to be able to climb on Devils Tower and visitors who enjoy watching them may continue to do so.

15 **The plan does not comply with the Natural Resources Management Guidelines (NPS-77). There is a lack of measurable objectives. There is no graduated management strategy where indirect controls are used before direct controls. A failure of indirect methods must be documented before direct methods are used. Climbers' needs are not addressed in the plan. There is no regional or national context used to measure how the plan would affect climbers' opportunity to climb in the area. Authorities: NPS 77 requires the NPS to encourage climbing and other recreational activities at Devils Tower. NPS-77 is not even mentioned in the authorities section of the plan and it is the sole NPS document that governs how the plan should be prepared and what the plan should contain.**
NPS-77 is the Natural Resources Management Guideline for the National Park Service. It does not deal with climbing activities. Management guidance comes from the NPS Management Policies (see comment F-10). Guidance for the environmental assessment and planning processes are found in NPS-12: National Environmental Policy Act Guideline and NPS-2: Planning Process Guideline. All requirements were met including the defining of objectives, developing alternative management strategies, and analyzing consequences.

16 **The NPS is favoring Indian culture over non-Indian culture.**
The NPS intent is to protect cultural resources in the monument and educate the public about this part of the American heritage. Climbing has been the main emphasis in our interpretive program for the last 20 years or more. We have a responsibility to balance our program and tell the whole story of Devils Tower to the American public.

17 The NPS only accepted input from Indians in developing the plan. Climbers should have been included.
The work group was heavily skewed in favor of Indians resulting in an inappropriate preferred alternative.
The NPS does not agree. Two climbing organizations and two American Indian organizations were represented on the climbing management plan work group, plus one environmental organization, a local county commissioner, and a NPS representative. The organizations decided whether to participate and who to represent them. Work group members expressed their views and brought up issues. We wanted diverse views represented from a wide spectrum of interests. The work group was not a voting body. The exact contents of the preferred alternative were selected and written by the NPS, not the work group.

18 The preferred alternative is not balanced. It gives preferential access to the tower to Indians.
The FCMP recognizes that the tower is a cultural resource as well as a recreational resource. It does not offer preferential treatment or access to the monument and applies to all monument visitors.

19 The plan offers preferential treatment for Indians over climbers.
The DCMP attempted to offer equal consideration to all monument visitors. As required by law, American Indians have been consulted on the management of a site significant to their culture. Climbers were equally involved in the planning process.

20 The nature and degree of climbing at Devils Tower is a phenomenon that is no more [illegible] 20 years old while traditional activities have gone on for centuries. The plan's analysis is slanted to maintain climbing at Devils Tower
It is true that current climbing conditions at Devils Tower are a very recent phenomenon. The first climb, however, occurred in 1893 and technical climbing has been a permitted recreational use of the tower since 1937. We agree that the tower has been of significance to American Indians for a much longer period than climbing has occurred on it. The FCMP attempts to reconcile these competing values in the contemporary world.

21 There should be significant representation by Indians in the planning process.
As part of scoping process, both the Grey Eagle Society and Medicine Wheel Coalition for Sacred Sites of North America participated on the work group. Twenty tribes received the DCMP to review. Public meetings were held in Rapid City and Pine Ridge, South Dakota to encourage American Indian comment. American Indians and other members of the public were given many opportunities to participate in planning during public review.

22 Climbers are not the largest source of noise in the park.
Noise is not a problem with climbing, it is with the general public.
Both general visitors and climbers are responsible for noise impacts. Climbing noise results from hammering pitons and bolts, yelling climbing signals, using equipment, knocking off loose rocks, etc. Climbers are the only source of noise on the tower, the prime resource of the monument. Climbing is certainly not the only noise impact in the monument nor is it a major component of overall noise impacts here. Due to the configuration of the tower, however, climber noise can be heard throughout the entire monument including the campground and picnic area. Though beyond the scope of the FCMP, solving noise problems from parking lot congestion, motorcycles from the annual Sturgis Rally, etc. is a high priority with the NPS.

23 General visitation impacts monument resources far more than climbers.
We agree that general visitation has a major impact on park resources. We have developed areas to handle visitors such as parking lots, campgrounds, etc. All visitor activities at Devils Tower impact the resources to some extent, including, climbing, hiking, camping, picnicking, etc. The FCMP is for managing climbing, not general visitation.

24 The draft plan is not clear about direct, indirect, long-term, short-term, and cumulative impacts.
These impacts were evaluated in the "Environmental Consequences" section of the DCMP.

25 There is no evidence that continued bolting would reduce the scientific, historic, and natural resource significance of the rock.
When complying with §106 of the NHPA, it is necessary to declare whether an action will introduce nonhistoric or inappropriate elements (visible, audible, or atmospheric) into a historic structure, setting, or environment. Clearly, such actions are of concern. Documented research, public scoping, and public comment received on the DCMP support our conviction that 600 bolts on the tower has resulted in undesirable impacts and that allowing for more would be inappropriate.

26 The higher density of climbers in months other than June will cause more impacts overall.
The overall impact to monument resources should be less. We do not anticipate that every would-be June climber would reschedule his or her climbs to other months at Devils Tower. Climbing numbers should actually decrease overall for the year with a successful voluntary closure. Crowding could increase somewhat in non-June months. During scoping, however, climbers repeatedly told us that the number of climbers on routes is not an issue with them.

27 Climber impacts should be measured in relationship to the impacts made by the general public.
The general public is not responsible for impacts to the tower. Climbing on the tower is impacting natural and cultural resources. These impacts must be controlled. The FCMP is a response to these concerns.

28 People like watching climbers. It is a positive, not negative impact.
We recognize that many visitors do enjoy watching climbers on the tower and are intrigued by the adventure of the activity. Through the scoping process and incidental reports many visitors have told us that they do not come here specifically to watch climbing since they were previously unaware that it even occurs, but once they arrive they enjoyed watching it. On the other hand, many people also have told us that they feel climbing on Devils Tower is inappropriate or offensive.

29 Climbing does not damage the area.
Climbing activities do impact a variety of resources valued and protected in the monument. Some clean climbing techniques have minimal impacts to resources.

30 Devils Tower is not primarily a crack climbing area, it is primarily a corner climbing area.
The concept is the same. Many cracks are, indeed, in corners between columns or where faces meet.

31 Climbers are best qualified to manage climbing at Devils Tower, not land managers.
The NPS is fully responsible for all management actions at Devils Tower. Many activities other than climbing take place at Devils Tower National Monument. No recreational activity holds primacy over any other activity or the protection of natural and cultural resources.

32 The NPS should not manage the style of climbing at Devils Tower (crack vs. face).
Public comment overwhelming supports the recreational significance of the tower as a traditional crack climbing area. Many people, including climbers, feel bolted face climbs are not necessary or desirable at the tower. The NPS is trying to manage the tower as one of the premier crack climbing areas in the world. For this and other reasons, we are managing climbing activities on the tower, such as new bolt placement, which precludes the development of new face climbing routes. We are managing impacts to resources rather than a climbing style.

33 Advances in technology will define what type of climbing is done at a particular site.

One of the driving forces behind the development of the FCMP was the enormous increase in climbing activity and increased uses of new climbing technology at Devils Tower over the last 20 years. Technology had improved rapidly and a need emerged to manage climbing at Devils Tower. Much of the new technology resulted in more and greater impacts to monument resources. We are very interested in new technologies that would reduce resource impacts.

34 The Devils Tower staff does not have rangers that climb well enough to lead rescues or monitor climbing activity.

There are some very capable climbers on our staff. In normal years, the NPS conducts some technical rescues off the tower. During the summer months, the park does have a basic rescue team and also recruits climbers to help with rescues as needed. Climbing rangers from Grand Teton National Park or Rocky Mountain National Park are available for serious technical rescues. Most of the year the park does not maintain a rescue team. Climbers climb at their own risk. We do monitor climbing management activities through occasional climbing patrols, our registration system, resource surveys, etc.

35 Slings and ropes are not routinely left on the tower.

Most climbers do not leave equipment behind on the tower. Brightly colored slings on anchor stations, however, are a lasting impact visible from the Tower Trail. The presence and visibility of climbing equipment left behind on the tower is also an impact on a cultural resource. The presence of visible climbing equipment was among the climbing impacts most opposed by respondents to the DCMP.

36 End climber registration, it is unnecessary.

Climber registration is a long-standing special regulation at Devils Tower and is one of the prime means by which we monitor and manage climbing and inform climbers of conditions and regulations. It provides a benefit for climbers in that it can let them know what routes are occupied. It will be valuable in monitoring the success of the FCMP. Maintaining this unique historical record depends on continuing the input of new data. This basic information gives us solid data over time from which we will make decisions. The NPS intends to continue to strictly enforce the required registration regulation at Devils Tower.

37 The NPS must insure that all climbers register in June to insure they are counted in measuring success.

The extremely high compliance rate we have had on required climber registration is one of the elements we consider essential to the success of the FCMP. Registration is currently required. Rules and regulations will be enforced.

H) INTERPRETIVE AND EDUCATIONAL PROGRAM

1 **Cultural education needs to be kept on a historical level. Religious details can not be made public.**
We respect this view. The intent of the new education program is to present a multicultural perspective on the history of Devils Tower. We will consult with American Indians in the development of our educational program to assure the program is respectful of their culture and does not reveal sensitive matters.

2 **The education program, exhibits, cultural demonstrations, videos, and more staff will destroy Devils Tower.**
We think many of these elements are crucial to the success of the overall climbing management program and the general mission of the monument. Most public comment has viewed these elements very positively.

3 **Inform national climbing organizations, magazines, climbing stores. Contact climbers through Internet, "Iwa To Yuki" - Japan, "High " - Britain, "Vertical" - France, "Outside," "Backpacker," "Rock and Ice", "Climbing," and "Summit" magazines in the USA.**
We will widely disseminate information about the FCMP in a timely manner, including international climbing periodicals and through the information superhighway. The effective dissemination of information is an important element of our cross-cultural education program and we hope the climbing community will help us in this effort.

4 **Climbing demonstrations should only be performed by experienced climbers.**
Presentation of interpretive demonstrations requires more skills than just personal knowledge and experience of a subject. NPS interpreters are trained in communication skills and in several technical disciplines, including climbing. Some of the interpreters on our staff also climb. We would encourage interested climbers to inquire about our volunteer program to help us with climbing demonstrations.

5 **Install climber information boards.**
This idea may have merit and will be considered as part of the education program.

I) SOCIOLOGICAL AND ECONOMIC EFFECTS

1 **It is unlikely that climbers would be able to reschedule visits to another month.**
On the contrary, over time a well-publicized voluntary closure in June should allow both American and international climbers to reschedule their trips. In most years, Devils Tower has about a seven-month climbing season that offers good weather and opportunities to climb. Many climbers prefer to climb in the less-crowded and cooler shoulder seasons of April/May and September/October.

2 **Rescheduling by climbers to other months will cause crowding during the rest of the summer which is a serious safety hazard for climbers.**
Safety in relation to increased climber numbers has not been a major concern identified during the scoping and public comment process. Climbers climb at their own risk and can choose to climb on crowded or uncrowded routes at any time of the year. Only a small percentage of the 220 routes at the tower are climbed regularly.

3 **There will be increased use of other Black Hills climbing areas. This is not mentioned as an impact in the plan.**
This was not mentioned as an impact in the DCMP. Displaced climbers during June could choose to climb in other areas or in other months at Devils Tower. With a successful voluntary closure, climbers could climb at other Black Hills areas rather than the tower. Devils Tower averaged about 1,100 climbers in June over the last six years. If these climbers are redistributed to other areas or to other months at the tower, there could be some impacts. We anticipate the bigger impact may be in the non-June climbing months at Devils Tower.

4 **The plan will prevent me from climbing, something I have done at Devils Tower for many years.**
The FCMP will permit climbing at Devils Tower. The NPS will encourage climbers to not climb at Devils Tower during June out of respect for American Indian cultural values.

5 **The closure will impact small businesses in the region.**
The economic effect by climbers is down played along with the impact to climbing guides and equipment stores.
In the past we have had as many as seven commercial climbing guide services in the park under license. Climbers only represent 1.3 percent of annual visitation at Devils Tower. Currently, June climbers number about 1,100, or only about 0.26 percent of annual visitation. We think the economic impact is minimal, especially if some climbers reschedule their visits to Devils Tower to other months. It is likely that spontaneous increases in general visitation will quickly eclipse any reductions by climbers.

6 **Explain the future for commercial use licenses for climbing guides.**
In 1994, Devils Tower had seven climbing guide services under commercial use licenses in the monument. Commercial use licenses for climbing guides have been issued for June 1995. The NPS plans to fully comply with the June closure. For this reason, commercial use licenses for June climbing guide activities will not be issued for June 1996 and beyond.

7 **Guide services are crowding the less difficult routes. They need to be restricted.**
We are not aware that this has been a significant issue at Devils Tower. At present, the number of guide services is not restricted. Most climbing routes at Devils Tower get little or no use. We hope that, at least in the immediate future, climbers can continue to regulate themselves by choosing which routes to climb. This issue was not a compelling enough concern for the NPS to endorse in the FCMP at this time. This issue will be researched as part of a future Visitor Experience and Resource Protection (VERP) plan. If this is an issue, it can be managed under the existing commercial use permit system.

J) OTHER OPTIONS, ALTERNATIVES, AND ISSUES INCLUDING THOSE BEYOND THE SCOPE OF THE FCMP

1 **No flags should be planted on the summit.**
This is an old mountaineering tradition that is not practiced at Devils Tower. We agree that there is no reason for flags to be planted on the tower summit. Climbers today sign their names on the summit register, but do not leave anything else behind.

2 **Climbing routes should not be renamed. Keep the original name because it's confusing in the guidebooks.**
The NPS does not name routes nor does it control the content of guidebooks. Devils Tower Natural History Association is publishing a new guidebook for the tower. Tradition in many climbing areas does allow first free ascent parties to rename aid routes when they are first done by free climbing.

3 **The summit register should be maintained.**
The summit register has been infrequently maintained over the years. The NPS is speaking with local climbing clubs who might be interested in maintaining the register on a regular basis. The NPS obtains its climbing data from the climbing cards, not the summit register.

4 **There is no way to enforce the type and color of climbing equipment required for the tower.**
The FCMP recommends that belay and rappel stations be equipped with camouflaged webbing or chains. The FCMP refers to fixed anchors when discussing the type and color of equipment. The FCMP does not address the color of climbing equipment used during an ascent that is not left behind. Our long-term goal is to have all anchors on the tower camouflaged and not visible from the tower trail. Guidelines will be developed by the NPS in consultation with local climbers.

5 **Precautions should be made to insure angry climbers do not vandalize the tower or harass Indians to protest restrictions.**
Both climbers and American Indians revere the tower. It is our hope that neither group will disrupt monument activities and will be respectful to one another. Vandalism or harassment by any visitor is not acceptable behavior. Rules and regulations will be enforced.

6 **Enforce the required registration for scramblers in the boulder field.**
The special climbing regulation in 36 CFR §7.30 for Devils Tower National Monument states: "Registration with a park ranger is required prior to any climbing above the talus slope on Devils Tower." The intent of this regulation covers technical climbing on the tower, not scrambling in the rocks.

7 **The NPS and the tribes should draft legislation for Congress to protect Devils Tower from climbing.**
We believe the FCMP can provide adequate protection for Devils Tower. Should that not be the case, additional measures may be pursued later.

8 **Measure noise impacts by climbers.**
The VERP should decide climbing levels for the tower.
Establish a quota on the number of climbers allowed for a given time period.
Based on our public scoping process, climbers do not feel a climber quota is needed right now at the tower. Reevaluation of the FCMP in three to five years will allow for a revaluation of noise and carrying capacity issues based on the results of the planned VERP.

9 **Develop a permit system that also provides guidelines for how new routes may be established.**
New routes requiring new fixed protection will not be allowed under the FCMP. A registration system will be established for replacing existing bolts and fixed pitons.

10 **Charge a special climbing fee to help support climbing management activities.**
It is within the authority of the NPS to charge a recreational use fee for permits including backcountry and climbing permits. This option could be explored in the future.

11 **Slings and webbing are unnecessary. Rappel stations could have chains and bolts with two carabiners.**
Replace slings with eye-bolts.
The exclusive use of eye-bolts would be an ideal system. Unfortunately, eye-bolts are costly and require a power drill for placement. We will keep this option in mind. Carabiners would be more visible than eye-bolts from the Tower Trail, resulting in more visual intrusion.

12 **Conduct more foot patrols on access routes and climbing patrols on the tower.**
The frequency of patrols is dependent on the annual funding levels of the monument. The success of the FCMP is primarily dependent on voluntary compliance and self-regulation among climbers. In addition to climbing, the monument staff must also manage the other 98.7% of visitors and their activities. Rangers will continue to patrol all areas of the monument.

13 **The NPS must explain what the most critical factors are in making their final decision.**
All factors are important. The driving issue behind the FCMP is the preservation of natural and cultural resources, not the consent of any one user group or the guarantee of a specific activity. The superintendent considered many factors in making the final decision including laws, regulations, policies, guidelines, resource data, and public input.

14 **Once a decision is made, a new superintendent should not be able to just change it.**
Threats to the resources, conditions, and available information may change over time. Superintendents have wide authority to implement resource protection measures. The FCMP will provide guidance to existing and future managers.

15 **Impacts to park resources from traditional cultural activities should be monitored the same as climbing.**
To be fair there should be an Indian management plan.
Impacts to park resources from group traditional cultural activities are monitored through the special use permit process. NPS management plans are not based on ethnic groups. They are based on activities in relationship to natural and cultural resources.

16 **The NPS should put in a modern technological means of getting to the summit so climbers do not have exclusive access.**
We believe this suggestion goes far beyond the scope of the FCMP. The NPS has no plans to put in a tram or elevator to the top of the tower as some have suggested. In our public scoping to date, this issue has not been seriously raised. Some American Indians and others have expressed concern that the top of the tower is the exclusive domain of climbers. Others have expressed concern that increased development on the tower will defile a unique national treasure.

17 **To be fair, the NPS needs to work on a way to cut down on visitor traffic, such as a shuttle system, just as hard as they have worked on climbing restrictions.**
We agree that a better system for managing monument visitation is desperately needed at Devils Tower. We hope to implement a better system, but it will take time. In July 1994, a management assessment was conducted for the monument that included the objective: "The park and area transportation system moves visitors in a safe and efficient manner and provides a quality experience." A shuttle system seems likely and it will be used by all monument visitors, including climbers.

18 **A simple map of approach trails should be available for all climbers.**
This is a good suggestion and we will pursue it. Devils Tower climbing guidebooks are available and do have maps of approach trails.

19 **Initiate a visitor experience and resource protection plan (VERP) immediately.**
The FCMP indicates the NPS will do a VERP. We have requested special funding to conduct this project and will begin when the money is available.

20 **The evaluation of success for a voluntary closure should include the opinions of the general American Indian community, not just the work group members.**
We agree with this suggestion and will continue to expand our consultation efforts with tribes.

21 **The NPS should require camouflaged ropes, low visibility chains, chalk/rosin, and low impact climbing techniques, not just encourage them. Also require the use of removable protection, not fixed. Climbing at Devils Tower should only be allowed if it is done free of any fixed protection. Clean climbing should be mandatory, not just encouraged. No leaving of software, no white chalk.**
Very few climbers in the world are good enough and bold enough to climb without equipment. Only a few climbs on the tower have been climbed free solo

with no equipment. Virtually every climber relies on fixed protection for safety. A small number of traditional climbers still use pitons on Devils Tower's aid routes. Under the FCMP, piton use on these routes will still be allowed as long as pitons are removed. No new bolts or fixed pitons can be installed. The leaving of software on the tower will be phased out. We will continue to endorse minimum impact climbing techniques including clean climbing and minimal use of chalk.

22 Change the term "voluntary closure" to "recommended closure."
We prefer the term voluntary closure because it indicates a personal choice on the part of the climber. The NPS fully endorses the voluntary closure and self-regulation concept.

23 Approach trails should be well defined and signed to reduce soil and vegetation impacts and help climbers.
Charge higher entrance fees to offset the cost of trail maintenance.
Climber approach trails were never constructed as permanent trails. With the increase in climbing at Devils Tower, the need for trail design and maintenance has increased. The FCMP calls for trail maintenance and signing. Rehabilitation on the trails will be a cooperative effort with climbers. Careful design and signing will be needed to insure the trails do not attract large numbers of non-climbers. The area within the loop of the Tower Trail is steep and dangerous and the environment is sensitive to foot traffic. We do not wish to encourage an increase in human presence close to the tower. Although higher entrance fees may be charged in the future to offset park costs, it might be more appropriate that a recreational use fee for climbing be charged for the maintenance of climbing trails and the support of climbing management activities.

24 Supply colored chalk and neutrally-colored ropes for climbers to buy.
The sale of camouflaged equipment outside the park would be appropriate and encouraged. Neutrally colored rope is fine, but it was not determined to be a significant issue in public scoping since ropes are not left on the tower. On the other hand, use of camouflaged webbing and chains will be encouraged on fixed anchors. We will encourage climbers to use only minimal amounts of chalk when climbing on the tower.

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CONSULTATION AND COORDINATION

LIST OF CONTACTS

The following agencies, organizations, businesses, and individuals have been contacted in the development of the Draft Climbing Management Plan/Environmental Assessment or the Final Climbing Management Plan/Finding of No Significant Impact.

U.S. Congress

U.S. Senator Malcolm Wallop (retired)
U.S. Senator Al Simpson
U.S. Senator Craig Thomas
U.S. Senator Ben Nighthorse Campbell
U.S. Representative Barbara Cubin

Federal Agencies

National Park Service:
- Washington Office, Washington, D.C.
- Rocky Mountain Regional Office, Denver, Colorado
- Albright Employee Development Center, Grand Canyon, Arizona
- Canyonlands National Park, Utah
- Colorado National Monument, Colorado
- City of Rocks National Reserve, Idaho
- Grand Teton National Park, Wyoming
- Joshua Tree National Park, California
- Pinnacles National Monument, California
- Rocky Mountain National Park, Colorado
- Yosemite National Park, California

Bureau of Land Management:
- Newcastle Resource Area

U.S. Forest Service:
- Bighorn National Forest, Wyoming
- Black Hills National Forest, South Dakota

U.S. Fish and Wildlife Service:
- U.S. Fish and Wildlife Service Field Office, Wyoming

State of Wyoming

Governor Jim Geringer
State Representative Marlene Simons
Wyoming State Historic Preservation Office
Wyoming Game and Fish Department
Curt Gowdy State Park

State of Colorado

Eldorado Canyon State Park, Boulder
City of Boulder Mountain Parks, Chautauqua Park

Local Government

Crook County (Wyoming) Commissioners

American Indian Organizations and Institutions

Medicine Wheel Alliance, Huntley, MT
Medicine Wheel Coalition for Sacred Sites, Riverton, WY
Blackfeet Community College, Browning, MT
Blackfeet Cultural Program, Browning, MT
Dull Knife Memorial College, Lame Deer, MT
Northern Cheyenne Cultural Committee, Lame Deer, MT
Fort Belnap College, Harlem, MT
Fort Peck Community College, Poplar, MT
Fort Peck Historic Preservation Office, Poplar, MT
Little Big Horn College, Crow Agency, MT
Crow Tribe Historical & Cultural Commission, Crow Agency, MT
Salish Kootnai College, Pablo, MT
Flathead Cultural Committee, Pablo, MT
Kootnai Cultural Committee, Pablo, MT
Stone Child Community College, Box Elder, MT
Nebraska Indian Community College, Winnebago, NE
Fort Berthold Community College, New Town, ND
Little Hoop Community College, Fort Totten, ND
Devils Lake Lakota Cultural Preservation Office, Fort Totten, ND
Standing Rock College, Fort Yates, ND
Turtle Mountain College, Belcourt, ND
Cheyenne River Community College, Eagle Butte, SD
Cheyenne River Lakota Cultural Affairs Committee, Eagle Butte, SD
Oglala Lakota College, Kyle, SD
Oglala Lakota Parks & Recreation Authority, Pine Ridge, SD
Sinte Gleska College, Rosebud, SD
Sisseton-Wahpeton Community College, Sisseton, SD
Northern Arapaho Language & Cultural Commission, Fort Washakie, WY

American Indian Tribes

Oglala Sioux Tribe, Pine Ridge, SD
Flandreau-Santee Sioux Tribe, Flandreau, SD
Blackfeet Tribal Council, Browning, MT
Rosebud Sioux Tribe, Rosebud, SD
Cheyenne River Sioux Tribe, Eagle Butte, SD
Crow Creek Sioux Tribe, Ft. Thompson, SD
Sisseton-Wahpeton Sioux Tribe, Sisseton, SD
Lower Brule Sioux Tribe, Lower Brule, SD
Yankton Sioux Tribe, Marty, SD
Arapaho Tribal Council, Fort Washakie, WY
Crow Tribal Council, Crow Agency, MT
Northern Cheyenne Tribal Council, Lame Deer, MT
Shoshone Tribal Council, Ft. Washakie, WY
Lakota-Teton Sioux Tribe, Interior, SD
Hunkpapa Sioux Tribe, Fort Peck, MT
Standing Rock Sioux Tribal Council, Fort Yates, ND
Southern Cheyenne and Arapaho Tribes, Concho, OK
Kiowa Business Committee, Carnegie, OK
Turtle Mountain Chippewa Tribal Council, Belcourt, ND

Organizations, Businesses, and Educational Institutions

The Access Fund
"Backpacker" magazine
Black Hills Climbers Coalition
Colorado State University
"Climbing" magazine
Devils Tower KOA
Devils Tower Natural History Association
Devils Tower Tourism Association
Devils Tower Trading Post
Fort Devils Tower
Gillette Climbing Club
"High" magazine
"Iwa To Yuki" magazine
Jackson Hole Mountain Guides
National Outdoor Leadership School
National Parks and Conservation Association
"Outside" magazine
"Rock and Ice" magazine
Sierra Club, Sheridan, WY
Sierra Club, Rapid City, SD
"Summit" magazine

Sylvan Rocks (climbing school)
Tower Guides (climbing school)
"Vertical" magazine
Wilderness Society

Climbing Management Plan Work Group

The CMP work group, which first met in April 1993, is composed of representatives from the following interests:

The Access Fund
Medicine Wheel Coalition
Crook County Commissioner
National Park Service
Sierra Club
Grey Eagle Society
Gillette Climbing Club and Black Hills Climbers Coalition

Individual members of the work group are as follows:
Bob Archbold (Access Fund)
George Sutton, Joe Williams (Medicine Wheel Coalition)
Perry Livingston (Crook County Commissioner)
Jim Schlinkmann (National Park Service)
Janet Maxwell (Sierra Club)
Royal Bull Bear, Joe Swift Bird, Elaine Quiver (Grey Eagle Society)
Carl Coy (Gillette Climbing Club & Black Hills Climbers Coalition)

PLANNING TEAM

Debbie Bird
Former Superintendent, Devils Tower National Monument

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Bob Moon
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Jim Reilly
Ranger Activities Specialist, Rocky Mountain Regional Office

Dave Ruppert
Ethnographer, NPS, Rocky Mountain Regional Office

George L. San Miguel
Chief of Resources Management, Devils Tower National Monument

Jim Schlinkmann
Chief Ranger, Devils Tower National Monument

Chris Turk
Environmental Compliance Program Leader, Rocky Mountain Regional Office

APPENDIX A: EXAMPLE CLIMBING USE PERMIT FORM

U.S. Department of Interior
National Park Service
Devils Tower National Monument
CLIMBING USE PERMIT

Visitor must obtain this permit before climbing. Climbers climb at their own risk.
The NPS does not maintain any bolts, pitons, anchors, or rappel stations on Devils Tower.

Name

Address

City | Zip

To Visit

Number of People in Group

Route Name	Summit	Finish

Date/Visitor Sign

Date/NPS Sign

Replacement of Bolts:

Bolting Permit Issued Yes or No.
Comments:

APPENDIX B: ACCESS FUND POSITION STATEMENT

The Access Fund urges all climbers to recognize and to limit the impacts of their climbing practices on the environment, other climbers, land managers, and other users.

Climbing may involve the use of fixed anchors, including expansion bolts or pitons, and their use has long been recognized as legitimate. The use of fixed anchors is often needed for safe climbing. Only climbers have the knowledge needed to install, replace, or remove fixed anchors. When placing fixed anchors, climbers should limit their impact by all reasonable means. All fixed anchors should be camouflaged, in accordance with local practice, to further reduce their minimal visual impact. Climbers should refrain from placing bolts where removable protection is feasible and safe.

"*Chopping*" or removing bolts invariably results in damage to the resource and should not occur until and unless a consensus has been reached between all parties. *Chipping* or *gluing* of holds on natural rock faces causes unacceptable resource impacts.

The Access Fund believes that the key to effective management is cooperation. Discussion between climbers and land managers will result in climbing management policies based on mutual agreement. Such policies will help ensure cooperation and effective enforcement of the policy.

Climbers should cooperate with the public and private land managers to mitigate the environmental impacts of climbing. The Access Fund believes that regulation affecting any climbing practices, including fixed anchors, is acceptable only if it follows from discussions and agreement between local climbers and land managers. Alternatives to regulation, such as camouflaging fixed anchors, education and self-regulation should be fully explored before regulation. Regulation may be appropriate to protect historical, archeological or environmental resources. Furthermore, climbers must respect regulations against the use of power drills in wilderness areas or other designated areas.

The most effective manner for dealing with access issues is for climbers to get involved with the Access Fund at the local level. If you have a local climbing organization, get involved and support its efforts to promote access to climbing areas. If you do not have a local club, form one immediately and contact the Access Fund for help in getting your local organization started.

Above all, climb responsibly. Show respect not only for other climbers, but also land managers and others users. Never trespass on private land, respect all closures on public lands, and report all questionable closures to the Access Fund and to local climbing organizations.

APPENDIX C: GLOSSARY

Ascensionist - see "Climber."

Adverse effect - is an action by a federal agency that may alter the characteristics of a historic property that may qualify the property for inclusion in the National Register of Historic Places. With respect to traditional cultural properties, an adverse affect results from an action that may diminish the integrity of the property's setting, feeling, or association such as the physical destruction, damage, or alteration of the property, the isolation or alteration of important historic characteristics of the property's setting, or the introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting.

Aid climbing/aid route - refers to a traditional method of recreational climbing performed with the aid of any number and various forms of artificial devices, primarily pitons, employed by the climber to obtain leverage in order to ascend. "Clean" aid climbing involves the use of removable protection only, but not pitons.

Anchor - see "Protection."

Approach - refers to a hiking trail by which climbers gain access to the base of a climbing route.

Avifauna - the variety of bird species that inhabit a particular area.

Belay or belaying - refers to the method by which one climber secures a rope in case the other climber falls. Typically, one climber (the "belayer") remains on the ground and "belays" the other climber (the "leader") while he or she ascends the rock and places protection. Once the leader reaches the top of the pitch, he or she then belays the other climber up the route. The rope that serves as a safety line while climbing, is usually fed through a device controlled by the belayer and provides friction needed to "catch a fall."

Bolts or Bolting - see "Expansion Bolt."

Butte - an isolated hill or small mountain with steep or precipitous slopes and a top variously flat, rounded, or pointed that may be a residual mass isolated by erosion.

Cairn - a pillar of rocks placed by hikers or mountaineers to mark the summit of a peak or the path of a trail.

Camming Devices - are mechanical devices, typically spring loaded, used for protection from falling. They are designed to expand once placed in a crack and are removed by manually retracting the spring. "Friends" and "Camalots" are examples of brand name camming devices.

Carabiners - are aluminum alloy snap-links used to connect protective equipment to the climber's rope.

Chains - see "Slings."

Chalk - typically consists of white magnesium carbonate this is used by gymnasts and climbers to dry sweaty hands and increase adhesion. It is pulverized and carried in a hand-sized bag carried during the climb. The persistence of the residue depends on the climate, rock type, and exposure to weather.

Chipping - see "Rock Alteration."

Chocks or Chockstones - Also called nuts, they are typically made of aluminum alloy in various shapes, the most common being trapezoidal, with sizes ranging from 1/16 inch to 8 inches in width. A chockstone is attached to a sling or cable capable of accommodating a carabiner. Chockstones are designed to be placed and removed by hand in the natural constrictions formed by cracks with irregular widths. Because chockstones are manipulated by hand, there is usually no damage to the rock in their use unless the rock is fragile. Some naturally occurring rocks found in the cracks of a climbing route are also used as chockstones.

Chopping - is the removal or destruction of fixed protection, typically bolts, on a climbing route.

Clean climbing - is a climbing method that uses no permanent fixed protection to ascend a route. Only removable protection such as camming devices are used then removed by the last climber in the party. Clean climbing is considered minimum impact climbing that does little or no harm to the rock.

Climber - is a visitor who ascends an established and recognized route by means of technical ability and equipment.

Climbing - is defined to include rock climbing, winter and ice climbing, and mountaineering, where such climbing aids as pitons, carabineers or snap links, ropes, fixed or removable anchors, or other similar equipment are generally used to make the climb. This is the definition used in new proposed 36 CFR §2.63 climbing regulations.

Code of Federal Regulations - CFR - A codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the federal government.

Commercial Use License - issued by the National Park Service annually to climbing guide services and other commercial operations earning an income within parks. The NPS stipulates the conditions under which the licensee must follow. To obtain a license, the applicant must provide proof of liability insurance and pay a fee to the NPS.

Consultation - A policy of the National Park Service that NPS managers establish and maintain effective consulting relationships with potentially affected American Indian tribes and groups so that management decisions will consider the concerns of potentially affected American Indian tribes and groups. In addition, certain other consultative and notification requirements for specific actions, such as the issuance of ARPA permits, are provided for in law and regulation.

Crack climbing (natural line) - refers to climbing along the natural fractures in a rock surface by means of natural hand and foot holds. Climbers wedge their fingers, hands, toes, heels, or feet into the crack to support their ascent. (Also see face climbing)

Cross-cultural education program - interpretive activities offered to the public as a critical element of the FCMP incorporating the themes, views, and experiences of all cultural groups that share a common resource. At Devils Tower this innovative program will emphasize the history and culture of all monument user groups.

DCMP - the Draft Climbing Management Plan for Devils Tower National Monument released in July 1994.

Effects (Impacts) - Environmental changes resulting from an action. Included are direct effects, that are caused by the action and are later in time or further removed in distance, but which are still reasonably foreseeable. Indirect effects may include growth-inducing results and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Endangered species - Any animal or plant species that is in danger of extinction throughout all or a significant portion of its range. Plant or animal species identified by the Secretary of the Interior as endangered in accordance with the 1973 Endangered Species Act.

Environmental assessment (EA) - see "National Environmental Policy Act of 1969."

Environmental impact statement (EIS) - see "National Environmental Policy Act of 1969."

Ethnographic resources - Any natural or cultural resource, landscape, or natural feature that is linked to the traditional cultural practices, values, beliefs, history, or ethnic identity of a cultural group. Ethnographic resources are the foundation of traditional societies and the basis for cultural continuity, ranging from traditional arts and native languages, spiritual concepts, and subsistence activities that are supported by special places in the natural world, structures with historic associations, and natural materials.

Expansion bolts - are 2 to 4-inch long metal rods that are typically threaded on one end and machined on the other end so that the end expands with great force when the rod is either twisted or hammered into a drilled hole ("bolting"). After the bolt is placed in a hole in this fashion, a "hanger" can be secured to the threaded end by use of a nut. Some varieties of bolts (eye-bolts) have hangers or eyes that are permanently pre-attached. Bolts are considered permanent fixed protection.

Eyes (eye-bolts) - are holes at the ends of certain types of bolts capable of accommodating a carabiner.

Face route/face climbing - refers to climbing by use of natural hand and foot holds out on the smooth, exposed rock surface between the natural fractures in the rock. (also see Crack Climbing) Face climbing usually relies on bolts for protection since no crack is available in which to place removable protection.

FCMP - the Final Climbing Management Plan for Devils Tower National Monument released in February 1995.

Fixed protection or fixed anchor - is permanently placed protection left in the rock, typically a bolt or a piton intended to be permanently placed. Fixed protection is usually applied when no "clean" opportunities are available.

Fixed piton - see "Fixed protection" and "Piton."

FONSI - Finding of No Significant Impact, a National Environmental Policy Act (NEPA) document written for an environmental assessment that indicates an environmental impact statement will not be written for the federal agency's proposed action.

Free climbing/free route - is the sole use of the body and physical power to ascend; rope and equipment are used only as a backup should the climber fall.

Friends - see "Camming Devices."

Gluing - see "Rock Alteration."

Hand drill - see "Power Drill."

Hanger - is an L-shaped piece of metal that is attached to a bolt with a threaded nut and bears an eye or hole capable of accommodating a carabiner. A hanger attached to a placed bolt is usually considered to be as permanent as a bolt.

Hardware - climbing equipment placed in cracks or on faces to protect climbers from falling including chocks, nuts, friends, pitons, and bolts.

Hiker/climber - a non-technical climber who scrambles around or above the boulder field at Devils Tower. This also refers to the casual family visitor who is not attempting to perform "technical rock climbing" activities.

Holds - are ledges, cracks, depressions, or protrusions on the rock surface that are used to support a climber's weight when grasped by a hand or stepped onto by a foot.

Impact - see "Effects."

Leading - refers to the act of a lead climber ascending a route, placing protection as he or she ascends while being belayed from below by a second climber. The term is used to distinguish between a climber ascending a route while being belayed from below. Lead climbers "get the rope up." When properly belayed, leading involves relatively little risk if the rock is firm and protection points are abundant.

Meadows - a steep vegetated ledge over 50 feet wide located about two thirds of the way up the southeast face of Devils Tower. A trail crosses the Meadows to connect some routes with the summit and the summit trail. Many climbing routes end at the Meadows rather than continue to the summit.

Memorandum of agreement - much like a contract, it is an agreement between parties, such as a federal agency, a SHPO, and other parties, on measures to avoid, reduce, or mitigate adverse effects on park resources, such as historic properties, or to accept each effect in the public interest.

Mitigation - includes: (a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and, (e) compensation for the impact by replacing or providing substitute resources or environments.

National Environmental Policy Act of 1969 - NEPA requires all federal agencies to consult with each other and to employ systematic and interdisciplinary techniques in planning. All actions significantly affecting the quality of the human environment require a detailed statement on the environmental impact, adverse environmental effects, and alternatives. The act also established the Council on Environmental Quality. Environmental assessments (EA) and environmental impact statements (EIS) are written by federal agencies to comply with NEPA.

National Historic Preservation Act of 1966 - The NHPA requires all federal agencies to conduct appropriate resource inventories and evaluations and consider nominating eligible cultural resources to the National Register of Historic Places. The act also requires federal agencies to consult with State Historic Preservation Officers on undertakings that may affect cultural resources on federal lands.

National Register of Historic Places - was established as part of the National Historic Preservation Act of 1966. The National Register documents the appearance and importance of districts, sites, buildings, structures, and objects significant in America's prehistory and history. Devils Tower is eligible for the National Register as a traditional cultural property (natural feature having cultural significance and as a ceremonial site).

Natural Lines - see "Crack Climbing."

Noxious weed - Noxious weeds are disruptive plants that are considered detrimental, destructive, injurious, or poisonous to humans, native flora, native fauna, and livestock. Noxious weeds are non-native to the State of Wyoming. These non-native plants occur at a given place as a result of direct or indirect, deliberate, or accidental actions by humans. Canada thistle and leafy spurge are local examples of noxious weeds.

Nuts - see "Chocks."

Pitch - The distance a lead climber ascends before he or she stops to belay the second climber's ascent. The distance of a pitch is limited by the length of rope used by climbers and the location of ledges and anchor stations.

Pitons - are variously sized iron alloy spikes with an eye or hole at the end in which a "carabiner" can be clipped. Pitons are placed in naturally occurring cracks with repeated blows from a hammer. They usually can be removed by hammering the piton from side to side until enough of the surrounding rock is pulverized to allow withdrawal. Some pitons are considered to be permanently placed or "fixed" when placed and used for free climbing, such as the fixed pitons still in place on the Durrance Route on Devils Tower.

Power drill - battery operated boring tool used by climbers to pierce holes into rock for the installation of expansion bolts. Power drills can bore a hole into rock in less than a minute. Hand drills are manually operated, metal drill bits driven into the rock when stuck repeatedly with a hammer. A bolt installed with a hand drill can take up to 30 minutes to place.

Preferred alternative - the proposal being advocated by an agency among other alternatives, all of which are analyzed in an environmental assessment or a draft environmental impact statement.

Protection (anchor) - indicates the various devices that a climber places in or on the rock for safety or to descend. The term includes multi-bolt anchors, camming devices, pitons, hangers, and bolts and includes both "clean" or removable types and permanent types of protection. "Natural" protection is offered by the natural attributes of the rock, chockstones, trees, or bushes.

Rappel - is the method by which a climber descends a rope, usually by using a mechanical device that allows a controlled descent with little effort. Ropes are generally doubled or tied together and retrieved by pulling all the way through on one end after the rappel is finished.

Raptors - Predatory birds, such as falcons, hawks, eagles, and owls.

Recreational opportunity - The availability of choices for users to participate in recreational activities within a given setting.

Removable protection - See "Nuts," "Camming Devices," "Friends," "Chocks," and "Clean Climbing."

Rock alteration - involves the physical modification of the rock surface and may include filing off rough edges, reinforcing loose hand and foot holds with epoxy glue, removing loose rocks or vegetation, or creating new holds with hammers, chisels, or drills.

Rosin - is an organic (derived from pine tree pitch) sticky substance applied to the hands by athletes, including rock climbers, to improve their grip.

Route - is the generally vertical path on the rock face that a climber ascends. A route is established when it is first climbed and is usually given a name by the first ascensionist, which is recorded in a guidebook for other climbers to use for finding, identifying, and duplicating the ascent path. Aid routes are usually renamed by the first free ascent party. A difficulty rating is assigned to routes by the first ascent party and may be revised by others that climb it afterwards.

Sacred site - as referenced in the FCMP, a sacred site is a place with traditional cultural values and spiritual significance for American Indians. Also see "National Register of Historic Places."

Scoping - A part of the National Environmental Policy Act process; early (in the planning process) and open activities used to determine the extent and significance of the issues, and the range of actions, alternatives, and impacts to be considered in an environmental assessment or environmental impact statement.

SHPO - "State Historic Preservation Officer."

Slings - are knotted or sewn loops of nylon webbing that are occasionally left behind when a climber descends from the top of a route, typically by rappelling or being lowered off by the belayer. Sometimes metal chains are used for the same purpose rather than slings because chains are easier to use once in place, last longer, and may be less conspicuous than webbing.

Social trails - Unauthorized foot paths established over time by repeated travel over previously undisturbed ground.

Software - refers to slings, webbing, and rope that attaches to climbing hardware.

Special use permit - an authorization issued by the NPS to manage particular group activities in a park that have the potential to interfere with other activities in the park. Examples include weddings, bike tours, and traditional cultural activities.

Sport climbing - is a style of climbing typically involving short (less than a rope length) routes with fixed bolt protection. Previewing and practicing a climb is common and the emphasis is on technical difficulty rather than adventure. Sport climbs tend to involve less physical risk (due to the regular spacing of bolted protection points) and rarely continue to summits. Sport climbing routes generally end at top fixed anchors where the sustained difficulty of the climb diminishes or the character of the rock changes.

State Historic Preservation Officer (SHPO) - The NHPA established a SHPO in each state under the oversight of the Advisory Council on Historic Preservation. The SHPO reviews agency undertakings that affect cultural resources and consults on other matters regarding the research, protection, and classification of significant cultural resources.

Substantive comment - Under the National Environmental Policy Act of 1969, an agency will consider and respond to substantive public comments when preparing a final document. Substantive comments must either:

1) Challenge the accuracy of the draft document's analysis
2) Dispute the accuracy of the draft document's information
3) Suggest different reasonable and viable alternatives
4) Provide new information that compels the decision maker to make a change in the proposal (preferred alternative)

Summit trail - a trail on the summit of Devils Tower that connects the top of a popular ascent route above the Meadows with the summit cairn. It is the only trail on the summit of Devils Tower.

Sun Dance - Many American Indians of the northern Great Plains performed and still perform this renewal of life ceremony. Some tribes traditionally performed these Sun Dances at Bears Lodge (Devils Tower) and other sacred sites. The ceremony is often performed in the month of June and requires several days to perform.

Technical climb - refers to the need for a rope and protection devices to ascend a route (5th class climbing). "Technical" is meant to distinguish from climbing in which a rope is needed, but protection devices are not (4th class climbing) or climbing in which a rope and protection devices are not needed (3rd class climbing) such as with hiker/climbers. Also see "Free climbing" and "Crack climbing." Technical climbs are rated for difficulty between 5.0 and 5.14.

Threatened species - Those plant or animal species likely to become endangered species throughout all or a significant portion of their range within the foreseeable future. Also see "Endangered species."

Traditional cultural practice - see "Ethnographic resources."

Traditional cultural property - is a property or place that is eligible for inclusion on the National Register of Historic Places because of its association with cultural practices and beliefs that are 1) rooted in the history of a community and 2) are important to maintaining that community's traditional beliefs and practices.

Webbing - tubular nylon material, often brightly colored, used by rock climbers to connect or carry climbing equipment. Also see "Slings."

Wetland - lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface.

APPENDIX D: PLANNING AND PUBLIC INVOLVEMENT TIME TABLE

TASK	RESPONSIBLE	STARTING DATE	COMPLETION DATE
Contact interested parties	NPS-DETO	9/92	12/92
Assemble work group	NPS-DETO	12/92	3/93
Publish Notice of Intent	NPS-DETO	10/92	12/92
Identify issues and conduct scoping in work group meetings	NPS-DETO	4/93	4/94
Newsletter and press release	NPS-DETO	7/93	7/93
Develop task directive	NPS-DETO, Pearson	2/94	2/94
Review task directive	NPS-DETO, RMR	2/94	3/94
Finalize task directive	NPS-DETO, Pearson	3/94	3/94
Newsletter-CMP Update	NPS	3/94	3/94
Write draft CMP/EA.	Pearson	2/94	3/94
Complete draft CMP/EA	NPS-DETO	3/94	4/94
Work group reviews draft CMP/EA in Denver	NPS-DETO, RMR, work group	4/94	4/94
NPS-DETO staff edits draft	NPS-DETO	4/94	6/94
RMR reviews draft	RMR	6/94	7/94
Analyze comments - complete draft	NPS-DETO	7/94	7/94
Print draft CMP/EA and mail to interested parties	NPS-DETO	7/94	7/94
90-day public review and public meetings	NPS-DETO, RMR, work group	7/94	10/94
§ 106 Review, NHPA	SHPO	7/94	1/95
§ 7 Review, ESA	U.S. Fish & Wildlife Service	7/94	9/94
Analyze and answer public comment	NPS-DETO	11/94	12/94
Write the final CMP	NPS-DETO	12/94	1/95
Write the FONSI	NPS-DETO	1/95	1/95
Print final CMP/FONSI and mail out	NPS-DETO	1/95	2/95
Implement the final CMP	NPS-DETO	3/95	ongoing

Abbreviations used in table

NPS-DETO:	National Park Service, Devils Tower
RMR:	National Park Service, Rocky Mountain Regional Office
Pearson:	Georgina Pearson
CMP/EA:	Climbing Management Plan and Environmental Assessment
SHPO:	State Historic Preservation Office, Wyoming
FONSI:	Finding of No Significant Impact
NOI:	Notice of Intent
ESA:	Endangered Species Act
NHPA:	National Historic Preservation Act