



January 20, 2026

Mike Thom
District Ranger
Powder River Ranger District
1415 Fort Street
Buffalo, WY 82834

Submitted online at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64474>

Re: Tensleep Canyon Climbing Management Plan #64474

Dear Forest Supervisor Thom,

Thank you for this opportunity to provide comments regarding the Tensleep Canyon Climbing Management Plan Draft Environmental Assessment (EA). Please accept the following comments on behalf of the Wyoming Wilderness Association (WWA), an education, stewardship and advocacy nonprofit organization dedicated to protecting Wyoming's public wildlands. Our organization represents over 5,000 members and supporters from across Wyoming and the United States. Our community is made up of conservationists, nature lovers, sportsmen, and outdoor recreationists, including rock climbers. WWA is involved in statewide efforts to protect designated Wilderness, and wildlands that may one day qualify.

The efforts of the Bighorn National Forest (BNF) Powder River Ranger District and its planning team to move the Tensleep Climbing Management Plan process forward are laudable and greatly appreciated. We recognize that your team has been working to complete a management plan for this area since before 2019, and the recently released Draft Environmental Assessment (EA) is a welcome step to help land managers balance access, safety, sustainable recreation, and the protection of natural and cultural resources in this world-class climbing destination. Overall, the Proposed Action you outline in the Draft EA will be positive if it is adopted. With that said, WWA has identified shortcomings in the Proposed Action that we ask for you to address in your Final EA to ensure comprehensive management for this wild and beloved place.

With the official designation of the Leigh Creek Research Natural Area (RNA) last year¹, the management proposal to close routes and user trails that currently exist within this RNA is appropriate. Furthermore, the Powder River Ranger District should develop clear RNA boundary signage as well as educational material (e.g. site specific signage, web resources, printed materials) to communicate to BNF users where the RNA is located, what the newly-implemented access restrictions protect, and how they will serve the ecosystem. Furthermore, recreation of any kind should be managed so as to not diminish the quality of natural resources in the area. Lastly, we ask that within *Step 6: Enforcement of Appendix B* of your Draft EA, that you elaborate on specific enforcement plans for managing and protecting the recently established RNA.

¹ [Establishment Record for the Leigh Creek Research Natural Area Within the Bighorn National Forest, Washakie County, Wyoming, 2025](#)

The proposal to install up to four vault toilets and pet waste stations at designated locations throughout the climbing area is appropriate. We appreciate that you set out design and location parameters to ensure that these vault toilets will have minimum impacts to cultural resources, water and wildlife². Consider also installing these pit toilets just out of sight of the highway to preserve the infrastructure for BNF users and to avoid them becoming a heavily used, hard to maintain highway pitstop. Additionally, consider the inclusion of human waste bag dispensers at additional popular crags throughout the management area, which has been a successful management intervention in Sinks Canyon climbing destinations on the Shoshone National Forest.

Outside of the Leigh Creek RNA, please clarify within the Final EA threshold and parameter definitions for the full scope of environmental and cultural impacts, as well as climber safety considerations that would indicate decisions to either close routes or permit additional routes to be installed. This should include impacts to plants and wildlife, input from the climbing community, and meaningful consultation with local tribes and other government agencies. We appreciate the process that you lay out in Appendix B for the public to propose new routes to the BNF, and the process that would follow³. However, we ask that you elaborate on exactly what the parameters would be for the decision to either deny or approve these proposals. For example, are you willing to consider an infinite number of route proposals a year or is there a reasonable cap that aligns with your team's capacity? We also ask that you expand this section to include a process that would allow the public to propose the closure of existing routes that mirrors the process you have laid out for proposing additional routes.

In addition to our requests regarding public proposals, we ask that you elaborate on the following:

*"Note: If survey results indicate that existing climbing routes are negatively impacting natural, cultural, or tribal resources, the Forest Service may pursue route removal."*⁴

While this management language is appropriate, WWA would like to see this proposed action be elaborated on. Route removal is an important part of an effective climbing management plan, and the process language needs to be more robust than a brief footnote at the end of a seemingly unrelated section. *Step 3: Field Surveys & Consultation of Appendix B* focuses on surveys regarding new proposed routes. Please add an additional section regarding surveys independent of public proposals, completed by the BNF, that assess the ongoing appropriateness of existing routes across the management area and that would inform the threshold and parameter definitions that we request you to develop earlier in this comment.

WWA appreciates the efforts that are outlined to include tribes and engage in government-to-government information sharing. We thank you for listening to the concerns you heard regarding the original proposed parking lot location. We are concerned however, with how the BNF shares the concerns the tribes have regarding the impacts of new routes on their sacred rocks of Tensleep Canyon⁵, but intends to move forward with new route development that does not adequately address these concerns. Please reconsider this response in your Final EA and work to develop a solution that balances recreational use with the feedback received from the tribes.

² Tensleep Canyon Climbing Management Plan Draft EA, Pg. 12

³ Tensleep Canyon Climbing Management Plan Draft EA, Appendix B, Pg. 5-6

⁴ Tensleep Canyon Climbing Management Plan Draft EA, Appendix B, Pg. 6

⁵ Tensleep Canyon Climbing Management Plan Draft EA, Pg. 22

The Draft EA goes on to outline questions within the *Issue Development* section that guides much of your analysis and yet the questions posed are limited to impacts that will come from an increase in use and the addition of new routes, trails, parking and facilities⁶. While WWA appreciates this Q&A model within the draft, we ask that you add questions to this section across all elements that include impacts and considerations of the use and human presence that already exists within the area. As the first climbing management plan for Tensleep Canyon, the BNF should consider what is happening currently within these questions as well. Doing so will inform management and access changes that you are proposing for current use.

Throughout the Draft EA, the Leigh Creek Inventoried Roadless Area (IRA) is mentioned only once⁷. While we recognize that your current Forest Plan⁸ falls short of including management language for roadless areas on the BNF, and that the Department of Agriculture is currently proposing a rescission of the Rule that protects them, WWA urges your team to outline the extent to which the Climbing Management Area overlaps with this IRA, and to outline how impacts will be addressed to maintain the roadless character of the area as outlined in the 2001 Roadless Conservation Rule⁹. This rule has been repeatedly defended in court since the creation of your Forest Plan in 2005¹⁰, and it is still in effect regardless of the efforts by this administration to rescind it. Beyond our ask that language be included to address the IRA in the Final EA, we also call on your team to illustrate the Leigh Creek IRA on all maps throughout the Final EA and appendices to bring public awareness to the boundaries of this protected area, and how it overlaps with the climbing management area and the proposed action alternative components being assessed.

In closing, we want to return to our opening gratitude to the BNF and this planning team for moving the Tensleep Climbing Management Plan forward. Once finalized this plan will be the tool that this world-class climbing destination has been in need of for more than decade. WWA is optimistic that its creation will enable land managers to balance access, safety, sustainable recreation, and the protection of natural and cultural resources that exist there. While WWA has focused our comments on issues most closely aligned to our mission, we recognize these comments are not exhaustive. The Draft EA is a strong start, we appreciate your consideration of our proposed changes and additions that stand to make your final product stronger. Thank you for your time and consideration.

Respectfully,
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⁶ Tensleep Canyon Climbing Management Plan Draft EA, Pg. 6-7

⁷ Tensleep Canyon Climbing Management Plan Draft EA, Pg. 2

⁸ https://www.fs.usda.gov/sites/nfs/files/legacy-media/bighorn/plan_preface20.pdf

⁹ <https://www.federalregister.gov/documents/2001/01/12/01-726/special-areas-roadless-area-conservation>

¹⁰ <https://earthjustice.org/feature/timeline-of-the-roadless-rule>