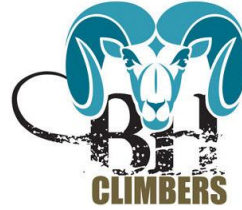




Protect America's Climbing



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Thank you for the opportunity to comment on the Tensleep Canyon Climbing Management Plan Draft Environmental Assessment #64474. WyoClimbers (Central Wyoming Climbers' Alliance) appreciates the Forest Service's efforts to address long-standing issues related to parking, sanitation, trail proliferation, and resource protection in one of the most heavily used climbing areas in the Rocky Mountain region. Improvements to infrastructure, safety, and sustainability are needed and broadly supported by the climbing community.

WyoClimbers has a long history of working collaboratively with land managers to support sustainable climbing management in central Wyoming. This includes a well-established adaptive raptor management program developed in coordination with Forest Service/Game and Fish staff, human waste management, trail stewardship, fixed-anchor maintenance/replacement, climber education, and other impact mitigation efforts.

While many elements of the Proposed Action are constructive, we have significant concerns that several aspects of the plan – particularly those related to route development, route removal, Research Natural Area (RNA) management, and cultural resource designation – contain vague or discretionary language that could set a problematic precedent for climbing management on public lands nationwide.

1. Undefined and discretionary route development approval process

The Proposed Action introduces a Forest Service review and approval process for areas open to new climbing routes, but does not clearly define approval criteria, timelines, decision standards, or mechanisms for transparency or appeal. Approval is contingent on multiple open-ended determinations related to wildlife, botany, cultural resources, and traditional cultural use areas, none of which are spatially delineated in advance.

This lack of clarity creates uncertainty for climbers, volunteers, and local organizations and risks functioning as a de facto prohibition on new route development without formally acknowledging such a restriction. If replicated elsewhere, this framework could normalize indefinite delays or denials for route development absent clear standards, undermining predictable and consistent recreation management on National Forest System lands.

2. Retroactive removal of existing routes based on RNA designation

The plan proposes closing Leigh Creek Research Natural Area to all sport climbing and removing all existing routes following the recent formal designation of the RNA. These routes were developed legally and have coexisted with the area's previously recommended RNA status for decades.

The EA does not establish a clear threshold for determining when recreation, particularly climbing, becomes incompatible with RNA objectives, nor does it evaluate alternatives such as partial closures, seasonal restrictions, or mitigation measures short of complete route removal. This approach sets a concerning precedent whereby new or elevated land designations can be used to retroactively eliminate long-established recreational uses without a proportional analysis of impacts or alternatives.

3. Lack of defined process for identifying cultural and traditional use areas

The EA repeatedly references sacred rocks, traditional cultural use areas, and future tribal determinations but does not define the criteria, boundaries, or procedural framework for identifying these areas. While consultation with tribes is essential and required, the absence of defined processes creates uncertainty for future climbing management.

Without clear standards, climbing access could be subject to post hoc closures or route removals based on future determinations rather than completed inventories or Section 106 findings. This uncertainty risks undermining both recreational planning and collaborative stewardship efforts.

4. Vague standards for route removal

The Proposed Action allows for removal of existing routes where surveys show “negative impacts” to cultural or natural resources, but does not define what constitutes a negative impact, whether mitigation must be considered prior to removal, or how determinations will be made.

This establishes an asymmetric management framework in which routes are relatively easy to remove but difficult to approve, without clear proportionality or mitigation standards. Such an approach could lead to incremental loss of existing routes over time without corresponding opportunities for replacement or adaptive management.

We are also concerned that the current language prohibiting “gluing” could unintentionally interfere with routine rebolting, anchor replacement, and route maintenance activities that are necessary for climber safety and long-term resource protection. In practice, limited use of epoxy or adhesives is a standard and widely accepted component of modern fixed-anchor placement and replacement, along with occasional fragile hold reinforcement, and does not constitute route manufacturing or hold creation. We respectfully request that the Forest Service clarify or revise this language so that necessary rebolting and maintenance activities are explicitly allowed and are not conflated with prohibited practices such as hold creation or route manufacturing.

5. Raptor and Bat Management

Raptor management strategies have continued to evolve away from broad, seasonal closures of entire cliffs or climbing areas and toward adaptive approaches grounded in active, site-specific monitoring. In Wyoming, WyoClimbers has successfully partnered with local land managers -including Sinks Canyon State Park, the Shoshone National Forest, and the Bureau of Land Management - to implement raptor adaptive management frameworks that rely on confirmed nesting activity, defined disturbance thresholds, and ongoing communication. These collaborative models have effectively protected nesting raptors while maintaining reasonable and predictable climbing access, and they provide a proven template for broader application.

While bat protection remains critically important, particularly in light of white-nose syndrome, a 250-meter buffer is not supported by available evidence for climbing-related disturbance. Research indicates that a 45-meter buffer is sufficient to minimize impacts to bats while avoiding unnecessary restrictions on access.

We recommend revising the bat closure radius to 45 meters for general roost sites, with the ability to expand protections on a site-specific basis where high-value or critical habitat is confirmed by a qualified biologist, and managing raptor and sensitive bird closures through transparent, collaborative, and adaptive policies informed by clear criteria, real-time monitoring, and consistent standards across jurisdictions.

6. Deferral of substantive decisions beyond public comment

Several critical decisions including parking location, site-specific route approvals, and potential route removals are deferred to the Implementation Guide following completion of the EA, without additional public review.

Deferring substantive management decisions beyond review weakens transparency and limits meaningful public involvement. If adopted broadly, this approach could allow future climbing closures or removals to occur without adequate site-specific analysis or stakeholder input.

7. Missed opportunity for collaborative stewardship

While the plan recognizes impacts associated with climbing, it does not meaningfully integrate the demonstrated capacity of the climbing community and local organizations to participate in stewardship, monitoring, education, and mitigation. Successful climbing management across public lands has consistently relied on collaborative, volunteer-driven models, which are not clearly incorporated here. Climbers are not only users of the resource, but have demonstrated the ability to serve as active stewards and reliable partners when provided with clear standards and a defined role in implementation. The plan would be strengthened by more explicitly incorporating this collaborative, adaptive management model and by formally recognizing the

Bighorn Climbers' Coalition as a key local volunteer organization and stakeholder representing climbers' interests in the region.

There are many examples of successful collaboration between land managers and Local Climbing Organizations with regard to managing new routing opportunities, we would encourage the Forest Service to look at models that have been successful in the long term, like the ones in place at Rifle Mountain Park, CO and Smith Rock State Park, OR. These areas have seen high rates of visitation for decades and will be good examples of resource management.

Conclusion

Taken together, these issues risk establishing a precedent in which climbing management is characterized by uncertainty, discretionary decision-making, and retroactive loss of access. We respectfully request that the Forest Service revise the Draft EA to clarify standards, define processes, and ensure that climbing management decisions are transparent, proportional, and consistent with long-standing multiple-use principles.

We appreciate the opportunity to provide these comments and look forward to continued collaboration with the Forest Service on a management approach that protects cultural and natural resources while supporting sustainable climbing access on public lands. Please feel free to contact me by email if you would like to discuss these matters further.

Best regards,

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WyoClimbers is a nonprofit organization dedicated to protecting access to Wyoming's climbing resources while promoting stewardship, education, and sustainable recreation. The organization works collaboratively with land managers, local partners, and the climbing community to balance conservation priorities with responsible climbing access in central Wyoming. WyoClimbers is a 501(c)(3) nonprofit organization.

The Bighorn Climbers Coalition (BCC) is a nonprofit organization dedicated to protecting access to Wyoming's climbing resources while promoting stewardship, education, and sustainable recreation. The organization works collaboratively with land managers, local partners, and the climbing community to balance conservation priorities with responsible climbing access in central Wyoming. BCC is a 501(c)(3) nonprofit organization.

