Submitted to:

Reviewing Officer, USDA Forest Service

c/o Powder River Ranger District

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Buffalo, Wyoming 82834

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Responsible Official: Mike Thom District Ranger, Powder River Ranger District, Bighorn National Forest Project: Tensleep Canyon Climbing Management Plan, Environmental Assessment #64474

Objectors: WyoClimbers (Central Wyoming Climbers' Alliance) and Access Fund

Date: October 16, 2026

WyoClimbers (Central Wyoming Climbers' Alliance) and Access Fund respectfully submit this objection to the draft Decision Notice and Finding of No Significant Impact (DN/FONSI) for the Tensleep Canyon Climbing Management Plan.

We support the Forest Service's efforts to address parking, sanitation, trail proliferation, resource degradation, and public safety concerns in Tensleep Canyon. We recognize the substantial improvements made between the Proposed Action described in the Draft Environmental Assessment (EA) and the current draft decision.

In particular, the decision retains existing climbing at three locations within the Leigh Creek Research Natural Area (RNA), replaces physical route removal with closure through signage and public education, and establishes a wall-based process for reviewing future route development.

These changes address several concerns raised in WyoClimbers' January 20, 2026, comment letter, submitted jointly with the Access Fund and the Bighorn Climbers' Coalition (BCC). However, significant concerns remain regarding the standards governing existing route closures, the predictability and transparency of future route development approvals, the treatment of fixed-anchor maintenance, and the role of local climbing organizations in implementation.

We request that the reviewing officer direct the responsible official to resolve these issues before issuing a final decision. Our objections are limited to issues raised in our previous written comments or arising from changes in the draft decision, with particular attention to whether the final decision establishes sufficiently clear, consistent, and implementable standards for climbing management.

1. Existing Routes, the EXPLORE Act, and Proportional Resource Protection

Issue

The decision retains authority to close existing climbing routes when surveys identify negative impacts to cultural or natural resources. Although the Forest Service has appropriately abandoned physical removal of route infrastructure, the decision does not establish objective criteria for determining when a closure is necessary or require consideration of reasonable mitigation measures before access is restricted.

The decision also states that the selected alternative is consistent with Section 122 of the Expanding Public Lands Outdoor Recreation Experiences Act (EXPLORE Act).

Basis for objection

We previously raised concerns about the Proposed Action's undefined "negative impacts" standard and the absence of a clear process for evaluating mitigation before existing routes could be removed. Our January 20, 2026, comments explained that this approach could produce incremental losses of established routes without proportional analysis of impacts or alternatives.

The draft decision improves the proposal by replacing physical removal with signage, public education, and coordination with climbing organizations. The Forest Service also acknowledges that it lacks the technical expertise to remove routes safely and that physical removal could create additional safety risks and resource impacts.

However, changing the mechanism of closure does not resolve the underlying problem. The decision still permits the loss of established climbing opportunities without defining the threshold for closure, establishing a mitigation-first approach, or explaining how the severity of a documented impact will be weighed against the consequences of restricting access.

Section 122 of the EXPLORE Act directs the Secretary concerned to issue guidance for recreational climbing on covered federal lands. Among other requirements, that guidance must include direction providing for the continued use and maintenance of recreational climbing routes, including fixed anchors, that existed as of January 4, 2025, in accordance with applicable law.

There is a strong presumption that climbing routes and fixed anchors in existence as of January 4, 2025, can be retained and maintained. Removal or closure of existing routes and anchors may occur only if a site-specific evaluation demonstrates through the application of the best available physical and/or social science methodologies that continued use or maintenance of

the route or anchor would cause unacceptable and unavoidable impacts to natural and/or cultural resources, or public safety.

We recognize that Section 122 addresses federal climbing guidance and does not, by itself, establish an unconditional right to climb every existing route. Nevertheless, the decision's stated consistency with the EXPLORE Act warrants a clear explanation of how the management framework, including the authority to close established routes when surveys identify negative impacts, complies with applicable federal climbing policy and the Act's direction concerning existing routes.

Requested remedy

We request that the final decision and the Implementation Guide (Appendix B) include the following language:

1. **Route Removal:** Existing routes and anchors shall not be removed, closed, restricted, or otherwise altered absent a site-specific evaluation demonstrating, through the application of the best available and scientifically defensible physical and/or social science methodologies, that continued use or maintenance would result in unacceptable and unavoidable adverse impacts to natural resources, cultural resources, or public safety.

   Any proposed removal, closure, or restriction shall be supported by documented, site-specific findings establishing that the identified impacts cannot reasonably be avoided or minimized through less restrictive management measures. Decisions shall be based on objective evidence, consideration of applicable resource protection requirements, and a transparent evaluation of reasonable alternatives. Generalized concerns, unsupported assumptions, or speculative impacts shall not, standing alone, constitute sufficient grounds for removal or closure of existing routes or fixed anchors.

2. **Mitigation First:** Before closing or removing an existing climbing route or fixed anchor, the Forest Service shall evaluate reasonable mitigation, restoration, and site-specific management measures to protect resources while maintaining climbing access.

3. **Less Restrictive Alternatives:** The Forest Service shall document why reasonable mitigation and less restrictive alternatives would not adequately address identified impacts before imposing a closure or removal.

4. **EXPLORE Act Compliance:** The Forest Service shall explain how decisions affecting existing climbing routes and fixed anchors comply with applicable requirements of Section 122 of the EXPLORE Act.

5. **Climber Consultation:** The Forest Service shall consult affected local climbing organizations before implementing closures or removals, except when immediate action is necessary to address an imminent threat to resources or public safety.

2. Route-Development Approval: Objective Standards, Timelines, and Transparency

Issue

The decision improves the proposed route-development review process by evaluating entire sections of cliff rather than individual routes and by committing to work with local climbing organizations to prioritize suitable areas. However, it does not establish sufficiently specific approval criteria, timelines, or decision standards to ensure that new-route development remains a viable and predictable recreational opportunity.

Basis for objection

We previously raised concerns that the Proposed Action could function as a de facto prohibition on new route development because approval depended on multiple open-ended determinations without defined timelines, transparent standards, or clear procedures.

The draft decision states that route development will be allowed only after National Historic Preservation Act (NHPA) Section 106 review is complete and where climbing would not negatively impact sensitive wildlife, botanical species, or traditional cultural use areas. It also directs the Forest Service to work with local climbing organizations to prioritize walls and schedule resource surveys through its program of work.

These are constructive changes. Reviewing entire walls should reduce administrative burdens, and prioritization should help the Forest Service allocate limited staff resources. Appendix B also identifies general factors for choosing priority walls and provides for posting on the Forest Service website where route development is allowed. Nevertheless, the decision does not specify how those factors will be weighed, how frequently surveys will be conducted, what standards will determine whether a wall is approved, or how the public will be informed of survey progress and of decisions not to approve a wall.

Without these elements, the proposed process could result in indefinite delays or inconsistent decisions among climbing areas. The commitment to establish a “timely and efficient” process is not, by itself, a measurable decision standard. The decision also retains a prohibition on route development where it would negatively impact traditional cultural use areas determined through additional consultation, without establishing how those areas will be identified, documented, or evaluated in relation to proposed climbing activities.

Requested remedy

We request that the Forest Service incorporate a defined route-development process into the final decision or Implementation Guide, including:

1. Published criteria for prioritizing walls and scheduling resource surveys that build on the general factors identified in Appendix B and are developed in consultation with local climbing organizations.
2. A transparent process for documenting survey completion, communicating results, and explaining approval or denial decisions.

3. A reasonable schedule for reviewing prioritized walls and communicating anticipated timelines, subject to documented resource constraints and seasonal survey requirements.
4. Defined standards for evaluating resource impacts, including consideration of avoidance and mitigation measures where appropriate.
5. A clear explanation of how cultural and traditional-use information will be considered, how relevant restrictions will be communicated, and how decisions affecting proposed climbing areas will be documented.
6. A commitment to periodically review the effectiveness of the process and adjust priorities based on resource conditions, survey results, and implementation experience.

These changes would not require the Forest Service to approve routes that are incompatible with resource-protection requirements. They would establish a fair and administratively workable process for identifying where climbing can occur while protecting sensitive resources.

3. Fixed-Anchor Replacement and the Prohibition on "Gluing"

Issue

The decision expressly allows replacement of existing fixed anchors and fixed equipment while retaining a prohibition on "gluing" and other practices associated with creating artificial holds. It does not clearly distinguish prohibited hold creation from the use of structural adhesive to install or replace glue-in climbing anchors.

Basis for objection

We specifically raised this concern in our January 20, 2026, comments, explaining that limited adhesive use is a standard component of modern fixed-anchor installation and replacement. Such work is distinct from manufacturing routes or creating and enhancing climbing holds.

The draft decision states that replacement of existing fixed anchors and fixed equipment is allowed. It separately prohibits "gluing, attaching artificial holds, or using mechanical equipment to create holds where a natural hold did not exist."

Although these provisions may have been intended to distinguish legitimate maintenance from route manufacturing, the decision does not explicitly establish that distinction. As written, the prohibition could be interpreted inconsistently and could interfere with routine replacement of aging fixed anchors, including glue-in bolts.

Fixed-anchor maintenance is necessary for climber safety and the long-term sustainability of established routes. Uncertainty about whether adhesive installation of fixed anchors is permitted could discourage necessary maintenance or create avoidable conflicts between climbers and land managers.

Requested remedy

We request that the final decision expressly clarify that the prohibition on “gluing” does not include the use of appropriate structural adhesives to install or replace fixed climbing anchors, which the decision allows.

The Forest Service should also clarify the applicable procedures, if any, for routine fixed-anchor replacement and maintenance. These clarifications would preserve the prohibition on artificial hold creation while ensuring that necessary safety maintenance remains authorized.

4. Leigh Creek RNA: Defined Boundaries and Consistent Implementation

Issue

The decision appropriately modifies the Proposed Action by retaining existing climbing at Godfather Boulder, Chemtrails, and Thunder Buttress. However, the remaining closure of the Leigh Creek RNA relies on signage, public education, and route-database changes without fully defining how the boundary will be communicated, maintained, or evaluated over time.

Basis for objection

We previously raised concerns about the proposed closure of all sport climbing within the Leigh Creek RNA and the physical removal of established routes. Our comments requested consideration of alternatives to complete closure and emphasized the need for proportional analysis of impacts and reasonable mitigation.

The draft decision is an improvement. It allows existing climbing to continue at three locations, prohibits new routes within the RNA, and closes the remaining climbing areas, including Haunted Wall and Twomey Town. The Forest Service also states that existing route infrastructure will not be physically removed.

The decision places significant responsibility on signs, public education, and the removal of closed routes from online databases and future guidebooks. It also states that climbers remain responsible for knowing where climbing is permitted. Appendix B adds that signs will mark the point beyond which climbing is not allowed, that maps and location-specific information will be posted on the Bighorn National Forest website, and that the Forest Service will monitor the RNA when staffing and capacity allow. These commitments are helpful, but the decision does not provide the actual locations of the boundaries, signs, and other features it commits to, such as GPS coordinates or marked points on a map, or a schedule for review.

Where access boundaries are not clearly delineated and communicated, this approach risks confusion and inadvertent violations. The decision should clearly distinguish the areas where existing climbing remains authorized from those where climbing is prohibited.

We recognize the Forest Service’s stated obligation to protect the ecological values of the RNA. Our concern is that the final decision should implement those protections through clear, site-specific management rather than relying primarily on generalized restrictions and public awareness.

Requested remedy

We request that the final decision or Implementation Guide:

1. Include an accurate, publicly accessible map identifying the permitted climbing areas, closure boundaries, access routes, and relevant signage locations.
2. Require clear, consistent signage at principal access points and locations where climbers enter restricted portions of the RNA.
3. Explicitly recognize the three retained climbing areas and establish that the closure will not be expanded administratively beyond the defined boundaries without appropriate analysis and public involvement.
4. Establish a process for periodic review of the closure and its effectiveness in protecting the RNA's identified ecological values, including consideration of site-specific mitigation where supported by resource information.
5. Coordinate public education and route-database updates with BCC, WyoClimbers, and other relevant climbing organizations.

These measures would support compliance, protect the RNA, and reduce uncertainty for both climbers and land managers.

5. Formal Collaboration with Local Climbing Organizations

Issue

The decision commits the Forest Service to working with local climbing organizations to identify and prioritize walls for future route development. However, it does not establish a defined mechanism for collaboration on implementation, resource monitoring, education, or adaptive management.

Basis for objection

Our original comments emphasized the demonstrated capacity of local climbing organizations to support sustainable management through stewardship, education, trail maintenance, fixed-anchor replacement, and wildlife-management partnerships.

The final decision's commitment to work with local climbing organizations is encouraging. However, without a defined process, the scope and timing of that collaboration remain uncertain.

Local organizations possess practical knowledge of climbing-area conditions, route history, use patterns, maintenance needs, and opportunities to reduce impacts. Their participation can help the Forest Service implement resource protections efficiently while maintaining appropriate climbing access.

Requested remedy

We request that the Implementation Guide establish a formal, ongoing consultation process with Bighorn Climbers' Coalition and other appropriate local climbing organizations, including opportunities to participate in:

1. Prioritization of walls for future route-development surveys.
2. Development of stewardship, education, and resource-protection measures.
3. Communication of route closures, access boundaries, and management changes.
4. Monitoring of climbing-related impacts and evaluation of mitigation effectiveness.
5. Periodic review of implementation outcomes and recommendations for adaptive management.

The Forest Service should identify a point of contact and a process for regular communication so that local organizations can contribute meaningfully to implementation rather than being consulted only on an ad hoc basis.

Conclusion and Requested Action

We appreciate the Forest Service's consideration of public comments and recognize that the draft decision incorporates several important improvements. The decision to retain climbing at three locations within the Leigh Creek RNA, abandon physical removal of existing route infrastructure, and move toward wall-based route-development review represents meaningful progress.

However, important deficiencies remain in the standards governing existing-route closures, the predictability of future route-development approvals, the treatment of adhesive-based anchor replacement, and the implementation of collaborative stewardship.

We respectfully request that the reviewing officer direct the responsible official to revise the final decision and Implementation Guide to address the issues identified in this objection. Specifically, we request objective and transparent criteria for closures and route approvals, consideration of reasonable mitigation before restricting established routes, explicit authorization for appropriate fixed-anchor replacement methods, clearly defined Leigh Creek RNA boundaries, and a meaningful process for collaboration with local climbing organizations.

These changes would strengthen the plan's implementation, reduce uncertainty for climbers and land managers, and better balance resource protection with sustainable recreational access. We remain committed to working collaboratively with the Bighorn National Forest to protect Tensleep Canyon's natural and cultural resources while supporting responsible climbing and long-term stewardship.

Submitted in connection with:

Comments dated January 20, 2026, submitted by the Access Fund jointly with WyoClimbers and the Bighorn Climbers' Coalition on the Tensleep Canyon Climbing Management Plan Draft Environmental Assessment #64474.

Respectfully submitted,



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