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October 16, 2026

Forest Supervisor and Reviewing Officer
Bighorn National Forest, c/o Powder River Ranger District
1415 Fort Street
Buffalo, WY 82834

RE: Objection of BlueRibbon Coalition to the Tensleep Canyon Climbing Management Plan

Bighorn National Forest – Powder River Ranger District

Project ID: 309788 (EA #64474)

Dear Objection Reviewing Office, Bighorn National Forest Supervisor:

Please accept these objections to the Final EA (EA), Draft Decision Notice (DN), and Finding of No Significant Impact (FONSI) for the Tensleep Canyon Climbing Management Plan. The Responsible Official is Mike Thom, District Ranger. These objections are submitted on behalf of BlueRibbon Coalition (BRC), including BRC's individual and organizational members who have enjoyed, and plan in the future to enjoy, access to the Tensleep Canyon Project Area.

These objections are submitted in accordance with 36 C.F.R. part 218. BRC filed scoping comments on November 24, 2023 the Tensleep Canyon Climbing Management Plan raising the stated issues or otherwise providing a basis for these objections. The point of contact for this objection is Simone Griffin, please direct all communication regarding these objections to Simone Griffin at 800 W Main St Suite 1460, Boise, ID 83702, simone.griffin@blueribboncoalition.org. We formally request a resolution meeting in accordance with 36 C.F.R. § 218.11.

I. Interest of the Objector

BRC has a unique perspective and longstanding interest in recreation access in the Project Area. BRC is a nonprofit corporation that champions responsible recreation and encourages individual environmental stewardship. BRC members use various motorized and nonmotorized means, including climbing, hiking,

OHVs, horses, and mountain bikes, to access public lands and waters, specifically including use of the Bighorn National Forest. BRC has a long-standing interest in the protection of the values and natural resources addressed in this process, and regularly works with land managers to provide recreation opportunities, preserve resources, and promote cooperation between public land visitors. BRC supports recreation in all of its forms and supports increased recreation opportunities, including rock climbing, in Tensleep Canyon.

II. Objection Issues

We note at the outset that the agency has conducted a lengthy process, and addressed many of our concerns, including by retaining climbing at Godfather Boulder, Chemtrails, and Thunder Buttress and by adopting a wall-based review for future route development. We want to express our appreciation for the agency's thoughtful effort, support of stakeholder involvement and collaboration, and patience in this lengthy process. Still, there remain concerns with the current approach, and we raise the following objections, which provide a legal basis for our requested changes to the Draft DN.

The objection process necessarily anticipates the possibility and potential likelihood of success in subsequent litigation brought by an objector. In such a challenge the Administrative Procedure Act (APA) waives the United States' sovereign immunity for those aggrieved by "final agency action." 5 U.S.C. §§ 702, 704; *Lujan v. National Wildlife Federation*, 497 U.S. 871, 882 (1990). APA section 706(2) provides the relevant standard of review: a reviewing court shall "hold unlawful and set aside agency action, findings, and conclusions found to be—(A) arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law; [or] (C) short of statutory right; [or] (E) unsupported by substantial evidence…." This standard of review is "narrow" but the agency:

> must examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made....Normally, an agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.

Motor Vehicle Mfrs. Ass'n. v. State Farm Mutual Automobile Ins. Co., 463 U.S. 29, 43 (1983) (citations omitted). This is considered a deferential standard of review. Still, there always exists some level of litigation risk, and we believe the decision can be improved.

Objection Points

1. **Closing existing climbing routes without objective criteria conflicts with the EXPLORE Act**
   The draft decision keeps authority to close existing climbing routes when surveys identify negative impacts, and it continues to close Haunted Wall and Twomey Town in the Leigh Creek Research Natural Area (RNA), without objective criteria for when closure is necessary and without requiring that mitigation be evaluated first. Section 122 of the EXPLORE Act, Pub. L.

118-234 (16 U.S.C. § 8422), directs the Secretary to provide for the continued use and maintenance of recreational climbing routes, including fixed anchors, that existed on January 4, 2025, in accordance with applicable law. The EXPLORE Act was passed after we submitted scoping comments. The EA acknowledges that under No Action climbing in the RNA would continue as it exists because of the Act (EA, p. 8), and the draft decision states that it is consistent with Section 122 without explaining how.

BRC recognizes that Section 122 directs agency guidance and does not by itself create an unconditional right to climb every route. But a decision that claims consistency with the Act must explain how closing routes in use on January 4, 2025 meets the Act's direction. Unless the record contains a site-specific finding that climbing at Haunted Wall and Twomey Town causes unacceptable impacts that mitigation cannot address, those routes should be retained. BRC supports the objections of local climbing businesses and organizations asking for a mitigation-first standard, documented site-specific findings, and consultation with local climbing groups before any closure, and incorporates them by reference.

2. **The route development process lacks standards, timelines, and clarity on anchor maintenance**

   BRC supports allowing new route development through a wall-based review and the replacement of existing fixed anchors. But the process lacks published criteria for prioritizing walls, a review schedule, decision standards, and documentation of approvals and denials. Development is also limited to the roughly 200-acre area surveyed to Class III standards, out of 26,544 acres (EA, pp. 26–28). Without those elements the process could function as a de facto prohibition on new development and could make routine rebolting subject to case-by-case delay, which undercuts the EXPLORE Act's direction on continued maintenance of existing routes and anchors.

   The decision also prohibits "gluing, attaching artificial holds, or using mechanical equipment to create holds where a natural hold did not exist" (EA, p. 9) without stating that structural adhesives used to install or replace glue-in anchors, or in rare cases to reinforce fragile existing holds, are permitted. The EA also states that consultation on effects to historic properties "is pending" (EA, p. 29). Section 106 consultation must be complete and documented before a decision issues. BRC incorporates by reference the objections of local climbing businesses and organizations on these points.

3. **Leigh Creek RNA boundaries and local collaboration are not defined**

   The draft decision relies on signs, public education, and route-database changes to implement the RNA closure, but does not provide a map, GPS coordinates, sign locations, or a review schedule. Where boundaries are not clearly delineated, climbers risk inadvertent violations. The decision also commits to working with local climbing organizations without establishing a process, scope, or point of contact. Local organizations have practical knowledge of conditions, use patterns, and maintenance needs that would help the Forest Service implement protections efficiently while maintaining access.

4. **The Road 18 dispersed camping closure exceeds what the forest plan standard requires and lacks replacement sites**
   The forest plan standard cited in the EA applies within 100 feet of Tensleep Creek, where the EA identifies four dispersed sites (EA, p. 22). The Proposed Action instead prohibits dispersed camping along 1.5 miles of Road 18, reducing camping opportunities on the road by about 19%. The EA then concludes that long-term negative impacts to camping are not expected because new sites "would likely be established" elsewhere within 300 feet of the road (EA, p. 22). If displacement of that scale is expected, the closure will not meaningfully reduce use or impacts, and the EA does not analyze where displaced use will go. The Forest Service also removed designated dispersed camping from the scope of this project (EA, p. 11), so the closure takes effect with no replacement sites and no schedule for the follow-on project. The EA states the closure would be put in place by a temporary forest order and later formalized in the Motor Vehicle Use Map (EA, p. 25). Any MVUM change must follow 36 C.F.R. part 212, subpart B, including public involvement under § 212.52.

5. **The decision should state that it adds no new or expanded motorized restrictions**
   The EA lists "motorized use of roads" among the disturbances to deer and elk winter range and credits the existing seasonal closure of Road 18 (November 16 to June 15) as mitigation (EA, pp. 14–16). It finds that the Proposed Action affects up to 27% of mapped winter range (EA, p. 16). Those findings could later be cited to justify further seasonal or area restrictions without new analysis. The new trails are also described as Class 1 trails designed for hiker and pedestrian use (EA, p. 22), without stating how that affects other authorized uses.

6. **Closures should not take effect before the parking area, toilets, and replacement camping are built**
   The parking lot location is left undetermined pending survey, design, and WYDOT coordination (EA, pp. 10, 25), while the camping prohibition and RNA closure follow the Forest's timeline. No funding or construction schedule is identified for the 50-space lot or up to four vault toilets. A single 50-space lot for a canyon with about 1,350 routes on 144 walls is likely to fill, and the EA does not analyze overflow, accessibility for visitors with mobility impairments, or highway safety if the lot is full.

7. **The EA does not analyze effects on local businesses and communities**
   The EA analyzes soils, wildlife, plants, the RNA, recreation, scenery, transportation, tribes, and cultural resources, but contains no socioeconomic analysis. Local businesses depend on this canyon. A Lander, Wyoming outdoor retailer told the Forest Service that "climbing in the state is vital to our business." The Bureau of Economic Analysis reports that outdoor recreation contributed $696.7 billion in value added, or 2.4% of U.S. GDP, in 2024 (BEA, Outdoor Recreation Satellite Account, March 5, 2026). A study commissioned by a Wyoming climbing organization, as reported by Cowboy State Daily (Nov. 2022), estimated that about 37,000 climbers spend $4.5 million directly in Fremont County each year and support 51 jobs. Closing routes, restricting camping, and slowing new route development all reduce the draw these businesses rely on.

8. **Legal and statutory consistency: resource protection does not take precedence over recreation**

   To the extent any objector contends that resource protection must take precedence over recreation in Tensleep Canyon, or that the decision must restrict climbing further, BRC disagrees. The Multiple-Use Sustained-Yield Act lists outdoor recreation alongside range, timber, watershed, and wildlife and fish as purposes of the National Forests and directs their coordinated management (16 U.S.C. §§ 528–531), and the National Forest Management Act carries that mandate into forest planning (16 U.S.C. § 1604(e)). The Bighorn forest plan directs the Forest to provide "diverse, high-quality outdoor recreation opportunities" and to develop climbing management plans (Objective 2.a and Strategy 11, EA, p. 1). The mandate is to manage climbing, not to minimize it.

   NEPA prescribes process, not a particular result. It "prohibits uninformed rather than unwise agency action." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350–51 (1989). The Forest Service analyzed the effects, applied design features, and reached a finding of no significant impact. The record also shows that climbing's footprint is small. About 74 of roughly 835 acres of cliff habitat (9%) have established routes, and cliff walls are about 3% of the 26,544-acre project area (EA, pp. 14, 17, 21). The 88% figure in the wildlife analysis is a worst-case estimate that assumes unrestricted development, which the decision does not allow (EA, p. 16). Design features Wildlife 1, Wildlife 2, Botany 2, Botany 4, Cultural 2, and Hydro 1 apply before any route, trail, or staging area is approved.

   Managed recreation already protects wildlife. The EA reports two active peregrine falcon territories, one of which has fledged young every year since 2021 with voluntary climbing closures in place, and notes that the golden eagle nest has low route density and climbing use (EA, p. 14). BRC respects the Forest Service's government-to-government consultation with tribes, and the decision addresses tribal concerns through Section 106 compliance, traditional cultural surveys, prohibitions on removing rock and gluing holds, and limits on development in traditional use areas (EA, pp. 9, 25–29). Those tools apply before development and do not support additional closures of existing routes absent a site-specific finding. Where impacts are documented, targeted mitigation such as hardened staging, designated trails, signage, and seasonal measures is the right first response. Closure moves use to unmanaged areas rather than solving the erosion, waste, and trail proliferation the EA identifies.

Requested Remedies

To address these objections, BRC requests that the Tensleep Canyon Climbing Management Plan be revised to:

- Retain Haunted Wall and Twomey Town, or document a site-specific finding that justifies closing them. Adopt a mitigation-first standard for any closure of existing routes, with documented findings that less restrictive measures are inadequate and consultation with local climbing organizations, and explain how the decision complies with 16 U.S.C. § 8422.

- Add to Appendix B a defined route-development process with published prioritization criteria, a reasonable review schedule, defined impact standards, and documented approvals and denials, with expedited treatment of anchor replacement and maintenance. Clarify that the prohibition on gluing does not bar structural adhesives for fixed-anchor installation, replacement, or rare reinforcement of existing holds. Complete and document Section 106 consultation before the decision issues.
- Include an accurate public map and GPS-referenced boundaries for the Leigh Creek RNA, signage at principal access points, express recognition of the three retained climbing areas, no administrative expansion of the closure without analysis and public involvement, and a formal ongoing consultation process with local climbing organizations and a named point of contact.
- Limit the Road 18 camping closure to sites within 100 feet of Tensleep Creek, or document the resource need for a longer closure. Designate and sign replacement sites before or with any closure, commit to a dated schedule for the designated camping analysis, require public notice and comment on any MVUM change, and have the forest order expire if that process is not completed.
- State in the Decision Notice that no motorized restrictions are adopted other than those expressly described, that the existing Road 18 seasonal closure is unchanged, and that the EA's wildlife findings alone are not a basis for further motorized restrictions. Clarify which uses are permitted on each trail added to the NFS system.
- Condition the Road 18 camping closure and any new RNA restriction on completion of the parking area, toilets, and replacement camping, or on a dated schedule, and require that these facilities meet accessibility standards and include overflow planning.
- Add to the decision record an analysis of the economic effects on Washakie, Big Horn, and nearby Fremont County businesses, and weigh those effects in any decision to close existing routes or camping.
- Decline requests to further restrict climbing absent site-specific findings, and document how the final decision balances resource protection and recreation consistent with the Multiple-Use Sustained-Yield Act and the forest plan.

Conclusion

While BRC supports many of the Tensleep Canyon Climbing Management Plan's objectives, including the parking area, vault toilets, trail adoption, and wall-based route development, the continued closure of existing routes, the Road 18 camping prohibition, and the open-ended standards for route development and anchor maintenance are inconsistent with the EXPLORE Act, multiple-use direction, and the project's stated purpose of supporting continued climbing opportunities. The decision should be revised to address these objections.

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed,

motorized and non-motorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,



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