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Comments:

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Bighorn National Forest
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Submitted via:
https://cara.fs2c.usda.gov/Public/CommentInput?Project=64474

RE: Tensleep Canyon Climbing Management Plan Draft EA #64474

The Access Fund welcomes this opportunity to provide input on the Tensleep Canyon Climbing Management Plan Draft EA #64474. This planning area contains some of the most scenic, accessible and important rock climbing resources in Wyoming, and is nationally significant attracting international visitors. Our members regularly climb at Tensleep Canyon and we have provided climbing management comments and community outreach throughout this planning area for several years to assist the Forest Service in the appropriate management of the climbing resources found within this area.

Comments

Permit and Authorization Framework

The proposed action introduces a Forest Service review and approval process for new climbing routes; however, the EA 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 or programmatically addressed in advance. As a result, the EA does not adequately disclose how decisions would be made or how long the review process would take, limiting meaningful public understanding of how the proposed action would be implemented.

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 in the absence of clear standards, undermining predictable and consistent recreation management on National Forest System lands.

At the same time, the proposed action appropriately adopts a framework for authorizing climbing area development and the placement of fixed hardware, rather than banning or broadly restricting climbing development. This approach is consistent with Forest Service recreation management policy and aligns with the PARC Act's emphasis on maintaining access while using inventory, evaluation, and site-specific analysis to protect natural and cultural resources. Overall, we support this framework and offer the following recommendations to improve clarity, efficiency, and transparency while reducing administrative burden.

To improve and streamline implementation, the EA and associated decision documents should be revised to:
1) clearly state that existing fixed hardware may be replaced or maintained without reauthorization, provided such activities do not create new or expanded impacts to cultural or natural resources;
2) Establish a clear process and timeline for approving sections of cliff for new route development, including defined review milestones and anticipated decision timeframes for the Forest Service and partner organizations such as the Bighorn Climbers Coalition (BCC), to set clear expectations and support volunteer engagement;
3) provide a transparent and clearly articulated appeals or reconsideration process for denied applications, consistent with Forest Service administrative review procedures, to promote accountability and reduce long-term administrative workload; and
4) specify that measurable and documented impacts to cultural or natural resources must be demonstrated prior to the closure of existing climbing areas, consistent with Forest Service directives emphasizing evidence-based decision-making and proportional management responses.

Incorporating these elements would improve predictability, transparency, and consistency in climbing management while maintaining the Forest Service's ability to protect sensitive resources and comply with the National Environmental Policy Act (NEPA) and other applicable authorities.

Programmatic/zone approval
We recommend that the Forest Service consult with the Bighorn Climbers Coalition (BCC) and experienced route developers to identify sections of cliff or specific crags that may be suitable for future development. The Forest Service should conduct cultural and natural resource evaluations in advance of permit applications for these areas. Where no resource conflicts are identified, this approach would allow the Forest Service to programmatically authorize designated zones for route development, rather than requiring individual, route-by-route approvals.

To manage implementation, the Forest Service and BCC could jointly establish a list of pre-approved route developers who have completed a training program and are familiar with resource sensitivities and best practices for responsible route development. Once an area is cleared for development, a pre-approved route developer could install new routes within that zone and report completed work to the BCC and Forest Service. This approach would significantly streamline the permitting process, reduce administrative burden, and improve compliance with resource protection objectives.

Programmatic authorization frameworks of this type have been successfully implemented at climbing areas across the United States, including Castle Rock State Park, Idaho, and Staunton State Park, Colorado.

Leigh Creek Research Natural Area
The Draft EA proposes closing the Leigh Creek Research Natural Area (RNA) to sport climbing and removing all existing climbing routes following the area's recent formal designation as an RNA. This represents a substantial change from the scoping proposal, which contemplated removal of only a limited subset of routes. The routes now proposed for removal were developed legally and have coexisted with the area's previously recommended RNA status for decades. The EA does not adequately explain or analyze the basis for this expanded scope of closure relative to the scoping proposal, as required under NEPA.
The EA fails to establish clear thresholds or standards for determining when recreation-particularly climbing-becomes incompatible with RNA objectives. Nor does it meaningfully evaluate reasonable alternatives to complete route removal, such as partial closures, seasonal restrictions, use limits, mitigation measures, or route-specific management. This omission is inconsistent with NEPA's requirement to rigorously explore and objectively evaluate reasonable alternatives and results in an analysis that appears to presume full closure rather than justify it. The EA's own analysis notes that existing climbing routes occupy a relatively small proportion of the canyon's total cliff habitat, which further undermines the conclusion that blanket route removal is the only viable management response.

The EA's rationale for closure relies largely on generalized assertions that sport climbing generates higher levels of use and that removal of routes would, over time, restore cliff habitat, and reduce landscape alteration. However, these conclusions are not supported by route-specific or site-specific evidence demonstrating measurable impacts to botanical, ecological, or wildlife resources. The EA does not identify which resources are affected, how they are affected, or why less restrictive measures would be insufficient to address those effects. NEPA requires that such conclusions be supported by disclosed data and analysis, rather than broad assumptions.

The Draft EA also lacks internal clarity regarding the scope of the proposed prohibition. While portions of the EA refer specifically to "sport climbing," the proposed action language describing route removal appears to apply to all existing routes, without clearly stating whether traditional climbing or bouldering would remain permissible. If the intent is to prohibit all forms of climbing within the RNA, the EA must state this plainly and analyze the associated impacts. If the intent is to prohibit sport climbing only, the EA must explain why sport climbing is uniquely incompatible with RNA objectives while other climbing styles may remain allowed. This ambiguity prevents meaningful public review.

To the extent the Forest Service's intent is to facilitate research on cliff ecology, any closures should be clearly identified as temporary and adaptive, with defined research objectives, monitoring protocols, and criteria for reevaluating access based on study results. Additionally, because climbing has already occurred at these sites, the EA should acknowledge that these cliffs do not represent baseline or undisturbed ecological conditions for the broader Tensleep Canyon, and explain how that limitation affects the stated research rationale.

Given these deficiencies, the EA should be revised to:

Clearly state what forms of climbing are proposed to be prohibited within the Leigh Creek RNA and the rationale for any distinctions among climbing types;

Define objective standards and impact thresholds for determining incompatibility with RNA objectives;

Conduct site-specific inventories and resource surveys to identify actual, measurable impacts associated with individual routes or climbing areas;

Analyze reasonable, less restrictive alternatives to complete route removal, including partial closures, seasonal restrictions, mitigation measures, and adaptive management approaches; and

Consider a managed-access alternative that limits new development within the RNA while retaining existing routes unless site-specific analysis demonstrates unacceptable impacts that cannot be mitigated.

Incorporating these elements would bring the analysis into closer alignment with NEPA requirements and Forest Service research and recreation management directives, while allowing for proportional, evidence-based decision-making regarding long-established recreational uses within the Leigh Creek RNA.

Standards for Route Removal

The proposed action allows for the removal of existing climbing routes where surveys identify "negative impacts" to cultural or natural resources; however, the EA does not define what constitutes a negative impact, establish thresholds for significance, or describe how such determinations will be made. This lack of definition is inconsistent with Forest Service planning and decision-making directives that require clear standards, criteria, and design features to guide implementation and ensure consistent application of management actions.

Further, the EA does not disclose whether avoidance, minimization, or mitigation measures will be considered prior to route removal. Forest Service directives emphasize the use of mitigation hierarchies and adaptive management to address resource concerns before eliminating existing uses. By failing to describe how mitigation would be evaluated or applied, the EA does not provide sufficient information to understand how existing routes would be managed or how impacts would be proportionally addressed.

As written, the proposed action establishes an asymmetric management framework in which existing routes may be removed based on undefined standards, while the approval of new routes is subject to discretionary and potentially open-ended review. This approach lacks the proportionality and predictability contemplated by Forest Service recreation management policy and raises concerns about incremental loss of existing routes over time without corresponding opportunities for mitigation, replacement, or adaptive management. The EA does not

meaningfully analyze these reasonably foreseeable outcomes.

To align the proposed action with Forest Service directives and ensure compliance with NEPA, the EA should be revised to:
1) define "negative impacts" and establish objective criteria and thresholds for evaluating impacts to cultural and natural resources associated with existing routes, consistent with Forest Service planning and implementation guidance;
2) describe how avoidance, minimization, and mitigation measures will be evaluated and applied prior to route removal, including the circumstances under which removal would be required;
3) analyze the cumulative and reasonably foreseeable effects of route removals under this framework, including the potential for incremental loss of climbing opportunities over time.

Definitions Needed

Mechanical Equipment:
In Attachment B- Implementation Guide, Route Development Review Process- Step 5 Route Development, we suggest additional clarification be added to the term "mechanical equipment to create holds where a natural hold does not exist." We recommend providing a brief definitions glossary or further clarification in text defining what "mechanical equipment" encompasses.

Gluing:
We are concerned that the current language prohibiting "gluing" could unintentionally interfere with routine rebolting, anchor replacement, and route maintenance activities necessary for climber safety and long-term resource protection. Forest Service recreation and climbing management guidance recognizes fixed anchors and associated maintenance as an established component of climbing use where authorized. In practice, limited use of epoxy or adhesives is a standard and widely accepted component of modern fixed-anchor placement and replacement, as well as occasional fragile hold stabilization, and does not constitute route manufacturing or hold creation. The EA's broad prohibition does not distinguish between these routine maintenance activities and practices that alter the character of the resource. We suggest the Forest Service clarify or revise the prohibition on "gluing" to explicitly allow routine rebolting, anchor replacement, and necessary maintenance activities that use limited epoxy or adhesives for safety and resource protection purposes, while clearly distinguishing these practices from prohibited route manufacturing or hold creation.

Cultural Resources, NHPA Section 106 & Traditional Cultural Surveys

Further clarification is needed regarding how the National Historic Preservation Act (NHPA) Section 106 review process differs from, and interacts with, the proposed additional Traditional Cultural Surveys. Specifically, the EA does not explain what criteria will govern situations in which an area is cleared through the Section 106 process and no historic properties or cultural resources are identified or recorded in the National Register of Historic Places, yet a separate traditional cultural survey subsequently identifies a conflict. Absent this information, the EA fails to disclose the full decision-making framework that could affect the proposed action and its reasonably foreseeable impacts. The EA must clarify which process controls, how conflicts will be resolved, and what decision-making authority applies in these circumstances in order to set clear roles, expectations, and outcomes for all parties involved.

Additionally, the EA repeatedly references "sacred rocks," "traditional cultural use areas," and future tribal determinations without defining the criteria, geographic boundaries, or procedural framework by which such areas would be identified, evaluated, or managed. While government-to-government consultation with Tribes is essential and required, the absence of defined standards or processes results in an impermissibly vague analysis and prevents meaningful public review. Without this information, the EA does not adequately disclose the scope of potential restrictions, closures, or management actions that could result from future determinations, nor does it

allow the public to understand the reasonably foreseeable environmental and recreational impacts of the proposed action.

This lack of clarity also raises concerns that the EA relies on future, undefined processes to determine key aspects of the action, contrary to NEPA's requirement that agencies take a "hard look" at environmental consequences before making a decision, rather than deferring analysis to later consultation or planning stages.

To address these deficiencies and ensure compliance with NEPA, the EA should be revised to:
1) clearly define the relationship between the Section 106 process and any additional traditional cultural surveys, including which process has controlling authority and under what circumstances;
2) establish objective criteria and thresholds for identifying, evaluating, and documenting sacred sites, traditional cultural use areas, or other culturally significant features, sufficient to support meaningful environmental analysis;
3) identify the procedural steps, roles, and decision-making authority applicable when conflicts arise between Section 106 findings and traditional cultural survey results; and
4) disclose how the outcomes of these processes will be incorporated into future climbing management decisions, including the range of reasonably foreseeable closures, mitigation measures, or adaptive management actions, so that their environmental and recreational effects can be evaluated in this EA rather than deferred.

Further clarification regarding how the NHPA Section 106 review process is different from the proposed additional Traditional Cultural Surveys is needed. Specifically, it is unclear what criteria will apply if an area is cleared through the Section 106 process and no resources are recorded in the NHPA register, yet through a separate traditional cultural survey a conflict arises. This process needs further clarification to set the roles and expectations for all parties involved.

Section 106 Consulting Parties

We request that local tribal governments, groups from the climbing community like Bighorn Climbers Coalition and Access Fund and other relevant stakeholders be included as consulting parties during the Section 106 review process.

According to the Advisory Council on Historic Preservation: "Consulting parties may include the State (or Tribal) Historic Preservation Officer, the local government, an applicant for federal assistance (if one is involved), and interested federally recognized Indian tribes or Native Hawaiian organizations. Historic preservation organizations and others with an interest in the preservation outcomes of the project or those with a legal or economic interest may also be invited to join consultation."

One of Access Fund's core values is respect for the Indigenous peoples who have lived on and cared for the land since time immemorial. Given this, we are committed to learning from and working with Tribes, and that means respecting the vision they have for their ancestral lands. We sincerely hope to collaborate with the Tribes to find a path forward that considers how climbing, along with other forms of recreation like, hiking, fishing and camping, may be managed to be compatible with the values and interests of the Tribal community.

Replace Current Climbing Regulations with CMP

Once the Tensleep Canyon CMP is complete and approved for implementation the Forest Service should rescind or sundown the standing climbing regulation issued in 2019 which states:

If an individual or group is manufacturing or creating new routes with any type of permanent hardware or apparatus to include bolts, glue, manufactured hand holds; or modifying routes through chipping or hammering or drilling new or existing holds, they will be subject to criminal prosecution, to include restitution for the impacted area.

Pursuant to 16 USC 551; 36CFR$261.9(a) Damaging any natural feature or other property of the United States.

36CFR§261.10(a) Constructing, placing, or maintain any kind of road, trail, structure, fence,enclosure, communication equipment, or other improvement on National Forest system land or facilities without a special-use authorization, contract, or approved operating plan.'

With the implementation of a new CMP for Tensleep Canyon the previous climbing regulations are no longer needed and should be rescinded to avoid future confusion.

Bat Management

We request that the proposed 250-meter buffer for climbing restrictions near bat roosts be revised to 45 meters. While we recognize the importance of protecting bat populations from disturbance-especially in light of threats like Pseudogymnoascus destructans (white-nose syndrome)-the 250-meter buffer is not supported by peer-reviewed evidence as a standard for disturbance from climbing activities. Research and recommendations from wildlife biologists and resource management studies suggest that a 45-meter buffer is adequate to minimize human disturbance to roosting bat species while preserving reasonable recreational access. The current buffer would unnecessarily restrict access to large areas of climbable terrain and lead to an excessive number of route closures. A 45-meter buffer has been effectively adopted by other land managers and is a more proportionate approach.

Recommendation: Revise the closure radius to 45 meters for general roost sites, with the option to expand protections on a case-by-case basis where high-value or critical habitat (e.g., known maternity colonies or hibernacula) is confirmed by a qualified biologist.

Raptor and Migratory Bird Management

We request the Forest Service implement modern adaptive management practices, based on the 21st century body of scientific literature, when issuing seasonal closures for raptors or migratory birds. The thinking around raptor management has evolved in recent years. Blanket closures-where entire cliffs and/or climbing areas are shut down for a portion of the year-are becoming less common. Adaptive, monitoring-based management is the new standard. Blanket closures are not always based on bird behavior, climber-use patterns, or terrain. Increasingly, wildlife biologists and climbers are instituting management or seasonal closure areas that cover a limited section of cliff line, based on site-specific conditions and data. Adaptive management practices are bolstered by partnerships between climbers and land managers, and by establishing volunteer monitoring programs for which climbers are particularly well suited, thanks to their knowledge of local crags and ability to access cliff sites.

The Access Fund has published a handbook on raptor management. The handbook is the result of years of effort to compile every relevant article related to managing recreation, specifically climbing, in raptor habitat, and it includes a 20 page reference list in Appendix A (a living document that is linked to the handbook). The handbook was reviewed and edited by Hawkwatch, UFWS, and NC Wildlife Resources Commission. It represents the latest knowledge base and mitigation models for protecting raptors. We suggest that the Forest Service utilize the most current, science-based models for protecting nesting raptors which can be viewed in this handbook.

We support seasonal, adaptive restrictions to protect nesting raptors and sensitive bird species. However, we recommend the following improvements to ensure restrictions are effective and accepted by the climbing community:

Transparency: Clearly define criteria used to initiate and lift closures (e.g., active nesting confirmation, fledgling status).

Collaboration: Work closely with avian biologists and climbing organizations to determine site-specific nesting patterns and appropriate buffers.

Adaptive Management: Allow for closures to be scaled or lifted based on real-time monitoring results rather than fixed seasonal dates.

Consistency: Align closure policies with other land management agencies to reduce confusion among the public.

Categorical Exclusions for Low-Risk Actions

Consider implementation of categorical exclusions for:
Replacing existing hardware in previously inventoried areas.
New routes in previously cleared zones (outside sensitive habitat or cultural sites).
These actions would expedite approvals for low-risk development and align with NEPA streamlining allowed under the EXPLORE Act (2024) Section (e).

Design Features

We support the proposed design features, including improvements to climbing access trails and their incorporation into the National Forest System trail network, development of climbing staging areas, installation of vault toilets, and construction of a new parking lot. To facilitate successful implementation, we request that the EA include a clear and transparent process outlining the steps required to plan, approve, and carry out future trail work and staging area development. Access Fund and our Conservation Team are interested in supporting these efforts and seek assurance that a defined process is in place to enable coordinated volunteer and partner involvement. Investment in this infrastructure is critical to ensuring the long-term sustainability of Tensleep Canyon as a world-class climbing destination.

Conclusion

In conclusion, while we support the Forest Service's goal of establishing a comprehensive Climbing Management Plan for Tensleep Canyon, the EA would benefit from clearer standards, defined processes, and evidence-based thresholds to ensure predictable, transparent, and proportionate management. Incorporating objective criteria for route removal and closures, clear definitions, adaptive wildlife protections, and meaningful consultation frameworks would strengthen NEPA compliance, reduce administrative burden, and foster durable partnerships with Tribes, climbers, and local organizations. With these revisions, the proposed action can better balance resource protection with continued recreational access and stewardship, ensuring that Tensleep Canyon remains both ecologically protected and responsibly accessible for future generations.

We appreciate your consideration of these comments and look forward to continued collaboration. Feel free to contact me via telephone (303-545-6772) or email (katie@accessfund.org) to discuss this matter further.

Best Regards,

Katie Goodwin
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The Access Fund

Cc:Erik Murdock, Deputy Director, Access Fund

Access Fund

The Access Fund is a national advocacy organization whose mission is to lead and inspire the climbing community toward sustainable access and conservation of the
climbing environment. A 501(c)(3) non-profit supporting and representing over 7 million climbers nationwide in all forms of climbing-rock climbing, ice climbing, mountaineering, and bouldering-the Access Fund is the largest US climbing organization with over 20,000 members and 150 affiliates.

Bighorn Climbers Coalition

A 501(c)(3) nonprofit organization, the Bighorn Climbers' Coalition (BCC) mission is to preserve, promote and protect climbing resources and access to climbing resources throughout the Bighorn Mountains and basin. BCC intends to raise funds, obtain grants and organize efforts to improve local recreation areas. This will benefit the climbing community as well as other recreational user groups while decreasing potential negative environmental impacts from climbers. BCC has a history of constructive partnership with local land managers and other local organizations. For more information about the BCC, visit www.bighornclimbers.org.

Central Wyoming Climbers' Coalition

The Central Wyoming Climbers' Alliance (CWCA) is a 501(c)3 non-profit organization dedicated to supporting climbing in the central Wyoming region. The Central Wyoming Climbers' Alliance mission is dedicated to protecting climbing access and resources for today in order to preserve them for tomorrow. For more information about the Central Wyoming Climbers' Alliance, see www.wyomingclimbers.org.