Data Submitted (UTC 11): 1/21/2026 1:07:03 AM
First name: Daniel
Last name: Cartwright
Organization:
Title:
Comments: Date:January 20, 2026

To:Michael Thom, District Ranger, Powder Ranger District

Subject:2026 Proposed Tensleep Climbing Plan

Comments Overview
Once again, my wife and I appreciate the opportunity to comment on the most recently proposed Climbing Management Plan for the Tensleep Canyon climbing area. We have submitted comments twice previously, in 2021 and 2023, for this same climbing plan's previous versions. Since our previous comments were submitted through the official website as requested, we have not attached them to our 2026 comments, but will refer to them as needed as we assume they are still included in the official record for this project. Nearly all of the recommendations and rationale to support them, as requested in both the 2021 & 2023 plan comment instructions, are explained fully in those documents and remain relevant to our comments for the present plan. If it would be more helpful to resubmit those comment documents, please advise and we will be glad to resubmit.

We will focus here on two major issues that we feel deserve more attention since the last submissions - safety and balance with the other essential system components.

Safety
There have been two climbing fatalities experienced within this climbing plan boundary since the last comment submission. One on August 14, 2024 and another on June 26, 2025. I retired after working 40 years in the coal mining business in the continental US, Mexico and Canada. Like rock climbing, coal mining also is inherently dangerous because it revolves around working near and in contact with rock and other variable geologic material, some of which is bolted. We learned that all accidents are preventable and that even a minor accident is a warning the associated area and/or work process must be stopped and closely examined to determine what must be changed to prevent a reoccurrence. Failure to do that was almost always a guarantee of the same or similar accidents in the future. I have seen amazing success in eliminating hazards we really did not think were possible when we first started the investigation, analysis and work process modification. The worst possible situation is one where those involved in a particular activity succumb to the belief that serious accidents, even fatalities, are inevitable in their world and can't be prevented. A fatality was the ultimate in serious coal mining accidents and was given the total priority over all other activities until corrected. Our concern here is we do not see anywhere near that level of concern expressed above in doing everything possible to prevent a reoccurrence from any entity associated with this climbing plan. It is not even apparent which, if any, associated entity feels responsible providing safe, properly designed and constructed climbing routes and ensuring the associated rules & policies are followed. More than one fatality in separate occurrences over such a short time span in coal mining was unheard of but would have resulted in multiple people becoming unemployed…and maybe even unemployable in the mining business.

In addition to the climbers, other groups of people whose safety is threatened by the climbing in this area are drivers & passengers traveling through this portion of US Highway 16, law enforcement personnel, emergency medical personnel and other non-climber residents & tourists. Before explaining how these groups are affected, I will first discuss the critical issue of balance the climbing has with the two other primary climbing system components - camping/lodging and parking.

Balance with the other essential climbing system components along with other area users

The rock climbing system here consists not only of the development and climbing activity of the many climbing routes, but also the support facilities required for the climbers to park and for their camping/lodging needs. The proposed camping improvements are good and necessary, but because of the other nearby lodging alternatives, are not the limiting factor. The size of the total climbing system must be capped by the maximum capacity of the limiting component which in this case is parking. In other words, it is a waste of money and other resources to construct and maintain more climbing routes than can be accommodated by safe and properly planned parking facilities.

The existing parking system in the plan area is chaotic and dangerous. This section of US Highway 16 was well-designed, particularly given the extremely challenging topography. The key to its safe and efficient function is the expert advantage taken by the WYDOT designers of the relatively few natural opportunities to provide turnouts. These turnouts allow a number of essential things for safe traffic flow. These include places for slow moving vehicles to pull over to allow faster vehicles to pass them safely, places for vehicles with mechanical problems or hot brakes to pull over with reduced chances of striking other moving or parked vehicles, opportunities for travelers to pull over and safely sightsee, and limited opportunity for short term parking while taking short hikes in areas immediately adjacent to the road. These turnouts were not provided to become the all-day parking lots for rock climbers and other users they have become, particularly since 2016. This is why we strongly support the plan proposal to construct a 50 vehicle (or more) officially-designated parking lot(s) located a safe distance away from the road right-of-way. We believe the Forest Service needs to get together with WYDOT as soon as possible to determine to best way to provide the maximum number of parking spots in properly developed parking lots, not in turnouts or along the road shoulder.

Once the maximum number of parking spots have been established, the daily maximum number of climbers can be determined. Until that point, we believe no new climbing routes should even be considered until it is known additional routes are required to accommodate the maximum number of climbers determined by the amount of available legal parking. But before ending the ban on climbing route development in Tensleep Canyon, the most critical and controversial issue must be resolved - whether to allow the practice of heavy manufacturing techniques proliferated and promoted by Louie Anderson beginning in 2016 to exist on any of the routes, present or future, or to limit route development to the traditional techniques which allowed only for minimal modification of the natural rock surface championed by the Bighorn Climbers' Coalition (BCC) who has been active in route development and climbing in Tensleep Canyon for many years. I have a Mining Engineering degree but am not a rock climber nor ever intend to be. But after working to gain a basic understanding of these issues, I strongly agree and align with the views and practices of the BCC. Rather than try to explain here all the reasons for my choice, I would encourage you to read the article "Battle For Ten Sleep, Rock and Ice written by Ben Ramsey dated November 12, 2019." This article does the best job of several well-written articles I researched of objectively describing the history and essence of the key issues involved in this very important controversy. It also describes my rationale for my point of view. To my knowledge, I have never met nor talked with any members of the BCC.

Beyond the issues discussed in the preceding paragraph, I would like to explain some additional reasons from my personal experience with this issue. In addition to a house in Gillette, we bought a house in Tensleep Canyon in 2011. This resulted in about 2-4 round trips per week between our two houses which has required us to drive through the plan area frequently. Prior to 2016, the increase in activity and congestion on US Highway 16 through this Climbing Plan area was noticeable during the summer, mostly due to climbers' vehicles parking in the turnouts, but not out of line and seemed to mesh acceptably with the other summer season activities. But in 2016, the activity level through that same area, congestion and resulting near misses increased dramatically. In trying to understand the reason for this abrupt change, I learned that a lot of additional climbing routes were being quickly added using a heavily manufactured approach which made these new routes significantly easier to climb. Coupled with the heavy promotion of these new routes, a large number of much less experienced climbers, some with only climbing gym experience, flooded to this area. The prior routes had been developed using the natural minimal modification techniques and required a significantly higher level of climbing skill thus

reducing the number of climbers with the required skill levels that had been here prior to 2016. In short, the increased numbers of climbers took over Tensleep Canyon facilities which created significant issues and risks for other users of this area. It also seemed to downgrade the climbing reputation of Tensleep Canyon from one of being a premium area geared to positive challenges for the higher skilled climbers to becoming more of the Disney World of rock climbing. We believe Tensleep Canyon should remain a premium climbing area geared to the more experienced climbers. Lesser experience climbers can gain experience in less difficult climbing areas elsewhere to gain the required skills for this area. This will limit the number of climbers to a level more compatible and considerate of others enjoying this area. We also believe the existing routes that have the heavy manufactured equipment which this plan proposal prohibits in new routes should have those same prohibited items removed to conform with that standard. If it is viewed that removal of those items is not possible or practical, then those routes should be closed to climbing. In summary, no grandfathering.

How to manage the number of climbers required to achieve the balance discussed above
The present climbing system is characterized by one allowing an unlimited number of unspecified climbers show up whenever they choose and climb wherever they want as long as they want without having to pay anything for the privilege. No reasonable person with any management knowledge would be surprised this system is wholly disfunctional. It is not surprising this overall climbing system performance has degraded to the point of having two successive years each with a climbing fatality. As discussed above, most of the problems this plan is being required to address stems from having too many climbers to balance with the other facilities (like parking) and the lack of essential management tools (or the will to use them) to have any hope enabling a safe, functional climbing system. The essential management tools include, at a minimum, a means to limit the number of climbers permitted at any time, a means to ensure climbers are qualified to climb the particular routes they choose and enough inspectors to ensure the rules are being followed with the authority to enforce with citations and fines. Both our 2021 and 2023 comments addressed all of these essential management tools in much greater detail and remain completely relevant now. The WY Game & Fish is offered as a directly-applicable model of how each of these management tools are currently being used very effectively in this same geographic area. Please let me know if I need to resubmit our previous comments. Those earlier comments also addressed permit fees assessed to the users of the other activities to fund their chosen activity. For example, nonresident elk hunters pay $707 for their annual permit in this same area, if they are fortunate enough to be drawn. Our 2021 comments cited a March 2021 article in Wyoming Wildlife Magazine that stated nearly 85% of the entire G&F revenue comes from hunters, anglers, recreational shooters and boaters. There is no justification for climbers not to fund the costs, including development and enforcement, of their activity as do the other users of this forest. We strongly suggest that the Forest Service get with the appropriate G&F personnel to see how these same management tools G&F is using successfully can be used, directly &/or adapted, for rock climbing. Also, we understand some Federal agencies, maybe including USFS, use some of these same tools to manage climbing and other activities in other places including Wyoming.

Conclusions and Summary
It may seem we are opposed to rock climbing in Tensleep Canyon, but we are not despite the fact we have no interest in doing it ourselves. Our community has been blessed with a very special resource that offers a world-class climbing opportunity. Further, during our first 5 years in Ten Sleep, we saw the climbing system can be done "right" and that when done properly, it can be done safely and is a wonderful resource for our community. But done wrong, the past two years showed us people can and do get killed. We have tried to explain what we think right looks like and why we think we have moved in the wrong direction since 2016. We hope that collectively we'll make the right choices in this plan. We recognize many of the changes we are recommending will be difficult and unpopular with some in the greater climbing community and thus will be hard to make. Hopefully we will have the courage to do the right things.