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https://cara.fs2c.usda.gov/Public/CommentInput?Project=64474
RE: Tensleep Canyon Climbing Management Plan Draft EA #64474
Comments on the Tensleep Canyon Climbing Management Plan - Draft Environmental Assessment
The SLCA (SLCA) appreciates the opportunity to comment on the proposed Climbing Management Plan (CMP). Tensleep offers world-class climbing for all climbers from beginners to experts. Salt Lake climbers often frequent Tensleep and the Bighorn National Forest throughout the year. This area offers unique recreational opportunities for Utah climbers. We recognize that both climbing and visitation in Tensleep Canyon has been increasing over the years and a CMP is needed. The SLCA supports a resilient climbing system where climbers and the resource can coexist for a sustainable future. Though we are not the Local Climbing Organization (LCO), we work closely with the Access Fund and support the Bighorn Climbing Coalition (BCC) and Central Wyoming Climbers' Coalition (CWCA) on their expertise in the area.
These comments are consistent in tone and intent with SLCA's previous submissions during earlier phases of this process. Our focus is on clarity, adaptability, and on-the-ground feasibility to support long-term stewardship and compliance.
SLCA
The SLCA is a Utah climbing advocacy group whose mission is to engage as an advocate to protect outdoor climbing access and as a steward to maintain sustainable climbing resources in the Wasatch and surrounding areas. The SLCA is a 501(c)(3) nonprofit that serves over 20,000 climbers in the Wasatch Region. The SLCA advocates for climbing not only in the Wasatch, but also where Wasatch climbers climb. Saltlakeclimbers.org.
Camping Management
SLCA supports thoughtful camping management that reduces resource impacts while recognizing camping as an integral component of the Tensleep climbing experience. We encourage the Forest Service to prioritize strategies that concentrate use in durable locations, improve sanitation infrastructure, and emphasize visitor education rather than broad prohibitions that may displace impacts elsewhere.
Clearly designated camping areas, improved information, and sanitation facilities are more likely to achieve resource protection goals than dispersal or enforcement-heavy approaches alone. Where new restrictions are proposed, SLCA encourages adaptive implementation informed by observed conditions and use patterns.
Fixed Anchor Maintenance and Replacement
SLCA strongly supports explicit authorization for routine fixed anchor maintenance and replacement, including rebolting and anchor upgrades that do not expand routes or introduce new impacts. These activities are fundamental to climber safety and long-term resource protection and are typically carried out by experienced volunteers working in coordination with land managers.
We encourage the Forest Service to clearly distinguish between:
? Maintenance and replacement of existing fixed anchors and hardware, and

? New route development or route expansion

Providing clarity between these activities will reduce confusion, prevent unnecessary delays in safety-related work, and support proactive stewardship by the climbing community.

Standards and Process for Route Removal

SLCA recognizes that, in limited circumstances, existing climbing routes may need to be modified or removed to address documented impacts to cultural or natural resources. We encourage the Forest Service to establish clear standards and decision-making guidance for when and how route removal would occur.

As described, the proposed action allows removal of existing routes based on identified "negative impacts,

" but does not define what constitutes a "negative impact" or how those determinations would be made. Establishing criteria and clear thresholds would improve transparency, consistency, and understanding for both managers and climbers.

SLCA also encourages prioritizing avoidance, minimization, and mitigation measures before pursuing route removal where feasible. In many cases, impacts can be addressed through tools such as seasonal closures, access trail adjustments, staging area improvements, or targeted education rather than permanent removal.

Clarifying how these mitigation options would be evaluated and under what circumstances route removal would be necessary will help ensure that management actions are proportional and adaptive. Clear guidance will also reduce uncertainty and improve compliance within the climbing community.

Finally, SLCA encourages consideration of the cumulative effects of route removal decisions. Without defined standards and an adaptive framework, there is a risk of incremental loss of established routes over time. A transparent and balanced approach will help protect resources while maintaining a stable and predictable climbing experience.

Clarification of Adhesive ("Glue") Use in Rebolting

As mentioned in our 2024 comment, we recommend that the Forest Service clearly define the use of "glueing" or adhesives as referenced in the management plan. Within the climbing community, adhesives are a standard and widely accepted best practice for installing modern glue-in bolts and for replacing aging hardware in a way that improves durability, safety, and longevity while minimizing visual and environmental impacts.

To avoid unintended consequences, SLCA encourages the Forest Service to distinguish between:

? The appropriate use of construction adhesives or epoxy for fixed anchor installation, replacement or maintenance, which should be explicitly allowed as part of routine maintenance and rebolting; and

? The use of glue or artificial materials to create, enhance, or modify climbing holds.

Clarifying this distinction will ensure that modern, safe rebolting practices can continue without ambiguity or unnecessary administrative burden.

Permits for New Route Development

The EA does not outline the review and approval process for new climbing routes. We encourage the agency to establish transparent criteria and expectations for new route proposals while avoiding unnecessarily individualized or burdensome processes where broader cliff-level or area-based evaluation may be appropriate.

We also encourage continued collaboration with local climbing organizations to help identify suitable areas, communicate expectations, and support compliance. A system that balances oversight with efficiency will improve outcomes for both resource protection and visitor experience.

To improve and streamline these efforts, recommend:

? Existing fixed anchor may be replaced or maintained without reauthorization, provided such activities do not create new or expand impacts to cultural or natural resources

? 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;
? 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
? 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.

Adaptive Management for Raptor Closures

SLCA supports seasonal raptor protections and recognizes their importance for nesting success and wildlife conservation. We strongly encourage the Forest Service to apply adaptive, site-specific management informed by current monitoring data rather than fixed closures based solely on historical use.

Where monitoring indicates that a nest is inactive, has failed, or is not present during a given season, SLCA encourages the Forest Service to allow for timely adjustment or lifting of closures. Tensleep Canyon benefits from a strong culture of voluntary compliance, and clear communication paired with responsive management will continue to foster cooperation from climbers.

We also support continued collaboration with state wildlife agencies, local climbers, and partner organizations to ensure monitoring protocols are effective, transparent, and realistic given staffing constraints.

Bat Habitat and Rescue Buffers

SLCA supports measures to protect bat species and roosting habitat in Tensleep Canyon and encourages the Forest Service to apply science-based, proportional buffers that are narrowly tailored to documented roost locations and seasonal use.

We recommend that bat-related closures or buffers:
? Be based on confirmed or highly likely roost presence, where feasible
? Be seasonally defined and periodically re-evaluated as new information becomes available
? Reduce the proposed 250 meter buffer to a 45 meter buffer

Trailheads and Climbing Access Trails

SLCA strongly supports improvements to trailheads and climbing access trails that concentrate use, reduce erosion, and improve visitor safety. Well-designed access infrastructure benefits both recreation management and resource protection and can significantly reduce long-term maintenance needs.

We encourage the Forest Service to continue working with partner organizations and volunteers to identify priority projects and implement sustainable trail solutions that reflect actual use patterns.

Closing

SLCA appreciates the Forest Service's engagement with the climbing community throughout this process and supports the overall goal of developing a clear, durable management framework for Tensleep Canyon. Continued collaboration, clarity in implementation, and adaptive management will be essential to the long-term success of this plan.

Sincerely,

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