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Comments: American Safe Climbing Association comments on Bighorn NF Climbing Management Plan #64474 Draft EA attached.

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The American Safe Climbing Association (ASCA) appreciates the opportunity to comment on the Tensleep Canyon Climbing Management Plan Draft Environmental Assessment (EA).

We commend the Forest Service for addressing long-standing issues in Tensleep Canyon, including parking, sanitation, trail proliferation, and resource protection. Improvements to infrastructure, safety, and sustainability are essential and broadly supported by the climbing community.

We are concerned about several sections in the Tensleep Canyon Climbing Management Plan Draft EA and request the plan be revised.

1. Route Development Approval

* The proposed process is vague, with unclear criteria, timelines, and decision standards.
* Risks functioning as a de facto prohibition on new routes and could normalize indefinite delays or denials, undermining predictable recreation management.
* Request: Establish a clear process and timeline for approving sections of cliff line for new route development, including review milestones and decision timeframes for the Forest Service and partner organizations such as the Bighorn Climbers Coalition (BCC).

2. Retroactive Closures

* Leigh Creek RNA proposal would remove long-established, legally developed routes.
* EA lacks thresholds for determining when climbing is incompatible with RNA objectives.
* Alternatives such as partial or seasonal closures are not considered.
* Request: Avoid retroactive closures without proportional analysis or consideration of alternatives such as seasonal or partial restrictions.

3. Cultural & Traditional Use Areas

* Criteria, boundaries, and procedures for identifying sacred or traditional use areas are undefined.
* This creates uncertainty and risks post hoc closures without completed inventories or Section 106 findings.
* Request: The Forest Service should establish clear criteria and procedures for identifying these areas to provide certainty for climbers and local stewardship partners.

4. Route Removal & Anchor Maintenance

* [ldquo]Negative impacts[rdquo] standard is undefined, which could lead to disproportionate removals of established routes.
* Language prohibiting [ldquo]gluing[rdquo] could unintentionally restrict standard anchor maintenance practices.
* In dolomite climbing areas like Tensleep: Epoxy/adhesive anchors are the accepted standard for rebolting and replacement. Routine adhesive use is essential for climber safety and long-term durability. Limited adhesive use does not constitute hold creation or route manufacturing.
* Request: Explicitly allow standard anchor maintenance, including adhesive/epoxy anchors, to ensure climber safety and protect long-term route integrity.

5. Raptor and Bat Management

* In recent years, raptor management strategies have continued to evolve. Rather than relying on broad, seasonal closures of entire cliffs or climbing areas, land managers are increasingly implementing adaptive approaches grounded in active monitoring.
* While bat protection is critical, particularly given white-nose syndrome, a 250-meter buffer is not supported by evidence for climbing-related disturbance. Research indicates a 45-meter buffer adequately minimizes impacts while maintaining reasonable access.
* Request: Revise the bat closure radius to 45 meters for general roost sites, with site-specific expansion where critical habitat is confirmed by a qualified biologist, and manage raptor and sensitive bird closures through transparent, collaborative, and adaptive policies that use clear criteria, real-time monitoring, and consistent standards.

6. Deferral of Key Decisions

* Parking locations, site-specific route approvals, and potential route removals are deferred to the Implementation Guide without additional public review.
* This limits transparency and meaningful stakeholder involvement.
* Request: Ensure that substantive decisions remain subject to public review before implementation.

7. Collaborative Stewardship

* The plan underutilizes the demonstrated capacity of climbers and local organizations to assist with stewardship, monitoring, and mitigation.
* More involvement with partners such as the Bighorn Climbers[rsquo] Coalition strengthens plan implementation.
* There are many successful adaptive management models allowing new route development. Historically popular climbing areas like Rifle Mountain Park, CO, and Smith Rock State Park, OR are great examples of how to manage new routing in collaboration with Local Climbing Organizations.
* Request: Better integrate collaborative stewardship by local climbing organizations into the plan to leverage volunteer capacity and ensure sustainable management.

We appreciate the opportunity to provide these comments and look forward to continued collaboration with the Forest Service to protect natural and cultural resources while supporting responsible climbing access on public lands.

Best regards,

Greg Barnes

Executive Director

American Safe Climbing Association

The American Safe Climbing Association (ASCA) is a national nonprofit organization dedicated to replacing aging and unsafe fixed anchors in climbing areas across the United States. Since 1998, the ASCA has worked in partnership with land managers, local climbing organizations, and volunteers to improve climber safety while promoting stewardship, sustainability, and responsible access. The ASCA is a 501(c)(3) nonprofit organization.