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Comments: Overview: I support the Forest Service's goal of establishing a comprehensive Climbing Management Plan (CMP) for Tensleep Canyon, one of the most nationally significant climbing destinations in Wyoming. While the proposed framework moves in the right direction, the Draft Environmental Assessment (EA) lacks clear standards, defined processes, and evidence-based thresholds necessary to ensure transparent, predictable, and proportionate management consistent with NEPA and Forest Service directives.

1. Unclear Route Permitting Process: The EA introduces a new review and approval process for climbing routes but does not define approval criteria, timelines, decision standards, or appeal mechanisms. This uncertainty risks creating a de facto prohibition on new route development. Recommendation: Clearly define approval criteria, establish review timelines, allow appeals, and explicitly permit routine replacement and maintenance of existing hardware when no new impacts occur.

2. Need for Programmatic, Zone-Based Authorization: Requiring route-by-route approvals creates unnecessary administrative burden. Recommendation: Identify suitable development zones in advance through cultural and natural resource surveys and authorize those zones programmatically.

3. Leigh Creek Research Natural Area (RNA) Closures: The EA proposes removing all sport climbing routes in the Leigh Creek RNA without defining when climbing becomes incompatible with RNA objectives or evaluating less restrictive alternatives. Recommendation: Conduct further analysis, define impact thresholds, consider partial or temporary closures, and base decisions on documented impacts rather than route type.

4. Undefined Standards for Route Removal: The EA allows route removal based on undefined "negative impacts," without mitigation requirements or cumulative effects analysis. Recommendation: Define "negative impacts," establish objective thresholds, apply avoidance and mitigation before removal, and analyze the foreseeable loss of climbing opportunities.

5. Cultural Resource Review Uncertainty: The EA does not clearly explain how NHPA Section 106 reviews interact with additional traditional cultural surveys or how conflicts would be resolved. Recommendation: Define procedures, decision authority, and criteria; disclose reasonably foreseeable outcomes; and include climbing organizations as consulting parties where appropriate.

6. Wildlife Management Must Be Adaptive and Science-Based: Proposed bat and raptor protections rely on overly broad buffers and blanket closures. Recommendation: Use site-specific, science-based, adaptive management with monitoring and collaboration.

7. Support for Infrastructure Improvements: I supports proposed trail improvements, staging areas, toilets, and parking but requests a clear process to enable volunteer and partner involvement. Conclusion With clearer standards, defined processes, and evidence-based thresholds, the CMP can protect sensitive resources while maintaining responsible climbing access. These revisions would strengthen NEPA compliance, reduce administrative burden, and support long-term stewardship of Tensleep Canyon.