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Comments:

A few main points:

1. Limit route development to 5 routes per person per year.
2. Prohibit anyone who has illegally developed in the past or who has a previous citation for illegal development (Louie Anderson) from applying for a permit to develop.
3. Outline CFRs and enforcement policy for the plan.
4. Create an official permitting system for route development
5. Remove illegally developed routes
6. Wag bags

In regards to Appendix B Implementation Guide:

(specifically, "Route Development Review Process")

In this portion of the appendix, it is specified in a note that "Any data provided to the Forest Service shall exclude personally identifiable information." Furthermore, that "The process begins with a climber submitting a route development proposal to the Bighorn Climbers' Coalition. ... [which] will screen the proposal before sending it to the Forest Service climbing ranger to begin the review process." While I agree wholeheartedly that new route development will require some type of application/review/authorization procedure, I have several significant concerns with respect to the proposed process.

First, it is unclear whether the BCC ("or similar local climbing organization in the absence of Bighorn Climbers' Coalition due to unforeseen changes") will have the authority to reject or screen out applications for non-administrative reasons. (Example of "administrative" rejection: An application is missing a portion of the required information, or the application exhibits a *direct, objective* violation of the development best practices document. Example of "non-administrative" rejection: the BCC uses its own subjective judgment about the location of a proposed new route to reject an application before it is subject to "Step 3: Field Surveys & Consultation".) If such a "screening process" is implemented, it is critical that the process has a clear rubric, enumerated in detail, and that there is some mechanism to ensure that USFS is at least *aware* of every application, even if not every application makes it past the initial screening. One can imagine a scenario in which all applications submitted by certain developers or at certain crags are rejected by the BCC without the USFS even being aware of the applications' existence.

Secondly, the fact that a *private corporation* is the only entity with access to personally identifiable information of applicants (and will, ostensibly, be the organization responsible for redacting this information before passing an application on to USFS) is extremely concerning. We have several known "bad actors" in the area who, I'm sure, will be eager to continue developing once this plan is in place. In my opinion, some rules need to be put in place to restrict certain developers from any further development activity in the canyon (notably, those who are known to have participated in illegal development activity in the past, e.g. Louie Anderson).

Combining these two concerns, one may imagine a scenario in which a bad actor becomes a board member of the BCC, and is then responsible for redacting their own personally identifying information from new route applications while simultaneously "screening out" the applications of other developers without the USFS's knowledge. This, to me, illustrates an egregious conflict of interest and potential failure mechanism of the proposed route development review process.

I accept that USFS might determine it to be necessary that a third-party organization like the BCC is brought on in a subject-matter advisory capacity. However, there is no reason that applications need to be submitted to a private organization for "screening" before they are submitted to the USFS directly. If PII is required to be removed for some legal reason, there are numerous software platforms that can automatically assure anonymity of an applicant. Furthermore, no matter the criteria for application rejection/acceptance, it is **critical** that no one involved in illegal activity in the past be involved in the screening/advisory process in any way.