Data Submitted (UTC 11): 1/21/2026 2:27:27 AM
First name: Nate
Last name: Liles
Organization:
Title:
Comments: Thank you for the opportunity to comment on the Tensleep Canyon Climbing Management Plan Draft Environmental Assessment (EA #64474).

I support efforts to improve infrastructure, safety, and resource protection in Tensleep Canyon. However, I have concerns with several elements of the Draft EA that could set problematic precedents for climbing management on public lands.

Route Approval
The proposed review process for new climbing routes lacks defined criteria, timelines, and decision standards. Approval depends on multiple open-ended determinations that are not spatially delineated, creating uncertainty and risking a de facto prohibition on new routes. Clear, predictable standards are necessary to ensure consistent recreation management.

RNA Closures and Route Removal
The proposal to close Leigh Creek Research Natural Area to sport climbing and remove existing routes is concerning. These routes were legally developed and have coexisted with the area's recommended RNA status for decades. The EA does not establish thresholds for incompatibility with RNA objectives or evaluate alternatives such as partial or seasonal closures. Retroactive removal of established routes without proportional analysis sets a troubling precedent.

Anchor Maintenance and Use of Adhesives
Language prohibiting "gluing" could unintentionally restrict routine rebolting and anchor replacement necessary for climber safety. Limited use of epoxy or adhesives is standard practice for fixed-anchor replacement-particularly in limestone-and does not constitute route manufacturing or hold creation. Limited use of epoxy to reenforce fragile holds is also a useful tool for climber safety and route preservation. This distinction should be explicitly clarified to allow essential maintenance.

Wildlife Buffers
Raptor management has successfully shifted toward adaptive, monitoring-based approaches that protect nesting birds while maintaining predictable access, and these models should be applied here. While bat protection is important, a 250-meter closure radius is not supported by available evidence for climbing-related disturbance. A 45-meter buffer for general roost sites, with expanded protections applied site-specifically where critical habitat is confirmed, would better balance protection and access.

Conclusion
I respectfully request that the Forest Service revise the Draft EA to clarify route approval standards, avoid retroactive RNA-based route removals without proportional analysis, explicitly allow standard anchor maintenance using adhesives, and apply adaptive, evidence-based wildlife buffers.

Thank you for the opportunity to provide these comments.

Sincerely,
Nate Liles