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Comments: The Boulder Climbing Community promotes responsible climbing stewardship in the Front Range of Colorado. Our members and constituents climb at Tensleep and we have a strong interest in the content of the CMP because it likely will serve as a model for other USFS regions. We support the general goals of the CMP and EA and offer some suggestions/comments.

1. Any permitting process should involve close coordination with, and input from, the climbing community. Climber-organized fixed hardware review committees have worked well for many years in our region at the state, county, and municipal levels. These committees save government land managers significant resources by excluding unworthy applications and modifying others. They strengthen land manager-climber relations. The land manager retains ultimate decision-making authority.
2. Any permitting process should make clear both the criteria for approving, modifying, or rejecting applications as well as the process for reviewing applications. Doing so improves public trust in the process, and helps guide potential applicants, among many benefits.
3. The requirement that new routes "not negatively impact wildlife and botany sensitive species" (EA, p.8) is too broad. Yes, such impacts should be taken into account. But, the requirement should be further refined to make clear that de minimis impacts, by themselves, do not warrant denial of an application. Any human presence has the potential to cause some slight impact but that has never been, and should not become, the governing standard. We do not apply such a standard to other users of our public lands.
4. The same basic point applies to the proposed removal of existing routes "where surveys show they are negatively impacting cultural and natural resources." (EA, p.8). That is, the impact should be material and not de minimis. Moreover, the reference to natural resources should be limited to natural resources of particular ecological concern. Finally, any such survey should be based on good scientific methods and data, to assure reliability and also to be sure that other potential causes, such as weather, have been excluded.

Thank you for considering these points.