Data Submitted (UTC 11): 10/14/2026 12:35:05 AM
First name: Jake
Last name: Dickerson
Organization: Wild Iris Mountain Sports
Title: Owner
Comments: Hello,
My name is Jake Dickerson and I am one of the owners of Wild Iris Mountain Sports in Lander, Wyoming. Climbing in the state is vital to our business, and I have been a visitor to the canyon for almost 20 years. Thank you very much for this opportunity to comment. I will do my best to keep this brief and to the point.
Primarily, our business supports the Forest Service's efforts to address parking, sanitation, trail proliferation, resource degradation, and public safety concerns in Tensleep Canyon. I agree with the draft changes to leave the routes at leigh creek and to not remove any climbs.

1. Existing Routes, the EXPLORE Act, and Proportional Resource Protection

The decision retains authority to close existing climbing routes when surveys identify negative impacts to cultural or natural resources. Although the Forest Service has appropriately abandoned physical removal of route infrastructure, the decision does not establish objective criteria for determining when a closure is necessary or require consideration of reasonable mitigation measures before access is restricted.

December 30, 2025, comments explained that this approach could produce incremental losses of established routes without proportional analysis of impacts or alternatives.
The draft decision improves the proposal by replacing physical removal with signage, public education, and coordination with climbing organizations. The Forest Service also acknowledges that it lacks the technical expertise to remove routes safely and that physical removal could create additional safety risks and resource impacts.
However, changing the mechanism of closure does not resolve the underlying problem. The decision still permits the loss of established climbing opportunities without defining the threshold for closure, establishing a mitigation-first approach, or explaining how the severity of a documented impact will be weighed against the consequences of restricting access.
Section 122 of the EXPLORE Act directs the Secretary concerned to issue guidance for recreational climbing on covered federal lands. Among other requirements, that guidance must include direction providing for the continued use and maintenance of recreational climbing routes, including fixed anchors, that existed as of January 4, 2025, in accordance with applicable law.
I recognize that this provision addresses federal climbing guidance and does not, by itself, establish an unconditional right to climb every existing route. Nevertheless, the decision's stated consistency with the EXPLORE Act warrants a clear explanation of how the management framework, including the closure of established

routes, complies with applicable federal climbing policy and the Act's direction concerning existing routes. The following below are my recommendations.

1. Establish a mitigation-first standard for existing-route closures, requiring the Forest Service to evaluate reasonable mitigation, restoration, or site-specific management measures before restricting access.

2. Define the resource-impact criteria and evidentiary threshold necessary to justify a closure, including how impacts will be documented and evaluated by qualified resource specialists.
3. Require a reasoned explanation of why less restrictive alternatives would not adequately protect the affected resource before a closure is imposed.
4. Explain how the decision's treatment of existing routes is consistent with applicable requirements and guidance under Section 122 of the EXPLORE Act.

5. Provide for consultation with affected local climbing organizations before implementing route closures, except where immediate action is necessary to address an imminent threat to a resource or public safety.
These revisions would preserve the Forest Service's ability to protect sensitive resources while ensuring that restrictions on established recreation are justified, proportionate, and consistently administered.
2. Route-Development Approval: Objective Standards, Timelines, and Transparency
The decision improves the proposed route-development review process by evaluating entire sections of cliff rather than individual routes and by committing to work with local climbing organizations to prioritize suitable areas.

However, it does not establish sufficiently specific approval criteria, timelines, or decision standards to ensure that new-route development remains a viable and predictable recreational opportunity.

I would suggest that the Forest Service incorporate a defined route-development process into the final decision or Implementation Guide, including:
1. Published criteria for prioritizing walls and scheduling resource surveys, developed in consultation with local climbing organizations.
2. A transparent process for documenting survey completion, communicating results, and explaining approval or denial decisions.
3. A reasonable schedule for reviewing prioritized walls and communicating anticipated timelines, subject to documented resource constraints and seasonal survey requirements.
4. Defined standards for evaluating resource impacts, including consideration of avoidance and mitigation measures where appropriate.
5. A clear explanation of how cultural and traditional-use information will be considered, how relevant restrictions will be communicated, and how decisions affecting proposed climbing areas will be documented.

6. A commitment to periodically review the effectiveness of the process and adjust priorities based on resource conditions, survey results, and implementation experience.
These changes would not require the Forest Service to approve routes that are incompatible with resource-protection requirements. They would establish a fair and administratively workable process for identifying where climbing can occur while protecting sensitive resources.

3. Leigh Creek RNA: Defined Boundaries and Consistent Implementation

Issue

The decision appropriately modifies the Proposed Action by retaining existing climbing at Godfather Boulder, Chemtrails, and Thunder Buttress. However, the remaining closure of the Leigh Creek RNA relies on signage, public education, and route-database changes without fully establishing how the boundary will be communicated, maintained, or evaluated over time.

Basis for objection
I previously objected to the proposed closure of all sport climbing within the Leigh Creek RNA and the physical removal of established routes. Our comments requested consideration of alternatives to complete closure and emphasized the need for proportional analysis of impacts and reasonable mitigation.
The draft decision is an improvement. It allows existing climbing to continue at three locations, prohibits new routes within the RNA, and closes the remaining climbing areas, including Haunted Wall and Twomey Town. The Forest Service also states that existing route infrastructure will not be physically removed.
The decision places significant responsibility on signs, public education, and the removal of closed routes from online databases and future guidebooks. It also states that climbers remain responsible for knowing where climbing is permitted.
Where access boundaries are not clearly delineated and communicated, this approach risks confusion and inadvertent violations. The decision should clearly distinguish the areas where existing climbing remains authorized from those where climbing is prohibited.

I recognize the Forest Service's stated obligation to protect the ecological values of the RNA. Our concern is that the final decision should implement those protections through clear, site-specific management rather than relying primarily on generalized restrictions and public awareness.
Requested remedy
I request that the final decision or Implementation Guide:
1. Include an accurate, publicly accessible map identifying the permitted climbing areas, closure boundaries, access routes, and relevant

signage locations.
2. Require clear, consistent signage at principal access points and locations where climbers enter restricted portions of the RNA.
3. Explicitly recognize the three retained climbing areas and establish that the closure will not be expanded administratively beyond the defined boundaries without appropriate analysis and public involvement.

4. Establish a process for periodic review of the closure and its effectiveness in protecting the RNA's identified ecological values, including consideration of site-specific mitigation where supported by resource information.

5. Coordinate public education and route-database updates with BCC, WyoClimbers, and other relevant climbing organizations.
These measures would support compliance, protect the RNA, and reduce uncertainty for both climbers and land managers.
4. Fixed-Anchor Replacement and the Prohibition on "Gluing"
Issue

The decision expressly allows replacement of existing fixed anchors and fixed equipment while retaining a prohibition on "gluing" and other practices associated with creating artificial holds. It does not clearly distinguish prohibited hold creation from the use of structural adhesive to install or replace glue-in climbing anchors. Adhesives are also used to reenforce existing critical holds on established routes that may be fragile and pose a risk of breaking.
Such work is distinct from manufacturing routes or creating and enhancing climbing holds.
The draft decision states that replacement of existing fixed anchors and fixed equipment is allowed. It separately prohibits "gluing, attaching artificial holds, or using mechanical equipment to create holds where a natural hold did not exist."

Although these provisions may have been intended to distinguish legitimate maintenance from route manufacturing, the decision does not explicitly establish that distinction. As written, the prohibition could be interpreted inconsistently and could interfere with routine replacement of aging fixed anchors, including glue-in bolts.
Fixed-anchor maintenance and rare instances of hold reenforcement are necessary for climber safety and the long-term sustainability of established routes.

Uncertainty about whether approved adhesive installation is permitted could discourage necessary maintenance or create avoidable conflicts between climbers and land managers.

Requested remedy
I request that the final decision expressly clarify that:
The prohibition on gluing, artificial holds, and mechanical hold creation does not prohibit the use of appropriate structural adhesives for the

installation or replacement of fixed climbing anchors, provided the adhesive is used for anchor installation or replacement and rare instances of existing hold reenforcement, not to create or enhance climbing holds.
The Forest Service should also clarify the applicable procedures, if any, for routine fixed-anchor replacement and maintenance. These clarifications would preserve the prohibition on artificial hold creation while ensuring that necessary safety maintenance remains authorized.

The final decision's commitment to work with local climbing organizations is encouraging. However, without a defined process, the scope and timing of that collaboration remain uncertain.
Local organizations possess practical knowledge of climbing-area conditions, route history, use patterns, maintenance needs, and opportunities to reduce impacts. Their participation can help the Forest Service implement resource protections efficiently while maintaining appropriate climbing access.
Requested remedy
I request that the Implementation Guide establish a formal, ongoing consultation process with BCC and other appropriate local climbing organizations, including opportunities to participate in:
1. Prioritization of walls for future route-development surveys.
2. Development of stewardship, education, and resource-protection measures.

3. Communication of route closures, access boundaries, and management changes.
4. Monitoring of climbing-related impacts and evaluation of mitigation effectiveness.

5. Periodic review of implementation outcomes and recommendations for adaptive management.
The Forest Service should identify a point of contact and a process for regular communication so that local organizations can contribute meaningfully to implementation rather than being consulted only on an ad hoc basis.

Conclusion and Requested Action
I appreciate the Forest Service's consideration of public comments and recognizes that the draft decision incorporates several important improvements. The decision to retain climbing at three locations within the Leigh Creek RNA, abandon physical removal of existing route infrastructure, and move toward wall-based route-development review represents meaningful progress.

Thank you for allowing us to submit feedback!

Sincerely, Jake Dickerson