

Subject: Comments on Proposed Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management

Dear United States Forest Service,

I am writing to provide feedback on the proposed Forest Service Manual 2300 – Recreation, Wilderness, and Related Resource Management, explicitly addressing Chapter 2350 – Trail, River, and Similar Recreation Opportunities direction.

I am an avid rock and ice climber, and I am concerned about the potential adverse impacts of these proposed regulations on climbers like myself. In this letter, I aim to articulate the possible adverse effects and provide constructive suggestions for managing climbing activities differently than outlined in the proposed Manuals.

**Purpose of Comment:**

My objective in commenting is to express my concerns and encourage the United States Forest Service to consider alternative approaches to managing climbing activities. A more nuanced understanding of climbing and climbers' needs is essential for effective and equitable management.

**Regulatory Concerns:**

To comply with the guidelines outlined in "A Guide to the Rulemaking Process," I will address specific aspects of the proposed regulations:

**1. Constitutionality and Legal Authority:**

Explain how the proposed regulations may infringe on climbers' constitutional rights and legal considerations.

**2. Notice-and-Comment Process:**

Highlight the importance of a transparent notice-and-comment process and express concerns about potential limitations in the proposed approach.

**3. Arbitrary and Capricious Actions:**

Identify instances where the proposed regulations lack a principled basis or rational connection to climbing activities, potentially rendering them arbitrary and capricious.

**Direct Adverse Effects:**

The lack of data provided by the Forest Service regarding climbing activities is a significant concern. I outline the three primary types of rock climbing and explain how the proposed regulations could negatively impact all climbers nationwide, even those not on Forest Service lands.

**Lack of Information:**

Express overarching concerns about the Forest Service's lack of knowledge regarding climbing statistics, routes, and fixed anchors. Emphasize the importance of gathering comprehensive data before implementing regulations to ensure informed decision-making.

**Specific Concerns with Proposed Sections:**

Provide detailed critiques of specific sections in the proposed Manuals, including 2355.32, 2355.31, and 2355.21, highlighting potential issues related to minimum requirements analysis, placement of fixed anchors, and climbing management plans.

**Recommendations for Consideration:****1. Utilize Recreation Opportunity Spectrum (ROS):**

Suggest incorporating the ROS in planning climbing opportunities to align with the specific characteristics of each area.

**2. Flexible Climbing Management Plans:**

Recommend a flexible approach to climbing management plans, making them optional rather than mandatory for each administrative unit or ranger district.

**3. Proactive Approach:**

Propose altering the directive to allow District Rangers to prioritize climbing management proactively based on their assessment of needs, usage, and potential conflicts.

**4. Define Adverse Impact:**

Advocate for a clear definition of adverse impact on wilderness character regarding climbing activities, promoting fairness and inclusivity.

**5. Consider Climber Safety:**

Stress the importance of allowing the replacement of existing fixed anchors, mainly for safety reasons, and emphasize the minimal visual impact of well-designed climbing infrastructure.

**Conclusion:**

In conclusion, I appreciate your consideration of my concerns and recommendations. I believe that by addressing these issues, the Forest Service can create regulations that better serve the diverse needs of the climbing community while preserving the natural beauty of our public lands.

Thank you for your time and attention to this matter.

Susan Urbanczyk