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First name: Christian
Last name: Beckwith
Organization: The Teton Climbers' Coalition
Title: Executive Director
Comments:

December 12, 2023

TO:
Randy Moore

Chief, U.S. Forest Service 1400 Independence Avenue Washington, D.C., 20250-0003

Chuck Sams
Director, National Park Service 1849 C Street NW Washington, D.C., 20240

RE: Climbing Organizations Request for Comment Period Extensions
? USDA Forest Service: FSM 2355 Climbing Opportunities #ORMS -3524
? National Park Service: Evaluation and Authorization Procedures for Fixed
Anchors and Fixed Equipment in National Park Service Wilderness Areas

USDA Forest Service and National Park Service Officials:

The Teton Climbers Coalition welcomes the opportunity to provide comments to USDA Forest Service and National Park Service "proposed guidance for managing climbing, protecting natural and cultural resources in wilderness areas." Per agency notices, the public is invited to provide input on both the agencies' guidance proposals through Tuesday, January 16, 2024. For the reasons stated herein we hereby formally request that both the USDA Forest Service and the National Park Service extend this comment deadline 30 days through February 15, 2024. Comment Period Deadline Extensions are Warranted for Fairness and to Ensure Meaningful Public Input

Two primary reasons argue for an extension of these two comment period deadlines. First, these related-but significantly distinct in many ways-nationwide policy initiatives are each highly complicated with very important and consequential implications to a range of stakeholders regarding many wilderness and non-wilderness landscapes across the country. Interested stakeholders will need to understand the specific differences distinguishing the two policy proposals, educate themselves on the nuances of each, and then submit informed and constructive comments by the same deadline. For many it will be difficult to differentiate all the complexities of each proposal and it is impractical for the agencies to expect to receive helpful and distinct comments for each complicated policy proposal during a parallel comment period with an identical comment deadline.

Second, these comment periods extend through several holidays, including the Christmas through New Years Day week when many Americans are not working or focused on matters of detailed land use policy. The agencies would receive much more detailed information and constructive suggestions-and have the benefit of this information to support informed policy decisions-if they did not require stakeholders to analyze complicated and detailed policy proposals during the busiest holiday season of the year.

For these reasons we respectfully request that both the USDA Forest Service and the National Park Service extend these comment deadlines 30 days through February 15, 2024.

Sincerely,

Christian Beckwith
Executive Director
The Teton Climbers Coalition