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Comments: As a climber, hiker, and cyclist, I deeply value our nation's forests, parks and wilderness areas. I deeply respect and admire the work of the USDA Forest Service and believe in the Service's commitment to protecting the land, respecting the cultural history, and ensuring opportunities for all users to enjoy US Forest lands. I submit my comments on the draft guidance related to Climbing Opportunities in National Forest System lands with gratitude for the work of the USDA Forest Service.

First a general question: what existing problem is the draft guidance trying to solve? The directive is silent on the conduct of a current analysis of the deleterious impact of fixed anchors or fixed equipment in NFS lands. Therefore, it can be presumed the directive intends the proposed regulatory framework to prevent a deleterious impact of fixed anchors in NFS lands. Given the long history and value of climbing in NFS lands, at what point was it determined NFS lands needed protection from climbers? Climbing has robust leave no trace and environmental stewardship advocacy; it is a community positioned to care for the land in collaboration with the NFS rather than in regulatory conflict.

Regulation ought to be practical, enforceable, necessary, and limit unintended consequences.

Practical: the complexity of the proposed management process is impractical to ensure safety in real time and actively evaluate, replace, and manage existing fixed anchors. The cumbersome and resource (time, money, expert input) intensive process will impede safety, exploration, and is anathema to the spirit of wilderness use.

Enforceable: given limited resources is the regulation enforceable?

Necessary: is the regulation necessary if the proposed PARC Act is included in the EXPLORE act? Is the regulation necessary given current analyses of impact and given the volume of climbers that actually use wilderness areas which require high levels of experience and expertise? Is the regulation necessary given analysis of impact in non-wilderness areas?

Unintended Consequences: impracticalities and barriers to implementation, increase risk and impact safety; due to fears, both safety and land preservation related, and without resources to adequately evaluate risk, the agency may default to an easier position of "no": no fixed anchors, no fixed equipment, and no climbing.

Thank you for your consideration and your invaluable contribution to the US.