



Slackline U.S. Comments on the Director's Order #100: Resource Stewardship for the 21st Century

Slackline U.S. acknowledges and understands the newly created draft DO #100 is in response to the uncertain environmental and social changes the National Park System (NPS) faces. We approve and promote the Director's initiative to create new plans to protect and promote conservation of the park system. The overarching goal of managing the NPS in a context of continuous change, especially in regards to protecting the NPS against climate change's unknown effects, is an issue of utmost importance.

However, as an organization, we are concerned with DO #100 initiative No. 6:

6. Incorporating the Precautionary Principle and Adaptive Management into Resource Stewardship

Specifically, we are concerned by the vague wording of the Precautionary Principle which is defined by DO #100 as:

- The **Precautionary Principle** requires that, when an activity raises *plausible or probable threats of harm to park resources and/or human health, management should take anticipatory action even when there is uncertainty*. When such uncertainty exists, NPS managers will take actions that *err on the side of caution* to protect natural and cultural resources in accordance with section 7 of this Order. Any decision made using the precautionary principle should take into account: (1) the threat of harm to park resources or public health; (2) the level of scientific uncertainty; and (3) the preventive, precautionary action.¹

We support well substantiated, scientific evidence-based decisions and believe the italicized language above gives too much discretion to NPS managers to make decisions regarding the sport of slacklining (and sub-discipline highlining) without full consideration or consultation with the user group.

Slacklining is in its infancy compared to many other sports and the slacklining presence within the NPS makes up a small portion of the total visitors to the parks. We are concerned scientific research on slacklining will not be prioritized and that DO#100 puts slackline access in national parks at undue risk.

Slackline U.S., a new organization, is only just beginning to engage in discussions with the NPS about how to work together to keep slacklining thriving within the parks. We are wary of the

¹ Director's Order #100 pg. 6 emphasis added

wording within the Precautionary Principle and ask Director Jarvis to remove this “ban first, ask later” language.

Many slackliners frequent the NPS on a regular basis and are often involved in conservation efforts within the parks. Slacklining and interacting with the park’s features stimulates a unique affection for the parks which translates in to a desire to preserve and protect the parks. Slackline U.S. is a Leave No Trace partner and we work hard to disseminate the leave no trace ethics within our community.

As explained above, Slackline U.S. is concerned the NPS will use the Precautionary Clause to unnecessarily restrict the legitimate practice of slacklining within the parks. We would like to note our concerns about DO #100 and ask that the wording of the Precautionary Clause be either changed or removed.

Thank you,

Slackline U.S.