

Data Submitted (UTC 11): 4/6/2024 4:00:00 AM

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Comments: Draft Reference Manual will not protect the Wilderness values that we all cherish. Please do not approve Draft Reference Manual 41.

The policies and protocols outlined in draft Reference Manual 41 will increase the risk of injury to those who recreate in Wilderness areas. As written, Draft Reference Manual 41 will also damage natural resources and Wilderness values.

Draft Reference Manual 41 defines the term "fixed anchor" in a manner that does not accurately reflect how modern climbers recreate in Wilderness areas. The gross over simplification utilized in Reference Manual 41 prevents these rules, as written, from both protecting Wilderness values and the safety of those who climb in Wilderness areas. By labeling all of the various climbing tools and methods that today's climbers use to both protect natural resources and maintain an acceptable margin of safety as fixed anchors, draft Reference Manual 41 falls short of accurately reflecting reality. To achieve the desired aims, good policy must use terms that are grounded in reality. In this respect, draft Reference Manual 41 is a failure.

This failure to accurately define modern climbing tools and methods, and the benefits to natural resources and human safety, prevents these draft rules from achieving the aims of the Wilderness Act, and other relevant policy.

Furthermore, the proposed increase in field and administrative work for agency Wilderness staff to even begin the evaluation phase described in draft Reference Manual 41 is not realistic. There is neither the funding or staffing necessary to implement the field and office procedures described in draft Reference Manual 41. This is problematic for a host of reasons, the first being that the goals of the policy will not be achieved. The second reason being that the lack of agency funding and staffing to implement these new policies means that routine safety activities that provide Wilderness climbing with a margin of safety will be blocked.

Rock climbing is a form of recreation that both predates the Wilderness Act and is also completely compatible with the Wilderness Act. For this and many other reasons not listed here, draft Reference Manual 41 must not be approved as written.