

Data Submitted (UTC 11): 12/30/2023 3:22:38 PM

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Comments: Thank you for the opportunity to comment.

On Page 3, #3; Wilderness Act...

Wilderness character is not mentioned although, '...directs agencies to manage wilderness to preserve natural ecological conditions...' is. The preservation of wilderness character is mentioned in Section 2(a), twice in Section 4(b), and Section 4(d)(3) and is often referred to as the primary mandate to agencies in managing Wilderness. It would be worth noting this in this section of the directive. In addition, there is no mention of the 'public purposes' of Wilderness outlined in Section 4(b) which might strengthen the document if mentioned here?

I located six instances where I believe there is a miss interpretation of the language in the Wilderness Act that could lead to confusion and legal challenges. In these six incidents the proposed directive states, "...are the minimum necessary for the administration of the area for the Wilderness Act purposes." The location of this wording is;

1. Page 5, #5
2. Page 12, #12
3. Page 14, #1
4. Page 14, #2
5. Page14-15, #4
6. Page 15, #6

In section 4(c); Prohibition of Certain Uses the language used is, "...except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act..." It is clear that Congress intentionally used the singular "purpose" which it appears the climbing directive is confusing with Section 4(b) which clearly states the primary responsibility of the agencies is to preserve the areas wilderness character and adds, "Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use."

The climbing directives should be very clear in the language used, specifically the use of the word "purpose" as opposed to "purposes". As currently written the directive is referencing Section 4(c) while using the word from Section 4(b) adding to confusion as to the primary responsibility of agencies to protect wilderness character while also acknowledging the 'public purposes'.

I would suggest using the wording from the Wilderness Act Section 4(c) to re-write these six instances to say, "...are the minimum necessary for the administration of the area for the Wilderness Act purpose." If desired, adding an additional statement references Section 4(b) and the 'other purposes' would provide more clarity and less confusion when using "purpose" vs. "public purposes".

Thank you again for allowing me to comment and for the work you are doing, it is important and appreciated.