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Comments: I have lived, worked, and climbed in Yosemite National Park for the past 10 years. During this time I have added and replaced old bolts in wilderness areas. As a stakeholder directly impacted by the reclassification of climbing equipment under §4(c) of the Wilderness Act, I will speak out against what I perceive to be flagrant bureaucratic overreach and misappropriation of public funds. The restrictive and reckless language of this proposal demonstrates a fundamental ignorance of basic climbing techniques and practices. The following dissent will outline these oversights starting with the erroneous bolting methods described in Section 2 Paragraph 4, and ending with a refutation of the defining principle of this entire regulatory effort.

Section 2 Paragraph 4 encourages unsafe and nonsensical bolt replacement policies. It allows old hardware to be maintained but only if using the original hole. There is no way to know the state of the current hole until the old bolt is removed. Most of the time the hole is compromised during the removal process and drilling a new hole is a safer and longer term solution. Modern climbers fill old holes and blend the scar into the rock. This prevents moisture from entering and is completely unnoticeable when done correctly. The fact that the park service is reprimanding volunteers who wish to use a new hole during a bolt for bolt replacement effort shows they have no idea how the process works.

The Park and forest services rely on climber bolts to protect the environment. In Yosemite alone anchors placed by climbers are used to study

Peregrine Falcons - <https://www.nps.gov/yose/learn/nature/ss-bird-species.htm>

17 different Bat species -<https://www.nps.gov/yose/learn/nature/ss-bird-species.htm>

Geologic processes - <https://www.nps.gov/yose/learn/nature/upload/Collins-Stock-2016-NatureGeoscience.pdf>

And countless other park related functions. The existence of these anchors pre-dates the wilderness act and has furthered human understanding and scientific knowledge. The impact of every bolt pales in comparison to a single geologic event in terms of measurable impact on the rock surface.

As we all look to protect our wild places it is best to dedicate public limited resources to areas where it will be the most effective. If this poorly written, unfunded and unenforceable legislation reflects poorly on the priorities of the current administration. The statement "the combined impact of many fixed anchors in a single area or rock wall can have a significant effect on wilderness character" is completely unfounded, unsubstantiated and sloppy. The very document used to justify this reclassification states "DO #41 Climbing is a "high risk" sport, and climbers are solely responsible for their own safety. Many climbing routes traverse hazardous terrain, and the National Park Service is not obligated to assess or mitigate these hazards" . Climbers CAN NOT be solely responsible for their safety if a MRA exists. It limits creativity, stifles innovation and artificially stunts the growth of an active and caring user group. I hope our elected officials can make meaningful contributions to our shared wilderness areas instead of wasting time debating nonsensical climbing bans