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Comments: As a bird biologist researching conservation, preservation, and threats to biodiversity - and who also identifies as an avid rock climber- a bolt ban in designated wilderness areas is a government action that threatens conservation, public safety, and protection of historical sites.

As a previous employee of Yosemite National Park, where I simultaneously studied bird populations and climbed on a daily basis, I was very familiar in the integrative nature and shared dialogue between climber and biologist ethics and practices. There is not strong scientific support for negative effects of climber-placed bolts on conservation of species or wildlife areas. A ban on bolts will not ebb human traffic on climbing routes. As my personal most visited climbing area, Kentucky's Daniel Boone National Forest in the Red River Gorge is an excellent example of how a ban on climbing bolts does NOT reduce traffic or impact of climbers on climbing routes/climbing crags. Personal connections to the Frankfort USFWS office has shown me that surveys of protected habitat and threatened species are not frequent enough to show that climber-placed bolts are correlated or causative in generating negative conservation concerns. In recent years, climbing has increased exponentially in the KY region, and the bolt ban has only accelerated the effects of habitat disturbance, erosion, and public risk. A more positive case study is the climber traffic in Yosemite National Park. It is well-managed by a permit system alongside rotating habitat closures for threatened and endangered species. The integrative systems employed by the Yosemite Terrestrial Wildlife Biologists in the Park should be used as model for how other wilderness areas can be most effectively managed.

The potential bolt ban is an extremely sensitive topic among climbers and conservation biologists because of the massive impact it would have on not only climber safety and access, but also the increased potential for habitat disturbance. Bolts protect wildlife habitats by providing climber protection that is secured by access to ROCK features, unlike the NATURAL anchors provided by trees and shrubs. Like the infamous alcohol prohibition of the '20s generating even more negative effects of alcohol, a ban on climbing bolts will only make matters worse. Climbers will be forced to use natural anchors off-route of rock features, which will increase habitat fragmentation in order to access said natural features (think bushwhacking), increase erosion, and increase disturbance of natural alcoves that are home to endangered or threatened species--including those of birds, bats, and plants. Bolted anchors provide the greatest safety to the public, as climbers are protected from failure / breakage of natural features (such as trees and shrubs) under the weight of a rappel or fall. These falls caused by failure of natural anchors are commonly fatal. Also, without indexed common knowledge of the HEIGHT of pre-placed bolted anchors on the rock, climbers are put in a position of significant increased chance of rappelling off the end of their rope. These accidents are also fatal.

"Disappointed" in our federal government by overlooking the major conservation impacts and threats to public safety is an understatement. The inadequate understanding of climbing mechanisms and practices is glaring. It is obvious to both climbers and biologists alike that the government officials involved do not understand the technical practices and mechanisms involved in rock climbing--otherwise, the neutral effect of a pre-placed bolt on conservation would be understood. It would be wise to fully understand climbing practices and true impact of bolts to draw conclusions about wildlife conservation and public risk management. This involves a review of peer-reviewed scientific articles on impacts of climbing bolts on conservation alongside public surveys to climbers of how the proposed ban will impact climbing safety and on-the-spot risk management decisions.

Integrating biological and conservation science, true knowledge of rock climbing systems and mechanisms, climber ethics and practices, and climber public opinion on this issue is a strong approach to a solution that best manages wildlife, historical sites, and public safety. Lack of doing so will 100% incite friction between climbers and the Department of the Interior. This will absolutely incite legislative push-back from climbers and biologists. If

this bolt ban were to be approved, the federal government will experience turmoil, uproar, distaste, push-back, and distrust.