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Title:

Comments: May 24, 2022

Ms. Kenna Belsky Forest Planner

Tonto National Forest 2424 E. McDowell Rd. Phoenix, AZ 85006

RE: Access Fund objection to the Tonto National Forest Plan and Final EIS Dear Ms. Belsky,

Access Fund, America's national climbing advocacy organization, appreciates this opportunity to submit objections to the final Tonto National Forest Plan EIS (FEIS). While the final Tonto National Forest Plan, published in March, 2022 did consider some of our comments on the draft Tonto National Forest plan, Access Fund objects to some of the final language and recommends changes that will support agency consistency and prevent uncertainty, confusion and potential resource management conflicts.

Access Fund has commented extensively on these same topics throughout the Forest Plan revision process and thus meets the criteria for filing this objection letter. Our comments are limited specifically to language in the new Forest Plan pertaining to the use of fixed anchors for climbing and/or rappelling. Our comments are broken down by sections of the Forest Plan.

Thanks in advance for your consideration of the objections below.

Comments

Page 30: Desired Conditions (REC-DIS-NMO-DC)

"Unauthorized permanent fixed anchors for rock climbing and rappelling are not present on the landscape or natural features."

Objection: While Access Fund can conditionally support authorization for permanent fixed anchors, no definition of "unauthorized", or authorized for that matter, has been provided by the Forest Service. Without definition, the statement is overbroad, ambiguous, and subject to misinterpretation. This planning process neglected to engage the public on any discussions relevant to the contours of an authorization process for fixed anchors. Tonto National Forest has never required authorization for placing fixed anchors; therefore, this final plan should not regard existing fixed anchors as unauthorized.

For example, in the FEIS associated with the revised Forest Plan, the following language appears in Table 13, on page 79, with respect to the Alternative "A" option for the Forest Plan: Other activities and programs such as rock climbing and equestrian would continue to be neglected and underdeveloped; unauthorized rappelling anchors may continue to be installed by the general public, and resource damages from equestrian use such as soil erosion and vegetation scarring from tethering animals may increase[hellip]

Since Alternative "A" is defined as the "no action" plan, meaning the current 1985 Forest Plan stays in place, this language suggests that (under the 1985 Forest Plan) it is currently acceptable for rappelling anchors to be installed on Forest land. In that case, calling them "unauthorized" is a misnomer. The USFS does not have a national climbing management policy, but national precedent indicates that fixed anchors are allowed at over 10,000 discrete climbing areas across the National Forest System (USFS manages 30% of America's climbing). Since there is no current Tonto National Forest policy against placement of fixed anchors, calling any such fixed anchor "unauthorized" before there is an established rule prohibiting them, is problematic from both procedural and implementation perspectives. Access Fund recommends that any climbing or rappel anchor existing before an authorization is required be considered allowable, since no type of "authorization" was required at the time of their placement.

Similarly, Section 1232 of the 2019 John D. Dingell, Jr. Conservation, Management, and Recreation Act protects existing climbing resources that were developed prior to the designation of San Rafael Swell wilderness:

1. Recreational Climbing. --Nothing in this part prohibits recreational rock climbing activities in the wilderness areas, such as the placement, use, and maintenance of fixed anchors, including any fixed anchor established before the date of the enactment of this Act--

1. in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.); and
2. subject to any terms and conditions determined to be necessary by the Secretary.

Page 31: Guidelines (REC-DIS-NMO-G)

"Permanent fixed anchors or bolts for rock climbing and rappelling should be allowed where resource conflicts do not exist (e.g., at-risk species, scenic integrity, cultural resources) and removable protection is not practicable for safe ascent or descent for approved routes."

Objection: Access Fund appreciates that fixed climbing anchors should generally be allowed where resource conflicts do not exist. We agree that fixed climbing anchors are not compatible where cultural resources or at-risk species would be compromised. Our objection is to the term "scenic integrity." Scenic integrity is undefined and the term could be interpreted over-broadly resulting in unnecessary access closures to the American public.

Access Fund recommends that "scenic integrity" be removed from this list of examples of resource conflicts.

Page 31: Management Approaches for Nonmotorized Recreation (REC-DIS-NMO-MA)

(01 through 03 omitted)

"04 Collaborate with established local and national climbing, caving, and canyoneering organizations to monitor popular and desirable climbing areas and develop best practices and management plans for these areas (e.g., cave management plans, climbing management plans, vertical trails, individual route applications, and canyoneering routes)."

"05 Coordinate with local partners and climbing groups to either remove or implement maintenance and replacement of existing fixed anchors and bolts and to consider new areas when necessary to meet demands for rock climbing and rappelling while meeting public safety and natural resource desired conditions and where compatible with other National Forest uses."

"06 Work with partner organizations and user groups to expand public education on safe recreational climbing practices and the use of permanent fixed anchors and bolts. Coordinate enforcement efforts with partner agencies, user groups, clubs, and local organizations to increase public education and build "self-regulation" within the recreational climbing community."

Comment: This is not an objection. Access Fund agrees that the creation of a Climbing Management Plan for the TNF is a good idea. We similarly agree that a plan to replace some of the antiquated, existing fixed anchors in the TNF is a good idea and is critical to the safety of climbers and the protection of natural resources. Access Fund looks forward to working with TNF in these areas and in the area of public education. In our experience, the general climbing community supports management that fairly balances climbing access with resource protection.

As always, if you have any questions about our comments, please feel free to contact me. Best regards,

Curt Shannon

Policy Analyst | Access Fund