Data Submitted (UTC 11): 2/5/2020 12:35:24 PM First name: Erik Last name: Filsinger Organization: Title: Comments: Dear Tonto National Forest Representative,

I am submitting these comments as an individual although I also am involved in at least two local climbing organizations (Queen Creek Coalition and Arizona Mountaineering Club) who may submit comments on their own. I have been involved in local climbing access issues for three decades and served on the McDowell Sonoran Preserve Commission in Scottsdale. representing rock climbers. I also have a broad outreach network of rock climbers and canyoneers who are concerned.

While it could be that some of details may be worked out after passage of the plan in negotiations with local and national advocacy groups, I feel that the black and white language of the plan should specifically recognize and allow for future specifications. Indeed some of the current language should be revised to allow for those future specifics.

It appears that the plan on numbered pages 28 and 29 limits rock climbing to prior authorization. I have two comments with regard to those statements.

1. There is no mention of grandfathering in existing rock climbing areas, most of which have rock climbing anchors in place. Could you please add a statement that grandfathers rock climbing routes and anchors that exist prior to the date of the adoption of the new management plan?

2. The draft plan appears to recognize fixed anchors only as a means of descent. That is incorrect. Fixed anchors (bolts) are very frequently used as a safety measure in ascending a route where removable anchors (pro) are not feasible. Could you please add language recognizing that fixed anchors and bolts are also required for ascending a route?

Also, the draft plan does not deal with rock climbing (fixed anchors) in the Wilderness areas, but much rock climbing does exist within the Superstition Wilderness area for example. Language should be added that deals with such climbing and anchors. It may be feasible for the Tonto to allow for the safe replacement of aging bolts and anchors but not new bolts in new locations. Language should be added acknowledging rock climbing in the Wilderness areas but stating that bolts can be replaced on a one for one basis only for safety reasons.

The draft plan also does not address the process for seeking and obtaining written authorization for rock climbing areas. Language should be added that spells out that process.

Thank you.