Data Submitted (UTC 11): 3/11/2020 7:00:00 AM First name: Stan Last name: Mish Organization: Title: Comments: Climbing Fixed Anchors do not need to be regulated

March 11, 2020

Dear Beth Rumpza,

Thank you for your continued support of recreation on the Tonto National Forest.

I am concerned and disturbed by the inclusion of "Desired Conditions" item 4 under the section for Non-Motorized Recreation. This item reads: "Unauthorized permanent fixed anchors for rock climbing and rappelling are not present on the landscape or natural features". I have several points to make, generally suggesting that this language be stricken from the final management plan.

Fixed anchor placement should be a "grandfathered" use. Fixed anchors have been in use in America for over a century. Iconic environmentalist John Muir was a climber, and most certainly placed a few fixed anchors to enable his safe descent from the mountains.

Fixed anchors save trees and other cliffside vegetation which might otherwise be used by climbers for anchoring, and which may not be able to sustain frequent use.

Many fixed anchors are placed on an ad hoc basis to maintain the safety of the climbing team. These anchors are placed by necessity, often in demanding circumstances where prior approval would be impossible. Subsequent climbing teams will reuse these fixed anchors on subsequent ascents. Any policy should support the placement of the best, most reusable anchors in these situations.

Climbing is one of the least impacting sports practiced on public lands. Climbing is practiced on solid rock, which tolerates repeated use with minimal implact. The most permanent of fixed anchors, drilled expansion bolts, disturbs material that is measured in grams. Such disturbance, which when allocated over years and thousands of uses, pales in comparison with many other accepted recreational activities, and represents an exemplary use of our public lands.

Climbers have at times voiced strong positions regarding fixed anchor use, both pro and con. These conversations, sometimes heated, may give observers and land managers the impression that the issue of fixed anchors is of grave consequence to the environment. This is not true. Climbers are focussed on minutia, which fall near the bottom of any ranking of human impact on public lands. These heated conversations should instead be interpreted as evidence of climbers' passion for the environment, and not a call for regulatory action.

Effective regulation of fixed anchors, short of an outright ban, will be very difficult to manage. Issues include: lack of reliable inventory, inaccessible geography, and subjective standards of use. Any effective management will most certainly involve heavy reliance on user groups for policy and policing.

If an outright ban is entertained, consider that climbing is one of the fastest growing sports in the world. Sales of climbing equipment have recently exceeded 1 Billion dollars per year. Climbing is one of the newest sports to be adopted by the Olympics. And, as I have mentioned, climbing is a model, minimally impacting use of our public lands.

In summary, I ask you to strike the language that suggests that fixed anchors "are not present on the landscape or natural features". Instead I encourage you to study the impacts of climbing in a fair comparison with all other uses of public lands, intervening only when such regulation is reasonably proportionate with all efforts to protect our natural resources.

Sincerely,