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Comments: The Arizona Mountaineering Club is a non-profit all-volunteer club with more than 300 members and a focus on mountaineering and rock climbing. Founded in 1964, the AMC teaches climbing and canyoneering skills; promotes safe and responsible outdoor recreation; and works with land management agencies to preserve access to climbing resources in central Arizona. This has become increasingly important as we have seen the sport grow rapidly in popularity, with an estimated 7.7 million Americans now actively participating in outdoor climbing each year and additional participants in related activities like canyoneering.

Due to its proximity to Phoenix and plethora of exposed rock, the Tonto National Forest has a long history of rock climbing, with some routes in use since the 1960's or earlier. AMC members are among the many visitors from around the world who climb and canyoneer on the Tonto year-round, and we trust that the Forest Service will continue to protect these activities as part of the multiple-use concept.

Accordingly, we read with interest the recently released Draft Land Management Plan for the Tonto National Forest. We were gratified that the Plan recognizes rock climbing as an important recreational activity on the Tonto. And we were pleased to see that the Forest Service is seeking to partner with local climbing groups, as the AMC has a long and successful history of working with other land management agencies, including the city of Scottsdale, with whom we have developed a comprehensive Climbing Management Plan to guide route development and maintenance within such areas as Pinnacle Peak Park and the McDowell Sonoran Preserve. We are eager to collaborate with the Forest Service to ensure that climbing remains a sustainable activity even as the number of climbers increases.

We would therefore like to call your attention to a few elements of the draft Plan that might be interpreted to reduce or restrict access to rock climbing on the Tonto. With regard to those issues, the AMC respectfully submits the following for your consideration:?

1. On page, 29, under Guidelines for Non-Motorized Recreation (REC-DIS-NMO-G), item 5 states:?"Where rock climbing is an appropriate recreational activity, permanent fixed anchors or bolts for rock climbing and rappelling should be allowed only by prior written authorization, if demonstrated impacts to at-risk species, scenic integrity, cultural resources, or user-conflict concerns have been communicated to the public, and there are no other safe means of descent available and the area is impassable by the use of removable anchors."

??There are a few items of concern in this statement. First are two technical points: 1- while fixed anchors do remain in place following installation, they are not truly "permanent," as they will eventually need to be replaced when the hardware is no longer safe or reliable, and 2- the above language appears to recognize fixed anchors or bolts only as a means of descent, but they are also used in ascending routes where opportunities for removable protection are inadequate. Second, the phrase "where rock climbing is an appropriate recreational activity," opens the question of who decides where climbing is appropriate and how that decision is made, communicated, or enforced, creating confusion about where rock climbing is allowed. Third, this language does not describe how existing bolts or anchors would be maintained and whether authorization would be required before replacing old or damaged hardware. Fourth, the proposed requirement to obtain prior written authorization before installing fixed anchors or bolts creates a series of practical problems. While we recognize that the Forest Service must serve diverse user groups and protect the land itself, we are concerned that a complex or lengthy authorization process might either halt the development of new routes-which help both to serve the growing demand for climbing areas and to disperse the impacts of rock climbing by spreading climbers across more areas-or discourage compliance entirely. We are also mindful of the burden that such authorization requests would place on Forest Service staff, who might have little context for evaluating the appropriateness of climbing

anchors. Additionally, the Plan does not describe how such authorization might be obtained, specify who is responsible for granting it, or provide guidelines for such authorization, which leaves us unable to evaluate the feasibility or fairness of such a process.?

However, as mentioned earlier, we note that the Management Approach detailed on p. 29 calls for the Forest Service to: "Collaborate with established local and national climbing, caving, and canyoneering organizations to monitor popular and desirable climbing routes and develop best practices and management plans for these areas (e.g., cave management plans, climbing zones, vertical trails, individual route applications, and canyoneering routes). Coordinate with local partners and climbing groups to either remove or implement maintenance and replacement of existing fixed anchors and to consider new routes when necessary to improve recreation opportunities and mitigate resource impacts (e.g., cultural or riparian resource damages)."

??We therefore suggest that the AMC partner with the Forest Service to develop a Climbing Management Plan that would include prescriptive language that clearly specifies the appropriate conditions for establishing new climbing routes and for installing fixed hardware, as well as detailing best-practices and responsibility for maintaining existing routes, anchors, and access trails, and addressing impacts to at-risk species, scenic integrity, cultural resources, and user-conflict concerns. Properly crafted, such a Climbing Management Plan could obviate the need for route-by-route authorization, while still protecting the forest from reckless use and development.??

Proposed language:?

Guidelines for Non-Motorized Recreation (REC-DIS-NMO-G), item 5:?"Fixed anchors or bolts for rock climbing and rappelling should be allowed in accordance with the Climbing Management Plan (to be developed), and where there are no other safe means of protection available, and the area is impassable by the use of removable anchors. Such fixed anchors and bolts should be maintained and replaced in accordance with the Climbing Management Plan."?

If additional prior authorization is still deemed appropriate, we request that the Plan add language that details the application process, the decision-making authority, parameters or guidelines for such decisions, the appeals process, and a reasonable timeline for obtaining authorization. The lack of such language creates confusion among climbers and raises concerns of an ad hoc process in which Forest Service staff might arbitrarily deny access for rock climbing or route development.

2. On page 28, Desired Conditions for Non-Motorized Recreation (REC-DIS-NMO-DC), item 4 states: "Unauthorized fixed anchors for rock climbing and rappelling are not present on the landscape or natural features."

While we recognize that the intent of this item is to impose reasonable control on the number and location of fixed bolts, it overlooks the fact that there are already hundreds of climbing routes across the Tonto that rely on fixed anchors for safe ascent and descent. The above language does not describe how those existing anchors would be authorized or maintained. The AMC would be willing to assist the Forest Service in documenting these routes for the purpose of retroactive authorization, but such a process would be cumbersome and could be avoided with a statement that recognizes those climbs and anchors and incorporates them into a Climbing Management Plan. Accordingly, we suggest a modification to the Desired Conditions.?

Proposed language:?

Desired Conditions for Non-Motorized Recreation (REC-DIS-NMO-DC), item 4:?"Fixed anchors and bolts for rock climbing and rappelling are present on the landscape or natural features only in accordance with the Climbing Management Plan (to be developed). Anchors already in place prior to the adoption of the Land Management Plan shall be considered authorized and shall be managed as such."

3. While the draft Plan includes an overview of the management of Wilderness-designated areas within the Tonto, there is no mention of rock climbing within Wilderness boundaries, despite the presence of many long-established and historical climbing routes in those areas, including routes with fixed anchors. While we appreciate the need for heightened regulations in the Wilderness setting, we are concerned about access to traditional Wilderness climbing routes and the need to replace aging bolts in those areas in order to protect current and future climbers. The bolts and anchors that conform to the best practices protocols that we endorse are minimal, visually inconspicuous, and innocuous to plants and wildlife, which we believe is in keeping with the Wilderness Desired Conditions expressed on page 130 (DWMA-DC), item 5: "Modern, human-made developments are rare, substantially unnoticeable, and use natural or complementary materials. They are present only when needed to provide for public safety, resource protection, or to reflect the historic and cultural landscape."

We suggest adding language that recognizes rock climbing within the Wilderness-designated areas of the forest, and either states that it will be managed in the same fashion as the rest of the Tonto or clarifies what specific limitations might be put in place, including protocols for replacing old or damaged bolts.

Proposed language:?

Desired Conditions (DWMA-DC), item 10:?"In Wilderness Areas, fixed anchors or bolts for rock climbing and rappelling should be allowed only in accordance with the Climbing Management Plan (to be developed), and should be maintained in accordance with the Climbing Management Plan."

Again, on behalf of the Arizona Mountaineering Club, I extend my thanks to the Forest Service for its ongoing stewardship of the Tonto and its special places. Thank you, as well, for the opportunity to participate in this review process. We recognize that rock climbing is only one of many activities that take place on our national lands and we appreciate your consideration.

With participation in climbing and related activities increasing, and with the population around the Tonto National Forest also growing rapidly, we see this Land Management Plan as a critical opportunity to collaborate with the Forest Service and other recreational organizations to develop a thoughtful strategy for managing climbing on public land. An effective Climbing Management Plan would address the concerns we see in the draft Land Management Plan, support the mission of the Tonto, provide consistent guidance to rock climbers, enhance multiple uses, minimize friction between user groups, and provide forest supervisors with clear guidelines. We hope to help you develop it.