Data Submitted (UTC 11): 3/12/2020 6:56:22 AM First name: Blake Last name: McCord Organization: Northern Arizona Climbers Coalition Title: Board Member Comments: To whom it may concern,

As the local climbing organization representing the climbing community of Northern Arizona, we the Northern Arizona Climbers Coalition, wanted to directly communicate our concerns with the language within the draft management plan addressing rock climbing and fixed anchor use within the Tonto National Forest. Specifically, we see the proposed permitting of future fixed anchors to potentially be a unnecessarily burdensome process for both the public and the agency. Unless a permitting process is both efficient and practically managed, our primary concern is that it will effectively end future fixed anchor use in the district, and severely detriment the future recreational opportunities for climbers.

As part of our organization's mission statement, we are dedicated to the promotion of both environmental stewardship and safe climbing practices. Bolts and fixed anchors have been a crucial component of climbing for decades, with a long history of use on Forest Service lands. Indeed, a huge percentage of climbing areas in the western US lie on Forest Service lands. Without fixed anchors, most of these areas would not exist and the recreational resources would be severely limited for rock climbers. Fixed anchors are crucial to safe climbing, whether they be utilized for top anchors/rappel anchors, or as lead protection where natural protection is unavailable. Fixed anchors have also proven to be an effective tool in mitigating resource degradation by limiting climbing traffic at clifftops and any associated erosion and impact to vegetation and habitat.

Fixed anchors have a long history on the Tonto National Forest, although many of the currently existing climbing areas on the Tonto have been developed in the past 15 years. The use of fixed anchors at these areas provide safe access for climbers to our public lands. Far more potential climbing areas exist throughout the Tonto, but the establishment of these limited resources would likewise require fixed anchors. Limiting or effectively ending bolt placement essentially prohibits future enjoyment of the abundant rock resources the Tonto holds. With an ever-growing population, both in the state and in the climbing areas. Impact would be far greater at these areas, with no real potential to spread use and mitigate concentrated impact through development of new areas.

We ask that the language in the draft management plan be amended. We would suggest removing the clause that states all new fixed anchors will require "prior written authorization". Our suggested language is as follows:

Where rock climbing is an appropriate recreational activity, permanent fixed anchors or bolts for rock climbing and rappelling should be allowed, if there are no other safe means of descent available and the area is impassable by the use of removable anchors.

The Northern Arizona Climbers Coalition is encouraged by the language in the draft management plan that advocates working with local organizations on collaborative future management. We would like to offer our assistance in future climbing management work with the Tonto National Forest. We look forward to the opportunity to build a strong working relationship between the agency and the climbing community.

Thank you for your time.

Northern Arizona Climbers Coalition (NAZCC)