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#### Access Fund comments on the new Draft Tonto Forest Plan and EIS

The Access Fund is a national, non-profit advocacy organization whose mission is to keep climbing areas in the United States open and to conserve the climbing environment. Founded in 1990, the Access Fund supports and represents over 7 million climbers nationwide and all forms of climbing, including rock and ice climbing, mountaineering, and bouldering. The Access Fund helps establish climbing ethics, promotes volunteerism, and advocates access to and sustainable use of federal and non-federal lands. The Access Fund works closely with land management agencies, environmental organizations, climbing groups, and businesses linked to use of the outdoors on conservation projects, land acquisitions, and climbing policy. Access Fund members across the country regularly use our National Forests for recreational purposes, including climbing. The US Forest Service and Access Fund share an active Memorandum of Understanding.

#### Comments:

The Tonto National Forest (TNF) published its new Draft Forest Plan and associated Draft Environmental Impact Statement (DEIS) on December 13, 2020, with a 90-day public comment period. Climbing community concerns relate primarily to the use of fixed anchors (bolts) in the Tonto National Forest. Specifically, in the non-wilderness Dispersed Recreation section of the Draft Plan:

A Desired Condition on p.28 of the Draft Plan reads: "Unauthorized permanent fixed anchors for rock climbing and rappelling are not present on the landscape or natural features."

A Management Guideline on p.29 of the Draft Plan reads: "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."

Instead, Access Fund recommends the following management guidelines:

Rock climbing has long been acknowledged as an accepted recreational use of Forest Service lands. Fixed anchors are defined as climbing equipment (e.g., bolts, pitons, or slings) left in place to facilitate ascent or descent of technical terrain. These anchors are a critical component of a climber's safety system. Fixed anchors are typically placed by the first ascensionist on technical ascents and descents (rappels) where removable anchor placements are not viable.

Rock climbing fixed anchors can be placed in such a way to protect natural resources, improve social conditions, enhance safety, and provide outstanding recreational opportunities. Fixed anchor hardware should be climbing-specific and comply with modern, currently accepted standards.

Climbers may use, place and maintain fixed anchors, including any fixed anchors established before the date of the enactment of this plan. Placement of new rock climbing fixed anchors may require prior authorization to protect natural and cultural resources. Programmatic authorization is the primary mechanism for fixed anchor management as it protects resources while minimizing burden to land managers and forest visitors. Site specific

authorization should only be implemented to manage areas with documented sensitive or endangered resources.

Motorized drills are prohibited for placement of new fixed anchors in Wilderness.

3) Finally, the TNF is currently preparing an EIS for the Resolution Copper (RCM) mine project. In the event this project moves forward, and the 2,400 acres of Forest land at Oak Flat are conveyed to RCM, it will represent the largest loss of a rock climbing resource to ever occur on public land in the United States. Oak Flat is an extremely popular climbing and bouldering area in the TNF, and climbers will have to climb elsewhere if this area is lost to mining. It is very likely that other climbing areas in the TNF will see higher use by local rock climbers. This is another reason why the Draft Plan language on fixed anchors should be modified, and a more flexible approach to fixed anchor management implemented in the new TNF Forest Plan.

Access Fund thanks you for the opportunity to contribute constructive input to the Draft TNF Plan. If there are questions about any of our comments, please feel free to contact me.

Sincerely,

Curt Shannon  
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