



31 July 2007

Mr. Jeff Rupert  
Refuge Manager  
Wichita Mountains Wildlife Refuge  
32 Refuge Headquarters  
Indiahoma, Oklahoma 73552

**RE: Rock Climbing as an Appropriate and Compatible Use of the Wichita Mountains Wildlife Refuge**

Dear Mr. Rupert,

I write on behalf of the Access Fund in support of the Wichita Mountains Climbers Coalition (“WMCC”) and the continued allowance of rock climbing as a compatible and appropriate use of the Wichita Mountains Wildlife Refuge (“Refuge”). The importance of climbing at the Refuge for the American climbing community can not be overstated. Many of our members visit the Refuge as either a destination climbing area or as a stop when traveling across the country. A picture of Crab Eyes at the Refuge is the cover photo for the Access Fund publication, “Climbing Management: A Guide to Climbing Issues and the Production of a Climbing Management Plan,” and the working partnership between the Access Fund, WMCC, the Advisory Bolting Committee (“ABC”), and the Refuge is cited as a model throughout the publication. As evidenced by the extensive and on-going process between the Refuge, the climbing community, and the general public that started in the 1990s, rock climbing today remains a legitimate and appropriate activity at the Refuge.

Rock climbing, ice climbing, bouldering and mountaineering are appropriate, sustainable, low impact, legitimate and longstanding uses of our nation’s public lands and are practiced in many places nation-wide on both federal and state owned and managed land. Throughout our National Park System, for example, climbing is considered a “welcomed and historical use.” In national parks like Yosemite, Joshua Tree, and Rocky Mountain climbing has been a popular pursuit for more than half a century. Climbing is also a welcomed and historical use on other agency lands including hundreds of sites managed by the US Forest Service, Bureau of Land Management, US Fish & Wildlife Service, and Army Corp of Engineers. In fact, the rock climbing opportunities at the Refuge are recognized as the finest in the region and have a long tradition going back decades.<sup>1</sup> [1]

**The Access Fund and the WMCC**

As the nation’s only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment, the Access Fund works with land managers from coast-to-coast to allay and address their concerns about potential liability

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[1] <http://www.fws.gov/southwest/refuges/wichitamountains/rockclimbing.html>



exposure resulting from recreational rock climbing, as well as questions about climbing's impact on the environment. In fact, the Access Fund has signed memoranda of understanding (MOU) with both the BLM (<http://accessfund.org/pdf/AF-BLM-MOUfinal.pdf>) and USFS (<http://accessfund.org/pdf/AF-03-MOU-USFS.pdf>) relating to any climbing initiatives within their areas of management. A 501(c)3 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 15,000 members and affiliates.

The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. Working towards a future in which climbing and access to climbing resources are viewed as legitimate, valued, and positive uses of the land, the Access Fund advocates to federal, state and local legislators concerning public lands legislation; works closely with federal and state land managers and other interest groups in planning and implementing public lands management and policy; provides funding for conservation and resource management projects; develops, produces and distributes climber education materials and programs; and assists in the acquisition and management of climbing resources. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

WMCC, an Access Fund Affiliate, was created to represent the interests of rock climbers from Oklahoma, Texas, Kansas, Arkansas, and Missouri who frequent the Refuge, and to work directly with the USFWS to protect the rock climbing resources and natural environment of the Refuge. WMCC signed a MOU with the USFWS in which the WMCC committed to assisting the USFWS in managing rock climbing activity at the Refuge by providing guidance on critical climbing issues, organizing volunteer conservation projects, establishing the ABC, and educating the climbing community on resource protection.

Since that time, the WMCC and the Access Fund have provided substantial assistance on a number of important projects, including: design and printing of informational rock climbing brochures, installation of a climbing and backcountry bulletin board, development of a fixed anchor application and review process, and organization of trash cleanups and major trail building efforts. In addition, the WMCC has kept the climbing community informed about important conservation issues through the organization's website and newsletter.

### **Tradition and Importance of Rock Climbing at the Refuge**

The Refuge is one of the finest rock climbing areas in the area, and an invaluable resource to climbers throughout the Midwest. I learned to climb in Nebraska in the early 1990s, and for many of my climbing partners, the Refuge was a long weekend get-away.



The Refuge's high-quality granite, multi-pitch routes, and wilderness setting provided outstanding opportunities for to those of us in the “vertically challenged” Midwest. To this day, for climbers throughout the Central and Western United States, the Refuge is a climbing destination that provides urban escape, nature appreciation, wildlife observation, wilderness experiences, and high quality and unique rock climbing opportunities found at Mt. Scott, the Narrows, Elk Mountain, Crab Eyes, Lost Dome and other classic sites.

As one of only a few granite climbing areas in this part of the country, the Refuge has an established climbing history dating back more than 50 years. One of the earliest known technical ascents at the Refuge took place in the 1940's with the first ascent of the route Great Expectations on Elk Slab in the Charons Garden Wilderness Area. Since that time, hundreds of quality routes of varying degrees of difficulty have been established at the Refuge. A majority of these were done in traditional, ground-up style without the need for fixed anchors thus emphasizing wilderness adventure and minimal use of fixed anchors.

Prior to 1996, technical rock climbing had historically been an unregulated activity at the Refuge. Aside from general public use regulations, climbers were allowed to carry out their activities with no restrictions. However, as the popularity of rock climbing began to increase across the country in the late 1980's, so did the number of climbers visiting the Refuge. With increased usage impacts became a concern for the USFWS. As a result, after much public input and evaluation of the compatible use of rock climbing at the Refuge, new management policies and regulations for technical rock climbing went into effect in May 1996 to insure that climbing resources and the natural environment of the Refuge were protected while acknowledging climbing as a compatible use of the Refuge.

### **Rock Climbing Connects People with Nature to Ensure the Future of Conservation**

Rachel Carson once said, “Like the resource it seeks to protect, wildlife conservation must be dynamic, changing as conditions change, seeking always to become more effective.” These words, which were quoted by Fish and Wildlife Director H. Dale Hall,<sup>2</sup><sup>[2]</sup> signify the direction of an organization that embodies Rachel Carson’s visionary approach to conservation. The USFWS is taking the lead for other agencies in its recognition that only through connecting people with nature are we ensuring the future of conservation.<sup>3</sup><sup>[3]</sup> To this end, the Access Fund, the WMCC and the climbing community in general have a proud record of conservation activism at the Refuge. As an example of this commitment climbers in Oklahoma annually host an Adopt-a-Crag at the

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<sup>[2]</sup> See Director’s Message of the Employee Handbook, <http://www.fws.gov/info/pocketguide/directorsmessage.htm>

<sup>[3]</sup> See Fish and Wildlife Priorities, <http://www.fws.gov/info/pocketguide/fwsfundamentals.htm>



Refuge, featuring an element of conservation, a sense of giving back, and a spirit of celebration.

The Access Fund's grant program regularly provides funding for management initiatives that raise awareness about climber responsibilities through stewardship projects, develop or support partnerships with resource management agencies and conservation organizations, reduce climber impacts on natural and cultural resources within the climbing environment, and develop understanding and knowledge about natural and cultural resource sensitivities where the information is used to open climbing areas or mitigate climbing impacts. In 1995, 1997, 1998, 2000, and 2004, the Access Fund provided grant funding totaling over \$10,000.00 in support of the Refuge for trail work, relationship building with the local climbing community, and informational brochures. The Access Fund's commitment to the continued conservation of the climbing resources and the preservation of the climbing opportunities at the Refuge is a top priority.

In addition to Adopt-a-Crag and Climbing Preservation Grants, the Access Fund and its Affiliates work on-site with resource managers around the country to help protect natural resources and conserve endangered or threatened species habitat in areas visited by climbers. Climbers have been a great source of help to biologists by providing volunteer help for a range of tasks. For example, climbers have helped with monitoring, circulated local information on restrictions, positioned signs, and provided observations to resource managers on new sightings or unusual behavior. It is the Access Fund's experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions.

## **Conclusion**

In talking with local climbers, the climbing opportunities at the Refuge are far superior and of a different style than opportunities offered in other areas around the region. Unlike some of the other non wildlife-dependent compatible activities, the rock and surrounding environment at the Refuge make it a truly unique and one-of-a-kind experience. We hope that under your leadership the Refuge will continue to be managed as a world-class climbing area and that climbing will continue to remain an appropriate and compatible use of the Refuge. As we have for nearly a decade, I know the WMCC and the Access Fund will continue to play a constructive role in assisting you. If you have any questions or comments regarding the Access Fund or rock climbing in general, please don't hesitate to contact me 1-888-863-6237, x112; [deanne@accessfund.org](mailto:deanne@accessfund.org). We very much appreciate your consideration of this important matter.

Sincerely,

Deanne Buck  
Acting Executive Director, The Access Fund



Cc H. Dale Hall, Director, USFWS  
Geoff Haskett, Chief, Refuges (via email)  
James W. Kurth, Deputy Chief, Refuges (via email)  
Nancy Roeper, National Wilderness Coordinator, USFWS (via email)  
Dr. Benjamin N. Tuggle, Regional Director, USFWS, Region 2  
Chris Pease, Regional Chief, Refuges, Region 2 (via email)  
Tom Baca, Regional Chief, Planning, Region 2 (via email)  
U.S. Senator James M. Inhofe  
U.S. Senator Tom Coburn  
U.S. Representative Tom Cole  
Jason Keith, Access Fund Policy Director (via email)  
Aaron Gibson, Access Fund Regional Coordinator (via email)  
Marion Hutchinson, Wichita Mountains Climbers Coalition (via email)  
Lawrence K. Gustafson, Haynes and Boone, LLP (via email)

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