



September 7, 2012

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RE: Access Fund Comments on the Comprehensive Conservation Plan and Environmental Assessment for the Wichita Mountains Wildlife Refuge

Dear Planners,

The Access Fund appreciates this opportunity to comment on the draft Comprehensive Conservation Plan (CCP) and Environmental Assessment (EA) (collectively the Plan) for the Wichita Mountains Wildlife Refuge (Refuge). Since 1996, the Access Fund has worked closely with the Wichita Mountains Climbers Coalitions to help protect the natural resources and unique climbing experience at the Refuge. It is heartening to see that the Plan recognizes rock climbing as a legitimate, existing, historic, and supportive recreational use of the Refuge. The Access Fund fully supports Alternative B (Proposed Action) and looks forward to providing climbing management expertise, conservation, and stewardship for the Refuge.

The Access Fund

The Access Fund is the only national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 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 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.¹ We compile and publish the largest list of wildlife related closures in the country.²

The Access Fund works closely with local climbers and federal, state, and private land managers

¹ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm

² <http://status.accessfund.org/>

to develop and implement climbing management plans³ that are currently in use across the country and has hosted several national climbing management conferences attended by hundreds of land managers from across the country. In many instances, climbers actively assist land managers by maintaining trails, removing trash, and helping locate, monitor, and report on species of concern.

For more information about the Access Fund, visit www.accessfund.org.

Wichita Mountains Climbers Coalition

In 1993, the U. S. Fish and Wildlife Service (USFWS) initiated numerous EAs at the Refuge to determine whether rock climbing and other recreational activities were causing significant impacts. In the early stages of this process, controversy was created when it was announced that climbing, which had been a compatible use of the refuge since the early 1940's, was to be terminated. In response, local climbers from Oklahoma, Texas, Kansas, Arkansas, and Missouri formed the Wichita Mountains Access Association (WMAA) to represent the rock climbing community in its efforts to insure that rock climbing was not eliminated as a recreational opportunity at the Refuge.

In 1995, following two more years of review, numerous discussions with the WMAA, and considerable public input, the USFW determined that, subject to a few additional regulations and assistance from local climbers in managing the associated impacts, climbing was a compatible recreational use of the Refuge,. To fulfill that requirement, the WMAA determined that the climbing community would best be served by forming a new non-profit, volunteer climber's organization. In 1996, the Wichita Mountains Climbers Coalition (WMCC) was created to work directly with the USFWS to protect the rock climbing resources and natural environment of the Refuge. The WMCC signed a Memorandum of Understanding (MOU) with the USFWS in which WMCC committed to assist the USFW managing rock climbing at the Refuge by providing guidance on critical climbing issues, organizing volunteer conservation projects, establishing an Advisory Bolting Committee (ABC), and educating the climbing community on resource protection.

Since that time, the WMCC has developed a successful working relationship with USFWS management and personnel at the Refuge and has provided substantial assistance on a number of important projects, including: design and printing of an informational rock climbing brochure, 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.

For more information about the WMCC, visit <http://www.wichitamountains.org>.

³ <http://www.climbingmanagement.org/>

COMMENTS

The climbing management policies within the Plan are well crafted, scientifically based, and should serve as a model for wildlife agencies across the country. I routinely use the Refuge as an example of the compatibility of climbing with wildlife focused management and the benefits of local climbers partnering with land managers. Between 1995 and 2004, the Access Fund provided over \$10,000 in grant funding for trail work, relationship building with the local climbing community, and informational brochures at the Refuge. The Access Fund remains committed to conserving the unique natural resources and climbing opportunities at the Refuge. Climbing at the Refuge dates back to the 1940's; the wildlife and natural beauty of the area offer a truly unique climbing experience. Climbers have and will continue to be drawn to the Refuge. The Plan is a product of years of experience managing climbing and working with the Wichita Mountains Climbers Coalition.

Below are several components of the Plan that highlight how far climbing management at the Refuge has come since the proposed ban in 1993:

- Recognition that wildlife is an important part of the overall Refuge climbing experience and that rock climbing is acknowledged as a supportive use of the Refuge.
- Rock climbers account for only a small fraction of total visitation and usage of the Refuge.
- Eliminating rock climbing will cause a significant negative impact on the human environment because the Refuge offers climbing resources that are not available anywhere else in the region.
- All reviews and recommendations are professional, scientific, reasonable, and unbiased.
- No significant changes are proposed for the management of rock sports on the Refuge. The replacement of existing anchors and the evaluation of new anchor placement will continue to be evaluated on a case-by-case basis in partnership with the Wichita Mountains Climbers Coalition Advisory Bolting Committee. The use density zones and group-size limits described for hiking will also apply to rock sports.
- Although the process is not explained, climbing activity will be monitored with a trail registration system and a study developed to determine the impacts of climbing on the social and natural environment.

Access Fund Assistance

In addition to providing climbing management expertise, community outreach, and education, the Access Fund Preservation Grant Program⁴ and Conservation Team⁵ are available to support

⁴ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000853/k.9CF5/Grant_program.htm

⁵ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm

conservation and climbing management at the Refuge. Our Grant Program funds projects that preserve or enhance climbing access and opportunities and conserve the climbing environment throughout the United States and is a source of funding available to the Refuge and Wichita Mountains Climbers Coalition. The Conservation Team, Access Fund's newest stewardship program, helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy. The Access Fund is connected to researchers experienced with studying the impacts associated with climbing and can help develop a study of climbing's impacts at the Refuge.

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Thank you for your professional and thorough consideration of climbing management at the Refuge. The Access Fund has the experience, local contacts, and resources to help conserve the natural environment and climbing experience of the Refuge. We look forward to participating throughout the planning process and beyond. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,



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Policy Director
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Marion Hutchinson, Wichita Mountain Climbers Coalition
Aaron Gibson, Access Fund Regional Coordinator, Wichita Mountains Climbers Coalition