Data Submitted (UTC 11): 1/31/2024 1:30:47 AM

First name: Grahm Last name: Hornsby

Organization: Wichita Mountains Climbers Coalition

Title: Advisory Bolting Comittee Member

Comments: Hello,

I appreciate you all working to create a plan to get all of the parks on the same page. I appreciate you all accepting public comments. And most of all, I love that this management plan states climbing as an appropriate use of wilderness.

Have you ever seen a climber high up on a wall and thought to yourself, "How do they get down from there?" I know I have been asked that question more times than I can remember. The answer is simple, "we use fixed hardware to rappel off once were done!" Fixed hardware is essential to rock climbing.

I am a board member of the Wichita Mountains Climbers Coalition (WMCC.) Here, I sit on the Advisory Bolting Committee, which is a group of volunteers who assist the park in making decisions for permitting new or maintaining existing fixed anchors.

The Wichita Mountains Wildlife Refuge (WMWR) houses Charons Gardens Wilderness Area. Here, climbing with fixed hardware started in the 1940s, and we have photos of people climbing out there from the 1920s. In the late 1990s the park decided they were to ban rock climbing. But with the birth of the WMCC and a strict climbing management plan, "rock sports" were considered permissible. The plan required climbers to maintain a permit before installing or replacing fixed hardware. This permit would go through a MRA and potentially be approved. This is a 30 year existing model of the current proposal.

When faced with losing climbing access permanently, we happily accepted this new model. However, many rightly felt that it was unreasonable to attempt to manage and restrict climbing when it did not damage natural resources and had been in existence long before the Wilderness Act was created. We also feared how a park that claimed to be under funded would manage this new plan.

Using the WMWR as a case study, we can see how this proposal may play out. Right now, the park stated that they will not be approving any new fixed hardware. The last permitted new fixed hardware was under different management in the late 2000s. This is an unfortunate example of how this policy is hinging on one person, who may or may not understand rock climbing. This also halts any new exploration. Climbing new routes is an essential part of rock climbing and a fantastic and profound way to interact with our countries amazing spaces. Climbing a new route is stepping into the unknown, and it is impossible to know what all hardware would be needed before venturing out.

With replacement of old fixed hardware, we made strides in the last few years. We used to have to submit a permit for one piece of fixed hardware at a time. Since 2018, the WMWR has allowed us to receive a permit for multiple routes and formations at a time. The permit is active for one year at a time and we have only that window to replace only the fixed hardware on that list. This is a victory for us locally, but it is not safe, and the park does not have the resources to manage this.

Our current permit took the park 5 months to be issued. Showing that 30 years after their climbing management plan was created, they still do not have the resources to manage this plan. I believe that the current proposal will hurt land managers and climbers in this way.

During the permitting process, the park conducts an MRA. I asked them how they justify fixed hardware under those strict requirements. They shrugged. I agree to that shrug, an MRA is not an appropriate way to analyze

fixed hardware. Considering fixed hardware an installation is not a great management plan as it enters us into a gray area that no one wants to live in.

Outside of our current replacement permit are many dangerous pieces of fixed hardware that visitors of the park expect to exist and expect to work as intended. Sitting on the WMCC board, I often hear complaints about various unsafe pieces of fixed hardware throughout the park. I reached out to our land managers to see if there is an emergency permitting system we could create to address these unsafe anchors. Their response was that we can only have one permit at a time but they personally wouldn't have a problem if we replaced these anchors off the radar. This is an example of the policy, being to break the policy. Which is only asking for trouble. For climbers and land managers to have a great relationship, we must stray away from gray areas.

Just two weeks ago I was climbing a route from the 1980s. Back then climbing ethics were different and they used some foul hardware. Things that are way below todays safety standards, even for climbers! The route I was on had the original bolt about 20' off of the ground. I observe it, know it's not safe, and knowing I couldn't reverse the difficult moves that got me there, clip it. I am now above the bolt knowing that I better not fall. Moments later I am soaring through the air with a piece of rock in my hand. My hold broke. Soon, I feel the bolt slow my fall, then, DING! The bolt breaks. I go cratering to the ground. My butt hits the ground first, shortly followed by my spine which gets bent backwards over a boulder. I lay there shaking like a chihuahua, terrified that I broke my back.

We were 1.5 miles from the car and we had about an hour until sunset. My friend touches my leg, I can't feel a thing. With rage I punch my leg hoping to feel something. I do! My friend didn't press hard enough. Now to wiggle my toes. They move! I ended up being completely fine, a miracle!

Unfortunately miracles cannot be our safety policy. If the park allowed us to replace any fixed hardware without a permit, this bolt would have been replaced in the early 2000s when it became too rusty to hold a fall.

As climbing grows in our area, we are starting to see more traffic on the existing climbs that we have. This traffic could eventually cause natural resource issues. I would like to see more routes permitted or no permits required in order to help spread out the use of these amazing areas as well as preserve the adventure that climbing in these places brings. After all, isn't it adventuring in wild spaces that brought about the preservation of these wilderness areas?

Thank you all for your time and all you do for us, I have left my email address it you would like any further information.