



SLCA
SALT LAKE CLIMBERS ALLIANCE



12/8/2015

Castle Rocks State Park
PO Box 169 (3035 Elba-Almo Rd)
Almo, ID 83312

Email: Wallace_keck@partner.nps.gov

RE: Draft Climbing Management Plan Castle Rocks State Park-Almo, Idaho

Dear Superintendent Keck,

The Access Fund, Salt Lake Climbers Alliance (SLCA), East Idaho Climber Coalition (EICC), Boise Climbing Alliance (BCA), and the Southern Idaho Climbers Coalition (SICC) appreciate this opportunity to comment on the Castle Rocks State Park (the Park) internal review DRAFT Climbing Management Plan (CMP). Castle Rocks State Park is a popular climbing destination drawing climbers of all abilities and styles from across the country and world. We are glad that the CMP lists climbing as an appropriate, permitted, and promoted recreational activity at the Park, and acknowledges that climbers are the predominant user group. We appreciate the Park's commitment to providing a high quality climbing experience for its visitors. We support your ongoing effort to update and improve the existing CMP, and hope to see the continuation of a climbing ranger position to implement and enforce this CMP. Access Fund, SLCA, EICC, BCA, and the SICC offer its comments and recommendations with the intention of improving the CMP and presenting the needs and concerns of the climbing community.

Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing millions of 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 100 affiliates. The Access Fund provides climbing management expertise, stewardship, policy and educational outreach.

Salt Lake Climbers Alliance

The SLCA exists to provide a unified voice for climbers in the Wasatch and surrounding regions through advocacy, stewardship, community, and education. The Salt Lake Climbers Alliance is Utah's leading voice for climbing access and stewardship: uniting, educating, and inspiring climbers of all disciplines to serve their local climbing community since 2002.

East Idaho Climbers Coalition

The East Idaho Climbers Coalition advocates for climbers interests at major climbing areas in East/Southeast Idaho, including The Fins, Massacre Rocks, and CIRO/CRSP. The mission of EICC is to promote stewardship and climber education, to provide a united voice for access and user advocacy, and to improve climber safety through climbing hardware maintenance. EICC is active in fixed anchor replacement and maintenance at Pocatello's Ross Park and at Massacre Rocks. We work closely with Idaho State University (ISU) Outdoor Program and the ISU Climbers Club to promote climbing and help sponsor local events like the Pocatello Pump and the 9 Lives Climbing Competition at ISU's Reed Gym climbing wall.

Boise Climbers Alliance

The Boise Climbers Alliance is a group of over 500 rock climbers in the Treasure Valley. Our mission is to advocate for climbers on issues regarding access, impact, and other climbing related matters; to promote low-impact, environmentally sensitive, safe climbing practices; to foster communication amongst local climbers and to serve as a voice for the climbing community.

Southern Idaho Climbers Coalition

The mission of the Southern Idaho Climbers Coalition is to promote climbing, provide a resource for responsible development and conservation of climbing areas, and to encourage the etiquette, education, and safety of the Southern Idaho climbing community.

COMMENTS

Purpose

The purpose and need for the DRAFT CMP is well defined: to protect natural and cultural resources. We recommend that the world-class climbing resources, in addition to the cultural and natural resources, be specifically listed as a value to protect. The high quality climbing experience Castle Rocks State Park offers is a valuable resource worthy of protection. High levels of climber visitation generate revenue for the Park and provide economic benefits to the surrounding community. We recommend adding a statement regarding the need to protect the climbing experience to the section *The Park offers world-class rock climbing*.¹ We also suggest moving the section titled *Significant Resources to Protect*² up towards the beginning of the document, and add climbing resources to the list of significant resources. Moving this section to the top of the CMP will help set the stage for the CMP, and provides better context for management actions

Closures

The DRAFT CMP gives an excellent history of Castle Rocks State Park and the complicated mosaic of land

¹ Internal Discussion Draft Climbing Management Plan, Castle Rocks State Park, Almo, Idaho, 2015

² Ibid.

ownership around the Park. To further clarify permanent and temporarily closed areas, we suggest listing all closed areas in an appendix, instead of the CMP body, which can easily be updated if closures change. We suggest including the evaluation process for temporary or permanent closures as well as clear directives where climbers can find changes in closure status. The continued presence of a climbing ranger could help facilitate ongoing communication with the climbing community in regards to closures.

Permits

The permit process to place fixed anchors is well thought out and easy to follow. Making permit applications, and first ascent registration available online will ease the documentation and application process. The field orientation required of all first time applicants ensures the new developer is aware of open and closed areas and familiar with natural and cultural resource sensitivities. The presence of a climbing ranger during the orientation process would ensure consistent and accurate information is being given to the climber. We suggest compiling a simple handbook or kiosk display with photos and descriptions of natural and cultural resources a climber could encounter. This educational material could be beneficial for all climbers as well as developers.

Standards

The standards on fixed hardware are adequate and we commend you for adding the stipulation that hardware standards will be reviewed annually by park staff and the Climbing Advisory Work Group (CAWG). We are concerned that the CMP states "*[n]ew routes should maintain a minimum distance of 15 feet laterally from existing routes.*"³ We suggest not stating a specific metric for bolt and route spacing; the structure of the rock as well as the local climbing ethics will dictate the appropriate spacing of routes.

The CMP recognizes the three primary types of climbing use, traditional, sport, and bouldering. Management of traditional and sport climbing are well covered in this CMP. We suggest adding some language to address potential impacts from bouldering:

Alterations to ground cover and surrounding areas (e.g. movement of rock or woody debris) to place bouldering pads, is strongly discouraged.

Dragging bouldering pads damages vegetation and soils, and is strongly discouraged.

Climbing Resource Advisory Committee

We support the development of a climbing advisory group for Castle Rocks State Park. The advisory group has proposed the name be changed from Climbing Advisory Work Group (CAWG) to Climbing Resource Advisory Committee (CRAG). We appreciate recognition that "*Climbing organizations have been instrumental in assisting agencies and managers with land acquisition, facility development, education, and volunteerism.*"⁴ We recommend setting up a Memorandum of Understanding (MOU) between the Park and the proposed Climbing Resource Advisory Committee (CRAG). A MOU offers structure to the relationship between the advisory group and

³ Internal Discussion Draft Climbing Management Plan, Castle Rocks State Park, Almo, Idaho, 2015

⁴ Ibid.

the Park and harbors good will and open communication between the two parties.

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The Access Fund, SLCA, EICC, BCA, and the SICC value the working relationship we have built with you and Castle Rocks State Park as well as your dedication to providing a high quality climbing experience in Castle Rocks State Park. Feel free to contact me via telephone 303-587-8039 or email katie@accessfund.org to discuss matters further.

Respectfully,



Katie Goodwin
Public Lands Associate, Access Fund



Julia Geisler
Executive Director, Salt Lake Climbers Alliance



Brian Fedigan
Boise Climbers Alliance



Mike Engle
President, East Idaho Climber Coalition



Corey King
Southern Idaho Climbers Coalition

cc: Brady Robinson, Executive Director, Access Fund
Erik Murdock, Policy Director, Access Fund