



November 13, 2009

Wallace Keck, Superintendent
City of Rocks National Reserve
Park Manager, Castle Rocks State Park
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RE: Access Fund Scoping Comments to the City of Rocks General Management Plan

Dear Wallace:

The Access Fund welcomes this opportunity to submit scoping comments to the City of Rocks National Reserve (CIRO) General Management Plan (GMP). We urge the National Park Service (NPS) to address the validity of the Twin Sisters climbing closure when considering the long range management for the Reserve. The NPS should also address the general issues raised in the Fall 2009 Scoping Newsletter, and consider whether to allow public access into the Reserve's longstanding Research Natural Area (RNA) considering that this holdover from the Bureau of Land Management and US Forest Service hosts outstanding low impact recreation opportunities and has never received any significant research in over 30 years.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of 1.6 million American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 15,000 members and affiliates. The Access Fund has long supported the efforts of the NPS to fulfill its mission during management planning initiatives, and we recently signed a memorandum of understanding¹ with the National Park Service to cooperate on climbing management and resource conservation efforts.

The Access Fund has a long history of interest and collaborative support at CIRO,² as well as with neighboring Castle Rocks State Park³ and surrounding BLM and USFS lands.⁴ Idaho is one of our largest member states and many of our members and affiliates climb at the City of Rocks. To learn more about the Access Fund, see www.accessfund.org

GENERAL COMMENTS

The Access Fund supports the general scope of analysis the NPS puts forth in its Fall 2009 Scoping Letter. These topics include cultural and natural resource protection, soundscape and



light pollution issues, facility and transportation concerns, and boundary adjustments to bring consistency to management zones. The NPS should also explore visitor experience issues, in particular whether some of the public access restrictions at CIRO may be lifted to allow managed recreation while continuing to protect the Reserve’s unique resources.

ADDITIONAL ISSUES TO BE ADDRESSED IN THE CITY OF ROCKS GENERAL MANAGEMENT PLAN

The NPS Should Honor Its Commitment to Congress and Reconsider the Controversial Twin Sisters Climbing Ban

The Twin Sisters were a popular climbing destination—dating back to the Oregon-California Trail days and peaking during the 1980s—until the controversial 1998 Climbing Management Plan (CMP) banned climbing. From the 1960s through the late 1990s, City of Rocks climbers—from Idaho, around the country, and internationally—traveled to the City of Rocks and specifically targeted challenging climbing objectives on the Twin Sisters.⁵

A number of qualities make climbing on the Twin Sisters a unique experience at the City of Rocks. These spires are the largest free-standing spires in the area, and have the highest elevation summits offering the best views of any formation at CIRO (one reason why pioneer travelers scaled these summits in the 1800s). These easily accessible towers can be reached by adventurous hikers without technical climbing gear, but also offer a variety of routes spanning all levels of difficulty requiring a variety of climbing techniques. In short, the Twin Sisters are very significant to climbers and were very popular prior to the 1998 climbing ban.

In 2004, the entire Idaho Congressional delegation signed a letter to NPS Director Fran Mainella urging her “to ease the absolute climbing ban on the Twin Sisters . . . and implement a multiple-use management approach providing for low impact climbing activities consistent with NPS policies.”⁶ The NPS responded that it intended to amend the Comprehensive Management plan at CIRO to, in part,

evaluate if the decision to ban climbing on the Twin Sisters remains valid . . . within the framework of a public planning process with full opportunities for public review and comment on proposed actions.⁷

In 2006 the Access Fund submitted scoping comments to the City of Rocks Climbing Management Plan revision (due in 2010), but internal NPS documents from planning meetings⁸ already make clear that the Twin Sisters issue will not meaningfully be addressed during that planning process, even while admitting that climbing “impacts can neither be demonstrated nor articulated.”⁹ This is particularly troubling given that the NPS pledged to Congress that that “all



interested parties will be consulted and given every opportunity to provide comment and input to the process” concerning Twin Sisters. Accordingly, this General Management Plan is the only possible venue for the NPS to fulfill their commitment to revisit the controversial climbing ban at Twin Sisters.

Current NPS management policies for Twin Sisters are inconsistent with the laws that govern City of Rocks National Reserve. While the general mandate for the NPS is to “conserve the scenery [of park lands] and the natural and historic objects and the wild life therein” it also requires the agency to “provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The specific mandate for City of Rocks is “to preserve and protect the significant historical and cultural resources; to manage recreational use; to protect and maintain scenic quality; and to interpret the nationally significant values of the reserve.” While the NPS at CIRO emphasizes its historic preservation mandate with the Twin Sisters closure, it ignores several compromises¹⁰ that could equally fulfill its enjoyment mandate for Twin Sisters without compromising either directive. This GMP is an opportunity to bring CIRO management practices back inline with the laws that direct the NPS as an agency, and that govern specific management plans for CIRO.

The NPS Should Consider Public Access to the City of Rocks Research Natural Area

A portion of CIRO has remained closed to all public access since the mid-1970s when 312 acres were designated a Research Natural Area by the U.S. Forest Service and Bureau of Land Management. When Congress later designated CIRO, the RNA remained intact including all access restrictions.

The CIRO RNA was established to research its outstanding natural features, natural processes, natural diversity, and ecological values, yet no research publications or planned research projects¹¹ are associated with this area. The CIRO RNA holds extensive outstanding recreation resources that could accommodate low-impact public access with no unacceptable harm to the area. This GMP should evaluate whether the CIRO RNA is necessary for natural resource protection and if low impact recreation such as climbing may occur in this large NPS management zone.

CONCLUSION

The Access Fund supports the general scope for this GMP as outlined by the NPS in its Fall 2009 Newsletter. However, it is critical that the NPS also assess the validity of the Twin Sisters climbing closure. The Twin Sisters ban is unreasonable and unnecessary, and this GMP process is that only meaningful opportunity that the NPS has to fulfill its commitment to Congress and “evaluate if the decision to ban climbing on the Twin Sisters remains valid.” The NPS should



also consider if the longstanding public access restriction at the City of Rocks RNA is still needed to protect that area's resources, and whether to authorize low-impact recreation such as climbing.

The Access Fund looks forward to working with the NPS to define the appropriate scope for the City of Rocks General Management Plan. Please contact me if you have any questions or comments.

Sincerely,

Jason Keith
Policy Director
The Access Fund

Cc: US Senator Jim Risch
US Senator Mike Crapo
US Representative Mike Simpson
Boise Climbers Alliance
Brady Robinson, Access Fund Executive Director
American Alpine Club

¹ http://www.accessfund.org/site/c.tml5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm

² http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/ID_City%20of%20Rocks_28_4.7.2006.pdf

³ http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/ID--Castle%20Rock_10.26.2005.pdf

⁴ [http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/Access%20Fund%20comments%20to%20BLM%20Castles%20\(ID\)%20CMP%20062309.pdf](http://www.accessfund.org/atf/cf/{1F5726D5-6646-4050-AA6E-C275DF6CA8E3}/Access%20Fund%20comments%20to%20BLM%20Castles%20(ID)%20CMP%20062309.pdf)

⁵ Previous NPS statements attempting to minimize the importance of climbing at Twin Sisters, claiming that the formation was never “considered enormously popular with the general visitor engaged in climbing at CIRO.”



obviously came from an uninformed non-climber. Any local climber from that era can attest to the fact that a number of climbing routes on the Twin Sisters were among the most popular and unique in the Reserve.

⁶ Idaho Congressional Delegation letter to NPS Director Fran Mainella, March 23, 2004.

⁷ NPS letter to Idaho Congressional Delegation, April 20, 2004.

⁸ In January 2006 the NPS conducted an internal climbing management plan review and subsequently published official minutes and recommendations. This meeting's primary purpose was to follow through on a recommendation in the 1998 Plan which

acknowledged that the Climbing Management Plan is a dynamic document. Rock climbing use is changing at City of Rocks, and the plan must also reflect changing conditions. From time to time it may be necessary for Reserve managers to make minor changes or adjustments in the plan. Periodically, at least every five years, the plan should be carefully reviewed by an interdisciplinary team composed of both resource and recreation specialists, and revisions made to the plan where warranted.

Climbing Management Plan Internal Review
Official Minutes and Recommendations
January 18-19, 2006

⁹ Id.

¹⁰ The Access Fund has long agreed to any of the following solutions:

- Climbing on Twin Sisters only on weekdays when there is little visitation, and temporarily prohibiting it during historic commemorative events.
- Climbing on Twin Sisters only by permit as determined by the Superintendent.
- Climbing on only a selection of North Sister routes between October 1 and April 30 and closing it for the remaining period so as to not conflict with the normal time period for historical appreciation.
- Limiting climbing to even-numbered calendar days so that both climbers and historical enthusiasts can be assured of an opportunity to experience the Twin Sisters without any chance of conflict, especially on weekends.
- Even issuing only one permit per day (to no more than four persons) on a trial basis to determine if "feeling.

¹¹ Except one 1997 paper that studied Pinyon-Juniper woodland classification in several southeastern Idaho RNAs.