



June 23, 2009

Dennis Thompson - Outdoor Recreation Planner
Burley Field Office - Bureau of Land Management
15 East 200 South - Burley, ID 83318
dennis_thompson@blm.gov

**Re: Access Fund Scoping Comments to Bureau of Land Management Castle
Rocks, ID Climbing Management Plan**

Dear Dennis:

The Access Fund welcomes this opportunity to provide scoping comments to the Bureau of Land Management's (BLM) Burley Field Office regarding a climbing management plan (BLM Castles CMP) for the BLM's property at Castle Rocks Ranch, Idaho (BLM Castles CMP). We applaud this effort to provide reasonable and effective management direction for this outstanding Idaho BLM climbing property.

The Access Fund

As you know, the Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rock climbers and mountaineers nation-wide. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

The Access Fund has a long history of involvement at Castle Rocks Ranch, from acquisition funding for purchase of the ranch for the new Castle Rocks State Park, to lobbying in Washington, DC for approval of land exchange legislation. On January 13-14, 2003 representatives from the Idaho Department of Parks and Recreation (IDPR), BLM, Sawtooth National Forest (USFS), Access Fund, and leaders in the Idaho climbing community, met at the ranch to develop an interagency climbing management plan for the newly acquired private lands (now state park) and the adjacent federal BLM and USFS properties. I facilitated the workshop at this meeting and worked with the group to provide assistance regarding the development of the climbing management plan for the interagency region at Castle Rocks Ranch.

We were pleased when IDPR and Castle Rocks State Park finalized its "Castle Rocks State Park and Castle Rocks Inter-Agency Recreation Area Climbing Management Plan."



Since the Castles Interagency Plan (IAP) was signed, the Access Fund has lauded that plan's effective and innovative management approaches that have worked well for both land managers at Castles and climbers who frequent the area with continued popularity. In particular, the fixed anchor and route development provisions in the Castles IAP are well suited for the IDPR-owned portion of Castles, and by extension the BLM's part as well. It makes sense that the BLM adopt the climbing management provisions designed for the state lands in the IAP.

For examples of how the BLM manages climbing elsewhere in the US, consider contacting the Royal Gorge FO in Colorado (Shelf Road), the Monticello and Moab FOs in Utah (Indian Creek and Castle Valley), or the Las Vegas FO in Nevada (Red Rocks). Cumulatively these offices manage an enormous amount of climbing that may help guide your management approach. We are encouraged that Idaho BLM has begun the public process of identifying proposed alternatives for the future of Castles that will benefit the many users that go there to climb, hike and ride.

Proposed BLM Action

The Burley Field Office proposes to allow for permitting and establishment of new climbing routes, placement of anchors, and new trails in the BLM-managed portion of the Castle Rocks Ranch Interagency Recreation Area. The BLM Castles CMP seeks to integrate management across administrative boundaries, that reflects differences between the agencies in managing climbing impacts, yet provides a framework for management that is mindful of the 2003 Interagency Plan and the 2003 Memorandum of Understanding (MOU) signed by IDPR, Forest Service and BLM "to coordinate and combine efforts to manage, protect and interpret public resources and uses in the multi-jurisdictional and geographic area known as Castle Rocks."

Scoping Topics and Comments

The decision to be made with this planning process is whether the Burley Field Office will decide to adopt and implement the Castle Rocks Interagency Recreation Area Climbing Plan. The Access Fund supports this action because the IAP provides reasonable guidelines for climbing closures that protect resources, an effective education program informing climbers of sensitive concerns, and a sensible fixed anchor policy that includes required orientation about park policies, a first ascent registration form, and a bolting permit application. The combination of these policies has worked well on the neighboring state parks property and is appropriate for the BLM property as well.



The BLM has developed no preliminary alternatives, but the following preliminary issues are key discussion topics during this scoping period:

- Which rock formations do we allow to be open for establishment of new climbing routes and placement of fixed anchors?

We believe that all rock formations within the BLM's jurisdictional boundaries at Castles be left open for potential new climbing routes unless there is a resource-based justification for a closure. The Access Fund is unaware of any protected raptors nesting in the BLM's Castles property.

- Where does the BLM need to build trails that would provide access to the formations that would be open for establishment of new climbing routes and placement of fixed anchors?

In addition to the existing trail that surrounds the main Castles region, the BLM should consider key trail approaches to the more popular climbing locations on the BLM property.

- How do we best assess the proposed rock formations and trails that would be of interest to climbers to determine resource concerns?

With respect to the trail locations and any management decisions affecting climbers, the BLM should consult Idaho climbers to tour the area with IDPR-NPS climbing ranger Brad Shilling to survey existing trails and determine and map the best locations for proposed routes. Contact:

Boise Climbers Alliance - fedinidaho@hotmail.com; brad_brooks@tws.org; dcolwell@harrisdean.com

Ketchum - brosso@elephantsperch.com; dorworth@mindspring.com; dbingham2@mindspring.com

Pocatello/Idaho Falls - bruce.black@seiclimbing.com; tneu@oldtownembroidery.com; steve@jasonbohrer.com

Access Fund Idaho Regional Coordinator - fedinidaho@hotmail.com



While writing comments to the 2003 Castle Rocks IAP, I surveyed members of the Idaho climbing community to identify desired future qualities for Castles. The BLM should also consider these points when planning for climbing management for its portion of the Castles Interagency Area:

- The agency should consider maintaining a more primitive management approach at the Castles and not expanding the existing infrastructure very significantly.
- A few appropriately designed and positioned bathrooms are appropriate.
- The creation of more auto-access roads or parking lots is unnecessary.
- Access into the park should only be by foot, mountain bike and/or horse.
- Many prefer a quieter walk-in approach to the area to maintain quiet (no car noise) and allows for a peaceful park experience.
- The agency should identify desired use patterns (concerning camping and trail use) before it develops infrastructure that will attract a specific user demographic.

Additional Issues that the BLM Should Consider:

- Natural and Cultural Resources. The Access Fund supports natural and cultural resource management decisions based on thorough information about the condition of field resources and visitor use. The use of baseline data is critical to making informed decisions when imposing management prescriptions to protect these resources. The BLM's Castles Plan should clarify how such information will be gathered and a timeline developed for an inventory of natural and cultural resources. Any analysis of the effects of recreational use on natural and cultural resource values begins by looking at patterns and levels of use, as well as the location and sensitivity of these resource values. Once this information has been obtained a determination may be made as to whether any management intervention is necessary for protection of that resource value.
- **Education/Community Outreach.** An education program is a critical component to any effective management initiative. Nearly all visitors will choose to "do the right thing" if they understand the appropriate behavior. The Castle IAP does an exemplary job of educating the climbing community with regards to climbing policies. The Access Fund applauds the proactive management approach taken by the IDPR thus far at Castle Rocks State Park; for this Plan to be successful the BLM should continue the policies adopted by IDPR to work with the user community (especially local and regional climbers) and foster understanding, appreciation, respect for the natural and cultural resources of the BLM's Castles property.



- **Informal Paths to Climbing Areas.** At present there exists a fairly minimal network of user-built trails established by the climbing community to access the various climbing cliffs and bouldering areas at Castles. The BLM should consider whether these trails should be formally acknowledged and incorporated into a master plan, and if so determine what level of trail development is appropriate or required, what materials should be used, and what level of maintenance will be regularly needed, if any. It is unclear how this process will relate to the interagency MOU and the current Castles SP Master Plan.
- **Sunset Date.** The BLM's Castles Plan should indicate the duration of the proposed management initiative. Often such plans have reauthorization dates of five years following plan approval to allow for any necessary revisions. Obviously, this one should be tied to the state park IAP to make the reauthorization processes more consistent and streamlined.
- **Sanitation and Garbage.** The BLM should consider the level of expected usage on its Castles property and plan for any necessary facilities needed to provide for human waste and garbage disposal needs. The facilities on the state land may be adequate.

The BLM should clearly identify on publicly available maps the extent of the management area for this plan, as well as adjacent public and private land boundaries (especially if any new BLM policies differ from the Castles IAP). The BLM should also:

- Clearly identify on publicly available maps any areas that may be closed to recreational use and the reasons and specific authority for such closures;
- Specify any commercial regulation that may govern guiding (of any sort) at Castles; and
- Identify camping/bivouac regulations, if any, for the BLM's Castles backcountry.

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I hope the above comments help the BLM's Burley FO identify the appropriate alternatives for its Castles climbing plan. The quality and quantity of the climbing on the BLM's Castles land certainly rivals its state park neighbor and underscores the need for an effective plan to reasonably and effectively manage recreational use across agency boundaries. The 2003 Castles IAP has proven to be the right plan for the state park should be adopted by the BLM.



The Access Fund looks forward to working with the BLM and any interested parties throughout the planning process for all of the various properties with ownership jurisdiction at Castle Rocks Ranch. Since the 1990s the Access Fund has been involved in acquiring and management planning at Castle Rocks Ranch for public recreation and we look forward to this next round of planning. Please do not hesitate to contact me if you require more information, or would like to discuss any of the points covered in this comment letter.

Best Regards,

A handwritten signature in blue ink that reads "Jason Keith". The signature is written in a cursive style.

Jason Keith
Policy Director
The Access Fund

Cc: Brady Robinson - Executive Director, The Access Fund
Brad Brooks, Boise Climbers Alliance
Brian Fedigan, Access Fund Regional Coordinator
Doug Colwell, American Alpine Club
Wallace Keck – City of Rocks National Reserve/Castle Rocks Ranch State Park
Brad Shilling – Climbing Ranger, IDPR/CIRO