

October 26, 2005

Wallace Keck
Park Manager, Castle Rocks State Park
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Email: Wallace_Keck@partner.nps.gov

Re: Access Fund Comments to Castle Rocks State Park Master Plan

Dear Wallace:

The Access Fund welcomes this opportunity to provide comments to the Castle Rocks State Park Master Plan, and applauds this effort to provide reasonable and effective management direction for Idaho's newest state park.

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 State Park, from acquisition funding for the purchase of park property, to lobbying in Washington, DC for approval of a land exchange legislation, and finally to assistance regarding the development of a climbing management plan for the Castles region. We are encouraged that Idaho Department of Parks and Recreation (IDPR) 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. In developing these brief comments I have surveyed members of the Idaho climbing community to identify desired future qualities for Castles.

The Castles Plan

There is little published information identifying any proposals for the future of Castles. Presumably, much of this information will be provided publicly at the

October 26 open house at the Castle Rocks Ranch House. Accordingly, I may provide additional comments at a later time as more information becomes available. However, a common thread of opinion has emerged from regular users of the Castles. Most individuals would like to see any “improvements” at Castles to be modest in scope and avoid duplicating the experience that can be found at neighboring City of Rocks (CIRO).

CIRO provides outstanding recreational opportunities that are easily accessible by auto traffic. While this is convenient in that it is easy for visitors to drive to campsites, trailheads and rock climbs, the use is intensive and not primitive in character. Conversely, Castles currently requires users to walk in from the Ranch House thus preserving a quieter experience. While some facilities are probably in order, such as a few restrooms located near high-use areas such as Lone Rock, it is probably neither necessary nor desirable to make the backcountry at Castles auto accessible. Instead of reproducing the experience at CIRO, requiring significant funding in the process, IDPR should consider only enough facilities and improvements at Castles that will accommodate human waste needs and prevent erosion from social trails and potential impacts to sensitive natural or cultural resources.

The Idaho climbers that I spoke to expressed the following concerns:

- IDPR 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.
- IDPR should consider a bathroom at the junction of the trails that access the major climbing areas (such the trails to Lone Rock and The Comp Wall).
- IDPR should limit any additional roads that provide access to the Castles; if IDPR must install a road for auto access, it should consider only a loop from the Ranch House/headquarters up to the north end of Castle Rock (Lone Rock), then over to Comp Wall, and back to the Ranch House/headquarters.
- IDPR should avoid spending limited state resources on extensive park infrastructure when thus far public visitation at Castles has been relatively low.
- Idaho already has numerous state parks that accommodate auto access; Castles could be unique if it provided only foot, bike and equestrian access.
- IDPR should identify desired use patterns (concerning camping and trail use) before it develops infrastructure that will attract a specific user demographic.

Additional Issues that IDPR should consider in the Master Plan:

- **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 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 park visitors will choose to “do the right thing” if they understand the appropriate behavior. For example, signage educating users regarding Leave No Trace principles should be posted at parking lots and trailheads to effectively inform visitors as to acceptable human waste disposal practices. The Access Fund applauds the proactive management approach taken by the IDPR thus far at Castle Rocks State Park, but for this Plan to be successful IDPR should continue to work with the user community (especially local and regional climbers) to foster understanding, appreciation, respect, and a sense of ownership for the natural and cultural resources of Castle Rocks State Park.
- **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. IDPR should consider whether these trails should be formally acknowledged and incorporated into the Master Plan, and if so determine what level of trail development is appropriate/required, what materials should be used, and what level of maintenance will be regularly needed, if any.
- **Sunset Date.** The Castle Rocks State Park Master 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. Accordingly, IDPR should provide a time-period specifying the effective duration for this proposed Master Plan.

- **Sanitation and Garbage.** IDPR should carefully consider the level of expected usage at Castles (that could be driven by the level of infrastructure built) and the necessary facilities needed to provide for human waste and garbage disposal needs.
- **Miscellaneous Comments:**

IDPR should:

1. Clearly identify on publicly available maps the extent of the management area for the Castles Master Plan, as well as adjacent public and private land boundaries;
2. Clearly identify on publicly available maps any areas that may be closed to recreational use and the reasons and specific authority for such closures;
3. Specify any commercial regulation that may govern guiding (of any sort) at Castles; and
4. Identify bivouacs regulations, if any, for the Castles backcountry.

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I hope the above comments helps IDPR identify the appropriate alternatives for the Castle Rocks State Park Master Plan. The quality and popularity of this outstanding climbing area underscores the need for a comprehensive plan to reasonably and effectively manage recreational use. At the same time, the opportunity for local stewardship projects and involvement in the planning process at Castles by the climbing public is encouraging and provides a timely opportunity to gain public investment in management policy for this special area.

The Access Fund looks forward to working with IDPR and any interested parties throughout the planning process for the Castle Rocks State Park Master Plan. We hope our comments will provide a meaningful contribution to both the substance and clarity of the plan regarding planning goals, objectives, and strategies. 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,

Jason Keith
Policy Director
The Access Fund

Cc: Steve Matous - Executive Director, The Access Fund
Mike Lanza, Boise Climbers Alliance
Brian Fedigan, Access Fund Regional Coordinator,
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