



June 26, 2015

City of Rocks National Reserve
P.O. Box 169
Almo, ID 83312

Email: Wallace_Keck@partner.nps.gov

RE: Access Fund Comments on City of Rocks National Reserve General Management Plan / Environmental Impact Statement

Dear Superintendent Keck,

The Access Fund and Boise Climbers Alliance appreciate this opportunity to comment on the DRAFT General Management Plan / Environmental Impact Statement for City of Rocks National Reserve [the Plan]. City of Rocks offers exceptional, world-class opportunities for rock climbing and the Access Fund and Boise Climbers Alliance value the efforts of the National Park Service and Idaho Department of Parks and Recreation to draft a fair and balanced management plan. The Access Fund and Boise Climbers Alliance offers its' comments and recommendations with the intention of improving the Plan through presenting the needs and concerns of the greater climbing community.

The 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 over 6.8 million 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 10,000 members and 80 affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach.

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.

COMMENTS

The Access Fund and Boise Climbers Alliance generally support the Plan's preferred alternative, Alternative B, but has concerns about many of the details associated with camping, management zones, and Twin Sisters.

Camping

The climbing community often visits City of Rocks National Reserve on short notice in order to maximize weather that is conducive to rock climbing. Campsites at City of Rocks are usually reserved during the best times to visit the Reserve and therefore the availability of dispersed or overflow camping is a priority to the climbing community.

We appreciate the Smoky Mountain campground proposal and agree that a first-come, first-serve camping option is needed. However, we also concerned that the proposed "social camping" at Smoky Mountain campground will not be sufficient to meet the needs of all climbers. The term "social camping" is not defined in the Plan and we request that more details regarding the definition of "social camping" be included in the Plan. Email correspondence with Superintendent Keck indicates that "social camping" at Smoky Mountain would be similar to the Smith Rock State Park, OR camping experience. The campground at Smith Rock State Park is an example of a camping option that severely lacks any privacy during peak season, which results in many climbers avoiding that camping option.

We would like a first-come, first-serve camping option that affords semi-private, more-dispersed camping opportunities. Price is a limiting factor for many younger climbers and people camping for multiple nights. Providing basic amenities and charging a lower price will result in an attractive camping destination for the climbing community. **We are eager to help City of Rocks National Reserve develop camping options that meet the specific needs of climbers in order to help ensure that climbers will use the campground after it is developed.**

It is important to note that while we do believe providing more climber-friendly camping options will help meet the climbing community's needs, the dispersed, primitive camping opportunities (that are currently allowed on National Forest Service and Bureau of Land Management land) provide another valuable camping option for climbers. **We are happy to work with the National Park Service and the BLM to address any issues associated with the current dispersed camping to minimize resource impacts and help educate climbers.**

Management Zones

Research Natural Area Zone

We commend the Plan for allowing traditional climbing as well as existing bolted routes in the expanded Research Natural Area Zone (RNA). We suggest that the Plan also explicitly mention that bolt replacement of authorized climbing routes is allowed because fixed anchor maintenance

is critical to climber safety and climbing resource sustainability.

The RNA encompasses several rock outcroppings with popular, established climbing routes and potential high-quality, new climbing routes. We understand that the purposes for establishing the RNA may not always be compatible with climbing. However, there may be climbing routes that would not diminish or detract from the RNA. We do not believe that the Plan should consider technical climbing activities as “consumptive recreation”. In fact, NPS Director’s Order #41 acknowledges that climbing is an appropriate wilderness activity and that the occasional fixed anchor does not necessarily violate the Wilderness Act – the highest level of protective land designation.¹ We believe that limited technical climbing fits within the Plan’s RNA desired condition that “although visitor access is limited, it is allowed if not disruptive to research or protection activities”.²

Therefore, we recommend that Alternative B of the Plan include a process for allowing limited bolt-dependent climbing development within the RNA. We encourage the NPS to develop an assessment tool for authorizing bolted routes that would not harm the purposes and values of the RNA. The Access Fund has provided public land agencies across the country with technical advice on the development of management plans that balance climbing access with strict resource protection. We offer assistance to help develop the aforementioned process for the RNA. The remote location of the RNA limits visitor-use, and we do not anticipate many route developers requesting access to the RNA. However, **the Plan should explore additional options, such as more conservative (relative to other zones) route authorization criteria, for managing climbing in the RNA without imposing a blanket prohibition on new bolt-dependent, backcountry climbing opportunities.**

California Trail Zone

Although the California Trail Zone prohibits technical climbing, a few pre-existing, high-quality climbing resources are located within that zone. For example, The Dungeon and Electric Avenue cliffs are located on private property but also within the proposed California Trail Zone. In the future, if private lands are ever transferred to the Reserve, those popular climbing resources would be closed to technical climbing per the Plan. Other climbing resources that would be impacted from the expansion of the California Trail Zone are: The Flintstone, Picnic Dome, Sun up Slab, BLM corridor, Eagle Rock, Nausea Wall, Eagle Rock, Indian Chief, BFD Rock and Bulldog Wall. **These measurable impacts of the California Trail Zone expansion should be specifically listed in the EIS as the expansion directly impacts access to established recreation resources. We strongly recommend a realignment of the California Trail Zone that would allow the aforementioned cliffs to be located within the Historic Rural Setting Zone or the Transition Zone.**

¹ Jonathan Jarvis, *Director’s Order #41: Wilderness Stewardship*, Section 7.2, National Park Service, US Department of the Interior (May 13, 2013).

² DRAFT General Management Plan / Environmental Impact Statement for City of Rocks National Reserve, 2015, page 93.

Twin Sisters

The Access Fund continues to maintain the position that technical climbing at Twin Sisters should be allowed. We believe that, with proper management, neither the viewshed nor the resources are adversely affected by climbing. In fact, the allowance of camping and rock scrambling near Twin Sisters creates a policy that is arguably inequitable toward climbers.

As the Access Fund and Idaho climbers have consistently proposed many management alternatives that could provide some level of climbing opportunity on the Twin Sisters without impacting the experiences of visiting historical enthusiasts such as numbered days, seasonal restrictions, or special use permits. The NPS's unwillingness to consider these obvious compromise alternatives and seek lesser restriction is (1) contrary to the mandate of the NPS to provide public use and enjoyment of park resources,³ (2) inconsistent with Congressional intent when establishing the Reserve (which includes managing recreation as part of its mandate),⁴ and (3) violates the NPS's own management policies which require education, mitigation, and/or lesser restrictive alternatives to be analyzed and employed before implementing public use restrictions.⁵

Current NPS Management Policies⁶ emphasize the “*enjoyment of park resources and values*” as “part of the fundamental purpose of all parks.” As such, the NPS should provide opportunities for activities that are “appropriate to the superlative natural and cultural resources found in the parks.” The NPS will encourage visitor activities that will “foster an understanding of, and appreciation for, park resources . . . [and to] *promote enjoyment through a direct association with, interaction with, or relation to park resources.*” **Allowing limited climbing on the Twin Sisters fits this policy objective much better than banning an activity that has been found to have virtually no impact in favor of an exclusive use that views distant park resources from afar.**

³While the NPS's general mandate 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.” While the NPS at CIRO emphasizes historic preservation, it ignores several compromises that could equally fulfill its *enjoyment* mandate.

⁴ The NPS's 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.” Nowhere in the City of Rocks enabling statute did Congress say that historical preservation and recreation are mutually exclusive, and cannot under any circumstance, be allowed to co-exist on Twin Sisters. It is illogical to think that a visiting historian—who knew that climbing on the formation took place in November when no wagon trains historically passed through the region—could have an impaired “feeling and association” while looking at the formation in August. The NPS must do a better job when interpreting the enabling statute for City of Rocks. If Congress meant that Twin Sisters should only be a museum piece viewed from a distance it would have said so specifically. Rather, Congress clearly directed the NPS to manage the City of Rocks for a number of values: historical/cultural resource protection, recreation, scenic quality, and national significance interpretation.

⁵ NPS Management Policies, Chapter 8 Visitor Use.

⁶ Id.

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The Access Fund and Boise Climbers Alliance greatly appreciate the opportunity to comment on the Plan. Feel free to contact me via telephone (720-588-3512) or email (erik@accessfund.org) to discuss this matter further.

Best Regards,



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Cc: Brady Robinson, Executive Director, Access Fund
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