



Protect America's Climbing



December 13, 2011

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, Boise Climbers Alliance, Eastern Idaho Climbers Coalition, and American Alpine Club Scoping Comments to Bureau of Land Management Resource Management Plan Amendment and Environmental Assessment for the Castle Rocks and Cedar Fields Areas, Burley Field Office, Idaho

Dear Dennis:

The Access Fund, Boise Climbers Alliance, Eastern Idaho Climbers Coalition, and American Alpine Club welcome this opportunity to provide scoping comments on the Bureau of Land Management's (BLM) Notice of Intent to Prepare a Resource Management Plan (RMP) Amendment and associated Environmental Assessment for the Castle Rocks and Cedar Fields Areas, Burley Field Office, Idaho. We provide these comments to assist the BLM in identifying the appropriate scope for this RMP Amendment and to provide reasonable and effective management direction for the outstanding Idaho BLM climbing properties found at Massacre Rocks and Castle Rocks.

The Access Fund

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 2.3 million technical rock climbers and mountaineers nationwide. The mission of the Access Fund 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. Idaho is one of our larger member states. For more information, see www.accessfund.org.

Boise Climbers Alliance

The Boise Climbers Alliance (BCA) was founded in 1998 to promote responsible stewardship of climbing areas in and around Boise. The mission of the Boise Climbers Alliance 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; to recognize that the achievement of the above objectives depends upon the participation of the climbing community; and to solicit moral and financial support from individuals, corporations, organizations, societies, and other groups.

The BCA represents the interests of several hundred rock climbers in Boise and the surrounding area, many of whom are frequent visitors to Massacre Rocks and Castle Rocks. The BCA and its members have a direct and vested interest in the outcome of this RMP Amendment because climbers from Boise and the surrounding area regularly climb at Massacre Rocks and Castle Rocks. See <http://www.boiseclimbers.org>

Eastern Idaho Climbers Coalition

The Eastern Idaho Climbers Coalition (EICC) was formed in direct response to the proposed closure at Massacre Rocks. Based out of Pocatello, the EICC represents climbers throughout the region. The EICC serves to educate, inform, and advocate for climbers in Eastern Idaho on issues including access, impact reduction, safety, and environmental stewardship.

The Access Fund and the Idaho climbing community have a long history of involvement¹ in climbing management, access, and land conservation in Idaho, from acquisition funding for the 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,

¹ See the following comment letters at (http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5050525/k.11DB/Position_statements.htm) :
City of Rocks General Management Plan – [2011 Scoping Comments](#)
City of Rocks General Management Plan – [2009 Scoping Comments](#)
Castle Rocks Climbing Management Plan – [2009 Scoping Comments](#)
City of Rocks Climbing Management Plan – [2006 Scoping Comments](#)
Castle Rocks State Park Master Plan – [2005 Comments](#)

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. The Access Fund 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.

Since the Castle Rocks Interagency Plan (IAP) was signed, we have lauded that Plan's effective and innovative management approaches that have worked well for both land managers and climbers who frequent the area with continued popularity. In particular, the fixed anchor and route development provisions in the Castle Rocks IAP are well suited for the Idaho Department of Parks and Recreation-owned portion of Castle Rocks Inter-Agency Recreation Area, and by extension the BLM's portion as well.

However, we were extremely disappointed when the BLM chose to close down its entire Castle Rocks property to climbing to protect cultural resources even though many lesser restrictive alternatives were and are available. The current Notice of Intent states "due to potential adverse cumulative effects of rock climbing activities on Historic Properties, a Finding of No Significant Impact (FONSI) could not be reached for the Castle Rocks."² Based on discussions with the Burley BLM Field Office, the reason a "FONSI could not be reached" was the BLM's inability to respond to five questions posed by the Idaho State Historic Preservation Office (SHPO) *See attached at p. 8*. The BLM reportedly failed to respond because of an insufficient budget. The BCA, EICC, AAC, and Access Fund have the expertise, resources and volunteers³ necessary to assist the BLM in addressing any future concerns raised by SHPO and the Tribes.

Many other BLM units around the country effectively manage climbing and protect sensitive cultural and natural resources. A few of these examples include the Royal Gorge Field Office in Colorado (Shelf Road), the Monticello and Moab Field Office in Utah (Indian Creek and Castle Valley), and the Las Vegas Field Office in Nevada (Red Rocks). All told, these BLM offices manage an enormous amount of climbing while fulfilling their obligation to protect sensitive cultural resources. We hope that these examples may guide your management approach rather than simply imposing unnecessary and poorly justified public access restrictions as was done for the BLM's Castle Rocks property.

² <http://www.gpo.gov/fdsys/pkg/FR-2011-08-23/html/2011-21560.htm>

³ The BCA and EICC members can assist with site specific climber based recommendations, raise funds and organize volunteers. The Access Fund Grant Program and general climbing management expertise are also available to the BLM.

See http://www.accessfund.org/site/c.tml5KhNWLrH/b.5023595/k.98A2/Grants_Program.htm

Comments

In the subject Notice of Intent, banning climbing completely at both locations is the only alternative offered: “The RMP Amendment and associated EA will consider the permanent designation of no climbing, no staging, no camping, and no construction of new trails on BLM-managed lands at Castle Rocks Inter-Agency Recreation Area and at Cedar Fields.”⁴ Unquestionably there are other management options worth considering that accommodate climbing while protecting cultural resources. The Access Fund, BCA, EICC, and AAC support reasonable guidelines for climbing closures tailored to protect specific identified resources, an effective education program informing climbers (and other user groups) of sensitive concerns, and a sensible fixed anchor policy that includes required orientation on regulations, a first ascent registration form, and a bolting permit application. The combination of these policies works well on BLM properties around the country and is appropriate for the subject BLM properties in Idaho.

An education program is a critical component to any effective management initiative. Nearly all visitors will choose to avoid impacting sensitive resources if they understand the value of the resource and what is appropriate behavior to protect known resources. For this Plan to be successful the BLM should continue the policies adopted elsewhere by BLM managers to work with the user community (especially local and regional climbers) and foster understanding, appreciation, and respect for the natural and cultural resources of the BLM’s Massacre Rocks and Castle Rocks properties. 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 the BLM imposes restrictions). 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.

Massacre Rocks and Castle Rocks are not similar in rock type or topography, but in general protecting cultural resources at either site will involve: educating user groups about the cultural significance of each area; working with the tribes to understand and respect each area’s cultural importance; directing trails away from sensitive areas; and limiting or even restricting climbing on specific formations. With respect to any management decisions affecting climbers, the BLM should consult Idaho climbers to help determine the best management approach.

Below is a list of Idaho climbers (most are already well known to BLM staff in the Burley Field Office) with the knowledge and willingness to help the BLM develop and implement climbing management plans for Massacre Rocks and Castle Rocks:

⁴ <http://www.gpo.gov/fdsys/pkg/FR-2011-08-23/html/2011-21560.htm>

Pocatello/Idaho Falls: Bruce Black (bruce.black@seiclimbing.com), Troy Neu (tneu@oldtownembroidery.com), Lisa Safford (lsafford@ida.net), Peter Joyce (joycpete@isu.edu)

Boise: Brian Fedigan (fedinidaho@hotmail.com), Doug Colwell (dcolwell@hdinsure.net)

Ketchum: Bob Rosso (brosso@elephantsperch.com), Dave Bingham (dbingham2@mindspring.com).

Scoping Topics

The BLM's proposal for this RMP amendment lacks a reasonable range of alternatives. Despite declaring "[t]he purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, *including alternatives...*" the BLM has provided no alternative to banning climbing completely.⁵ Further, all the "preliminary issues" identified by the BLM assume climbing is negatively impacting cultural resource.⁶ The following "preliminary issues" are key topics to be considered during this scoping period and for developing a management alternative that allows climbing:

Which rock formations should be open for climbing, including the establishment of new climbing routes and placement of fixed anchors?

We believe that all rock formations within the BLM's jurisdictional boundaries at Massacre Rocks and Castle Rocks should be left open for climbing unless there is a resource-based justification for a closure. The BLM has provided no information regarding the location of sensitive resources at either location. Further, the BLM has provided no data demonstrating the "potential for damage to cultural resources" from rock climbing at Massacre Rocks; nor establishing "potential negative affects" on cultural resources at Castle Rocks.

The BLM should assess the climbing use patterns at both Massacre Rocks and Castle Rocks (historically) to better understand potential resource concerns.

⁵ See <http://www.gpo.gov/fdsys/pkg/FR-2011-08-23/html/2011-21560.htm>

⁶ "The BLM has identified the following preliminary issues: the potential for damage to cultural resources within the American Falls Archeological District at Cedar Fields from rock climbing and other recreational activities; potential adverse affects on Historic Properties at Castle Rocks from rock climbing and other recreational activities; and the impact that closures to certain activities would have on recreational climbing in the area." *Id.*

The Access Fund, BCA, EICC, and ACC support natural and cultural resource management decisions based on thorough information about the condition of field resources and visitor use. This baseline data is critical to making informed decisions when imposing management prescriptions to protect resources. The BLM's Massacre Rocks and Castle Rocks EA should clarify how such information will be (or has been) 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 resources begins by looking at patterns and levels of use, as well as the location and sensitivity of these resources. Once this information is obtained, BLM can then determine whether any management intervention is necessary for protection of that particular resource.

How can the BLM provide access to climbing while avoiding potential adverse cumulative effects of rock climbing activities?

In addition to educating user groups about the cultural significance of each area; working with the tribes to understand and respect each area's cultural importance; directing trails away from sensitive areas; and limiting or even restricting climbing on specific formations, the BLM can use signage and the hardening of select staging areas at the base of popular climbing cliffs to protect resources. Local climbers are a valuable volunteer base to assist with trail work, stewardship, and education.

The Access Fund Conservation Team consists of two trail experts traveling the country using their expertise to protect cultural resources⁷ and conserve the climbing environment with trail building and restoration.⁸ The Access Fund, BCA, EICC, and AAC have the resources necessary to assist the BLM manage climbing despite looming budget reductions. At present there exists a network of user-built trails established by the climbing community to access the various climbing cliffs and bouldering areas. The BLM should consider whether these trails should be formally acknowledged and incorporated into this RMP Amendment, 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.

* * *

We hope the above comments help the BLM's Burley FO identify the appropriate alternatives for this important RMP Amendment. The quality and quantity of the climbing on BLM land at Massacre Rocks and Castle Rocks underscore the need for an effective plan to reasonably and effectively manage recreational use and protect cultural

⁷ See <http://vimeo.com/32222863> (The Access Fund CT Team working with the Bishop, CA BLM to protect cultural resources)

⁸ See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm

resources. Clearly, the Castle Rocks Inter-Agency Plan is the appropriate alternative for the BLM managed lands at Castle Rocks Inter-Agency Recreation Area. However, management approaches that are less burdensome and involve less BLM staff and financial support should be considered for Massacre Rocks. The Castle Rocks IAP is adaptable to Massacre, but site specific considerations should ultimately shape the climbing management plan for Massacre Rocks.

The Access Fund, Boise Climbers Alliance, the Eastern Idaho Climbers Coalition, and American Alpine Club look forward to working with the BLM and stakeholders throughout the planning process for this RMP Amendment. Since the 1990s the Access Fund and the Idaho climbing community has been involved in acquiring land and management planning for public lands across Idaho and we look forward to this next round of planning. Please do not hesitate to contact us if you require more information, or would like to discuss any of the points covered in this comment letter.

Best Regards,



R.D. Pascoe
Policy Director, Access Fund



Brian Fedigan
President, Boise Climbers Alliance



Troy Neu
V.P, Eastern Idaho Climbers Coalition



Phil Powers
Executive Director, American Alpine Club

Cc:

The Honorable Mike Crapo, United States Senate
The Honorable Jim Risch, United States Senate
The Honorable Mike Simpson, United States House of Representatives
Brady Robinson - Executive Director, Access Fund
Doug Colwell, American Alpine Club
Ken Reid, Idaho SHPO
Steve Ellis, BLM Idaho State Director

February 11, 2010

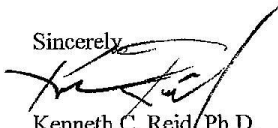
re: 400 Acres Administered by the BLM within the Castle Rocks Interagency
Recreation Area

Dear Suzann,

We cannot agree with your findings of a no effect. As we have discussed with you over the last several weeks, additional information needs to be provided as outlined below:

1. More detail needs to be provided regarding the potential impact of the recreation activities you propose. These activities are already occurring in the same type of geographical setting with similar cultural resources at a location nearby. What has been the effect of these activities upon the historic properties? Is there sufficient evidence that historic properties will not be disturbed and that there will be minimal ground disturbance in areas of buried and therefore undocumented cultural deposits? How will climbers access permitted rock formations that are not on the proposed trail? What about properties 24-2, 4, 5, and 6 which appear to be in the path between the designated trail and the climbing formations?
2. You state that qualified BLM and NPS staff will regularly monitor archaeological sites. What is meant by "qualified" staff and "regularly" monitored? Will staff be trained? How frequently will each historic property be checked? If this is a day-use area, how will the prohibition of overnight camping be enforced?
3. Please provide documentation for your identification and determination of the area as a traditional cultural property. Due to the traditional importance of this area, we would like to review any tribal comments regarding your determinations of significance and effect.
4. There are documented historic properties within the immediate area of your APE. Please discuss these properties and the findings of any associated investigations.
5. Any cumulative effect that may be occurring to historic properties in the uniquely featured geographic setting of the general area may also need to be considered.

Sincerely,



Kenneth C. Reid, Ph.D.
State Archaeologist and Deputy SHPO
Idaho SHPO
210 Main St.