



November 9, 2021

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Submitted via email: blm_id_monumentcassiarmpamend@blm.gov

RE: Access Fund Comments on Cedar Fields Plan Amendment DEIS

Dear BLM Burley Field Office Planning Staff,

The Access Fund appreciates this opportunity to provide comments on the BLM's DRAFT environmental impact statement (DEIS) for the Cedar Fields (Massacre Rocks) area. The Cedar Fields area includes the American Falls Archaeological District (AFAD) which encompasses cliffs and rivers west of the Fort Hall Indian Reservation and is the ancestral land of the Shoshone-Bannock and Paiute Tribes. This area has also become a popular modern day recreation destination for rock climbers, OHV users, fishing enthusiasts, and hikers and campers, as well as being used as livestock grazing range. Access Fund provides the following comments on the BLM's DEIS to assist the BLM in developing a management plan that both meets the need to protect the AFAD and Sacred sites while balancing recreation management.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 120 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

Comments

The purpose of this Monument RMP Amendment is to update the management for the Project Area to make it consistent with current laws, regulations and policies regarding use, cultural resource management and Native American traditional cultural properties/sacred sites.¹ The need is to address impacts from OHV use, rock climbing, and livestock use on the cultural resource sites and the Native American traditional properties and Sacred sites located in the Project Area.² The preferred alternative as set forth in the DEIS would mandate the closure of all climbing routes within the project area as well as the removal of all fixed anchors. While we support the intent behind the RMP Amendment, there has also been a ten year gap between initial scoping and the release of the DEIS. We feel this decade gap offered a missed opportunity for the BLM to facilitate meaningful collaboration between the Tribal government and the recreation community. Access Fund recommends that BLM withdraw the DEIS and start a new scoping process that includes a collaborative management planning process and increased dialogue between stakeholder groups, with the same overall goal of protecting Tribal cultural and sacred sites. Our recommendation is based on the following:

Sacred values and Tribal considerations

No group has as powerful a connection to Massacre Rocks and the broader Cedar Fields area as the Shoshone-Bannock and Paiute peoples. As such, it is appropriate that the primary driver behind the Cedar Fields RMP amendment is the need to “address impacts from OHV use, rock climbing... and livestock congregation on the cultural resource sites and Native American traditional cultural properties/sacred sites located in the Cedar Fields Project Area.”³ Access Fund strongly supports the objectives of the DEIS.

One of Access Fund’s core values is respect for the Indigenous peoples who have lived on and cared for the land since time immemorial. Given this, we are committed to learning from and working with Tribes, and that means respecting the vision the Shoshone-Bannock and Paiute have for their ancestral lands. We sincerely hope to collaborate with the Tribes to find a path forward that considers whether and how climbing, along with other forms of recreation like OHV use, hiking, fishing and camping, may be managed to be compatible with the values and interests of the Tribal community.

Although we support the intent behind the RMP amendment, Access Fund is concerned that BLM has relied on a 10-year old scoping process in issuing a DEIS that proposes as a preferred alternative the total exclusion of climbing and the removal of all fixed anchors. We believe there should be a renewed effort at a collaborative discussion around the management of this area and the protection of cultural resources and sacred lands, and we would welcome that opportunity. And we further believe that BLM should utilize a refreshed scoping process to help facilitate that collaborative conversation. We are prepared to listen and learn to the concerns of the Shoshone-Bannock and Paiute Tribes, and we believe that the dialogue could be beneficial for all of us including BLM.

¹ Cedar Fields Plan Amendment Draft Environmental Impact Statement and Monument Resource Management Plan. DOI-BLM-ID-T020-2013-0029-EIS. 2021

² Ibid.

³ Ibid.

In addition, Access Fund has several concerns regarding the DEIS including an incomplete inventory of existing climbing and recreation resources, mapping issues, Section 106 consultation, heavy focus on climbing impacts, and process for removing fixed anchors; all of which are detailed below.

Climbing Resources

Sport climbing specifically has been a popular activity at Massacre Rocks since the 1980's, while climbing activity has occurred in the area since the 1960's. The majority of route development occurred in the 1980s-1990s prior to the area being designated an archeological district in 1999. The DEIS states there are approximately 170 bolted routes on BLM land, and 290 bolted routes on USBR land within the AFAD.⁴ Online sources such as mountainproject.com list up to 750 known climbing routes within or near the project area. The focus of the DEIS is primarily on sport climbing, however other forms of climbing occur in the project area that do not require the use of fixed anchors. Sport climbing, bouldering and traditional climbing exist in the project area, however there is a lack of inventory of all forms of climbing resources in the DEIS.

It has come to our attention through outreach to the local climbing community that bouldering is an activity that also occurs in the project area. Access Fund has procured GPS coordinates and a map of existing bouldering resources in the project area. This data has been shared with the BLM planning team and can be viewed here: <https://caltopo.com/m/5G7JD>. Bouldering use and locations are not discussed in the DEIS, and it is unclear if their potential impacts have been assessed. There is also no clarifying language that addresses bouldering specifically, which varies from sport and traditional climbing significantly in terms of use and impact patterns. We suggest the BLM include this inventory of bouldering in the EIS as well as clarifying language related to bouldering use in the future. Below are definitions of each type of climbing activity.

Bouldering

Bouldering is a form of climbing in which participants scale small, shorter rock faces, usually on boulders. Instead of using ropes and harnesses they protect themselves from injury by using thick foam pads placed temporarily at the base of the rock faces. If the climber falls they land on the pads instead of on the ground, reducing the risk of injury to the climber. One of the appeals of bouldering is the simplicity of the gear required.

Sport Climbing

Sport climbing uses ropes, harnesses, and pre-placed fixed anchors for safety. Holes are drilled into the rock, and durable metal fixed anchors are put in. Climbers are belayed by a partner, and can ascend the rock face using the fixed anchors, a rope, and their harness to protect themselves if they fall. Climbers attach quickdraws to the fixed anchors they pass, meaning the size of the fall a climber takes is limited by the distance between fixed anchors. The fixed anchors are permanently left in the rock.

Traditional Climbing

Before sport climbing was invented traditional climbing, or "trad" climbing, was the main form of rock climbing. Traditional climbing involves placing specialized, removable gear in cracks or other weaknesses in a rock face. If a climber falls, the rope running through their gear to their

⁴ Cedar Fields Plan Amendment Draft Environmental Impact Statement and Monument Resource Management Plan. DOI-BLM-ID-T020-2013-0029-EIS. 2021

harness stops them. Traditional climbing is more complex than sport climbing and requires more knowledge and training, but many of the basic ideas are the same. Trad climbers can use some fixed anchors as well, but many trad climbs do not require that any permanent fixed anchors are left in the rock.⁵

Scoping

As discussed above, we have serious concerns related to the lengthy gap between scoping conducted in 2011 and the release of the DEIS in 2021. While Access Fund staff and members of the local climbing community did participate in this scoping phase, it was over ten years ago. The use patterns, user groups, resource conditions, and interested stakeholders in this project may have changed in the last decade. No indication is given that the BLM has taken this into consideration when releasing the DEIS. The BLM should have conducted an additional scoping period in 2021 that could have given current stakeholders an opportunity to work on a collaborative approach with the BLM, Shoshone-Bannock Tribe and other stakeholders. We had hopes for a more collaborative process led by the BLM and find the current DEIS lacking in many ways that would have been addressed through a new scoping phase in 2021.

Mapping issues

The BLM has failed to provide adequate maps that clearly show the proposed project boundary and up to date inventory of recreational resources. We have requested both through the FOIA process and via email, that the BLM provide clearer maps or the GIS files to allow us to conduct our own analysis of how the proposed project would impact known climbing resources and access points.

Section 106

Access Fund requested in 2011 and again in 2021 to be a consulting party in the Section 106 process. No response was received. The lack of response or consideration to allow the climbing community and other community stakeholders to participate as consulting parties in the Section 106 process is a discredit to the BLM, Section 106, and the NEPA process. The climbing community has no intention of disrespecting cultural resources or Sacred sites; a different and more nuanced preferred alternative may have been drafted if this process were more inclusive.

According to the Advisory Council on Historic Preservation: *'Consulting parties may include the State (or Tribal) Historic Preservation Officer, the local government, an applicant for federal assistance (if one is involved), and interested federally recognized Indian tribes or Native Hawaiian organizations. Historic preservation organizations and others with an interest in the preservation outcomes of the project or those with a legal or economic interest may also be invited to join consultation.'*⁶

Focus on climbing over other uses

The DEIS heavily focuses on sport climbing impacts, while other uses are not well analyzed or addressed. All existing recreation activities and livestock use impact the land, but climbing seems to be singled out for soil and vegetative impacts. For example, although the DEIS addresses grazing, the DEIS does not analyze how cattle grazing may affect the district's values, such as through impacts to soil erosion and vegetation trampling, or by compromising its

⁵ <http://www.climbingmanagement.org/climbing-information-and-management-plans/Climbing-Information>

⁶ <https://www.achp.gov/protecting-historic-properties/section-106-process/initiating-section-106>

Sacred nature. In addition, little to no evaluation is provided in the DEIS for hiking, hunting, fishing, camping, or campfires, which all have the potential to create some level of impacts to soils, vegetation, and the spread of invasive plant species. BLM has a Multiple Use Mandate under the Federal Land Policy and Management Act (FLPMA) which states that *'the resources and uses on public land must be utilized in a balanced combination that will best meet the needs of the people (current and future needs for current and future generations).'*⁷

We recognize that the Shoshone-Bannock Tribe specifically asked the BLM to address adverse impacts of rock climbing and that climbing be banned.⁸ We respect the Sacred nature of this area and we encourage the BLM to carefully analyze and assess all user generated impacts to ensure the area truly is preserved and protected, and not single out climbing when its resource impact may not be greater than other common recreational activities.

We are concerned that if climbing is banned as an allowable activity as proposed in the preferred alternative, ongoing impacts to soil, vegetation, and cultural resources will continue by livestock grazing and other recreation user groups. The Condition Assessment summary states *'The most pervasive effects to archeological sites identified during the Reclamation assessment came from off road vehicle use, vandalism, cattle trampling and several forms of natural erosion.'*⁹ These ongoing impacts could further degrade the AFAD making the specific closure of climbing a futile effort.

Removal of fixed anchors/bolts

The preferred alternative states that all climbs with fixed anchors within the project area would be closed to climbing and fixed anchors would be removed. The local climbing community including the Eastern Idaho Climbers Coalition (EICC) have asked BLM staff who will remove the fixed anchors and who will get to keep the fixed anchors. The fixed hardware installed in the project area has monetary value and could be reused in another area. We recommend the BLM work with the Access Fund, EICC, and other local climbers to address this topic. It should also be noted that the removal of fixed anchors is a skilled process¹⁰ and should only be attempted by someone who has been properly trained and has the appropriate equipment. Improper removal of fixed anchors can lead to damage to the rock and surrounding resources. Again, the techniques and impacts of removing fixed anchors is something we would look forward to sharing with the Shoshone-Bannock and Paiute Tribes and BLM as part of a renewed and collaborative scoping process.

Conclusion

Access Fund wishes to work with the BLM to address these concerns, and will continue to advocate for fair treatment of climbing through the planning process. We also strongly support fair and appropriate management that facilitates the protection of the Sacred values of the landscape as envisioned by the Shoshone-Bannock tribe, and sincerely hope to build more robust climber-tribal relationships through this planning process and into the future.

Based on the concerns stated above, **Access Fund requests that BLM withdraw the DEIS**

⁷ <https://www.blm.gov/or/districts/burns/newsroom/files/multipleuse.pdf>

⁸ Summary of the Bureau of Reclamation and Bureau of Land Management Condition Assessments Concerning the American Falls Archaeological District, Power County, Idaho. May 2021

⁹ Summary of the Bureau of Reclamation and Bureau of Land Management Condition Assessments Concerning the American Falls Archaeological District, Power County, Idaho. May 2021

¹⁰ <https://www.accessfund.org/learn/for-advocates/managing-fixed-anchors>

and start a scoping process that includes a collaborative management planning process rather than rely on a 10-year old scoping process to issue a DEIS that proposes a blanket ban on climbing.

Justice, Equity, Diversity, and Inclusion (JEDI)

Access Fund urges the BLM to work with the local community to advance inclusive and equitable access to Cedar Fields. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. Access Fund has staff dedicated to JEDI issues, and is more than willing to offer our time and resources to assist the BLM in applying JEDI principles to the Cedar Fields area.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the BLM may require to provide for the outstanding opportunities for climbing found in the Burley Field Office that are slated to remain open under the current DEIS. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain^{11, 12} climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of these comments on the BLM's environmental assessment for the Cedar Fields DEIS. Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. Access Fund looks forward to continuing to work with the BLM and the Shoshone-Bannock Tribe. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 552-2843 or via email (katie@accessfund.org) to discuss this matter further.

Sincerely,



Katie Goodwin - Access Fund, Policy Analyst

Cc:

Chris Winter-Access Fund, Executive Director

Erik Murdock-Access Fund, Vice President of Policy and Government Affairs

Thierry Legrain- Eastern Idaho Climbers Coalition, President

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¹¹ <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

¹² <https://www.accessfund.org/pages/conservation-team>