Hannah North
[redacted]
Boise, ID 83702

14 March, 2006

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

Dear Mr. Keck,

Following are my comments on the Recommended Revisions to the Climbing Management Plan for Idaho's **City of Rocks National Reserve**.

I believe that the Recommendations from the National Park Service and Idaho State Parks & Recreation are deficient in one important area: the lack of Alternatives to the ban on climbing on the Twin Sisters rock formations. I strongly urge additional Alternatives that would allow some level of climbing activity be drafted and considered. Preferably several alternatives will be considered, so that a *reasonable balance* between historical conservation and recreational activity can be achieved. The current ban on climbing does NOT achieve a reasonable balance.

As noted in the Minutes of the Jan. 18-19, 2006 NPS internal review, the purpose of the National Reserve is:

Preservation & protection
Interpretation of values
Recreation

As also noted, these purposes can be in conflict with each other and it is the job of the Reserve's stewards to strike an appropriate *balance* between these purposes.

The Minutes also note that the US Court supported the authority of the NPS in determining what the proper *balance* should be. To date, the NPS has exclusively allowed persons with *historical conservation expertise* to determine what the proper balance should be. The NPS has failed to weigh the inputs of persons with *recreational expertise,* and has failed to perform *objective analysis* of conflicting values among these experts.

As evidence of the current one-sidedness, I note that the suppositions about climbers that were documented in the internal review are inaccurate and even biased. For example, the NPS participants made statements that climbing on the Twin Sisters was not very popular

among climbers. As a long-time climber at the City of Rocks I know that this statement is wrong. The climbs on the Twin Sisters are of very highest quality. There are at least two "natural" routes (which do not require any fixed anchors on the rock) that are unequaled in length and quality anywhere else in the Reserve. There are many other climbers who will support my statement. It is not surprising that persons with historical conservation backgrounds do not have much comprehension of recreational perspectives, but that's why *cooperative analysis and decision-making* among areas of expertise is the required process for setting management policy.

The NPS has also failed to perform *objective analysis* of the impacts of recreation in the Twin Sisters area. By allowing only persons with historical conservation perspectives to set policy, there have not been on-the-ground impact studies to determine what activities are acceptable and compatible in the Twin Sisters area. A good example of this is the lack of any visual analysis to determine what a visitor who desires historical experience will actually see if other visitors are climbing, camping, or hiking in the vicinity.

In addition to the lack of objective analysis, the NPS has also allowed personal bias among internal decision-makers to drive policy at the Twin Sisters. This is evidenced by the ban on climbing in the Twin Sisters, with no concern whatsoever for other forms of visual impact in the area. For example, there are developed campsites, a graded roadway, power lines, automobile traffic, a private house, and a concrete latrine residing in the visual landscape of the Twin Sisters. These modern improvements have far more visual impact than the occasional climber on the rock, yet these impacts are not considered inappropriate. In fact, there is no documentation of even a single written complaint by any visitor or land manager (whether historian or climber) about these non-climbing visual impacts.

I do not believe the Court intended for the NPS to take such a one-sided view when determining management policy for the Twin Sisters. The Minutes note that the Court can only overturn an agency's decision for arbitrary or abusive policy. Thus, the decision from the Court is not an indication of legal support for the current policy, but rather a conclusion that the current policy is not arbitrary or extremely abusive. I believe the current ban on climbing does border on an abusive policy because of its narrowness and lack of input from experts outside of historical conservation. I think the NPS should provide a thorough and well-balanced analysis of the compatibility of recreation and historical conservation. The first step in this process is to propose reasonable Alternatives. The next step is to conduct measurable, real-life studies of possible impacts. These studies should involve experts from <u>*both*</u> recreational and historical backgrounds.

It has been stated in multiple documents that the Twin Sisters are the visual icon for the City of Rocks National Reserve. NPS staffers have stated that this is a reason why climbers should not be allowed on the Twin Sisters. Yet in other National Parks there are many beautiful and culturally or religiously significant rock formations where climbing takes place. A few that come to mind are Half Dome in Yosemite, Devil's Tower in Wyoming, Denali Peak in Alaska, and numerous arches in Arches National Park. In fact,

these other formations are far more recognized American icons than the Twin Sisters. The reason these other icons have been found compatible with climbing is because of unbiased, comprehensive planning. I urge similar diligence for the City of Rocks Climbing Management Plan.

One final comment. The NPS response letter to the Idaho congressional delegation promised "full opportunities for public review" and "public consultation process will be thorough and lengthy." Because the Twin Sisters closure is such an important issue to climbers, I do not believe the single month of March 2006 is sufficient time for public review of the CIRO Climbing Management Plan. The documentation notes that there have been relatively few letters from the public about the closure. If *volume of letters* is needed from the climbing community of the United States in order to obtain additional Alternatives, then sufficient time is needed to garner magazine and internet coverage of the opportunity to send the NPS letters of concern. I would recommend at least four months, or else the inclusion of Alternatives in the revised Climbing Management Plan.

Thank you very much for the opportunity to comment.

Hannah North

Hannah North

Cc: Senator Larry E. Craig
Senator Mike Crapo
Representative Mike Simpson

March 19, 2006

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

Dear Superintendent Keck,

I have become aware that the City of Rocks National Reserve has begun the process of revising its 1998 Climbing Management Plan. I've also learned that National Park Service has decided that this revision will not consider amending the present ban on climbing on the Twin Sisters formation. I feel these restrictions are short sighted and overly restrictive. In many locations across the country, park management has been able to implement less restrictive and more balanced management alternatives. Less restrictive and more balanced plans have been supported by the Idaho Congressional delegation, the community of Almo, ID, and the climbing community.

Please, as a resident of Idaho, I implore you to expand the narrow scope of your climbing management revision to the City of Rocks. Please add an alternative that provides at lease some climbing access to the Twin Sisters. At a minimum, amend the policy so that it is more consistent with the current (and controversially restrictive) NPS management policies.

Sincerely,

Rick Pongratz

Rick Pongratz
Pocatello, ID

[redacted]
Pocatello, ID 83201

March 20, 2006

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

Dear Superintendent Keck,
I am writing today to encourage the National Park Service to expand the narrow scope of the planned climbing management plan revision at the City of Rocks, Idaho. Specifically, I request that the National Park Service add a third alternative that provides at least some level of climbing opportunities on the Twin Sisters formation that is more consistent with current restrictive NPS management policies.

I am an annual visitor to the reserve and greatly value access to climbing at Twin Sisters and other rock formations at City of Rocks, Idaho.

Thank you,

Vincent Dunn
[redacted]
Salem OR 97302

Cc:

US Senator Larry E. Craig
SH-520 - Washington, D.C. 20510-1203

US Senator Mike Crapo
SD-239 - Washington, D.C. 20510-1205

US Representative Mike Simpson
1339 LHOB - Washington, D.C. 20515-1202

March 31, 2006

Wallace F. Keck
Castle Rocks State Park
Idaho Department of Parks and Recreation
P.O. Box 169
Almo, ID 83312

Re: Climbing in the Twin Sisters

Dear Wallace F. Keck,

I am writing you in the hopes that somehow climbers could once again enjoy climbing at the Twin Sisters area in the City of Rocks. I have fond memories of the routes that I've done there and am hoping that the area could once more be open to climbing. Prohibiting climbing due to historic view shed never made sense to me. The main formations are too far from the road to even hope to see a climber, much less be impacted by one. In over 20 years of climbing there, I've never encountered anyone who thought that viewing a climber impacted their sense of the history of the City of Rocks. Compare a climber on a distant rock formation to the historical perspective of 50,000 people in a single summer season passing through the area in wagons and on horses. I can't imagine that the mass migration was an unobtrusive event!

Another issue would be the length of these historic trails. Most don't involve terrain suitable to climbers, so any potential for conflict between user groups for most of the trail length is pretty negligible. Singling out one small area where the act of climbing is so low profile does not seem reasonable. And, as a bit of a history buff myself, there's no better place to reflect on the migration of pioneers than from the summit of one of the Twin Sisters.

Thought I'd take this opportunity to pass along my thoughts on the issue. Hope all is well with you and I'm looking forward to the spring, summer and fall climbing season (as usual!).

Regards,

Brian D. Cabe
American Alpine Club
Northern Rockies Section Chair
[redacted]
Salt Lake City, UT 84106

[redacted]

cc: Jason Keith, Access Fund (email)
Hannah North (email)

[redacted]
Eugene, OR 97404

April 2, 2006

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

Dear Mr. Keck:

Following are our comments on the Recommended Revisions to the Climbing Management Plan for Idaho's City of Rocks National Reserve.

We strongly urge the National Park Service to expand the narrow and arbitrary scope of their planned climbing management plan revision at the City of Rocks by including additional Alternatives that would allow some level of climbing activity on the Twin Sisters rock formations. We think it is reasonable to consider several alternatives so that a balance between historical conservation and recreational activity can be achieved. Allowing climbing on the Twin Sisters formations is supported by the Idaho Congressional delegation, Almo locals and the climbing community.

Sincerely,
Dee Tvedt + David Tvedt

Dee and David Tvedt

Cc:
Senator Larry E. Craig
Senator Mike Crapo
Representative Mike Simpson
Senator Ron Wyden
Senator Gordon Smith
Representative Peter DeFazio

Wallace Keck, Superintendent
City of Rocks National Reserve
P.O. Box 169
Almo, Id 83312

April 3, 2006

Dear Superintendent Keck:

I am writing because of the stance that City of Rocks is taking with regard to rock climbing on the Twin Sisters formation. I believe that any negative that is caused by the few people viewing the formation from afar and seeing climbers on it is overshadowed by the many positive benefits by allowing climbers access to the formation. I think you need to expand the narrow and arbitrary scope of your planned climbing management plan revision and also add a third alternative that provides at least some level of climbing opportunity on the Twin Sisters that is more consistent with current , though restrictive, NPS management policies.

Thank you very much for your consideration,

John Robinson
[redacted]
Elk Grove, Ca 95624
[redacted]

CC:
Senator Craig
Senator Carpo
Rep Simpson
Senator Feinstein
Senator Boxer
Rep Lungren