April 1, 2020

BLM, Burley Field Office
15 East 200 South
Burley, ID 83318

Submitted via email: id_burley_fo@blm.gov

RE: Burley Field Office Recreation Improvements Scoping Comments

Access Fund and CRAG ID appreciate the opportunity to provide scoping comments on the Burley field office recreation improvements NEPA # DOI-BLM-ID-T020-2020-0005. This proposal is to address growing recreation needs through development of facilities at multiple locations across the field office.

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 123 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.

CRAG ID

The Climbing Resource Advisory Group of Idaho (CRAG ID) is a collection of Idaho based climbing organizations working together to address climbing and stewardship needs in the City of Rocks and Castle Rock region of Idaho.

Comments

Access Fund and CRAG ID overall support the Proposed Action and appreciate BLM’s efforts to address recreational needs and impacts in the area. Specifically addressing dispersed camping use on BLM land adjacent to City of Rocks and Castle Rock State Park which attract rock
climbers from across the country. We support actions proposed under Alternative A, including evaluating the addition of:

- CXT manufactured vault toilets.
- Trash receptacles.
- Metal fire rings with flip style grill surface
- Vegetation removal at camping areas
- Barriers, fencing, and signs to manage vehicle access
- Increased maintenance of roads and installation of erosion control devices such as waterbars and culverts

All of these actions would meet the goals needed to provide for sanitation and public safety, curtail ongoing impacts and prevent future degradation of resource values. We provide the following comments to be considered in this project when evaluating Alternative A.

- There is local concern on how to evacuate Smoky Mtn Campground rapidly in the event of fire. This applies to the proposed BLM campgrounds, which will be further back in the trees, with roads too narrow to pass a fire truck.
- Kiosks where BLM info can be posted, as well as notes between private parties, would be a useful addition to both campgrounds.

Access Fund, CRAG ID and the climbing community are ready and able to help planners identify and improve the climbing related trail system, roads, and other management needs the BLM may require to provide for the outstanding opportunities found in the Burley Field Office area. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program\(^1\) or assistance from our Conservation Team\(^2\) which helps maintain 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.

Thank you for your consideration of these comments on the BLM’s scoping process for the Burley field office recreation improvements. Access Fund and CRAG ID have 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

\(^1\) [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm)

\(^2\) [http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm](http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm)
experience. Access Fund looks forward to continuing to work with the BLM. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone (303) 552-2843) or email (katie@accessfund.org) to discuss this matter further.

Sincerely,

[Signature]

Katie Goodwin-Policy Analyst, Access Fund

Cc:

Chris Winter- Executive Director, Access Fund

Erik Murdock- Policy Director, Access Fund

CRAG Idaho