Comprehensive Management Plan
Development Concept Plan
Environmental Impact Statement

City of Rocks
NATIONAL RESERVE
Idaho
RECOMMENDED:

Ned B. Jackson  
Ned Jackson, Park Manager  
Idaho Department of Parks and Recreation  
2/1/96  
Date

RECOMMENDED:

James A. Mann  
James A. Morris, Acting Superintendent  
National Park Service  
2/1/96  
Date

CONCURRED:

Yvonne S. Ferrell, Director  
Idaho Department of Parks and Recreation  
2/1/96  
Date

CONCURRED:

William C. Walters, Deputy Field Director  
National Park Service  
2/1/96  
Date

APPROVED:

Stanley T. Albright, Field Director  
Pacific West Field Area  
National Park Service  
2/1/96  
Date
CONCLUSION

The overriding issue to be resolved by this Plan is to provide Reserve managers with a blueprint for the preservation and protection of the Reserve's historical, cultural, scenic and natural resources as specified by Congress, while managing public recreational and private agricultural uses within a relatively small geographic area. This is to be accomplished in a highly scenic setting where significant resource values often overlap, and where the use of the resources by competing interests is often present. Congress directed the National Park Service, aided by our State and County partners, and in cooperation with private landowners, to preserve and protect the significant historical and cultural resources of the Reserve, which has been designated a National Historic Landmark and a National Natural Landmark.

In our opinion, the Plan, in response to the Reserve's enabling legislation, provides for the long-term protection of the Reserve's natural, cultural, historic resources and its remarkable scenic beauty. The Plan provides that cattle grazing, trailing, and other traditional rural uses would continue within the Reserve. The preservation of the historic rural setting will be accomplished through the application of local ordinances by Cassia County, and these protection measures will be augmented by National Park Service acquisition of either development rights (conservation easements) or fee title interests where a willing seller situation is present. While Alternative 3, with its stringent protection measures, has been identified as the Environmentally Preferred Alternative, its implementation would have resulted in more socioeconomic impacts on landowners and permittees within the Reserve and may have adversely affected the Reserve's historic rural setting. Alternative 3 was therefore rejected as the Proposed Action.

In accordance with the requirements of the National Historic Preservation Act and its implementing procedures, consultations were held with the Advisory Council for Historic Preservation and the Idaho State Historic Preservation Officer. Those consultations have resulted in concurrence on most major cultural resource protection issues facing the Reserve, and a programmatic agreement is being negotiated covering future consultation requirements.

After a thorough evaluation of each alternative as measured against legislative intent and environmental effects, and after careful consideration of public response, including concerns of landowners and permittees within the Reserve, comments from recreational and other user groups, and input from the historic preservation community including the Idaho State Historic Preservation Officer and elected officials from all levels of government, we believe that the selected alternative represents the best balanced course of action for the future protection, public use and management of City of Rocks National Reserve.
(5) Natural biological diversity will benefit from a grazing management program directed at protection of natural vegetative communities on public lands throughout the Reserve and on private lands where landowners choose to participate.

(6) The selected action establishes carrying capacity standards to protect the park's resources and ensure a high quality visitor experience. (page 61 of Final CMP/EIS)

(7) Cassia County has developed and adopted a zoning ordinance to protect the historic rural setting, as specified in the Reserve's enabling legislation.

(8) County zoning (e.g. scenic setbacks), technical assistance, and cooperative management agreements are all tools to assist development within the Reserve, and can be used to keep the three arrival road corridors free of nonconforming commercial uses, and provide guidelines for new residential uses.

(9) Prior to the development of the administrative support and visitor facilities east of the Reserve in accord with the Development Concept Plan, it will be necessary to first obtain BLM approval of a detailed site plan for these developed areas. Additionally, since Federal lands are involved, the BLM will be evaluating any site specific impacts as part of a companion compliance process, to determine if the significance of any potential site impacts that may result from the proposed development. To assist the BLM in this impact analysis process, the BLM will be able to reference and "tier" off of all the pertinent environmental data contained within the Final Environmental Impact Statement for the City of Rocks Comprehensive Management Plan.
MEASURES TO MINIMIZE HARM

All practicable means will be taken to avoid or minimize environmental harm from the undertakings in the selected alternative.

This Record of Decision incorporates by reference the detailed mitigation measures described in the Comprehensive Management Plan/Development Concept Plan/Environmental Impact Statement. A summary of mitigation measures described in the Final Environmental Impact Statement follows:

(1) Compliance with Section 106 of the National Historic Preservation Act will be undertaken as described in the body and Appendixes F and H of the EIS and in accordance with the Programmatic Memorandum of Agreement among the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and the National Park Service. Archeological resources will be managed in accordance with Section 110 of the National Historic Preservation Act, and an archeological research and management plan will be developed in consultation with the Idaho State Historic Preservation Officer. Modern development and incompatible activities in the historic viewsheds from the California Trail and the Reserve’s historic rural setting will be reduced and managed to minimize the potential for future intrusions.

(2) All federal agencies are charged with protecting wetlands. As in other parts of America’s interior west, degradation of certain wetlands and riparian areas has occurred within the Reserve. Where private grazing use on public lands occurs to maintain the historic rural setting, livestock will be managed to protect wetlands and riparian areas. Wetlands and riparian areas will be protected as described in Appendix J: Statement of Findings for Wetlands.

(3) Prior to construction, the National Park Service will consult with the U.S. Fish and Wildlife Service to ensure that any proposed developments will not adversely affect threatened/endangered candidate/listed species of plants and animals. All areas in the Reserve identified as potential endangered or threatened species habitat will be continually monitored for the presence of these species. If they are present, Reserve management may have to take additional steps to protect species and their habitat. This may include temporary closures of certain areas to public use, curtailment of certain types of recreational activities, along with commensurate restrictions on staff use of these areas.

(4) The Reserve will establish a climbing management program emphasizing protection of both natural and cultural resources. Rock surfaces and habitat will be inventoried, and impacts will be monitored to identify adverse effects early to eliminate or reduce the cost of mitigation efforts.
Alternative 1--No Action: This alternative constitutes the minimum requirements alternative. It reflects the minimum actions necessary, consistent with the park's purpose, for the safe and effective operation of the park. Under the no-action alternative there would be no significant change in present management or visitor use. Reserve managers would take the minimum actions necessary to meet legislative requirements, to protect natural and cultural resources, and to address health and safety concerns, but few additional interpretive or recreational programs or facilities would be provided. Livestock grazing would continue on private and most of the public land. This alternative would continue to emphasize unrestricted private use and public recreational use, sometimes to the detriment of exceptional cultural and natural values.

Alternative 3--California Trail Emphasis: This alternative would greatly enhance the protection of the Reserve's exceptional cultural, natural and scenic resources and tell the California Trail story through a variety of media and interpretive programs. Under this alternative, public recreational activities would be more restrictive than the selected alternative, as would certain private uses within the Reserve. Compared to the selected action, Alternative 3 would result in less opportunities for public use and enjoyment of the area, increased socio-economic impacts, and potential adverse impacts on the historic rural setting.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

Regulations issued by the Council on Environmental Quality require the identification of the environmentally preferred alternative in the Record of Decision (40 CFR 1505.2(b)). The environmentally preferable alternative is the alternative that would best promote national environmental policy as expressed in Section 101 of the National Environmental Policy Act. This alternative would be the one that causes the least damage to the biological and physical environment; it would also be the alternative that best protects, preserves and enhances historic, cultural and natural resources. The environmentally preferred alternative may or may not be the same as the agency's preferred alternative as identified in the Final Environmental Impact Statement.

Of all the alternatives considered in the Final Environmental Impact Statement, Alternative 3--California Trail Emphasis, offers the greatest potential for protecting the nine miles of the California Trail and the features and landscapes that are part of the Reserve, the National Historic Landmark and the National Natural Landmark. Restoration of native vegetation and repair of areas eroded by recreational and livestock use would be possible and, absent grazing cattle, wetlands could be restored. In comparison to the other alternatives, Alternative 3 would, in time, provide a larger portion of protected sagebrush steppe habitat for a variety of wildlife species. For these reasons, Alternative 3 is identified as the environmentally preferred alternative.
Implementation of the proposal will be by a partnership involving the National Park Service, the Idaho Department of Parks and Recreation, the Cassia County Commissioners, and private landowners who own land within the Reserve. Portions of the Reserve will remain in private ownership, and some public land will remain under grazing allotments, where traditional ranching activities would perpetuate the historic rural setting existing at the time of the Reserve’s establishment. Private land use and potential land development on private land within the Reserve will continue to be regulated by the already adopted Cassia County zoning ordinance. Additionally, land may be further protected by the acquisition of fee or less-than-fee (e.g. easement) interests in lands by the National Park Service on an opportunity purchase basis (willing seller).

The selected alternative includes a Statement of Findings on Wetlands detailing further actions that will be taken to provide required protection of these areas and a chart showing actions that will be taken to complete required compliance with Section 106 of the National Historic Preservation Act.

Congressional authorization is necessary to raise the public development ceiling of the Reserve to allow for the construction of the proposed visitor center, administrative and maintenance area, and other projects articulated in the plan. Such authorization will be sought by the National Park Service as soon as possible.

An ultimate staff of 28 full-time equivalent employees are recommended to fully implement the Plan, which is intended to be phased-in by the end of the 15-year Plan period through the year 2010. The full complement of staff will be composed of 13 permanent employees and 20 seasonal employees. Most of these positions will be employees of the Idaho Department of Parks and Recreation. It is intended that the National Park Service will continue the present practice of augmenting State operating funds for administration of the Reserve through annual appropriations from NPS operational base funds which are transmitted to the State of Idaho via an existing cooperative agreement. Funding for some of the specialized positions may be augmented by other entities, including cooperating associations, volunteers, and others. The increased staffing over current levels will be used to manage, maintain, and protect the resources of the Reserve, and will operate adjacent visitor and administrative facilities proposed on Bureau of Land Management property to the east of the Reserve. The proposed staffing levels are also necessary to help keep pace with the growing visitation rate, to provide additional services and facilities for the public, and to assist in improving the overall quality of the visitor experience at the City of Rocks National Reserve.

ALTERNATIVES CONSIDERED

Three alternatives, including the selected alternative, were analyzed in the Final Environmental Impact Statement. In addition to the selected alternative described previously, the other alternatives considered include:
and/or State funding is requested, every effort will be made to ensure that each project makes prudent use of available resources, utilizes sustainable and durable materials wherever possible, all the while maintaining high standards of design quality and protecting the natural environment of the area along with its cultural, historic and scenic resources.

3. The full cost of implementing the developed campground on Bureau of Land Management land just east of the Reserve is assigned to the Idaho Department of Parks and Recreation for implementation. IDP&R will utilize the Recreational Vehicle Account for construction of the facility, which will be derived from the revenues available on an annual basis through recreational vehicle registrations. IDP&R will also take the lead in facility design, in cooperation with the National Park Service and the Bureau of Land Management. The NPS will be available to provide technical design assistance to the State, upon request.

4. The approval of the employee housing component in the mid- and long-term phase of the Development Concept Plan is contingent upon a study of employee housing needs within the region. Before employee housing is constructed, it must first be demonstrated that the private sector is unable to provide the necessary rental and owner-occupied housing needed in nearby communities in order to serve the residential housing needs of the Reserve’s permanent and seasonal work force. If the housing study findings reaffirm the Plan proposal for all or a portion of the proposed employee housing area to east of the Reserve, then all efforts will be made to ensure that housing construction costs mirror those which are typical for the local area, based upon a comparison of similar housing design and materials.

THE SELECTED ALTERNATIVE

The selected alternative, which was identified as Alternative 2--Historic Continuum (Proposal) in the Final Environmental Impact Statement, calls for the preservation and protection of exceptional and important natural, cultural and historical resources, the management of recreational use, the protection and maintenance of the Reserve’s scenic quality, and the interpretation of the nationally significant values of the Reserve. The Plan’s focus is on remnants of the California Trail, distinctive rock outcrops and associated habitats, and the area’s historic rural setting that is reminiscent of the American West. These objectives will be achieved, while accommodating the traditional uses of livestock grazing and trailing, along with sport hunting, rock climbing, primitive camping and other recreational uses. In accord with NPS policies, various park activities and public uses will be directed to specific management zones within the Reserve to minimize conflicts among potentially incompatible activities. Both grazing and recreational uses will be managed to avoid unacceptable degradation of resource values, placing the greatest emphasis on the protection of historic resources, natural rock surfaces, habitats for species of special concern, and riparian areas and wetlands.
INTRODUCTION

Pursuant to regulations promulgated by the Council on Environmental Quality (40 CFR 1505.2) and the implementing procedures of the National Park Service for the National Environmental Policy Act of 1969 (40 USC 1501 et seq.), the National Park Service (NPS) has prepared a Record of Decision on the Final Environmental Impact Statement for the Comprehensive Management Plan/Development Concept Plan for City of Rocks National Reserve, Idaho.

This Record of Decision describes the decision that was made, the alternatives that were considered and the mitigating measures that have been adopted to avoid or minimize environmental impacts. Also, the environmentally preferred alternative is identified.

DECISION

I approve for implementation the proposed action as described in the Final Environmental Impact Statement for the Comprehensive Management Plan/Development Concept Plan for City of Rocks National Reserve, Idaho, as written, with the following changes and clarifications:

1. Regarding the management of the Twin Sisters formation within the Reserve, the decision concerning whether or not to retain the closure to public recreational climbing on the Twin Sisters formation is deferred pending completion of the planning process for the Reserve's Climbing Management Plan and Environmental Assessment (EA). Though the public review period for the Draft Climbing Management Plan/EA is over, consultation continues with the Idaho State Historic Preservation Officer and the Advisory Council for Historic Preservation, in accord with Section 106 of the National Historic Preservation Act.

2. Both the National Park Service and the Idaho Department of Parks and Recreation (IDPAR) have significant concerns about preliminary cost estimates that have been developed in association with this project (Final Comprehensive Management Plan, Appendix E). While it is recognized that these preliminary cost figures are considered to be only general estimates, and that more detailed and refined estimates will be provided during the design phase of each project, for the most part, construction costs reflected in the plan are somewhat higher than those which are typically experienced in the Reserve's southern Idaho location.

As the Plan states, the capital development of the Reserve's facilities is intended to be a shared responsibility between the National Park Service and the Idaho Department of Parks and Recreation. Before individual project construction funds are requested from either Congress or the Idaho State Legislature, more detailed and location-specific construction cost estimates will appropriately be developed during the design phase of each project. As individual development projects move forward and Federal
L7617(PWA-RE)

5 February 1996

Dear Friend of City of Rocks National Reserve:

Enclosed for your information is a copy of the recently approved Record of Decision for the Comprehensive Management Plan/Environmental Impact Statement (CMP/EIS) for City of Rocks National Reserve, Idaho. With the qualifications noted, the alternative selected for implementation is the proposed action as described in the Final CMP/EIS. If you have questions about the plan, please contact Park Manager Ned Jackson at P.O. Box 169, Almo, ID 83312 or telephone (208) 824-5519.

We appreciate your interest in the City of Rocks National Reserve.

Sincerely,

William C. Walters
Deputy Field Director

Enclosure
Friends of the City of Rocks National Reserve,

It is with great pleasure that we present to you the Final Comprehensive Management Plan and Environmental Impact Statement (EIS) for the City of Rocks National Reserve. The release of this final plan document culminates a planning process in which literally hundreds of individual citizens, numerous interest groups, and public agencies actively participated. The final product is better because of your involvement and your input.

This Comprehensive Management Plan complies with the intent of Title II of Public Law 100-696, the Act that established the City of Rocks National Reserve. As the adopted plan for the Reserve, it provides an important framework for the future protection, public use and management of this magnificent area. By adhering to the goals of the plan, and implementing the proposed actions, the unique qualities of the area will be protected, while providing for public use and enjoyment of the resources of the Reserve.

Our overriding mission for the future administration of City of Rocks is the protection of the resource: the features of the California Trail, the natural environment, and the historic rural setting of the area. The City of Rocks will be protected as a unit of the National Park System by sustaining partnerships among all levels of government. After this plan is approved, and the pertinent State and county regulations and ordinances for the Reserve have been enacted, the management and administration of the City of Rocks National Reserve will be transferred from the National Park Service (NPS) to the State of Idaho. After this transfer takes place, the NPS will continue to provide assistance to the State of Idaho in a variety of areas, including cost sharing for facility improvements and resource management. Cassia County will continue to play an important role in protecting the Reserve through the regulation of land use. The Bureau of Land Management will provide the land base necessary to develop visitor and administrative facilities just outside the Reserve.

We would like to give special thanks to the local members of the City of Rocks planning team, including Messrs. Thomas Clark, Bill Jones, and Charles Ward, who contributed their time and energies throughout the development of the plan, and helped assure local concerns and perspectives were included.

Charles H. Odegaard
Regional Director
Pacific Northwest Region, National Park Service

Yvonne Ferrell
Director
Idaho Department of Parks and Recreation

John Adams, Chairman
Cassia County Commission

November 1994
This Final Comprehensive Management Plan/Development Concept Plan/Environmental Impact Statement presents a proposal and two alternatives for the management, use, and development of City of Rocks National Reserve. The proposal, which constitutes the draft comprehensive management plan for the reserve, calls for the preservation and interpretation of exceptional and important resources 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. The plan's focus is on remnants of the California Trail, distinctive rock outcrops and associated habitats, and a historic rural setting reminiscent of the American West, while accommodating the traditional use of livestock grazing, trailing, sport hunting, and recreation. Uses would be directed to different zones to minimize conflicts among potentially incompatible activities. Grazing and recreational use would be managed to avoid unacceptable degradation of resource values, placing greatest emphasis on protection of historic fabric, natural rock surfaces, habitats for species of special concern, and riparian areas and wetlands. Portions of the reserve would remain in private ownership, and some public land would remain under grazing allotments, where traditional ranching activities would perpetuate the historic rural setting existing at the time of the reserve's establishment. Private commercial and residential development would be regulated by county zoning ordinance and may be limited by the acquisition of interests in lands on an opportunity basis necessary to protect reserve resources. Implementation of the proposal would be a partnership among the National Park Service, the Idaho Department of Parks and Recreation, the Cassia County commissioners, and private landowners.

An overview of changes that have been made in the proposal since the draft plan follows:

- The decision on how climbing would occur outside the foreground of the California Trail would be deferred to the climbing management plan.
- Some additional areas would be closed to grazing to protect wetland and riparian areas. Some decisions on where grazing would occur would be deferred to the grazing management plan.
- Prescriptions for uses of zones, subzones, and areas within the subzones would be eliminated in favor of more general guidance.
- The proposed road around the south end of the reserve would be eliminated.
- The Twin Sisters formation would be managed to emphasize resource protection and to exclude active recreational uses, including climbing, picnicking, and camping.
- A Statement of Findings on Wetlands has been added.

A more detailed list of changes are in the plan summary and in appendix I.

The alternatives under consideration, in addition to the proposal, include the no-action alternative, which would continue to emphasize unrestricted private use and public recreational use, sometimes to the detriment of exceptional cultural and natural values, and an alternative that would emphasize the preservation and interpretation of the California Trail and the rock outcrops to the exclusion of traditional land use and the historic rural setting.

The environmental consequences of the proposed action and the other alternatives were fully documented in the DEIS and are represented with modifications in the FEIS. The public review period on the DEIS ended February 1, 1994. The results of the public comment on the DEIS are included in the FEIS. The no-action period on this final plan and environmental impact statement will end 30 days after the Environmental Protection Agency has accepted the document and published a notice of availability in the Federal Register. For further information, contact: Regional Director, National Park Service, Pacific Northwest Region, 909 First Ave., Seattle, WA 98104-1060, (206) 220-4010.
## SUMMARY

### CHANGES FROM DRAFT TO THE FINAL PLAN

| Two management plans for monitoring grazing and rockclimbing would provide direction on managing these uses. In the case of Twin Sisters rock formation, active recreational use, including climbing, picnicking, and camping, would be excluded from the foreground of the California Trail. Grazing use would be discontinued in some areas to protect wetlands.

The management zoning for City of Rocks has changed from two zones (Preservation and Public Education Zone and Development Zone) to three zones (Historic and Natural Preservation Zone, Historic Rural Setting Zone, and Public Use and Development Zone). Emphasis would be placed on preserving the foreground of the California Trail and preserving outstanding features outside the foreground of the corridor. Rather than allowing specific recreational activities and grazing on public and private lands as described under the zones in the draft plan, climbing and grazing use would be determined by climbing and grazing management plans. The Public Use and Development Zone would contain facilities needed to support visitor use and reserve opportunities.

Landownership has changed because private land has been obtained since the draft.

Certain recreational activities would change. Vehicle camping would be clustered in multiple areas to provide walk-in access to campsites, most of the climbing in the reserve would continue to occur in the natural and recreational resource area, and mountain biking would be limited to designated secondary roads or bicycle trails.

Facilities inside and outside the reserve would change. Generally, parking would increase in Circle Creek basin and more trails would be added. Outside the reserve, the visitor center/administrative office space would be increased by 2,000 square feet and include a museum and 15- to 30-seat multipurpose room. The 100-seat amphitheater would be expandable to 200 seats. The RV campground would be a developed campground.

To improve access to the reserve, orientation/information signs would be requested on interstate and state highways.

The phasing of development chart was changed to provide more detail. The primitive campground has been added. There would be short, medium, and long-term phases as in the draft plan, but the timeline would be open-ended.

City of Rocks, an extraordinary encirclement of granite rising out of the gently rolling sagebrush country in south-central Idaho, has attracted and intrigued people since they first entered this region. The Shoshone camped here, as did the emigrants traveling along the California Trail, and they and the settlers who followed have overlaid a rich human history onto this dramatic natural backdrop. For all the area's significant natural and cultural values (it is a national historic landmark, a national natural landmark, and contains segments of the California National Historic Trail), it did not receive national attention at a time when many of the other natural and cultural wonders of the West were withdrawn as federal reserves. Instead, the area was homesteaded, and most of the land in the heart of the City of Rocks passed into private ownership.

Generations of Cassia County residents have made their living here and found recreation and inspiration in the great wealth of the area's natural and historic resources. Local traditions run deep at City of Rocks, and local residents are strongly tied to this place. Increasingly, people from outside the region, most notably sightseers but also rockclimbers and other recreationists, have discovered the area.

Concerns about growing use of the area prompted local residents to support efforts to designate City of Rocks as a national reserve, a national historic landmark, and a national natural landmark, and the area was added to the national park system in 1988.

Congress recognized, in establishing the reserve, that local interest in this area and its traditional use was strong, and it specified that though the area was to remain a unit of the national park system, the reserve should ultimately be turned over to the state or an appropriate local governing body for management. Congress also indicated, through the type of zoning it specified, that some private use would continue within the reserve in accordance with a comprehensive plan developed in cooperation with state and federal agencies, local units of government, and local residents.
The overriding issue to be resolved by this comprehensive management plan for the reserve is finding a balance between historic and natural resource preservation, public education and recreation, and private use within a relatively small geographic area where significant values overlap and the potential for competing interests is great. Successful implementation of the plan will require the cooperative efforts of the National Park Service, the Idaho Department of Parks and Recreation, Cassia County, and private landowners. Unlike most units of the national park system, this federal reserve will not, in all probability, be directly managed by the National Park Service. Instead, it is proposed that the reserve be managed by the Idaho Department of Parks and Recreation in cooperation with the National Park Service. Because a portion of the national reserve will remain in private ownership, county zoning will play a critical role in ensuring that the reserve achieves its intended purpose.

During the course of developing the draft plan, a number of alternatives were developed, reviewed by the federal, state, and county governments and the general public, and revised to reflect a realistic range of management options. Two alternatives in addition to the proposal (alternative 2) were analyzed in detail. The no-action alternative (alternative 1) would continue to emphasize private and public recreational use, potentially to the detriment of exceptional cultural and natural values. Alternative 3 would emphasize the preservation and interpretation of the California Trail and the rock outcrops with less area devoted to preserving the historic rural setting (where traditional ranching occurs) and the exclusion of some recreational uses.

THE PLAN
( ALTERNATIVE 2)

Description

The final comprehensive management plan recognizes the three principal resource values of the reserve as the California Trail, the exceptional rock outcrops and the habitats associated with them, and the historic rural setting reminiscent of the American West. Recognition of these important values and the need to provide recreational opportunities and facilities for visitors provided a framework for developing the principal components of the plan and for determining the management classifications for zoning throughout the reserve.

Regarding the California Trail, the plan proposes to preserve the major landmarks, trail remnants, and inscription rocks.

Visitors would be given the opportunity to walk the entire length of the California Trail within the reserve and to walk around within the entire Circle Creek encampment area. Minimal modern intrusions would be allowed in the foreground of the views from the California Trail to allow visitors to experience a landscape reminiscent of the historic trail period. The plan would also preserve the crescent-shaped rock outcrops and protect the raptor and bat habitats they provide. The crescent would be managed in ways that would protect the significant resource values. A potential loop tour would link sites outside the reserve.

Some of the reserve would remain in private ownership. Most of the private lands in the reserve, along with some public lands (primarily those outside the exceptional resource areas), would be managed to preserve and let visitors experience the remnants of historic farm and ranch buildings and the ongoing ranching activities, such as grazing and cattle drives, that characterized the historic rural setting of the reserve at the time of its establishment.

Opportunities for some types of recreational use would be expanded. Climbing, hiking, and camping would be supported in prime recreational areas, such as the southern arm of the rock crescent (including section 36) and the Indian Grove area.

Unlike most units of the national park system, hunting would be permitted within certain public areas of the reserve and within private lands where prior permission from the owner has been obtained.

Only those modest facilities essential to visitor enjoyment of resources, such as access roads, interpretive overlooks, parking pulloffs, trails, picnic sites, tent campsites, and comfort facilities, would be included inside the reserve. Reserve managers would work with federal and state government to replace or realign roads inside the reserve. A visitor center and developed campground, employee housing, and all administrative and maintenance functions would be placed outside the east boundary near the Almo junction on existing public land.

In cooperation with the local community, air, water, biological, geological, and scenic resources would be maintained at the highest quality possible, using a resource management plan to guide management of these resources.
Generally, the plan would promote conservation of natural and cultural resources and provide for public education and recreation and private livestock grazing.

Historic sites and structures and a small number of archeological sites related to the California Trail and other periods of the reserve's history would be stabilized and preserved. Some historic sites and structures would be interpreted. Continued deterioration or damage to other archeological sites caused by vandalism, collecting, or construction activities would create losses that are irreversible. Modern developments and incompatible activities in the historic views from the California Trail and the reserve's historic rural setting would be reduced and would be managed to minimize the potential for future intrusions.

The proposed action would have generally beneficial effects on the reserve's biological and physical resources. Natural quiet in the reserve would be protected by prohibiting the use of motorized equipment, motor vehicles, or sound devices outside the development zone. Discharge of fire arms during hunting season would be excepted. Sensitive cliff-dwelling species, including two candidate species, rock formations, and associated vegetation and soils in the reserve would benefit from a climbing management program emphasizing the protection of resources. Soil, vegetation, wildlife habitat, rare plants, and fragile wetlands and riparian areas would benefit from phasing out grazing on certain lands within the reserve identified through a grazing management program directed at protecting resources. Wetlands and riparian areas would benefit from actions described in appendix J. However, domestic livestock grazing and water uses would adversely affect up to 244 acres of wetlands and riparian habitat, but to a lesser extent than they do now. Proposed grazing use and development would be mitigated where necessary to protect floodplains and wetlands. The fire management plan might contain provisions to allow natural fires to burn, which would help ensure habitat diversity. Disturbance from proposed development within the reserve combined with the restoration of disturbance from dispersed campsites, roads, and trails would result in a net loss of about 24 acres of vegetation. Outside the reserve an estimated 77 acres would be disturbed by development of facilities.

Protection of the reserve's air quality and visibility would be enhanced through the redesignation of the reserve as a class I air quality area. Such action must be requested by the state and must include a public involvement process. Site design and visitor management would help to protect and enhance scenic quality along the rim. In addition, new access points to see views would be provided, and developed areas would be compatible with the historic rural setting.

Visitors would have the opportunity to understand and appreciate the California Trail and the full historic continuum, free of conflicting development. Some rock formations would be closed to climbing. Opportunities for camping on lands inside and outside the reserve would be provided in designated areas.

Closing 283 acres to grazing on public land and reducing the total number of AUMs as permittees vacate allotments would have adverse economic impacts on ranchers/permittees. Affected private landowners would be compensated with the fair market value of their property. The local economy would be adversely affected since grazing would be reduced, and related employment and expenditures would be diminished.

The character of the surrounding communities would continue to be altered through car, bus, and mountain bike use. Bus and tour traffic would increase during the week, and car traffic would be more prominent on the weekend. Potential private development in Almo and Oakley could also alter the character of the communities. Economic benefits to the communities from reserve visitor expenditures would likely remain the same as now. Cassia County and the surrounding area would possibly benefit because of federal and state expenditures for salaries, operating costs, and construction.

There would be no significant change in current management or visitor use. Reserve managers would take the minimum actions necessary to meet legislative requirements, to protect natural and cultural resources, and to address health and safety concerns, but few additional interpretive or recreational programs or facilities would be provided. Livestock grazing would continue on private and most of the public land.

Visitors would continue to participate in recreational opportunities (shown on the Existing Infrastructure and Public Use map) and experience the California Trail. They would be on their own to discover and learn about the reserve's resources, except for information provided at a ranger/administrative station outside the reserve and at two kiosks inside the reserve.

**ALTERNATIVE I: NO ACTION**

**Description**
Rock climbing and camping would be permitted in most areas, except for special natural and cultural features. Hunting would be allowed in the same areas as it is now, and permission from landowners should be obtained for recreational activities on private property.

Resources would be managed under the current programs of the National Park Service and Idaho Department of Parks and Recreation. Management of cultural resources would remain limited, and most significant resources would remain in private ownership.

The existing road network, parking areas, and picnic sites would be retained.

Environmental Consequences of No Action

<table>
<thead>
<tr>
<th>Description</th>
<th>Environmental Consequences of No Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slow deterioration of historic sites and structures and archeological sites related to the California Trail and the reserve’s historic rural setting would cause an irreversible loss of historic and archeological values.</td>
<td></td>
</tr>
<tr>
<td>The gradual intrusion of modern developments and incompatible activities into the historic views from the California Trail and the reserve’s historic rural setting would cause a long-term but theoretically reversible impact, although the investments in new development would make its removal unlikely in the foreseeable future.</td>
<td></td>
</tr>
<tr>
<td>Existing disturbance of soils, vegetation, and habitat for campsites, roads, trails, and private development would continue to cause a long-term loss.</td>
<td></td>
</tr>
<tr>
<td>Disturbance of 88 acres of soils, vegetation, and habitat for campsites, roads, trails, and private development would continue, causing a long-term but reversible effect. There would also be continuing degradation and reduced productivity of natural plant and animal communities caused by domestic livestock grazing and suppression of natural fire on 89 percent of the reserve, including 95 percent of the riparian and wetland areas. The productivity of damaged riparian areas and wetlands, damaged upland areas, and severely eroded areas would be substantially diminished indefinitely.</td>
<td></td>
</tr>
<tr>
<td>Air quality and the range of visibility would likely be adversely impacted. Scenic quality would be diminished, particularly the most outstanding landscape view and arrival views at the entrance.</td>
<td></td>
</tr>
<tr>
<td>Visitor understanding and appreciation of the California Trail and the historic continuum would be affected by a lack of preservation of and public access to many key resources and by competing recreational activities. Public lands for rockclimbing and other recreational activities, including tent and RV camping, would continue to be available. Minimal management of recreation would adversely affect natural and cultural resources. Power and audio devices would continue to be restricted under Cassia County ordinance. Conflicts between hunting and other visitor activities could be dangerous for some reserve users.</td>
<td></td>
</tr>
</tbody>
</table>

Public and private land for livestock grazing (12,215 acres) would continue to be available. However, the natural productivity of this land would continue to be decreased by loss of soils and invasions of woody species and nonnative plants.

The character of the surrounding communities would be most affected on weekends because of traffic and the resulting demand for parking and pedestrian/car conflicts. The economic benefits to the communities from reserve visitor expenditures would be expected to remain the same as now. Cassia County and the surrounding area would benefit from federal and state expenditures for salaries, operating costs, and construction.

Protection of the reserve’s exceptional cultural, natural, and scenic resources would be greatly enhanced. The California Trail story would be told through several types of interpretive programs, while allowing for reduced amounts of compatible recreational and private use.

Visitors would be accommodated by providing many access points along the California Trail and Salt Lake Alternate and presenting a variety of interpretive programs. As described under the proposal, a visitor center would be outside the reserve. Two roads would lead to interpretive overlooks and day use areas, and a potential loop tour route would link sites outside the reserve. The reserve would be a day use area.

A road would be developed outside the boundary around the south end of the reserve, and managers would work with federal and state governments to replace or realign roads inside the reserve. A maintenance area would be outside the reserve near the visitor center and administrative facility. No campsites and no recreational trails would be developed.

Resources would be managed in such a way that would return the area to a more natural setting. All
cultural resources unrelated to the California Trail would be inventoried and evaluated to determine appropriate treatment. Management would seek fee title to lands visible from the trail corridors, which would exclude grazing. Native grasslands would be restored, native species promoted, and, if suitable habitat could be maintained without creating problems with domestic livestock, reintroduction of native wildlife would be considered. Like the plan, reserve managers would try to maintain the highest degree of integrity of air, water, biological, geological, and scenic resources.

| Environmental Consequences of Alternative 3 | Historic sites and structures related to the California Trail, including the foreground and middle ground of the views seen from the trail, would be stabilized, preserved, and interpreted. While emphasis would be placed on California Trail resources, other properties eligible for the National Register of Historic Places would be identified, evaluated, and protected in accordance with a cultural resource management plan.

Modern developments and incompatible activities in the historic views from the California Trail would be eliminated, and management of these activities would minimize the potential for future intrusions.

An additional 21 acres of soils, vegetation, and habitat would be disturbed by increasing visitor use, new campsites, roads, and trails, and 28 acres of currently disturbed areas would be restored for a net restoration of 7 acres. The total area of land disturbance for facilities and roads outside the reserve would be 77 acres. Although in the long term these changes would be reversible and the natural biological productivity could return to the areas, it would be unlikely in the foreseeable future. Although most developed areas could be restored to previous conditions over time, the use of the land and financial resources to implement this alternative would, in the practical sense, be an irretrievable commitment of resources. In areas that were restored, the natural biological productivity would be expected to increase indefinitely.

Gradual recovery and restoration of natural productivity of natural plant and animal communities in most areas of the reserve, including most riparian and wetland areas, would occur as livestock grazing was phased out.

Visitors would have an excellent opportunity to understand and appreciate the California Trail without conflicts from competing activities and conflicting development. However, the availability of popular rockclimbing areas would be reduced, and all opportunities for camping on lands inside the reserve would be eliminated. Many rock formations would be protected from impacts caused by some climbing methods.

Grazing on public lands within the reserve would cease. A major reduction in the availability of private land for livestock grazing would occur because reserve managers would seek to acquire most of the land inside the reserve on an opportunity basis. The decrease in land inside the reserve available for grazing would result in a loss of cattle forage to local ranchers. The local economy could also be adversely affected by a reduction in agricultural-related employment and local expenditures.

The character of the surrounding communities would be affected by traffic, primarily on the weekend. In addition, demand for lodging would probably increase in Oakley.

The economic benefits to surrounding communities from visitor expenditures would likely remain the same as now. Cassia County and the surrounding area would benefit because of federal and state expenditures for salaries, operating costs, and construction.
# CONTENTS

## PART ONE: COMPREHENSIVE MANAGEMENT PLAN

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>PURPOSE OF AND NEED FOR THE PLAN</td>
<td>3</td>
</tr>
<tr>
<td>THE PLANNING PROCESS</td>
<td>7</td>
</tr>
<tr>
<td>MAJOR PLANNING CONSIDERATIONS</td>
<td>9</td>
</tr>
<tr>
<td>LEGISLATIVE MANDATE</td>
<td>9</td>
</tr>
<tr>
<td>MANAGEMENT OBJECTIVES</td>
<td>14</td>
</tr>
<tr>
<td>MANAGEMENT AUTHORITIES AND RESPONSIBILITIES</td>
<td>17</td>
</tr>
<tr>
<td>AUTHORITIES PROVIDED BY CURRENT LEGISLATION</td>
<td>17</td>
</tr>
<tr>
<td>AUTHORITIES REQUIRING ADDITIONAL LEGISLATION</td>
<td>19</td>
</tr>
<tr>
<td>MANAGEMENT ZONING</td>
<td>20</td>
</tr>
<tr>
<td>BASIS FOR ZONING</td>
<td>20</td>
</tr>
<tr>
<td>IDENTIFICATION OF RESOURCE VALUES</td>
<td>20</td>
</tr>
<tr>
<td>IDENTIFICATION OF TRADITIONAL AND CONTEMPORARY PUBLIC AND PRIVATE USES</td>
<td>25</td>
</tr>
<tr>
<td>MANAGEMENT ZONES</td>
<td>30</td>
</tr>
<tr>
<td>HISTORIC AND NATURAL PRESERVATION ZONE</td>
<td>30</td>
</tr>
<tr>
<td>California Trail Subzone</td>
<td>30</td>
</tr>
<tr>
<td>Natural Area Subzone</td>
<td>31</td>
</tr>
<tr>
<td>HISTORIC RURAL SETTING SUBZONE</td>
<td>31</td>
</tr>
<tr>
<td>PUBLIC USE AND DEVELOPMENT ZONE</td>
<td>34</td>
</tr>
<tr>
<td>LAND PROTECTION INSIDE THE RESERVE BOUNDARY</td>
<td>34</td>
</tr>
<tr>
<td>AREAS OF SPECIAL CONCERN OUTSIDE THE RESERVE</td>
<td>35</td>
</tr>
<tr>
<td>RESOURCE MANAGEMENT</td>
<td>38</td>
</tr>
<tr>
<td>CULTURAL RESOURCES</td>
<td>38</td>
</tr>
<tr>
<td>California Trail/Salt Lake Alternate</td>
<td>38</td>
</tr>
<tr>
<td>Historic Rural Setting</td>
<td>38</td>
</tr>
<tr>
<td>Archeological Sites</td>
<td>39</td>
</tr>
<tr>
<td>Museum Collection</td>
<td>40</td>
</tr>
<tr>
<td>Additional Planning Requirements</td>
<td>40</td>
</tr>
<tr>
<td>NATURAL RESOURCES</td>
<td>41</td>
</tr>
<tr>
<td>Air Quality</td>
<td>41</td>
</tr>
<tr>
<td>Geological Resources</td>
<td>41</td>
</tr>
<tr>
<td>Water Resources, Water Rights, Wetlands, and Floodplains</td>
<td>42</td>
</tr>
<tr>
<td>Vegetation and Soils</td>
<td>42</td>
</tr>
<tr>
<td>Nonnative Plant Species</td>
<td>42</td>
</tr>
<tr>
<td>Wildlife Management</td>
<td>42</td>
</tr>
<tr>
<td>Rare/Threatened/Endangered/Sensitive Species</td>
<td>43</td>
</tr>
<tr>
<td>Scenic Quality</td>
<td>43</td>
</tr>
<tr>
<td>Management of Natural Resource Uses</td>
<td>44</td>
</tr>
<tr>
<td>VISITOR USE</td>
<td>46</td>
</tr>
<tr>
<td>INTERPRETATION</td>
<td>46</td>
</tr>
<tr>
<td>Interpretive Themes</td>
<td>46</td>
</tr>
<tr>
<td>Orientation/Information</td>
<td>47</td>
</tr>
</tbody>
</table>
CONTENTS

East-West Road 47
Interpretive Trails 48
Regional Loop Tour 49

RECREATION 49
Camping 49
Climbing 51
Hiking and Horseback Riding 52
Picnicking 52
Driving for Pleasure 52
Hunting 52

GENERAL DEVELOPMENT 53

FACILITIES INSIDE THE RESERVE 53
Roads 53
Trails 53
Campgrounds 55
Backcountry 55
Signs 55

FACILITIES OUTSIDE THE RESERVE 55
Headquarters Site 57
Emery Canyon and Moulton Entrances 58
Utilities for Headquarters Site 58
Developed Campground 58
Signs 60
Housing 60

CARRYING CAPACITY 60

PART TWO: DRAFT ENVIRONMENTAL IMPACT STATEMENT

STAFFING AND OPERATING COSTS 64

ADMINISTRATION AND MAINTENANCE 65

ENVIRONMENTAL ISSUES 69

CULTURAL RESOURCES 69
Preservation of National Historic Landmark Values: The California Trail 69
Preservation of the Historic Rural Setting 69
Protection of Archeological Resources 70

NATURAL RESOURCES 70
Air Quality 70
Geological Resources 70
Water Resources and Water Rights 70
Wildlife Management 70
Threatened, Endangered, and Sensitive Species 71
Domestic Livestock Grazing 71

VISITOR USE 71
Interpretive/Educational Opportunities 71
Recreation 71
Public Access and Accessibility 72

LOCAL COMMUNITIES AND ECONOMY 72
Character of Surrounding Communities 72
Private Landowners and Livestock Grazing Permittees 72
Economic Conditions 72
ALTERNATIVES, INCLUDING THE PROPOSED ACTION

INTRODUCTION 75
ZONING FOR ALTERNATIVES 1 AND 3 75
    Preservation and Public Education Zone 75
    Recreation Zone 76
    Development Zone 76
ZONING FOR ALTERNATIVE 2 76
    Historic and Natural Preservation Zone 76
    Historic Rural Setting Zone 77
    Public Use and Development Zone 77

ALTERNATIVE 1: NO ACTION 79
    CONCEPT 79
    MANAGEMENT ZONING 79
    VISITOR USE 79
    RESOURCE MANAGEMENT 79
    DEVELOPMENT 79

ALTERNATIVE 2: HISTORIC CONTINUUM (PROPOSAL) 83
    CONCEPT 83
    MANAGEMENT ZONING 83
        Historic and Natural Preservation Zone 83
        Historic Rural Setting Zone 83
        Public Use and Development Zone 86
    COUNTY ZONING 86
    VISITOR USE 86
    RESOURCE MANAGEMENT 87
    DEVELOPMENT 87

ALTERNATIVE 3: CALIFORNIA TRAIL EMPHASIS 88
    CONCEPT 88
    MANAGEMENT ZONING 88
        Preservation and Public Education Zone 88
        Development Zone 89
    COUNTY ZONING 89
    VISITOR USE 89
    RESOURCE MANAGEMENT 89
    DEVELOPMENT 92

ALTERNATIVES CONSIDERED, BUT REJECTED 93

AFFECTED ENVIRONMENT

CULTURAL/VISUAL ENVIRONMENT 101
    OVERVIEW 101
        Prehistory 101
        History 101
    NATIONAL HISTORIC LANDMARK 104
    OTHER HISTORIC RESOURCES 105
    ARCHEOLOGICAL RESOURCES 106
    ETHNOGRAPHIC RESOURCES 108

NATURAL/VISUAL ENVIRONMENT 109
    CLIMATE 109
Camping 127
Utilities 128
Dams 128
Hazardous Waste 128
Mineral Development 128

ENVIRONMENTAL CONSEQUENCES

OVERVIEW OF MAJOR IMPACTS 131
ALTERNATIVE 1 (NO ACTION) 131
ALTERNATIVE 2 (PROPOSAL) 132
ALTERNATIVE 3 (CALIFORNIA TRAIL EMPHASIS) 133

IMPACTS ON THE CULTURAL/VISUAL ENVIRONMENT 134
HISTORIC RESOURCES 134
National Historic Landmark Values: The California Trail 134
Historic Rural Setting 136
ARCHAEOLOGICAL RESOURCES 137
Archeological Site Disturbance 137
COLLECTIONS 138

IMPACTS ON THE NATURAL/VISUAL ENVIRONMENT 139
INTRODUCTION 139
Topics Addressed in this Statement 139
Topics Dismissed from Further Consideration 139
NATURAL QUIET 139
ROCK FORMATIONS 140
NATURAL BIOLOGICAL DIVERSITY 141
SPECIES OF SPECIAL CONCERN 143
Raptors 143
Rocky Mountain Mule Deer 144
Bats 145
RARE AND SENSITIVE PLANTS 146
WETLANDS, RIPARIAN AREAS, AND FLOODPLAINS 146
AIR RESOURCES 149
SCENIC QUALITY 150

IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT 153
VISITORS 153
Interpretive/Educational Opportunities 153
Recreational Opportunities 154
PUBLIC SAFETY AND ACCESSIBILITY 156
Hunting Hazards 156
Accessibility 156
PRIVATE LANDOWNERS AND LIVESTOCK GRAZING PERMITTEES 157
LOCAL COMMUNITIES AND ECONOMY 159
Character of Surrounding Communities 159
Local Economy 161

PREPARERS, CONTRIBUTORS, AND CONSULTANTS 167

CONSULTATION AND COORDINATION 169

PUBLIC REVIEW OF THE DRAFT COMPREHENSIVE MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT 173
CONTENTS

APPENDIXES/BIBLIOGRAPHY

APPENDIX A: LEGISLATION  333
APPENDIX B: CONSULTATION WITH THE U.S. FISH AND WILDLIFE SERVICE  341
APPENDIX C: RARE OR SENSITIVE SPECIES IN OR NEAR CITY OF ROCKS NATIONAL RESERVE  341
APPENDIX D: SITE DESIGN CONSIDERATION  342
APPENDIX E: PROPOSED DEVELOPMENT AND ESTIMATED OPERATING COSTS  347
APPENDIX F: ACTION PLANS AND RESOURCE STUDIES CALLED FOR IN COMPREHENSIVE MANAGEMENT PLAN  359
APPENDIX G: CASSIA COUNTY ZONING PERTAINING TO RESERVE  360
APPENDIX H: SECTION 106 COMPLIANCE REQUIREMENTS  362
APPENDIX I: CHANGES IN THE PROPOSAL (ALTERNATIVE 2) SINCE THE DRAFT PLAN  364
APPENDIX J: STATEMENT OF FINDINGS FOR WETLANDS  374

BIBLIOGRAPHY  379
INDEX  385

MAPS

Region 4
Vicinity 5
Key Features 10
Resource Values 22
Existing Ownership/Grazing Ranching Use 26
Existing Infrastructure and Public Use 28
Management Zoning 32
Areas of Special Concern 36
Regional Loop Tour 50
Development Concept Plan Overview 56
Development Concept Plan / Visitor Center / Administrative Headquarters 56
Development Concept Plan / Developed Campground 58
Alternative 1 80
Alternative 2 84
Alternative 3 90
California Trail Viewshed 106
Vegetation 112
Scenic Viewpoints and Viewsheds 118

TABLES

1: Day Use Activity Areas Accessible by Car 54
2: Summary Comparison of Development, Alternatives 1-3 94
3: Temperature Data, Oakley 109
4: 1987-1994 Visitation 121
5: 1990-1991 Visitation 121
6: 1987 Percent of Visitors Participating in Activities 121
8: Private Allotments and Approximate AUMs in the Reserve 126
9: Riparian and Wetlands Affected By Domestic Livestock Grazing 147
10 Accessibility of Popular Climbing Rocks for Alternatives 1-3 154
11 Allotments, AUMS, and Federal and Private Range in the Reserve by Alternative 158
12: Summary of Impacts 164
PREFACE

We encamped at the City of the rocks, a noted place from the granite rocks rising abruptly out of the ground. They are in a romantic valley clustered together which gives them the appearance of a city, a dismantled, rock-built city of the Stone Age.

— James Wilkins, 1849

City of Rocks was an important milestone on the emigrant trails west. To trail users of the 1850s, it was a haven from the harsh heat and winds of the American West. The scenery inspired poetry and elaborate writings. It was a place to celebrate the end to the tedious emigrant trails west. To trail users of the City of Rocks, it was a haven from the harsh heat and winds of the Great Plains. It was a moment for respite, a place to pause, regroup, and relax. For a brief stay, all was well.

For centuries Native Americans and their ancestors used the City of Rocks area for a wide variety of resources, including the pinion tree. In 1826 Peter Skene Ogden and his beaver trappers were the first non-Indians to see the City of Rocks. For 40 years, between 1843 and 1883, City of Rocks was a landmark for emigrants and other travelers on their way to California and Oregon, and, later, the gold fields of southern Idaho. By the 1870s cattlemen and farmers began to settle the City of Rocks area, and ranching continues today.

City of Rocks, world renowned for its geologic features, includes some of the oldest rock in North America. Some believe the rock is 2.5 billion years old, the oldest in the western half of the continent. Erosion created this landscape of domes, spires, and hogbacks. The granites of the City of Rocks, created from molten rock deep within the earth's surface, were intruded up through older granite. As time passed, the overlying rock was cracked, fractured, and eroded, leaving "the City" as seen today.

City of Rocks is still a haven from the harsh heat and winds of the Great Plains. It is still a scenic wonder. It still inspires verse and celebration of people ambling along the cherished route of our forefathers. But now a retreat must be found away from the strain of everyday life.

Trail users had to search for shelter along a horizon line, setting a course to the best guess for finding a place to spend the night. Today's visitors arrive to find neatly organized historic settlements to welcome them — settlements worthy of their own place in the scenic quality of the visitor experience, towns built of local brick by sophisticated craftsmen at a time in western history when logs were the style of the day, towns built with the confidence of permanence rooted in a strong abiding faith.

Today, City of Rocks is internationally known for the greatest number and variety of 5.13 and better climbs in the United States. Climbers, including many from overseas, come here expressly to climb Rabbit Rock, Morning Glory Spires, or the Breadloaves.

Along with climbing, hiking, and other activities, the "Silent" City of rocks is enjoyed for its namesake—silence. Here, one can come, sit, listen to the wind, embrace this magnificent landscape, and contemplate what this place may have meant to those California Trail pioneers more than a century ago. The City of Rocks is a place of both history and timeless beauty.

Even as one travels outside the reserve, through the region's scenic ranchlands, communities, and distant forested mountain slopes of southern Idaho, all become part of a visit to the City of Rocks. Ranch hands trailing, cattle, blue skies, friendly people, and small quiet towns are all part of the experience.

As a part of that region, they find the towns of Almo, Declo, Malta, Albion, and Oakley — towns where the pace is still pedestrian and wide streets and building arrangements are ordered by a definite religious planning style. These are places where the general store is the community center, fields and pastures surround small settlements, and folks tend to be informal and friendly.

City of Rocks legislation calls this the historic rural setting. It asks for the reserve's recognition and protection. While the plan defines pros and cons of a national/state/county area partnership, it has been left to the county and the citizens to acknowledge the value of the visual integrity of their way of
living. As government infrastructure and visitor services try to fit into these places, it is important to stay close to the beauty. And it is important for the National Park Service, the Idaho Department of Parks and Recreation, Cassia County, and the residents to remind each other of this beauty.

As John Muir noted, "nothing dollarable is safe." Applying this piece of wisdom to the preservation of City of Rocks, public uses must be accommodated within a context that provides for the enjoyment of the area while preserving the integrity of its resources. An experience for visitors, the staff, and local residents must therefore be created that still allows the unique heritage and spirit of this magnificent area to shine through.

The City of Rocks is now part of the national park system, established by Congress in 1988 as one of the nation's four national reserves. By its establishment, Congress recognized the character of this place — its history, scenery, and natural wonders — long forgotten and hidden from all but the local resident, history buff, and rockclimber.

Congress' recognition and establishment of City of Rocks National Reserve mandates cooperative protection, preservation, and management of this special place. Cooperative efforts between local citizens, Cassia County, the state of Idaho, and the National Park Service will be the partnerships that ensure preservation of the historic and natural resources, protection of the area's scenic qualities, and wise management of its use. This comprehensive management plan defines and presents the proposed strategies for the protection, preservation, and management of these values.

Cognizant of the need to protect the values of this special place and the opportunities presented by the cooperative spirit evidenced by each of the participants, the preparation of the City of Rocks Comprehensive Management Plan becomes the vehicle by which the common goals for the future of the national reserve may be realized. The vision of the future for the City of Rocks is therefore forward-looking, yet grounded in the past. The challenge is to provide for the long-term protection of the City of Rocks, while providing for the use and enjoyment by future generations of Americans.
PURPOSE OF AND NEED FOR THE PLAN

City of Rocks, an extraordinary encirclement of granite rising out of the gently rolling sagebrush country in south-central Idaho, has attracted and intrigued people since they first entered this region. Native Americans camped here, as did the emigrants traveling along the California Trail/Applegate Trail, and they and the settlers who followed have overlaid a rich human history onto this dramatic natural backdrop. For all the area's significant natural and cultural values (it is a national historic landmark, a national natural landmark, and it contains segments of the California National Historic Trail), it did not receive national attention at a time when many of the other natural and cultural wonders of the West were withdrawn as federal reserves. Instead, the area was homesteaded, and most of the land in the heart of the City of Rocks passed into private ownership. Generations of Cassia County residents have made their living here and found recreation and inspiration in the great wealth of the area's natural and historic resources. Local traditions run deep at City of Rocks, and local residents are strongly tied to this place. Increasingly, recreationists from outside the region, including sightseers and rockclimbers, are also discovering the area.

Concerns about growing tourism prompted local residents and the preservation community, after many years of reluctance, to support efforts to designate City of Rocks as a national reserve, and the area was added to the national park system in 1988 (see the Region and Vicinity maps).

Congress recognized, in establishing the reserve, that local interest in this area and its traditional use was strong, and it specified that the reserve should ultimately be transferred to the state or an appropriate local governing body for management. Congress also indicated, through the type of zoning specified, that some private use should continue within the reserve (see appendix A).

The overriding issue to be resolved by this draft comprehensive management plan is finding a balance between historic and natural resource preservation, public education and recreation, and private use within a relatively small geographic area where significant values overlap and the potential for competing interests is great. Successful implementation of the plan will require the cooperative efforts of the National Park Service, the Idaho Department of Parks and Recreation, Cassia County, and private landowners.

The tension created by the overlapping values of the reserve challenges planning to find a common ground and to emphasize the ways in which various uses can be mutually supportive rather than focusing on potential conflicts. The plan addresses resource management, visitor use, and reserve operations from this point of view. Some major planning issues are raised by this perspective. One is how broadly to define the significant resources of the reserve. Although a good case can be made for considering the reserve's historic rural setting (and the ranching operations that characterize it) as a significant resource value warranting long-term preservation and interpretation, another case can be made for defining significance more closely in line with sound preservation principles. Under alternative 2, the first approach recognizes that the prehistory and history of the City of Rocks region is a continuum in which the California Trail is a pivotal event. It marked the demise of the traditional hunting and gathering society of the Native American groups who used the area prehistorically and foreshadowed the agricultural and ranching economy that now shapes the landscape. Under the latter traditional approach, the reserve could be limited to the national historic landmark and California National Historic Trail values of the California Trail and the national natural landmark values of the rock outcrops. These two approaches provide different premises for the two alternatives considered during the course of the planning process.

A closely related issue is the degree to which the traditional land use of livestock grazing can or should be accommodated in the reserve. Grazing is not addressed expressly in the establishing legislation; however, the act states that there will be local private use, and the legislative history indicates that Congress expected that one of the private uses would be grazing.

Although livestock grazing is prohibited by policy in most units of the national park system, it might be permitted if it is necessary to maintain the historic scene. Consequently the issue of livestock grazing is closely tied to a determination of the significance of the reserve's historic rural setting and the elements contributing to that setting.
TO TWIN FALLS (34 MILES)

TO POCATELLO AND FT. HALL (62 MILES)

NOTE: PLEASE SEE KEY FEATURES MAP FOR SPECIFIC BOUNDARIES

U.S. INTERSTATE HIGHWAY
PAVED STATE OR COUNTY ROAD
MAINTAINED GRAVEL ROAD

TO SALT LAKE CITY (105 MILES)
Another issue is technical rockclimbing in an area where the rock outcrops have significant historic and geologic values. The National Park Service supports technical rockclimbing as a legitimate recreational activity in units of the national park system; however, it recognizes that increasing impacts from the growth of certain climbing activities require that these activities be managed to protect significant resource values. Planning for the national reserve addresses management strategies that would manage compatible recreational use while protecting the geological, historical, archeological, and scenic values of the rocks, the historic rock inscriptions, and the habitats of species of special concern.

This Final Comprehensive Management Plan/Development Concept Plan/Environmental Impact Statement presents the proposal and two alternatives for the management of City of Rocks National Reserve. It also analyzes the environmental consequences of implementing the proposal and alternatives. Part one is the plan. Part two contains the issues surrounding the reserve, a description of the affected environment, the alternatives considered in determining a proposal for management of the reserve, and the environmental impacts of each of the alternatives.

In this document, the terms cultural resources, historic resources, and archeological resources are all used to refer to historic properties as defined under the National Historic Preservation Act.
THE PLANNING PROCESS

The purpose of the comprehensive management plan for City of Rocks National Reserve is to guide cultural and natural resource management, visitor use, and general development for the next 15 years. This is the first plan for the reserve, which was authorized by legislation in 1988.

When Congress established the reserve it directed the National Park Service, in cooperation with appropriate state and federal agencies, local units of government, and local residents, to formulate a comprehensive plan for the protection, preservation, and interpretation of the reserve. To carry out this direction from Congress, a planning team was formed with eight members from the National Park Service, two from the Idaho Department of Parks and Recreation, and four residents of Cassia County, Idaho. The team consulted with numerous other public agencies, private organizations, and the general public (see the "Consultation and Coordination" section in part two of this document).

The formulation of a comprehensive plan for City of Rocks is being accomplished in three basic steps. The plan is now in step three. Each step is described briefly below:

**Step One—Gather Information:**
Considerable information has been gathered over the past few years. Historians, natural scientists, and landscape architects have surveyed the cultural, natural, and scenic resources of the reserve. Public ideas and concerns about how the reserve should be managed have been gathered at nine public meetings in eight different communities in southern Idaho and northern Utah and through two newsletters asking for public comment.

**Step Two—Consider the Possibilities:**
Based on ideas presented by the public and on professional assessments, the planning team identified the feasible range of possibilities for management and use of the reserve and developed alternative plans representing the different possibilities. The draft alternatives were presented for public review and comment in a workbook published in August 1991. Following that review the alternatives were revised into the three alternatives that were more rigorously assessed in the draft plan. (See part two of the document, "Environmental Impact Statement," for the documentation of that assessment.)

**Step Three—Select and Refine a Proposal:**
After considering the public comments and recommendations of their planning and management staffs, the regional director of the Pacific Northwest Region of the National Park Service and the director of the Idaho Department of Parks and Recreation agreed upon a draft plan proposal for how the National Park Service, the Idaho Department of Parks and Recreation, and Cassia County anticipated managing the reserve. This proposal and the alternatives were presented for public review in the draft comprehensive management plan and draft environmental impact statement. The draft plan focuses on the proposal for managing the reserve. The draft environmental impact statement presents an analysis of the impacts of the draft plan (proposal) and compares them to the impacts of the other feasible alternatives. The public has had an opportunity to review and comment on both the draft plan and the draft impact statement. Following that review this final plan and final environmental impact statement were prepared. Representative letters are printed along with agency responses in Part II of this document in the "Consultation and Coordination, Comments and Response" section.

Following approval, implementation of the plan will occur. This will include resource surveys, natural and cultural resource studies, compliance actions, development of design guidelines, preparation of action plans, design and construction of proposed facilities, resource management actions, and the transfer of site management of City of Rocks to the state of Idaho. The plan will be implemented as funding permits.

The following excerpt from the City of Rocks enabling legislation guided the development of the "Major Planning Considerations" section of the plan.
TITLE II—CITY OF ROCKS NATIONAL RESERVE

ESTABLISHMENT OF CITY OF ROCKS NATIONAL RESERVE

Sec. 201. (a) There is hereby established the City of Rocks National Reserve (hereinafter referred to as the "reserve"), in order 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.

PLAN AND MANAGEMENT OF RESERVE

Sec. 202. (a) To achieve the purpose of this title, the Secretary, acting through the National Park Service, in cooperation with appropriate State and Federal agencies, local units of government and local residents shall formulate a comprehensive plan for the protection, preservation, and interpretation of the reserve. The plan shall identify those areas or zones within the reserve which would most appropriately be devoted to—

(1) public use and development;
(2) historic and natural preservation; and
(3) private use subject to appropriate local ordinances designed to protect the historic rural setting.

(c) At such time as the State or appropriate units of local government having jurisdiction over land use within the reserve have enacted ordinances or established regulations which in the judgment of the Secretary will protect and preserve the historic and natural features of the area in accordance with the comprehensive plan, the Secretary shall, pursuant to cooperative agreement—

(1) transfer management and administration over all or any part of the property acquired under subsection (d) of this section to the State or appropriate units of local government;
(2) provide technical assistance to such State or units of local government in the management, protection, and interpretation of the reserve; and
(3) make periodic grants, which shall be supplemental to any other funds to which the grantee may be entitled under any other provision of law, to such State or local unit of government to carry out the purposes of this title.

(d)(1) The Secretary is authorized to acquire such lands and interests as he determines are necessary to accomplish the purposes of this title by donation, purchase with donated funds, or appropriated funds, or exchange, except that the Secretary may not acquire the fee simple title to any land without the consent of the owner. The Secretary shall, in addition, give prompt and careful consideration to any offer made by an individual owning property within the reserve to sell such property, if such individual notifies the Secretary that the continued ownership of such property is causing, or would result in, undue hardship.
MAJOR PLANNING CONSIDERATIONS

LEGISLATIVE MANDATE

The following definitions of City of Rocks provide a framework for determining what is important in making planning decisions for the reserve. Each of these definitions is an extension of the legislation establishing the reserve and its designation as a national historic landmark, national natural landmark, and the California Trail within the reserve as a national historic trail.

**City of Rocks is a unit of the national park system.**

The legislation that created City of Rocks National Reserve specifies that the area is to be administered subject to the provisions of the organic act for the National Park Service. The organic act specifies that units of the national park system are "to conserve the scenery and the natural and historic objects and the wildlife therein" and "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." This means that conservation of resources is of primary importance and that visitor use, although also important, must not degrade the scenic, historic, and natural values of the area (see Key Features map).

**City of Rocks is a national reserve.**

City of Rocks is one of four national reserves in the United States and one of two that are units of the national park system. The other is Ebey's Landing National Historical Reserve on Whidbey Island, Washington. Two other reserves are listed as affiliated areas of the national park system. A reserve is an area that is managed cooperatively by the federal government through the National Park Service and one or more nonfederal entities. Each reserve is inherently different, and each law designating a reserve reflects its individual values and purposes. How this reserve will be cooperatively managed has been further defined by this comprehensive management planning process. The legislation establishing City of Rocks National Reserve provides for transfer of management to a unit of local government. In this case, management will be turned over to the Idaho Department of Parks and Recreation with continued help from the National Park Service.

City of Rocks National Reserve has several potentially competing purposes based on its great variety of important resource values.

As indicated by Congress and further defined by the planning team, the purposes of City of Rocks are to

- preserve, protect, and interpret
  - the City of Rocks, a major landmark and principal stopping place along the California Trail
  - the trail segments and rock inscriptions associated with the California Trail
  - the scenery, mystery, and silence of the landscape
  - the historic sites and current ranching activities that contribute to a historic western rural setting
  - archeological sites and traditional cultural properties
  - the natural ecosystem that supports the species of particular interest and that forms the context for the reserve's cultural values
- manage recreation to ensure preservation and protection of resource values

**City of Rocks is a national historic landmark.**

In 1964 City of Rocks was designated a national historic landmark — one of our country's most significant cultural resources. It received this designation because of its relationship to the California Trail and the history of American westward migration during the mid 1800s. Situated on the approach to the best mountain pass between Fort Hall and the Humboldt River basin, this area of grass-covered valleys ringed by spectacular granite monoliths became a major landmark and principal stopping place along the California Trail and the Salt Lake Alternate. Many of the emigrants traveling through the area recorded their impressions of the intriguing granite outcrops. One such emigrant, passing through in 1849, identified the assemblage as "the City of Rocks." The name gained acceptance,
IMPORTANT FEATURES

SILENT CITY OF ROCKS
CALIFORNIA TRAIL
SALT LAKE ALTERNATE TRAIL
GRAVEL ROAD
PAVED ROAD
STEEP SLOPE
NATIONAL RESERVE BOUNDARY
NATIONAL NATURAL LANDMARK BOUNDARY
NATIONAL HISTORIC LANDMARK BOUNDARY

KEY ROCKS
1 BREADLOAVES
2 BATH
3 TURTLE
4 REGISTER
5 TREASURE
6 CAMP
7 ELEPHANT
8 TWIN SISTERS
9 CASTLE
10 PARKING LOT

KEY AREAS
A INSCRIPTION ROCKS CULTURAL AREA
B NICHOLSON RANCH HOUSE
C CIRCLE CREEK BASIN/TRAIL ENCAMPMENT AREA
D TWIN SISTERS RIDGE
E PINNACLE PASS
F STAGE STOP CULTURAL AREA
G GRANITE PASS
H INDIAN GROVE
I GRAHAM CREEK DRAINAGE
J TWIN SISTERS BASIN

The story of the California Trail is an important but relatively brief part of the history of City of Rocks. People have inhabited the area for thousands of years. By the early 1800s Shoshone and other Native American groups ranged over a broad territory that included City of Rocks. The area was first visited by white fur hunters in 1826. It was poor fur-bearer habitat and proved more valuable as a practical travel corridor when the mountain men turned to laying out the early transcontinental wagon routes about 15 years later. Most of the pioneer families bound for California and virtually all of the 49ers who traveled overland to the California gold fields, and many Oregon-bound emigrants who followed the Applegate Trail used this route. The use peaked in 1852, when some 52,000 people passed over the California Trail. The overgrazing of lands along the trail and the depletion of game by the emigrants eventually led to conflicts with the Native Americans, who by the late 1860s were forced to resettle on the reservations.

Following the completion of the transcontinental railroad in 1869, a road was developed from Kelton, Utah, to Boise, Idaho, to provide a connection for postal service, express, and freight operations between the railroad and the burgeoning mining communities of southern Idaho. A stage station near the junction of the old California Trail and Salt Lake Alternate served the thriving Boise-Kelton traffic until 1882 when the Oregon Short Line Railroad took the place of the road.

Responding in part to the growing market for meat by the expanding Idaho mining communities, cattle ranching began in the City of Rocks vicinity in the
early 1870s. From the late 1870s to the early 1890s Mormon settlements also began to dot the valleys adjacent to City of Rocks. Dry farming methods coupled with increasing precipitation after about 1890 allowed successful crop planting in City of Rocks up until the 1920s. Sagebrush was cleared, lands were fenced, and grain and hay crops were planted. During this period the existing road was built across City of Rocks from Almo to Moulton. In the 1920s more arid conditions and the severe agricultural depression that followed World War I caused a retrenchment of dry farming operations, and previous farm holdings at City of Rocks were consolidated back into stock ranches. Few farm or ranch buildings still stand in the reserve, but several structures or parts of structures have survived, along with many of the cattle trailing routes, passes, water sources, grasslands and pastures, and basins that are an important part of the memories passed down through the farming and ranching families who lived there. This historic rural setting is an important and increasingly rare remnant of the American West.

The unique landscape at City of Rocks is an important part of the historic scene and has outstanding scenic quality.

To modern-day visitors traveling along the California Trail through City of Rocks the landscape still looks and feels much the same as it did to the emigrants. The ability to recapture this experience without modern intrusions is one of the most important resources of the reserve. The first major impression is one of enclosure. The vistas here are different from the vistas on the surrounding plains; they are defined by the encircling rocks that alternately close in and open up, adding great variety to the scenery. The Circle Creek basin, where many of the emigrants camped, is still an open, expansive valley with a flowing creek, ringed by towering rock formations and offering a sense of security and comfort to plains-weary travelers. The Silent City of Rocks, the crescent shaped canyon at the heart of the outcrop, still retains a quality of mystery and an impressive silence that has awed people for centuries. The Twin Sisters, which have been known by various names, still appear on the horizon at a point just past the inscription rocks, guiding anyone who will follow them across the next open valley to Pinnacle Pass.

Although the physical landscape remains much the same as it was historically, the present plant and animal communities are considerably different from those seen by the first emigrants — a combination

of historic and modern uses has resulted in successional shifts toward a dominance of sagebrush, piñon pine, juniper, and nonnative plants; riparian communities are no longer as prevalent near streams and springs, and a number of wildlife species, including bighorn sheep, pronghorn antelope, gray wolf, beaver, and grizzly bear, have disappeared from the scene. Management to preserve natural processes and to restore more natural conditions to sites that have been disturbed by man's use would also enhance the historic scene that is important to the story of the California Trail.

The same characteristics of the landscape that make it valuable from a historical point of view also give it outstanding scenic quality. The variety of enclosed and expansive spaces, the rich mixture of colors and textures created by rocks and vegetation, the focal points and sense of direction provided by such distinctive landmarks as Twin Sisters, and the mystical qualities of this unusual place all contribute to a vividness that makes the City of Rocks a memorable scenic landscape.

City of Rocks is a national natural landmark.

The national natural landmarks program was established by the secretary of the interior to identify, recognize, and encourage the protection of sites containing the best remaining examples of ecological and geological components of the nation's natural heritage. City of Rocks was designated a national natural landmark in 1974 because it is a geologically unique area that exhibits nationally significant features, including the dominance of bornhardt formations, the scarcity of tors, a wide range of elevations over which the landforms are distributed, and evidence that the landforms have been carved from the upper parts of a pluton.

The geology of City of Rocks includes some of the oldest rocks in North America juxtaposed with others that are more recent. The Twin Sisters are billions of years apart in age. City of Rocks is listed in Natural History in the National Park System and on the National Registry of Natural Landmarks: 1990 under Great Basin Natural Region, group 1, "Landforms of the Present," theme 6, "Sculpture of the Land."

Most of the significant landforms are in parts of sections 25, 26, and 36, township 15 south, range 23 east; sections 19, 30, and 31, township 15 south, range 24 east; and sections 11, 12, and 13, township 16 south, range 23 east (Jones 1973).
Dr. Frank C. Cunningham described the process of weathering at City of Rocks in his paper that formed the basis for recommending City of Rocks as a national natural landmark. According to Jones (1973), if Cunningham's theories prove to be valid, "Cassia Silent City of Rocks would be the type area where an important concept in origin of landforms was developed." Rocks that are mentioned specifically in the report on the eligibility of Cassia Silent City of Rocks for registered natural landmark designation include (using their 1970 popular names): Bathtub, Register, Twin Sisters, Camp, Treasure, Andy Gump, Look Out, Kaisers Helmet, Great Stone Bird, Dragon Head, Pagoda, Devils Bedstead, Two Rock Turtles, American Eagle, Elephant Head, Monkeys Head, Granite Peak, King on the Throne, Rabbit Rock, Clam Shell, Stripe, Flaming, Chinamans Head, Mica Knoll Hill, Needle, Giant Toadstool, Elephant, Squaw and Papoose, Skeleton Head, and Saddle.

The ecosystems associated with the granite outcrop include an uncommon diversity of vegetation and wildlife, including ferruginous hawks and Townsend's big-eared bats, both of which are candidate species for listing as threatened or endangered. Cliff chipmunks and several plant species, both considered rare or sensitive by the state of Idaho, are known residents. The reserve also provides essential habitat for other sensitive species, including golden eagles, prairie falcons, and other birds of prey. The piñon-juniper forest type is at the northern edge of its range here.

A portion of the reserve that has remained relatively undisturbed by man's activities was designated a research natural area by the U.S. Forest Service and Bureau of Land Management prior to the establishment of the national reserve.

City of Rocks contains segments of the California National Historic Trail.

The national significance of the California Trail was recognized by Public Law 102-328, approved on August 3, 1992. The legislation designated the California National Historic Trail as a component of the national trails system. The National Trails System Act (Public Law 90-543), enacted into law in 1968, defined the purpose of the national historic trails as "the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment."

City of Rocks has a long tradition of recreational use by local residents and is now receiving attention as an outstanding rockclimbing area.

City of Rocks has been a popular destination for camping, sightseeing, picnicking, and rock scrambling for generations of local residents. Over the last two decades, it has become a destination for climbers not only from the region, but from all over the nation and the world. Recognizing the recreational value of the area, a state-owned section of land in the heart of the City of Rocks was transferred to the management of the Idaho Department of Parks and Recreation in 1973. Tourists have been coming to the area in increasing numbers ever since. The most popular recreational activities in the reserve are sightseeing, picnicking, rockclimbing, camping, hiking, mountain biking, photography, and nature study. An amendment to the legislation establishing the reserve allows for hunting to continue in locations and under conditions determined cooperatively by the secretary of the Interior and the Idaho Department of Fish and Game.

Approximately half of the lands in the national reserve are in private ownership.

In 1988, the year the national reserve was established, approximately 6,400 acres inside the boundary designated by Congress were in private ownership and used primarily for cattle grazing. Congress indicated that the plan for City of Rocks should identify which zones could most appropriately be devoted to "private use subject to appropriate local ordinances designed to protect the historic rural setting" existing at the time the reserve was established.

Congress authorized the secretary of the Interior to acquire on an opportunity basis any lands or interests in lands considered necessary for the purposes of the reserve.

In addition to private lands, private grazing permits for allotments on public lands are currently in effect on most of the public lands in the reserve, except section 36 owned by the Idaho Department of Parks and Recreation. Grazing is not permitted in the research natural area (312 acres) even though it is within an allotment boundary. Permits for these allotments are currently reviewed on an annual basis.
The following management objectives were developed by the planning team as part of the planning process. They are based on direction provided in the reserve's authorizing legislation, landmark designations, the organic act, and NPS Management Policies.

**Cultural Resource Management**

Identify, inventory, evaluate, protect, and preserve the resources related to the California Trail.

- Safeguard the route, remnants, and relics of the trail, including trail archeological evidence.
- Protect the rock inscriptions from further deterioration.
- Preserve the pristine scenic vistas seen by the emigrants along the California Trail.
- Pending historic documentation, stabilize stage station site. (Note: HABS documentation is complete; preliminary archeological testing has been done.)

Identify, protect, and preserve elements contributing to an ambience and scenic quality reminiscent of the American West.

- Ensure the long-term preservation of the traditional kind of ranching that was occurring at City of Rocks at the time the reserve was established.
- Cooperate with the state universities to develop and demonstrate ecologically sound, sustained-yield methods for grazing livestock on public lands.
- Place a high priority on preserving the area’s historic rural setting and minimize development.

Identify, inventory, protect, and preserve all historic properties eligible for the national register, including sites, objects, landscapes, districts, and traditional cultural properties associated with the prehistoric and historic human occupation of the reserve and archeological resources.

**Aesthetic Resource Management**

- Inventory scenic resources; protect and maintain scenic quality.
- Measure, monitor, and protect the reserve’s expansive, pristine vistas.
- Protect the romance, mystery, and impressive silence of City of Rocks.

**Natural Resource Management**

- Strive to preserve and restore natural resources.
- Balance ecological relationships and processes with uses in the reserve.
- Maintain natural conditions as much as possible.
- Determine the location of and protect the important habitat used by rare species and species sensitive to human uses.
- Protect air quality at the highest level possible under the Clean Air Act by working cooperatively with the state of Idaho to redesignate the area from class II to class I.
- Control exotic species that could disrupt the ecological, archeological, historical, or scenic integrity of the reserve.
- Conserve natural hydrological processes, including subsurface hydrology and control the acceleration of erosion due to human activities to preserve natural, cultural, and scenic resources.
- Protect or restore wetlands and riparian areas by managing their use wherever possible.
- Complete a comprehensive inventory of natural resources in the reserve.

**General Visitor Use**

- Give precedence to resource preservation and interpretation over recreational use.
- Provide an integrated visitor experience incorporating, in addition to park resources, historically relevant sites and recreational opportunities in surrounding communities.
- Manage visitor use to ensure that resources are not degraded.
- Prevent vandalism of natural and cultural resources.
Information/Orientation

- Provide adequate information and orientation to allow visitors to plan their visit, tour routes, and use of facilities and services in the reserve and surrounding area.
- Provide the means for visitors to find their way around the reserve.

Interpretation

- Provide opportunities to walk along the California Trail without damaging archeological evidence and to understand and appreciate the life of the emigrants.
- Provide visitors with a sense of history that allows them to place the California Trail in the context of what happened in this region before and after the major period of westward emigration.
- Interpret the historic landscape at the stage station site reflective of the scene in 1869-82.
- Interpret livestock grazing as a traditional use of the region, beginning with the Shoshone.
- Manage the visitor experiences to ensure that each visitor is exposed to the area's essence of romance, mystery, and awe.
- Help people understand the geological history of the area and the processes that created the City of Rocks.
- Provide opportunities for people to learn about the natural vegetation, with an emphasis on piñon pine, and about the wildlife within the reserve.

Recreation

- Support recreational activities that let visitors experience the reserve's natural, cultural, and scenic resources without impairing significant resource values.
- Manage recreational activities so as to minimize the potential for conflict among different users.
- Provide for an appropriate level of recreational opportunities.

Public Health and Safety

- Ensure that sanitary facilities are adequate.
- Provide emergency services for visitors and staff.
- Provide waste collection points for recreation vehicles outside but near the reserve to minimize the impacts of trash on reserve and adjacent lands.
- Work with local governments to prohibit illegal or inappropriate activities, such as keg parties, illegal drug use, and disturbing the peace.

Cooperative Management

- Fulfill the intents of the area's overlapping designations as a national natural landmark, a national historic landmark, a part of the California National Historic Trail, and a property listed on the National Register of Historic Places, as well as a national reserve.
- Define those areas or zones within the reserve that would most appropriately be devoted to private use subject to appropriate local ordinances designed to protect the historic rural setting.
- Define the geographical area of local influence on the reserve and work cooperatively with others to eliminate or mitigate actions that would otherwise degrade the reserve's resource values.

- Maintain a close working relationship with private landowners to help carry out the purposes of the reserve.
- Support county authorities and others in their efforts to protect resources outside the reserve boundaries.
- Work cooperatively with other federal and state agencies to accomplish the purposes of the reserve.
- Ensure the continued involvement of local residents in the operation of the reserve.
- Strive to help local communities through local contracts, technical assistance, and other cooperative measures.
**Development**

- Minimize development.
- Create and implement design standards that reflect the size, scale, and character of the historic western rural setting and that are compatible with the natural surroundings.
- Provide access to the full range of the reserve's significant resources, while protecting sites vulnerable to vandalism or too much visitation. Provide accessibility in accordance with the Americans with Disabilities Act.

**Land Acquisition**

- Provide for the expeditious public acquisition of lands or interest in lands within the reserve from willing sellers to protect natural, cultural, and scenic resources.
- Give prompt and careful consideration to any property owner within the reserve who notifies the secretary of the interior that continued private ownership within the reserve will result in "hardship."
## MANAGEMENT AUTHORITIES AND RESPONSIBILITIES

| AUTHORITIES PROVIDED BY CURRENT LEGISLATION | The legislation establishing the reserve provides that when the state and Cassia County have enacted ordinances or established regulations which "in the judgment of the Secretary will protect and preserve the historic and natural features of the area in accordance with the comprehensive plan," the Secretary of the Interior will, pursuant to cooperative agreement—  
|  | (1) transfer management and administration over all or any part of the property . . . to the State or appropriate units of local government  
|  | (2) provide technical assistance when requested to such State or units of local government in the management, protection, and interpretation of the reserve; and  
|  | (3) make periodic grants, which shall be supplemental to any other funds to which the grantee may be entitled under any other provision of law, to such State or local units of government to carry out the purposes of this title  
|  | (4) ensure that the management of the reserve is consistent with legislation and the provisions of the comprehensive management plan  
|  | Later legislation (PL 101-512) provides that hunting will be permitted in accordance with applicable laws of the United States and the state of Idaho, except in designated zones where and periods when no hunting may be permitted for reasons of public safety, administration, floral and faunal protection and management, or public use and enjoyment. Except in emergencies, such restrictions will be put into effect only after consultation with the Idaho Fish and Game, which has jurisdiction over hunting activities.  
|  | The proposal envisions that the cooperative relationship between the National Park Service and state of Idaho would continue. The transfer of the responsibility for management and administration of City of Rocks National Reserve from the National Park Service to Idaho Department of Parks and Recreation should occur upon—  
|  | (1) the completion of the final comprehensive management plan that would clearly define a management direction and issuance of a record of decision.  
|  | (2) the completion of written agreements between all key local, state, and federal entities. The agreements would articulate roles and responsibilities of each entity and allow for the transfer of money, services, and other items.  
|  | (3) enactment by Cassia County of those land use ordinances necessary to protect reserve values in accord with the comprehensive management plan (PL 100-696, section 202(c).)  
|  | The first step in defining a management direction would be completion of this comprehensive management plan/environmental impact statement and publication of the record of decision. Next, action plans such as cultural and natural resource management plans, a land protection plan, a grazing management plan, a climbing management plan, and an interpretive plan would be written to guide state administration and stewardship of the resource. Standards would also be developed that would be used to evaluate state administration of the reserve.  
|  | While the comprehensive management plan was in progress, Cassia County was developing zoning that would protect the important values and purposes of the reserve. After the comprehensive management plan has been approved, funding would be sought for the design and construction of proposed facilities. The plan envisions funds from state and federal governments that would provide for site planning, design, and development of the reserve.  
|  | NPS authority to assist in developing reserve facilities and programs in cooperation with other agencies would come from congressional authorization and appropriation. Interagency cooperative agreements would be the instruments to implement the authority provided by Congress. Each agreement would be subject to review by the Department of the Interior regional solicitor. Public Law 100-696, section 202(c)(3), provides for the secretary of the interior to make periodic grants to state and local governments to further reserve purposes and to implement plan provisions.  
|
All proposed major reserve support facility development outside the authorized reserve boundary, including visitor center/administration, maintenance, employee housing, RV campground, and amphitheater, would be built on federal land managed by the Bureau of Land Management. Chapter 9 of the NPS Management Policies provides that, "Where authorized, major facilities may . . . be located outside park boundaries in the vicinity of the park." The authority to commit federal dollars to develop and construct facilities outside the reserve is provided for by 16 USC 17j-2(b): "Appropriations for the National Park Service are authorized for . . . (b) Administration, protection, improvement, and maintenance of areas, under the jurisdiction of other agencies of the Government, devoted to recreational use pursuant to cooperative agreements."

A land protection plan is being prepared along with the comprehensive management plan. It is intended that the land protection plan will be prepared in consultation with area landowners and released in conjunction with the final comprehensive management plan. The land protection plan will articulate levels of protection necessary to protect values and public benefits on all nonfederal lands within the reserve. Acquisition of full or partial interest in lands, along with the enactment of county zoning ordinances, are some of the variety of land protection tools available. Land exchanges may also be used in certain instances. All federally acquired property will remain in federal ownership after transfer of reserve management to the Idaho Department of Parks and Recreation. As restricted by legislation, any full or partial interest in land acquired within the reserve will be only through the consent of the owner (willing seller).

The reserve will be transferred to the state before the principal visitor and administrative facilities are cooperatively developed. The facilities would include the new visitor center/administrative complex and parking lot, visitor center media, wayside exhibits, brochures, sign plans, and campground development. A tangible expression of this collaboration might be entry signs that have both the National Park Service arrowhead and the Idaho Department of Parks and Recreation logos as agreed upon by the respective departments. Recognition of the contribution of the Bureau of Land Management, the U.S. Forest Service, and other participating partners will also be provided. Because the reserve has been designated a unit of the national park system, development and the visitor experience must be of the quality expected by the public of an NPS area. Therefore, the state and the National Park Service would need to reach a consensus on a specific agenda for the state to follow. This agenda would be documented through a cooperative agreement between the National Park Service and the Idaho Department of Parks and Recreation required by section 202(c) of PL 100-696.

When management of the area is transferred to the state, the reserve will remain a unit of the national park system. The National Park Service would continue to serve the reserve through the services of park, regional office, Denver Service Center, Harpers Ferry Design Center, and Washington office staffs in areas concerning interpretation, resource management, and site development. The National Park Service would ensure that its responsibilities under the National Historic Preservation Act, National Environmental Policy Act, and other appropriate federal legislation are carried out by the state of Idaho in administration of the area.

As requested, the National Park Service would also provide technical assistance to the Idaho Department of Parks and Recreation, Cassia County, and in some cases, private landowners. National Park Service authority to provide technical assistance to private property owners within the national reserve is based upon the following laws: National System Trails Act of 1968 (California National Historic Trail), Outdoor Recreation Act, and the National Historic Preservation Act. National historic landmark and national natural landmark designation for private lands within and outside the City of Rocks also provides for NPS technical assistance to landowners to help preserve landmark values. Assistance would be available for all areas within the reserve. Outside the reserve, assistance would be limited to areas within national landmarks, areas of special concern identified in the plan, and other areas integral to the tour loop concept and along the Oregon and California trails.

Federal technical assistance would be available for cultural resource preservation, national landmark preservation, natural resource management, scenic resource management, interpretation and education, visitor use management recreation programs and development, site planning and design, and road and trail conservation. Requests for technical assistance must be made through proper channels and would be funded based on the merits of the proposed project and the funds available for carrying out the program. Further information about applying for
technical assistance might be obtained from reserve management.

Recognizing that parks are integral parts of larger regional environments, the National Park Service will work cooperatively with others to anticipate, avoid, and resolve potential conflicts, to protect park resources, and to address mutual interests in the quality of life for community residents, considering economic development as well as resource and environmental protection.

Title to federal land in the reserve would remain in federal ownership. If it was later determined that the comprehensive management plan was not being implemented or provisions of the establishing legislation were not being adhered to, the secretary of the interior could withdraw management and administration from the state, and the National Park Service would resume management and administration of the reserve except for state-owned section 36 based on establishing legislation. (Please see section 202e in appendix A.)

Additional legislation would be required to authorize the increased spending ceiling for development and operations that would be needed to implement this plan and to authorize the expenditure of federal funds for planning, design, and construction on nonfederal land. Proposed facilities on nonfederal lands include entrance stations on nonfederal land and county roads within the reserve.
**Management Zoning**

**Basis for Zoning**

All units of the national park system are required to divide the unit into management zones to provide guidance to park managers concerning resource protection and management, visitor use management, and development. Usually NPS management zoning is developed for all public land in the unit. However, the legislation at City of Rocks calls for the planning team to develop zoning for all the land within the reserve. Although the management zoning described in the plan on private land reflects the planning team's judgment of which areas are most appropriately devoted to various uses, the National Park Service cannot enforce that management zoning unilaterally on private land. Reserve management must rely on landowners' voluntary compliance with reserve zoning and on county enforcement of county zoning unless the reserve purchases an interest in land on an opportunity (willing seller/willing buyer) basis. Regulation of private land use is the responsibility of local government, in this case, Cassia County. County zoning of private lands in the reserve is discussed in the "Management Authorities and Responsibilities" section of this plan.

Congress directed that the comprehensive management plan for City of Rocks National Reserve should identify those areas or zones that would most appropriately be devoted to:

- historic and natural preservation
- public use and development
- private use subject to appropriate local ordinances designed to protect the historic rural setting

The public and private use zones included in this draft plan have been modified slightly from those listed by Congress to reflect that public educational use is an important part of the preservation zone and also that certain private uses can be compatible with preservation and public use. Rather than treating private use as a separate and distinctive zone, it is treated as activities (stock grazing and residential use being the primary possibilities) to be encouraged or discouraged in each zone based on their compatibility with the management intent for that zone.

The development of a management zoning scheme for the reserve was a three-phase process of (1) mapping important resource values, (2) mapping traditional and contemporary uses, both private and public, and (3) identifying the most appropriate uses for each area of the reserve, recognizing that resource preservation, public use, and private use should all be represented in the final scheme.

The reserve's cultural, natural, and scenic resources were surveyed and evaluated to provide a basis for planning. Two categories of important and exceptional resources were identified: cultural and visual, and natural and visual.

Those cultural and visual resources identified as important are the national historic landmark boundary, historic structures and sites, archeological sites, foreground and middle ground of the views seen from the California Trail, and the historic rural setting. Congress recognized the land within the national historic landmark boundary as an important resource by designating it a historic landmark. Historic structures and sites associated with periods of history other than the California Trail are important because they provide information about other times and about regional and local history. The importance of archeological sites stems from the fact that they hold data about and artifacts from historic and prehistoric periods. Some of this material is of national significance. Consultations with concerned tribes are underway in order to complete the survey of ethnographic resources within the reserve. The foreground and middle ground of the views seen from the California Trail are relatively unchanged from the trail period and are an important part of the cultural landscape that assists visitors to envision and sense the California Trail setting and experience. The legislation for the reserve establishes the importance of the historic rural setting by calling for its protection. ("The plan shall identify those areas or zones within the reserve that would most appropriately be devoted to . . . (3) private use subject to appropriate local ordinances designed to protect the historic rural setting." Public Law 100-696 sec 202 (A)(3)). Surviving resources associated with historic cattle ranching operations in the reserve contribute to a historic rural setting that imparts an increasingly rare ambience and scenic quality reminiscent of the America's West (see Resource Values map).
The exceptional cultural and visual resources are historic structures, sites, and the "viewshed" of the California Trail (trail remnants, inscription rocks, other historic trail-related features, and the foreground and middle ground of the views seen from the trail). These are the nationally significant features that led to the designation of the area as a national historic landmark. The California Trail is the most significant historical theme at City of Rocks.

The trail viewshed has been discussed in terms of its continuity and sequence; however, there are three important views and their viewsheds that warrant special attention. They are important because they are views experienced by travelers trying to find their way along the trail. These landmark views are:

- the view south towards Twin Sisters from the California Trail corridor as the ground rises into the basin in front of Twin Sisters
- the view northwest towards Twin Sisters along the Salt Lake Alternate Trail at the stage stop
- the view southwest to Granite Pass, 1/4 mile outside the southwest boundary of the reserve

The first view is barren in the foreground, with neither vegetation nor groundform to frame the scene. The viewer is directed to the focal point of the highest two spires, but the spires' dominance is lost in the jumble of crags and peaks along Twin Sisters ridge and the lengthy distance of the scene from the viewer. Yet, the view retains its significance by setting up the trail alignment to Pinnacle Pass, once the lowest point along the ridge.

The second view is the most dramatic view of the Twin Sisters. From this angle, their separate character is apparent. Their individual and distinctive forms and textures can be vividly perceived. Their strength as a dominant focal point is more evident at this closer distance. The absence of competition from the serrated ridge they lie in allows a sharp contrast within this view of rolling sagebrush hills and smooth granite domes.

The third view is expansive and open, without any foreground textures or containment to distract the viewer. The distant mountain pass is a subtle but important focal point that is experienced at the reserve boundary.

Important and exceptional natural and visual resources were also identified. Those identified as important are the national natural landmark; distinctive geologic features; potential habitat for endangered, threatened, or candidate species under the federal Endangered Species Act; potential habitat for state species of concern and for rare and sensitive plant species; habitat for golden eagles and other birds of prey; wetlands; most scenic views; and most commonly seen views. Congress recognized the area within the national natural landmark boundary as important because of its nationally significant rock formations and the unusual processes that formed them. The high scenic value of the distinctive geologic features has been a distinguishing characteristic of the area from early times as evidenced by the frequent reference to these features in emigrant journals.

Wetlands, another highly important ecosystem, provide necessary food, water, and shelter for many species of animals and plants. They can filter pollutants, increase groundwater recharge, improve water quantity and quality, reduce downstream flooding, and decrease soil erosion.

As part of the establishing legislation to "protect and maintain scenic quality," the most scenic views and the most frequently seen views were judged to be important to achieving this purpose.

Those natural and visual resources identified as exceptional are major rock outcrops and associated enclosures that provide essential nesting and roosting sites for species of special concern and are of the highest scenic value and habitat for several rare and sensitive plants. The rock outcrops are exceptional because they contain multiple important resources. In addition to the geologic value of the rock outcrops themselves, the rocks provide habitat for special species and are important as scenic resources.

The two reduced maps that make up the Resource Values map show the most important resources identified by this study and the extent of those resources within and adjacent to the reserve. Each map is a composite of several overlays, as follows:
CULTURAL RESOURCES AND HISTORIC VIEWSHED

- IMPORTANT RESOURCE AREAS
- EXCEPTIONAL RESOURCE AREAS
- NATIONAL HISTORIC LANDMARK
- NATIONAL RESERVE BOUNDARY
Resource Values
Natural/Cultural Visual
City of Rocks National Reserve
United States Department of the Interior
National Park Service
003-20020C-DSC-MAY 94
**Cultural/Visual Resources**

Overlays of Important Resources

- National historic landmark boundary
- Historic structures and sites
- Archeological sites
- Foreground and middle ground of the views seen from the California Trail
- Historic rural setting and viewshed

Exceptional Resource Areas

- Historic structures, sites, and "viewshed" of the California Trail (trail remnants, inscription rocks, other historic trail-related features, and the foreground and middle ground of views seen from the trail)

**Natural/Visual Resources**

Overlays of Important Resources

- National natural landmark boundary
- Distinctive geologic features
- Potential habitat of endangered, threatened, or candidate species under the federal Endangered Species Act
- Potential habitat for state species of concern and for rare and sensitive plant species
- Essential habitat for the region's wildlife populations
- Wetlands
- Most-scenic views
- Most-frequently-seen views

**Exceptional Resource Areas**

- Major rock outcrops and associated enclosures that provide essential nesting, roosting, and denning sites for species of special concern and are of the highest scenic value
- Habitat for hedgehog cactus, narrow-leaved Indian paintbrush, and Krukeberg's swordfern
- Research natural areas

Because the area included inside the reserve boundary is the nucleus of a larger area with both national historic landmark and national natural landmark designations, all the lands inside the reserve have one or more important resource values that also extend beyond the boundary of the reserve.
As stated in the "Planning Considerations," the City of Rocks area has traditionally been used for dry farming and ranching, with some highly dispersed residential use associated with early homesteading, farming, and ranching activities. There has been virtually no residential or crop farming activity in City of Rocks for the past several decades. Stock grazing occurs on all private lands and most of the public lands (see Existing Ownership/Grazing and Ranching Activities map). Because stock grazing and associated ranching activities are closely associated with the reserve's historic western rural setting, they are also reflected on the Resource Values map.

The Existing Infrastructure and Recreational Use map provides data on where recreational use is occurring. It is generally concentrated around the rock outcrops, mostly in sections 25, 26, 31, 36, and the Twin Sisters. Group camping occurs west of Breadloaves and north of the road about 1 mile east of the junction (Moulton) entrance. Six restrooms are located along the east-west road between the Y-intersection and Emery Canyon and one at Twin Sisters. Information kiosks are located near Bath Rock and near the east-west road where it turns southwest into Emery Canyon.
EXISTING OWNERSHIP
GRAZING AND RANCHING USE
CITY OF ROCKS NATIONAL RESERVE

United States Department of the Interior
National Park Service

003 • 200508 • DSC • MAY 94

GRAZING
PRIVATE LAND
PUBLIC LAND (Federal)
PUBLIC LAND (State)

CALIFORNIA TRAIL
NATIONAL RESERVE BOUNDARY

INFRASTRUCTURE
GRAVEL ROAD
RANCH ROAD
LIVESTOCK TRAILING CORRIDOR

NOTE: All federal land within the national reserve boundary is held by the National Park Service. 10 grazing allotments currently exist. See Table 11.
EXISTING INFRASTRUCTURE AND PUBLIC USE
CITY OF ROCKS NATIONAL RESERVE

PRIVATE LAND
PUBLIC LAND (Federal)
PUBLIC LAND (State)

NATIONAL RESERVE BOUNDARY
EXISTING FEATURES

· CALIFORNIA TRAIL CORRIDOR
· SALT LAKE ALTERNATE TRAIL
· BEST PRESERVED WAGON RUT REMNANT

INFRASTRUCTURE

- GRAVEL ROAD
- RANCH ROAD

CLIMBING
PARKING
CAMPING
PICNICKING
PARK HEADQUARTERS
MAINTENANCE
RESTROOM

0 - 1 MILE

N

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

MAY 94
### MANAGEMENT ZONES

<table>
<thead>
<tr>
<th>HISTORIC AND NATURAL PRESERVATION ZONE</th>
</tr>
</thead>
<tbody>
<tr>
<td>This zone would contain lands where the preservation and public appreciation of cultural and natural resource values would be the predominant concern. The zone would include subzones for the California Trail and major rock outcrops—the two exceptional resource values identified for the reserve. (See the Management Zoning map for proposed federal/state zoning of the reserve.)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>California Trail Subzone</th>
</tr>
</thead>
<tbody>
<tr>
<td>The management intent for this subzone would be to preserve the major landmarks, trail remnants, and inscription rocks associated with the California Trail and to give visitors the opportunity to walk alongside the entire length of the California Trail and to walk within the Circle Creek encampment area. For the purposes of zoning in this plan the term California Trail includes the Salt Lake Alternate. Minimal modern intrusions would be allowed in the foregrounds of the views from these areas to allow visitors to experience a landscape reminiscent of the trail period. Adhering to these objectives will protect significant cultural values and provide for those activities which do not adversely affect cultural resources. The accompanying viewshed analysis identifies uses that affect the foreground, middle ground, and background views from the California Trail. Based upon this analysis it can be determined if either mitigating measures or restrictions will be needed to ensure the retention of these values.</td>
</tr>
</tbody>
</table>

Most uses within this zone would relate directly to the preservation and interpretation of California Trail-related resources. However, to minimize impacts on traditional private use, livestock grazing would continue to be allowed in some portions of the trail subzone, because this activity has not caused major disturbance to the historic trail corridor. In locations where random trampling or rubbing by cattle would potentially damage significant resources, such as the best trail remnants or rock inscriptions, cattle would be excluded. These exclosures would not only maximize protection of outstanding features but also provide places where the public could experience these highly significant resources without having to compete with grazing cattle. The outstanding features from which cattle would be excluded would be Twin Sisters, Pinnacle Pass, three of the best trail remnants, the inscription rocks, a portion of the Circle Creek encampment area, and wetland and riparian areas on public land. The National Park Service would acquire fee title to these outstanding areas on an opportunity basis so that cattle could be excluded and use could be focused exclusively on interpretive (educational) activities. |

For the remainder of the lands within this zone, the National Park Service would acquire, on an opportunity basis, the interests necessary to ensure visitors the opportunity to experience and/or access these areas in their currently undeveloped state. The National Park Service would seek sufficient interest in these lands to complement county zoning and ensure that incompatible commercial or residential development did not occur in the historic viewshed. It was not considered necessary to exclude cattle grazing from the historic trail viewshed. Although herds of grazing beef cattle were not a part of the historic California Trail scene, the livestock pulling the emigrants' wagons and their saddle horses and dairy cows were prominent features. Because of this close association, grazing cattle were not considered incompatible with the preservation of the historic trail viewshed. |

While the preservation of cultural resources (including their natural resource context) is the primary emphasis of this management zone, appropriate recreation uses directly related to historic resources, including low-impact day use such as walking, informal picnicking without facilities, nature viewing, and photography, are the types of activities that might occur. No overnight camping would be permitted in the zone. |

Recreation uses not directly associated with the access or the enjoyment and interpretation of the California Trail would generally be precluded within the foreground viewshed of the California Trail. The foreground viewshed occurs approximately 1/4 mile on each side of the California Trail and Salt Lake Alternate prisms and includes Twin Sisters. Precluded activities would be the siting of recreational facilities such as campgrounds and picnic areas and recreational uses such as bicycling, climbing, or scrambling on the Inscription Rocks, Twin Sisters formation, Pinnacle Pass, and other physical features that have cultural significance. Grazing would be excluded from riparian areas and wetlands on public land. Any further restrictions or mitigation measures necessary to address activities within the California Trail subzone, but outside of
The management intent of this subzone would be to preserve the exceptional natural resource values of the reserve and to provide for recreational activities where appropriate. Areas included within the natural area subzone would include most of the crescent-shaped rock outcrops of the Circle Creek basin, the ridgeline and northern slopes of the reserve, the research natural area, and most of the Indian Grove and Graham Peak areas. Use of these areas would focus on natural resource preservation. The National Park Service would seek to acquire the private lands in this subzone on an opportunity basis to protect sensitive habitats and scenic vistas from livestock grazing and development. Three management areas are identified within the natural area subzone.

Research Natural Area. The Research Natural Area preserves outstanding natural features, natural processes, diversity, and ecological values, with a focus on unique geologic formations and the northern limit of the pinon-juniper forest type in North America. Activities within the research natural area would be restricted to nonmanipulative research, education, and other activities that would not detract from the area's research values as set forth in the Natural Resource Management Guidelines, NPS-77. Grazing would not occur in this area. An expansion of approximately 100 acres is proposed for addition to the western boundary of the research natural area. This area was part of an earlier proposal submitted by the U.S. Forest Service in 1982.

General Natural Area. The management approach for the general natural area is to protect natural resource values and to provide for a level of public and private use that does not degrade the natural qualities of the area. Grazing would be excluded from riparian areas and wetlands on public land in the General Natural Area. Grazing would be allowed to continue in those areas appropriate for such use, and as articulated in the City of Rocks grazing management plan. Some of the area is considered to have water resources critical to ranching operations. Camping by permit only would be allowed at up to seven sites in the Indian Grove area. Individual campsites would not be designated. Popular sites would be monitored and impacts mitigated. Up to two of the seven might be group sites. Campers would hike in via a trail from Breadloaves. The number of campers would be limited to 50 at one time to protect the backcountry experience. The number of sites might be adjusted based on resource impacts, but the maximum number of people would be 50.

Grazing and recreation would be managed to protect the areas natural resources and the backcountry visitor experience in the general natural area. The area would be subject to more intense natural resource monitoring and management than other areas of use to ensure that sensitive habitats were not degraded.

Natural and Recreational Resource Area. The emphasis of this area would be to balance recreational use with the protection of natural resources. Opportunities for more intense resource-based day recreation would be provided in the western arm of the rock crescent (including section 36 and portions of sections 25 and 31), which contains many of the the most popular areas for rockclimbing, hiking, picnicking, and camping. Grazing would not occur on public land in part of this zone as shown in appendix J.

The National Park Service would acquire fee title to these lands on an opportunity basis so that the public could have unobstructed access and use of these areas.

Most of the private lands in the reserve, along with some public lands outside the historic and natural preservation zone, would be in this zone. The management intent would be to preserve the historic rural setting and to perpetuate ongoing ranching activities that captured the rural character of the reserve at the time of its establishment. Uses of lands in this zone would include continued ranching use, interpretive activities, and day recreation on the public lands. While preservation of historic resources and the historic rural setting are the primary emphasis of this management zone, appropriate recreation, including day uses such as hiking, informal picnicking (no facilities), photography, nature viewing, and climbing would be permitted. Since much of this zone is in private ownership, the public would be directed to seek the owners permission prior to entering private land. Reserve management would request that if landowners choose to allow recreation in this portion of the historic and natural preservation zone, they would allow the same dispersed, day uses listed for public land in this subzone. Regarding private lands within this zone, enacted Cassia County ordinances and regulations are intended to provide for the...
ON MICROFILM

HISTORIC AND NATURAL PRESERVATION ZONE

CALIFORNIA TRAIL SUBZONE
- FOREGROUND OF CALIFORNIA TRAIL
- GENERAL USE

NATURAL AREA SUBZONE
- RESEARCH NATURAL AREA
- GENERAL NATURAL AREA
- NATURAL AND RECREATIONAL RESOURCE AREA

HISTORIC RURAL SETTING ZONE
- PRIVATE LAND
- PUBLIC LAND

PUBLIC USE AND DEVELOPMENT ZONE
- GRAVEL ROAD (proposed)
- RANCH ROAD
- MINOR ROAD
- TRAIL

EXISTING FEATURES
- CALIFORNIA TRAIL CORRIDOR
- LIVESTOCK TRAILING CORRIDOR
- SALT LAKE ALTERNATE TRAIL
- BEST PRESERVED WAGON RUT REMNANT
- BEST PRESERVED WAGON RUT REMNANT
- NATIONAL RESERVE BOUNDARY

NATIONAL PARK SERVICE

33
protection of the historic rural setting. The National Park Service would acquire development rights on an opportunity basis to provide additional protection of the open ranchland character of this zone from incompatible development.

**PUBLIC USE AND DEVELOPMENT ZONE**

The management intent of this zone would be to provide the facilities needed to support visitor use and reserve operations without degrading the values the reserve was established to preserve. There is very little unseen area within this public reserve. What is seen must be treated with a standard that retains the spacious western character that is so much a part of the history of this region. The only land inside the reserve boundary that could be developed without intruding on scenic vistas seen from the historic trails, the tour road corridor, visitor use areas, or backcountry sites is confined to hidden slopes of the Trail Creek and Graham Creek drainages. Because new development would significantly degrade the visual resource values for which the reserve was set aside, it was determined that most visitor facilities (especially the visitor center and developed campground) and all administrative, housing, and maintenance functions should be placed outside the reserve and on land already in public ownership. Only those modest facilities essential to visitor enjoyment of resources, such as access roads, parking pulloffs, trails, picnic sites, primitive campsites, and toilet facilities, would be included in the reserve. Appropriate recreation would be driving for pleasure, snowmobiling, bicycling, picnicking at designated sites, camping in designated sites, and visiting sites developed for visitor education. Educational sites would include the amphitheater, interpretive waysides, information kiosks, and visitor center.

The National Park Service would acquire fee title to lands needed for development in the reserve on an opportunity basis. Outside the reserve the Idaho Department of Parks and Recreation is working cooperatively with the Bureau of Land Management to secure land for the visitor center, amphitheater, developed campground, maintenance area, and employee housing.

County zoning is central to the achievement of the purposes of the reserve because it would preserve and protect pre-1968 ranching character of the large amount of private land inside the boundary. (Public Law 100-696, included in appendix A, calls for local governments to "protect and preserve the historic and natural features of the area . . .") Cassia County has proposed zoning to retain traditional grazing uses, but it would preclude commercial and industrial development within the reserve. County zoning limits residential development in the reserve to one residence per owner at the time the enabling legislation was enacted. With the cooperation of area landowners and reserve managers, the county has established a historic preservation zone for all nonfederal land within the reserve. (See appendix G for pertinent sections of the ordinance.) The county would develop design guidelines to minimize the effects of residential development on the historic rural setting. The guidelines would provide area residents with recommendations concerning the materials, textures, scale, orientation, and circulation that would be in keeping with the historic development patterns. As requested, the National Park Service would provide technical assistance to the county to develop these guidelines, which would be similar to the design standards adopted for all public facilities inside the reserve (see appendix D for site design considerations).

In addition to the protection afforded by county zoning standards, the National Park Service would seek to acquire that interest in land on an opportunity (willing seller/willing buyer) basis necessary to protect cultural, natural, and recreational values as described in the "Management Zones" section. The type and method of protection necessary to ensure the retention of the traditional ranching scene (e.g., scenic easements) will be described in the City of Rocks land protection plan. This additional protection would ensure continued traditional grazing use of private lands within the reserve while limiting the construction of residences and other development.

It is recommended that this comprehensive management plan be adopted by the Cassia County Board of Commissioners as the county's comprehensive land use plan for the area of the county within City of Rocks National Reserve.
AREAS OF SPECIAL CONCERN OUTSIDE THE RESERVE

Because of the importance of landmarks and vistas to visitors' understanding and appreciation of the California Trail, the protection of historic views extending beyond the reserve boundary would be highly encouraged. Areas of special concern for their historic landscape values would include:

- the foreground of the views along the entrance road from Almo, which is also near the route of the historic trail and from which the rock outcrops are first sighted.
- the view from the trail looking east toward Smoky Mountain.
- the views to the south and east from Pinnacle Pass.
- the foreground of the views from the segment of the trail west of the reserve boundary leading to Granite Pass, which was the next guiding landmark beyond Pinnacle Pass and a major milestone on the journey to California.

Other areas would be of special concern because of their importance to visitors' first impressions of the reserve. They would include the foregrounds of the views along the Almo, Oakley, and Moulton entrance roads (see Areas of Special Concern map).

The National Park Service, the Idaho Department of Parks and Recreation, and Cassia County would offer to work in partnership with landowners in these areas, including the Bureau of Land Management and the U.S. Forest Service, to encourage voluntary and complementary stewardship of these lands so that they remain in harmony with the region's historic rural character. The top of Granite Pass and most of the trail corridor in between Circle Creek and Granite Pass is privately owned ranchland. As possible, and with the full consent of area landowners, periodic commemorative trail rides would be highly encouraged. Steps would be taken to make these commemorative drives as historically authentic as possible. This interpretive event would provide visitors with a historical retracing of the steps of early American settlers as they went on one-day journeys from camp to camp.

Portions of the California Trail prism and associated foreground viewshed, between the reserve boundary and Granite Pass, should be considered for potential addition to the designated national historic landmark. Landowner permission is required for any additions. While such designation would recognize its historic value, no additional restrictions would be placed on private property use with such a designation.
RESOURCE MANAGEMENT

CULTURAL RESOURCES

Under the proposed plan the principal cultural resources in the national reserve would be given increased protection, preservation treatment, and interpretation as directed by a cultural resource management plan, subject to consultation with the Idaho state historic preservation officer and the Advisory Council on Historic Preservation. The scope of the proposed plan would encompass the entire historic continuum of the City of Rocks area, focusing on the principal aspects of the reserve's history from prehistoric times to ranching practice present at the time the reserve was established.

Actions called for on private land would require either the permission of the owner or a willing seller acquisition of that interest necessary to provide for the intended public use.

California Trail/Salt Lake Alternate

The outstanding trail features would be enclosed to increase protection for the resources and to enhance interpretive opportunities in a livestock-free environment. Two principal areas would be enclosed to protect and interpret the outstanding features associated with the California Trail: (1) the inscription rocks (including the 13 inscription rocks), one of the preserved intact trail ruts and remnants, and a portion of the encampment area in the vicinity of Circle Creek; and (2) the Twin Sisters/Pinnacle Pass, including the vicinity of the Twin Sisters landmark, several preserved intact trail ruts and remnants, and a wagon-related cable cut at Pinnacle Pass. Because of the emphasis on preserving these outstanding features and interpreting them to the public, the National Park Service would acquire fee title to these areas on a willing seller/willing buyer basis. Visitor activities would be limited to educational and interpretive uses in this area.

Visitors would be encouraged to peruse the enclosed cultural areas and would be permitted to walk past the preserved intact trail ruts and remnants. The rock inscriptions would be given appropriate preservation treatment to prevent further deterioration and would be protected by fencing and associated wayside exhibits to keep the visitors from touching them. Wayside exhibits would illustrate the historic appearance of key resources and interpret their cultural significance.

Outside the enclosures, a half-mile-wide corridor running the entire length of the California Trail and Salt Lake Alternate, a portion of the Circle Creek encampment area, and part of the rim area overlooking the Silent City would be managed to protect the views and to support public access and interpretation in conjunction with other public recreational use and private livestock grazing. The National Park Service would acquire the interest necessary to provide for visitor access and scenic protection within a corridor approximately 1/4-mile wide on each side of the two trails to protect the foreground views of the trails’ viewsheds. The only nonhistoric intrusions allowed in these areas would be occasional fencelines, grazing livestock, and day recreation on public lands (no camping). South of the Y in the road and north and east of the inscription rocks would be reduced to a less-visible trace, primarily for ranching use, and the road crossing the Circle Creek basin would be down-sized to a trail and the remainder of the road scar rehabilitated.

The historic rural setting is the spacious, open expanse and the cultural artifacts resulting from the cumulative land uses beginning with the trail era and through the establishment of the reserve in 1988.

The years intervening between the 1860s, when the trail era ended, and 1988, when the reserve was established, witnessed a progression of homesteading, dryland farming, and ranching activities in City of Rocks, and the development of the community of Almo, 2 miles to the east of the area. During these years, crop production and livestock ranching were alternately pursued and abandoned, following the boom-and-bust cycles of commodity prices and changing weather patterns. Even at the height of homesteading during the World War I period, residential use was limited to scattered structures. As ranching became more and more predominant, these structures were gradually abandoned and fell into ruin.

At the time the reserve was established in 1988 the landscape was a wide-open expanse of rangeland interrupted only by necessary fencelines and dirt roads marking pastures and property lines. Minimal structures, such as fencing and water tanks needed to support range cattle operations, were present. Grazing livestock and occasional trailing, branding, and fence-building activities made it a dynamic expression of traditional ranching operations. This
This setting should be preserved to the extent possible by protecting the contributing elements and minimizing incompatible intrusions. Structures should be limited to those that support range ranching operations, such as unloading chutes, corrals, wells, and stock tanks. Barns and outbuildings associated with residential uses would not be consistent with the isolated, rustic character of the scene, nor would any residential, commercial, or park development. Interpretive waysides and primitive trails would be acceptable development in this area. Roads should remain unpaved but improved sufficiently to ensure safe use and maintenance.

The few remaining ruins of historic structures are a contributing part of the historic rural scene and help represent the historic continuum of the reserve's history. Selected historic resources would be enclosed to exclude cattle, increase protection, and enhance interpretive opportunities. The intent would be to preserve representative elements of all the post-trail-period themes in the historic continuum of the reserve's history. These sites would be interpreted via wayside exhibits that would illustrate their historic appearance and interpret their cultural significance.

The extant stone walls of the Nicholson house would be included in the area set aside for the inscription rocks/Circle Creek encampment cultural area. Measures would be taken to ensure visitor safety at the site by removing nonhistoric debris and providing appropriate design to keep visitors away from the potentially hazardous walls. The house site would be interpreted via a wayside exhibit, and the structure's stone walls would be given minimal stabilization.

The stage station site would be enclosed and interpreted via a wayside exhibit. The structures at the site would be given minimal stabilization, and measures would be taken to ensure visitor safety by removing nonhistoric debris and removing hazardous structural elements.

Small enclosures would be constructed around several other historic sites in the reserve, including the remnant foundations and associated features of an early homestead site near Trail Creek, the log cabin near the Nicholson house, and a corral site where ranching activities still occur. These sites would be given minimal preservation treatment and would be interpreted via wayside exhibits. Measures would be taken to ensure visitor safety at these sites.

Cattle grazing and trailing would also be a component of the historic rural setting and its associated interpretive story and would be encouraged to continue in appropriate zones with management to protect resource values. Livestock grazing is discussed in greater detail in the natural resource section of this plan.

Archeological surveys and testing have been carried out at the reserve over the past four years to assess the nature and extent of the reserve's archeological resources. Among the types of prehistoric sites that have been recorded in the reserve are rockshelters, hunting blinds, bedrock trays, and open sites featuring lithic scatters, metates, hopper mortar bases, and other artifacts. Since only portions of the reserve have been surveyed to date, there is a high probability that significant numbers of undiscovered prehistoric archeological sites exist at City of Rocks.

Funding would be sought for further archeological studies, and a comprehensive reserve-wide inventory of archeological resources would be completed to evaluate their contextual significance and interpretive value. Based on the inventory and survey of archeological resources, a site may be designated based on consultation with the regional archeologist and the Idaho state historic preservation officer for protection and interpretation. Until this database was developed, cultural resources would be evaluated for their significance and possible nomination to the National Register of Historic Places under criterion D (likely to yield information important to prehistory). This evaluation would be carried out in consultation with the Idaho state historic preservation officer. In addition, areas to be affected by ground disturbance and development would be surveyed and archeological clearance obtained before initiation of such projects. This would include archeological testing to determine the nature and extent of the archeological resources to be affected. After testing, every effort would be made to avoid adverse impacts on resources. If adverse impacts could not be avoided, a plan for mitigation of those impacts would be developed in consultation with the state historic preservation officer. Mitigation would normally involve data retrieval through controlled surface collection of artifacts, excavation of buried remains, mapping of features, and production of a report.
Collections from the archeological investigations, as well as limited natural specimen collections, have been formed but documentation and planning for the management of these collections is still in its earliest stages. A Scope of Collections statement, cataloging funds, and a trained employee capable of managing the collection to NPS standards are all high-priority needs.

The principal historical study relating to the historic sites in the reserve is "City of Rocks Historical Report," an overview-type document prepared by Merle Wells in 1989. This historical overview, outlining the basic themes and historical periods associated with the reserve, would serve as the basis for completing a scope of work for a historic resource study of the reserve. The historic resource study is needed to provide a documented historical narrative of the City of Rocks area and additional data on the historic sites in the reserve within the context of their cultural milieu. The study, using primary and secondary sources, would identify and evaluate the historic events that occurred in and around City of Rocks and locate and identify the historic sites, scenes, structures, and objects associated with them, including their historic functions. Topics to be addressed in the study should include:

- Native American inhabitants during the post-Euro-American contact period
- exploration and fur trapping
- overland trails to California and Oregon
- regional freight, stage, and express traffic
- ranching and cattle grazing operations
- homesteading and white settlement
- mining
- dryland farming
- U.S. Forest Service, Bureau of Land Management, and state of Idaho management of area
- tourist recreation

Funding for the study was received in fiscal year 1994 and bids accepted.

An annotated bibliography of the late 19th- to early 20th century settlement era would assist the research for the historic resource study.

An initial assessment of cultural landscape resources within the reserve was completed by the Pacific Northwest Regional office in 1992, complementing the visual resource analysis completed by the Denver Service Center planning team. Comprehensive research and in-depth documentation of cultural landscapes began in 1994.

The ongoing historic landscape study will identify and evaluate the historic rural setting of the City of Rocks area, which was identified as a significant resource worthy of preservation in the reserve's establishing legislation. This study will determine appropriate management options for the historic landscape.

Existing knowledge of the ethnography and ethnographic resources in the reserve is largely limited to an overview-type study prepared by David H. Chance in 1989. The study is entitled "The Tubaduka and the Kamuduka Shoshone of the City of Rocks and Surrounding Country." A documented ethnographic overview and comprehensive reserve-wide inventory, including an assessment of ethnographic resources, is needed to evaluate their significance and interpretive value.

Consultation with interested American Indian groups has begun under the direction of the regional anthropologist, who has met with representatives of the Fort Hall Shoshone-Bannock Tribes. In addition to establishing a long-term consulting relationship with these tribes, which may have interests in several NPS sites, information is being sought regarding sites of special significance and interest to the tribes within City of Rocks, for which protection and management strategies will have to be developed. It is anticipated that this will be an ongoing relationship that will continue through completion of the planning process and establishment of a management direction for the reserve and its resources.

Archeological surveys and testing have been carried out at the reserve over the past four years to assess the nature and extent of the reserve's archeological resources. The results of this effort have been provided to the state historic preservation officer and will be used to develop a long-term strategy for archeological investigations at the reserve as defined in a programmatic agreement covering NPS responsibilities under sections 106 and 110 of the National Historic Preservation Act.

A research design for the reserve will be developed to address both prehistoric and historic archeological sites and to provide a plan for future survey work.

A comprehensive reserve-wide survey, inventory, and assessment of archeological resources will evaluate their contextual significance and interpretive value.
Collections from the archeological investigations, as well as limited natural specimen collections, have been formed, but documentation and planning for the management of these collections is still in its earliest stages. A Scope of Collections statement, cataloging funds, and a trained employee capable of managing the collection to NPS standards are all high-priority needs.

The Idaho state historic preservation officer will be asked to comment on these ongoing studies because City of Rocks is a new entity with a small existing database that will increase substantially.

A cultural resource management plan is being prepared. It includes ongoing identification and evaluation components and provides for a computerized data management system that enables relevant variables to be weighed in the management planning and decision-making processes. The plan establishes program goals and mechanisms for coordinating these with other resource management goals. A schedule for program development and accomplishments provides the basis for justifying personnel and funding needs of the cultural resource management program. Recommended reserve staffing includes a historic preservation specialist on call from neighboring park units or stationed at the reserve at least during the initial planning stages to ensure adequate development and implementation of the program.

Reserve managers would strive to maintain the highest degree of integrity of the air, geological resources, water, biological resources, and visual/scenic resources by establishing a resource baseline to determine the present condition of these resources, monitoring changes in resource conditions, and identifying and, if possible, mitigating the sources of changes. Scientific research in the reserve would be encouraged to increase knowledge about the processes, objects, and organisms present. Reserve managers would continue to cooperate with the Bureau of Land Management, the U.S. Forest Service, state and local governments, and landowners for compatible management on adjacent lands to ensure continued preservation of the reserve’s natural resources and significant related resources on lands adjacent to the reserve. In addition, reserve managers would seek technical assistance from the U.S. Fish and Wildlife Service in restoring wetlands and riparian areas and in completing a comprehensive inventory of natural resources within the reserve, especially for rare and sensitive species.

A resource management plan would be developed that would provide ways to resolve deficiencies in knowledge and recommend actions to solve resource management problems. Important components of the natural resource portion are described below.

City of Rocks National Reserve is a class II clean air area for air quality as designated under provisions of the Clean Air Act. The maximum increments beyond baseline concentrations of air pollutants allowable for class II areas would allow modest industrial growth in the vicinity of the reserve. Because City of Rocks was established to preserve and interpret significant cultural resources and to protect and maintain the scenery—all of which are air-quality-related values—and because air pollution, even at concentration levels below national ambient standards, can harm cultural resources, degrade visual quality, and diminish visitors’ enjoyment, reserve managers would work with the state of Idaho to seek redesignation of City of Rocks as a class I area. With class I designation, the reserve and all its air-quality-related values—visibility, plants, animals, water quality, and cultural and other resources—would be given additional protection from air pollution impacts from major new emitting sources.

Reserve managers would actively cooperate in all regional efforts to maintain air quality and remedy any existing air pollution effects. An air monitoring program would be developed for the reserve.

City of Rocks was designated a national natural landmark in recognition of the nationally significant geological and scenic values of its rock formations. One of the objectives of the landmark program is to encourage protection of the site, and any management actions must avoid damage to site integrity. Although most of the formations appear to be competent granite, geological research for the area suggests that some rock formations in the reserve are in a fragile condition because of natural geological and weathering processes (Cunningham 1971). To ensure protection of these nationally significant rock formations a monitoring and inventory sampling program would be developed. The inventory process would concentrate on locating fragile rock formations and on identifying impacts to all rock surfaces from visitor activities, particularly the use of climbing equipment. The monitoring process would determine if impacts over time are significantly altering the natural state of the rock surfaces or accelerating erosion processes.
Depending on the fragility of the rock resources or the significance of impacts, it might be necessary to restrict recreational use to prevent impacts.

In addition, all public lands disturbed by past mineral development would be inventoried for hazards. Any identified threats to the environment or to the safety and health of visitors would be mitigated. Recreational collection or removal of minerals, such as rockhounding, would be prohibited on all public lands to protect both the resources and the visitors.

**Water Resources, Water Rights, Wetlands, and Floodplains**

Baseline water quality and quantity data would be collected from all streams and springs in the reserve. Measurements would include biotic and abiotic elements relating to water quality and quantity. The baseline data would be used to monitor streams and springs for possible future disturbances and to locate and mitigate present and future impacts in reserve watersheds, including those caused by grazing.

To the degree feasible, the actions proposed in the plan would be accomplished using water rights currently held by the United States and the state of Idaho. If additional water was needed to fulfill the purposes of the reserve, rights would be obtained according to state law.

A wetland inventory, monitoring, and protection program will be developed. The program will include a detailed onsite evaluation of all wetlands in the reserve. The study will determine the location, condition, threats to, and ecological function of all wetlands. The data will be used to monitor and mitigate impacts, including those caused by grazing. Strategies to restore damaged wetlands will be developed to reestablish their natural ecological functions. Methods such as limiting livestock access and structural improvements to abate soil erosion may be required to improve wetland conditions in some areas.

The proposed roads, trails, campground, and facilities would be placed outside wetlands and floodplains unless there is no practicable alternative.

**Vegetation and Soils**

One of the reserve's most notable qualities is its large degree of biological diversity concentrated in a relatively small area. The great variety of textures, colors, and shapes in the natural landscape contributes considerably to the reserve's scenic quality. Intense grazing, dryland farming, and other events associated with the settlement of the area have reduced the diversity of the natural landscape by causing successional shifts in plant communities toward a dominance of woody perennial and alien annual herbs in many areas of the reserve. In recent years an increase in vegetative disturbance in the reserve has been attributed to an increase in recreational activities. The overuse of the land in some areas of the reserve has caused the loss of both vegetative cover and soil.

Various methods would be developed involving fire and vegetation management to protect the natural diversity of the native plant communities to the extent possible. Vegetation and soils would be intensively managed to control and repair damage caused by recreational use. For example, heavily used areas might be rested and revegetated, and runoff would be controlled to reduce erosion. Vegetation might be managed to enhance views from scenic overlooks. Wetlands would be protected from vegetation trampling, soil compaction and erosion, and pollution. Damaged riparian areas would be restored. For areas where grazing would be allowed, a grazing management plan directed at protecting the natural diversity of native biological communities would be developed and implemented.

A coordinated wildland fire management plan would be prepared for the reserve, consistent with NPS policies and guidelines. This plan would include provisions for prescribed natural fire and prescribed burning. Through interagency agreements, the managing agency could provide support to the Forest Service and Bureau of Land Management by participating in all firefighting activities in the region. In addition, other agencies might provide resources as needed to control wildfires in the reserve.

Many introduced plant species exist within the reserve. Some are a potential threat to resources; for example, halogeton is toxic to livestock and wildlife. Nonnative plant species would be eradicated or controlled only if they threatened to spread or compete with reserve resources and if control was feasible. Care would be taken to ensure that programs to manage nonnative species did not significantly damage native species.

Reserve managers would continue to consult with the Idaho Department of Fish and Game in managing wildlife and hunting in the reserve. A wildlife management and hunting program for the reserve would be developed in accordance with NPS and Idaho Department of Parks and Recreation policies and guidelines. Hunting would only be allowed in the reserve if it did not compromise...
public safety or more significant purposes of the reserve such as visitor enjoyment, protection of historic features, and protection of natural resources, including other species. Hunting would be allowed only during established deer or upland game bird seasons. Hunting would be limited to big game, and upland game birds and would be prohibited in the greater Circle Creek basin. All other indiscriminate hunting, shooting, and discharge of fire arms would be prohibited. Trapping would continue to be prohibited.

Many rocks in the reserve provide essential habitat to some species that are sensitive to human activity. The rocky cliffs provide important nesting habitat for various species of raptors, including the ferruginous hawk, a candidate threatened or endangered species. The cracks, crevices, and caves may be important roosting habitat for as many as six species of bats, including Townsend's big-eared bat, also a candidate species. To ensure protection of sensitive cliff-dwelling species their habitat would be inventoried and important habitat monitored seasonally. Efforts would be directed primarily at protecting ferruginous hawks, golden eagles, red-tailed hawks, prairie falcons, and Townsend's big-eared bat. The management direction for specific species would be as follows:

Early season surveys would be conducted during raptor courtship and nest selection to find the outcrops occupied by breeding raptors. Any outcrops with occupied nests would be closed to climbing for the duration of the breeding season for sensitive species. Outcrops within 300 meters and in sight of golden eagle and ferruginous hawk nest sites also would be closed because they are particularly sensitive to disturbance during their courtship and nesting cycle.

Any caves or large crevices occupied by Townsend's big-eared bats would be closed to all visitors.

There are no federally listed threatened or endangered species in the reserve. However, ferruginous hawks and Townsend's big-eared bats, category 2 (candidate) species, do occur in the reserve. Ferruginous hawks and Townsend's big-eared bats and their important critical habitats would be strictly protected. The state has identified additional rare or sensitive plant and animal species that might occur in the reserve, but information is limited for these species and their important habitat in the reserve (see appendixes B and C).

The reserve would be proactive in protecting habitat for all threatened, endangered, or candidate species identified in or near the reserve. Reserve managers would cooperate with the Bureau of Land Management, U.S. Forest Service, U.S. Fish and Wildlife Service, Idaho Department of Fish and Game, and other agencies to protect and reestablish federally listed species in the region. The reserve would enter into conservation agreements for inventory and management of federally listed or candidate species when the opportunities exist. Before any construction activities begin, impacted areas would be surveyed for those protected species likely to be affected and appropriate mitigation would be undertaken.

The reserve would inventory all federal and state listed threatened, endangered, rare, declining, sensitive, or candidate species native to and present in the reserve along with their critical habitats. The reserve would seek technical assistance from the U.S. Fish and Wildlife Service in completing the inventory. These species would be given special consideration in all future planning activities and in management of special uses and activities such as grazing and recreation, including climbing. Species of special concern would be periodically monitored to ascertain the health of each identified population.

The establishing legislation recognizes scenic quality as a value requiring protection through management. Preserving scenic quality is achieved through protecting the aspects that create scenic quality: naturalness, vividness, and unity. These qualities within the eight selected important viewsheds that display the reserve's outstanding scenic quality would be managed to retain conditions at the time the reserve was established. Photographic documentation would set up baseline images that would be used for monitoring changes. This documentation would serve as the goal towards which to manage.

Specific tools of management would include manipulating air quality, vegetation, and visitor use to ensure the best possible visual experience for the visitor. Air quality would be managed to maintain pristine conditions for clarity and visibility.

Vegetation within the viewsheds would be managed to maintain visual variety in textures, forms, and colors. Visitor use would be managed so that viewers could experience a sense of solitude in the
Management of Natural Resource Uses

Domestic Livestock Grazing. Reserve managers and willing private landowners would work cooperatively to develop and demonstrate ecologically sound, sustainable methods for managing rangelands. A grazing management plan would be developed in accordance with range management techniques, consistent with NPS policies and guidelines, to ensure that livestock grazing on public lands did not result in significant resource damage. The plan would be developed in cooperation and coordination with the Bureau of Land Management, U.S. Forest Service, and permittees and would prescribe methods for managing each allotment in the reserve. Any grazing allotments in the reserve that were vacated for any reason by the recognized permittee of record would be allocated to remaining or adjoining permittees with no increase in AUMs for those permittees. In these cases, the same number of AUMs would therefore be using a larger allotment. Specific decisions on vacated allotments would be consistent with sound range management principles or would be permanently withdrawn from domestic livestock grazing if it was in the best interest of resource protection and visitor use.

Grazing over the years has caused an increase in the density of woody plants and their expansion into new areas of the reserve. Increasing woody plant cover, especially sagebrush, has served to confine livestock grazing to less and less productive area over time, resulting in a reduced range condition, a loss of native perennial herbaceous species, and an increase in nonnative plant species that are more resistant to livestock grazing.

Various techniques would be developed involving fire and vegetation management to restore the range to more natural vegetative communities. For example, some basin areas now covered with monotypic stands of sagebrush and nonnative annual grasses would be managed toward a natural community of native perennial grasses and widely dispersed sagebrush. Only native plant materials would be used if planting was required. Protecting the natural vegetative communities would increase forage for both livestock and wildlife, provide better soil protection from erosion, and support a greater diversity of wildlife.

To protect riparian areas, domestic livestock grazing and trailing activities on public lands would be excluded from wetlands and riparian areas in the California Trail subzone (includes the foreground of the California Trail, Circle Creek basin, and the stage station site), the General Natural Area, the Research Natural Area, portions of the South Fork of Circle Creek basin, Taylor Springs, Mahogany Springs, and some damaged wetlands and riparian areas on public lands in any zone. This involves about 220 acres (30% of total in the reserve) of public wetlands and riparian areas. The National Park Service would also give a high priority to acquiring private land within the California Trail subzone from willing sellers, which would add another 260 acres (36%) of wetlands and riparian areas that would be protected from grazing.

For areas where grazing would be allowed in riparian areas the grazing management plan would incorporate wetland protection and restoration strategies developed under the resource management plan. The grazing management plan would include livestock management techniques to limit access to wetlands. Techniques would vary depending on the condition and sensitivity of wetlands in a particular area. In some cases, fences or other restrictive barriers would be built to keep livestock out of wetlands, either permanently or until wetland vegetation has recovered and soils have stabilized. In other wetland areas, livestock would continue but would be more limited. For example, grazing rotation and deferred seasons might be used to protect riparian areas during periods when they are most vulnerable to damage. Direct water pollution by livestock grazing under commercial grazing permits would also be prevented by eliminating existing corrals and watering sites near all streams and springs that originate in the reserve. The grazing management plan would include strategies to develop alternate water sources to move stockwater tanks and livestock away from wetlands on public lands. Only water sources that did not directly modify wetlands or change the timing, distribution, or amount of water supplying wetlands on public lands would be developed. The reserve would work cooperatively with private water rights owners that divert water from wetlands on public land to encourage them to mitigate any damage they might cause to wetlands. Water rights...
could be acquired where possible according to state law. In some cases, livestock grazing permits might be modified to ensure the protection of wetlands. As grazing allotments changed over time, subsequent revisions to the City of Rocks grazing management would be identification of additional areas where riparian areas might be protected. Additional environmental compliance, including a statement of findings, might be required to address the impacts caused by specific actions under the grazing management plan.

Domestic livestock could be trailed through any zone necessary to move them from one area of an allotment to another. Livestock trailing corridors would be designated along the new east-west road alignment and the existing north-south road alignment (see the Management Zoning map). Trailing corridors would remain for all other historic trailing routes. Trailing would be prohibited in the research natural area and where California Trail ruts are best preserved.

Impacts would be inventoried and monitored to help develop methods to protect vegetation, soils, and wet areas. Special emphasis would be placed on monitoring the cumulative effects of grazing and recreational use in the backcountry recreation subzone just west of the research natural area. Most of this area is poorly suited for grazing because of steep terrain, extremely erodible soils, and low forage value of the vegetation covering the area. If it was determined that domestic livestock were adversely affecting this area, grazing would be reduced or eliminated from the area.

Visitors. Visitors would be informed about sensitive wildlife or plants, where their critical habitat occurs, and their life histories. Temporary closures of some areas might be necessary to protect important habitats. For example, use would be directed away from raptor nest sites. Visitors would also be informed about the locations of all established trails and campsites and educated about the delicate nature of vegetation and soils.

Campfires would be allowed only in established campites. To protect habitat the gathering of firewood within the reserve would not be allowed, but visitors could use their own firewood from other sources.

A climbing management plan with input from the local climbing community is being developed. The plan will provide strategies for protecting cultural and natural resources from significant climbing impacts.

To preserve the natural silence that is a significant value associated with City of Rocks, no noise-generating equipment, including generators, radios, or power tools would be allowed away from the road corridor without permission of the reserve manager or landowner. No firearm use would be allowed other than during established hunting seasons and for the purpose of hunting. County ordinances have been developed to protect this value on private lands within the reserve. Reserve managers would pursue an agreement with the U.S. Air Force to eliminate low-level overflights over the reserve.
VISITOR USE

<table>
<thead>
<tr>
<th>INTERPRETATION</th>
<th>Actions called for on private land would require either permission of the owner or a willing seller acquisition of that interest necessary to provide for the intended public use.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interpretive Themes</td>
<td>City of Rocks was designated a national historic landmark on July 19, 1964, and is listed in History and Prehistory in the National Historic Landmarks Program: 1987 under theme X, &quot;Westward Expansion of the British Colonies and the United States, 1763-1898,&quot; subtheme D, &quot;Western Trails and Travelers,&quot; facet 4, &quot;California Trails and Settlement of California.&quot;</td>
</tr>
<tr>
<td></td>
<td>City of Rocks is listed in Natural History in the National Park System and on the National Registry of Natural Landmarks: 1990 under Great Basin Natural Region, Group I, Landforms of the Present, Theme 6, Sculpture of the Land.</td>
</tr>
<tr>
<td></td>
<td>Before deciding what areas will be made more accessible to visitors and where facilities will be located, it is essential to determine what visitors need to know about the reserve. The following interpretive themes represent those ideas about the resources that are critical to a visitor's understanding of the reserve's significance. All interpretive efforts (both media and personal services) should relate to one or more of the themes, and each theme should be addressed by some part of the overall interpretive program.</td>
</tr>
<tr>
<td></td>
<td>The following themes, in priority order, would provide the basis for interpretation at City of Rocks:</td>
</tr>
<tr>
<td></td>
<td>• The Oregon and California Trails — The trails were the routes of the most significant overland emigration in American history. City of Rocks, situated along the eastern approach to the best mountain pass between Fort Hall and the Humboldt River basin, became a major landmark and stopping area along the California Trail. The site was noted for its impressive scenery and the feelings of awe it inspired in the emigrants. A typical encampment at City of Rocks offered a brief respite from a long day on the trail, during which the emigrants would pasture their livestock, replenish water supplies, bathe, record their names on the rocks, cook and eat, visit around the campfire, and repair equipment.</td>
</tr>
<tr>
<td></td>
<td>• Geology — At City of Rocks a unique combination of rock types and geological weathering forces has resulted in some of the oldest rock in the United States being juxtaposed with others that are much more recent. The two spires of the Twin Sisters are actually billions of years apart in age.</td>
</tr>
<tr>
<td></td>
<td>• Livestock Grazing — The Shoshone were the first to graze livestock in this area. They traded horses to other tribes in the Northwest. The first whites to use the area were trappers and explorers. Early settlers tried dryland farming, but it was not successful. Ranching has proved to be a sustainable use of this land.</td>
</tr>
<tr>
<td></td>
<td>• Diverse Habitat — The habitat of the reserve supports a large variety of sensitive and rare species, such as golden eagles, ferruginous hawks, cliff chipmunks, and Townsend's big-eared bats.</td>
</tr>
<tr>
<td></td>
<td>• Vegetative Diversity — The City of Rocks is situated in a unique location that contains a wide variety of plant species — it is at the northern edge of the Great Basin with plants representative of that area and at the southern edge of the Snake River plains with plants representative of it. Add to these plant diversities the varied elevation of the reserve, and an even larger variety of plants can be found because of the different moisture levels and microclimates. To date approximately 600 different species have been identified in the reserve area, and a plant list is being developed.</td>
</tr>
</tbody>
</table>
|                         | • Stage Route — The Kelton-Boise stage route (1869-1883) through the City of Rocks was the fastest way to get from the East to the gold fields of Idaho. The Emigrant Canyon stage station at the south end of the reserve was a welcome rest area and overnight stop for weary travelers on their way to Boise. The stage station offers an impressive view of the Twin Sisters and is on the Salt Lake Alternate Route of the California Trail.
Visitors would be directed to City of Rocks by signs along I-84 at the Burley, Declo, and Sublette/Malta exits and at other key intersections of state and county roads.

Visitor information and an interpretive overview of the reserve would be provided at a new visitor center in the vicinity of but outside the reserve. The reserve does not include any areas where a major facility such as a visitor center or a full-service campground would not intrude on important views. Therefore, as suggested by many during the scoping meetings and review of the preliminary alternatives, these facilities would be located outside the reserve on land owned by the Bureau of Land Management, where they could be accommodated without degrading the wide open, undeveloped character of the reserve's historic rural setting.

The Bureau of Land Management administers a parcel of federal land at the City of Rocks junction on the Almo road, just south of Almo. The National Park Service and the Idaho Department of Parks and Recreation are working cooperatively with the Bureau of Land Management to obtain use of the land to build the proposed visitor center on this site. Most visitors (estimated at 70%) approach the reserve from the east; thus a visitor center at this location would serve the majority of visitors before they entered the reserve.

The center would provide a point of arrival and a place where visitors could get an overview of the interpretive themes before entering the reserve. Details regarding specific interpretive media would be provided in a separate interpretive prospectus. Visitors would receive literature (including a map of the reserve) identifying key resources, facilities, and recommendations for a safe visit. They also would be able to purchase theme-related publications and to ask specific questions at the information desk. These materials would help visitors gain an understanding of the reserve concept and how it relates to other units of the national park system.

At the two western entrances to the reserve visitors could get information at one staffed and one unstaffed kiosk. The panels would provide general information about the reserve's key resources, facilities, and services and encourage visitors to stop at the visitor center when they got to that side of the reserve.

An audiovisual program at the visitor center would present the human history of the area from Native American occupation to present-day ranching; however, the principal focus would be the emigrants along the California Trail. Audiovisual media would be excellent vehicles for interpreting chronological events and for conveying emotions, such as those expressed in the diaries of the people who traveled by wagon on the trail.

An exhibit area would complement the audiovisual program. The goals of the exhibits would be to highlight aspects of the primary interpretive themes, to provide a historical context for the resources visitors would experience during their stay, and to relate elements of the natural and human history that most people would be unlikely to see during their visits. For example, one exhibit might interpret lifestyle elements of the Shoshone in the region, another might depict scenes of life on the California Trail, still another could show the emigrant trails in the reserve in context with the entire route, and yet another could focus on the diversity of wildlife and plantlife in the reserve. Interpretive exhibits would work best when they incorporate articles, such as artifacts, reproductions, models, maps, photos, or artwork. The reserve currently owns few artifacts, and there would be no guarantees that many objects of significance would be forthcoming. Consequently, reproductions, models, and other media might be required to provide effective exhibits.

An outdoor amphitheater, parking lot, and trail would be built near the developed campground. Here daytime interpretive demonstrations, talks and walks, and evening programs would be presented. The amphitheater would be within a mile of the visitor center outside the reserve, and the facility also could serve people camping within the reserve and local residents. The amphitheater would be designed for an initial capacity of 100 with expansion capability for 200 visitors.

Most visitors, upon leaving the visitor center, would opt to take the tour road through the reserve to experience the resources firsthand.

From the visitor center a road would cross the reserve from east to west, providing access to most of the reserve's significant resources, developed facilities, trails, and recreational opportunities.
As visitors travel into the reserve from the east, they would be directed to their first stop at an overlook of the Circle Creek basin. Here visitors could view a large section of the California Trail, the Circle Creek encampment area, and the City of Rocks with the Twin Sisters landmark visible in the background. Wayside exhibits at the overlook would interpret the historic trail, the encampment area, and the scene as it may have looked during the emigrant period. It would provide an overview of the geology of the area.

The Nicholson house would be the next interpretive site. Site interpretation at this location would interpret early homesteading and later ranching activities. A wayside near the inscription rocks would describe the significance of the rocks and perhaps provide enhanced illustrations of some of the inscriptions. To encourage visitors to leave their cars, a short interpretive trail would lead from the Nicholson house to Register Rock.

At the next pullout visitors would have an opportunity to stand at a high point overlooking the Twin Sisters basin, where they could view a scene similar to what the early emigrants would have seen, and to pick out the next major landmark on their journey. To enhance this experience, the Twin Sisters basin would be managed to retain an open expanse with little or no signs of modern development. The north-south road would be maintained at a lesser standard than the main road to make it less visible.

Visitors would be encouraged to walk along this section of the trail, to experience it more as the emigrants would have (see the "Interpretive Trails" section below).

At the existing corral site near the east/west road, a wayside exhibit would interpret some of the modern ranching activities practiced in the reserve.

Upon entering the natural area subzone natural and recreational resource area (see the Management Zoning map) visitors would be directed by signs to day use areas at Bath and Turtle rocks where they could view the Silent City from the rim. Wayside exhibits at these two areas would interpret the rocks from both a geological and a historical perspective.

To access the southern portion of the reserve and the Twin Sisters area by car, visitors would be encouraged to follow the existing dirt road or exit the western boundary of the unit, drive south on the county road, and reenter the reserve via the Southwest or Junction (Moulton) entrance on an alignment that parallels the California Trail. Before reentering the reserve, a pullout and wayside exhibit would draw attention to Granite Pass, the next day's goal for emigrants on the California Trail. At the point where the road turns north toward Twin Sisters, a wayside exhibit would interpret this segment of the California Trail and its intersection with the Salt Lake Alternate. Another wayside near Twin Sisters would explain the historical and geological significance of this landmark.

Upon leaving the reserve from the Twin Sisters area, visitors could head back to Almo, or they could choose to travel north to Oakley and perhaps take advantage of the loop tour of the region (described below).

By leaving their cars visitors could leave the developed areas, get closer to the resources, and gain better understanding and appreciation of each of the primary themes.

**Historic Emigrant Trails.** Walking alongside the California Trail and Salt Lake Alternate would offer special interpretive experiences to reserve visitors. These historic trails were not paths but routes (sometimes miles in width) used by countless wagon trains in the 19th century. Visitors would be encouraged to walk along these routes and to experience the area much as the 19th century emigrants would have experienced it. An important characteristic of this experience would be traveling across open country without being confined to a defined path. Reducing automobile traffic from a portion of the trail corridor would greatly enhance this experience. Because the trail corridors would cut across several management zones, including zones where livestock grazing occurred, visitors would occasionally encounter fences that they could cross either through marked narrow gaps in the fencelines or by simple stiles. Visitors would also be encouraged to wander freely through the encampment area.

Key features on the historic trails would be interpreted through wayside exhibits. Some of the exhibits would be the same as those along the tour road. However, Pinnacle Pass would only be accessible by walking. The California Trail narrowed at this pass to allow the wagons to squeeze through, and the heavy traffic left wheel ruts on the rock and scars from the cables used to slow the
wagons' decent. A wayside exhibit at Pinnacle Pass would interpret the emigrant activity here and direct visitors' attention to Granite Pass, which represented the next barrier to cross.

**Historic Continuum Trails.** A loop trail would lead hikers through the historic rural setting to Twin Sisters, the junction of the California Trail and Salt Lake Alternate, the stage station site, and Pinnacle Pass. The wayside exhibits mentioned above would interpret many of the key features. On the Salt Lake Alternate, a short distance east of its intersection with the California Trail, another wayside not accessible by road would point out the site of the stage station that operated well after the peak emigration period. The station buildings were converted years ago into ranching structures that are now in an advanced state of deterioration. The wayside would interpret the evolving uses of the Salt Lake Alternate corridor up to and including present-day ranching activities.

Visitors would be encouraged to walk from the tent campground along a short trail to a homestead, mining site, a view of the reserve, and connections to Twin Sisters formation and the stage station. A wayside exhibit at the homestead site would interpret the early settlement of the region.

**Silent City Trail.** To experience the silence and mystery of City of Rocks, which can be as awesome to modern-day tourists as it was to the emigrants, visitors would be directed to a loop trail connecting the day use areas on the rim and descending down through the rocks. Here visitors would disperse and experience the drama of the rim and the inner city on their own, away from other people and development. A segment of the trail would be provided between Turtle Rock and Parking Lot Rocks.

**Natural Environment Trails.** A 7-mile loop trail between the Silent City and Indian Grove would take hikers through areas of outstanding scenery, significant geology, and examples of the reserve's diverse flora and fauna. The story of the continuum of history in the City of Rocks area would be greatly enhanced by the interpretation of resources throughout Cassia County. For example, the Oakley Historic District, listed on the National Register of Historic Places, is an excellent representative of Mormon town planning and architecture. Additional resources that could help tell the story include the county courthouse at Burley, other town sites and institutions, dryland farms and ranches, and traces of old trails and roads. This tour route and the associated literature would be developed in cooperation with the communities, local chambers of commerce, and other tourism agencies in the area (see Regional Loop Tour map).

The main visitor center for telling this story would appropriately remain at City of Rocks, where all the various aspects of the story would come together in explaining how this nationally significant landscape was settled and how the land uses in this area have related over time to the land uses in the larger region. From the City of Rocks visitor center, a loop tour could link related resources outside the reserve boundary. Information stations would be established in Burley, Oakley, Albion, and Connor to contact visitors as soon as they entered the loop and advise them of what they could see along the way.

The reserve managers could provide technical assistance to Cassia County and to communities in the vicinity of the reserve to help them preserve, protect, and interpret the significant cultural resources in their respective jurisdictions, thus enhancing the cultural setting for the reserve. Properties listed on the National Register of Historic Places would receive primary consideration. Properties in Cassia County that are already listed include the Oakley Historic District, Granite Pass, the Albion Methodist Church, the Albion Normal School campus, and the Cassia County courthouse in Burley. Adaptive reuse of these properties and development of design guidelines for the communities would be encouraged.

It is recommended that the tour loop, much of which passes through Forest Service and BLM lands, be studied for possible designation as a national scenic byway.

Three types of camping would be available within the reserve: primitive camping, group camping, and backcountry camping. Within the natural and recreational resource area in the southwest corner of section 36, a tent campground would be developed for up to 50 sites.

Located adjacent to, but not within, aspen groves, the campground would have sites for primitive camping. Water, picnic tables, fire grills, trash receptacles, and restrooms would be provided. A bulletin board would hold changeable information, regulations, safety precautions, and interpretive
program schedules. Vehicle parking would be clustered to provide walk-in access to campsites. Campsites would be located to avoid any impacts on wet areas and to use the existing landscape and vegetation to maximize privacy.

A group campground would be developed in the area behind Breadloaves. It would be operated on a reservation basis. Amenities would be similar to those provided in the primitive camping area.

Up to seven backcountry campsites would be available for up to 50 people in the Indian Grove area. Up to two of the sites might be group sites with fire rings and toilets. Use of these undesignated sites would require a permit. Visitors could hike to Indian Grove along trails within the reserve. Grazing would be managed to protect natural resources and the backcountry visitor experience.

In addition to campsites within the reserve, in cooperation with the Bureau of Land Management, a developed campground would be developed on BLM land in cooperation with the Idaho Department of Parks and Recreation just outside the reserve boundary near the visitor center.

The majority of rockclimbing activity within the reserve would continue to occur in the natural and recreational resource area that encompasses all of section 36 and portions of adjacent sections 25 and 31. These areas offer prime climbing opportunities. At various access points, parking areas would be developed along with designated trails to popular rock faces.

Rockclimbing activity within the reserve would be managed in accordance with the objectives established for each management zone, subzone, and area as described in this plan. To protect outstanding features, climbing and scrambling would be prohibited on historic inscription rocks, Twin Sisters formation, Pinnacle Pass, and other physical features that have cultural significance. Like other recreational uses not directly associated with the access or enjoyment and interpretation of the California Trail, climbing would be precluded within the foreground viewshed of the trail. This would eliminate climbing opportunities where the activity would be visible from approximately 1/4 mile of each side of the California Trail. The research natural area would be managed exclusively to protect natural processes and to conduct nonmanipulative research, which would exclude climbing and other uses from this area without a special use permit.
Other specific issues and restrictions pertaining to climbing will be addressed in a climbing management plan that is being developed with input from the climbing community.

The plan will provide strategies for protecting natural and cultural resources from significant climbing impacts and for monitoring the environmental effects of climbing use. Since some climbing rocks are located on private property, the reserve will continue to direct climbers to obtain permission from private landowners prior to entry onto private lands.

<table>
<thead>
<tr>
<th>Hiking and Horseback Riding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hiking would be permitted on public lands anywhere in the reserve. Hiking on private lands would require prior permission from the landowners. Specific hiking trails would be developed to lead visitors to many of the reserve's magnificent viewpoints and significant historic and natural resources. A trail plan would be developed to identify the locations of designated trails within the reserve. The trail up North Circle Creek to Indian Grove would be accessible to horseback riders and hikers, but not to mountain bikers. Off-road vehicles would be permitted only on existing roads that are open to all motorized vehicles. Mountain bikes would be limited to designated secondary roads or bicycle trails.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Picnicking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fully accessible picnicking facilities would be provided in the two day use areas off the main tour road in the natural and recreational resource area. The picnic area adjacent to the Twin Sisters would be removed.</td>
</tr>
</tbody>
</table>

Motor touring, a popular visitor activity, would continue and would be enhanced by the public use of the proposed tour loop from Burley through Albion, Almo, and back through Oakley.

Hunting is recognized as a traditional and compatible use of the reserve. PL 101-512 authorized the continuation of hunting, within limitations, to be managed in consultation with the Idaho Department of Fish and Game. Hunting would be allowed within certain public areas of the reserve and on private lands where prior permission of the owner has been obtained. Restrictions would be based on public safety, administration, floral and faunal protection, and management of public use and enjoyment. Consequently, it is expected that in the future hunting would be limited or not be permitted in areas and zones within the reserve that are dedicated to high visitor use and zones or portions of zones specifically intended for resource protection. A wildlife/hunting management plan would be developed in consultation with the Idaho Department of Fish and Game that identified those areas within the reserve where hunting would continue during specific times of the year or seasons (see appendix A for hunting legislation). The program would be developed in accordance with the National Park Service and Idaho Department of Parks and Recreation policies and guidelines.
GENERAL DEVELOPMENT

<table>
<thead>
<tr>
<th>FACILITIES INSIDE THE RESERVE</th>
<th>Roads</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actions called for on private land would require either permission of the owner or a willing seller acquisition of that interest necessary to provide for the intended public use.</td>
<td></td>
</tr>
</tbody>
</table>

Two major road alignments would change as follows:

The east-west gravel road from Nicholson ranch to the west boundary at Emery Canyon, approximately 3.5 miles, would be relocated to the south of the inscription rocks and the Silent City of Rocks rim activity area. This would help preserve the historic setting surrounding the inscriptions rocks and create an access and circulation pattern more conducive to separating potentially conflicting uses along the rim. The new road, which would be approximately 4 miles long, would retain the scale and textures of the existing road and be designed to support a 25 mph limit, in keeping with the historic rural setting.

A segment of the north-south road across the Twin Sisters basin, approximately 2 miles, would be reduced to a ranch route to minimize vehicular travel through one of the most significant trail viewshed areas. Although vehicular use would be allowed, it would be discouraged. Fencing might or might not be removed at the discretion of the landowner.

The road crossing the Circle Creek basin from the Nicholson ranch up to the North Circle Creek drainage, approximately 1.5 miles, would be converted to a hiking trail (see discussion below).

One mile of gravel road would be constructed from the east-west road to the new Circle Creek basin overlook.

Gravel, sand, and materials would not be taken from within the reserve for road maintenance or construction. These materials would come from a nearby source and be petrologically and mineralogically compatible with the native rock of the reserve, especially for road work.

Three major trail loops would be created and would become the principal trails of the reserve. Other trails might be added later after preparation of a trail plan and appropriate compliance.

Silent City loop trail. Approximately 3.5 miles of loop trail around the Silent City would originate at the primitive campground. The route would follow the rim for 1.5 miles from its most southern point at Turtle Rock north to the Breadloaves, connect to the Bath and Parking Lot Rocks day use areas, then descend from Parking Lot Rocks into the Silent City, wind its way along the eastern edge of the escarpment, and climb out at Turtle Rock. Much of the route already exists. The new trail would clarify, organize, and consolidate a myriad of climbing access routes and social trails. Other social trails would be obliterated.

Indian Grove loop trail. Approximately 7 miles of loop hiking/horseback riding trail would connect the Breadloaves group area to the Indian Grove overlook. The route would follow a new alignment east around the Taylor property to Indian Grove, descend North Circle Creek, and connect with the north leg of the Silent City loop trail to connect back through Parking Lot Rocks to Breadloaves. Except for the Taylor property bypass, all of this alignment is in place and being used (see the Management Zoning map).

Twin Sisters loop trail. Approximately 4 miles of trail would connect Twin Sisters to the stage station site by way of Pinnacle Pass and the trails junction interpretive wayside. This trail would cross and follow significant portions of the California and Salt Lake Alternate trails, carving through piñon woodlands and across Homestead basin. The intent of this alignment would be to allow the least impacting access to sterling trail resources. A spur trail would connect the primitive campground with the Twin Sisters loop trail.
Approximately 1 mile of trail would leave the tent campground and climb 800 feet to the top of an unnamed ridge that encloses the Twin Sisters basin. This route would require easements across two private properties and provide a primitive overlook experience.

The road crossing the Circle Creek basin from Nicholson ranch up to the North Circle Creek drainage, approximately 1.5 miles, would be ripped back to create a 3-foot natural surface hiking trail.

Two existing road segments would be removed and converted to trail use as follows:

- Approximately 1.5 miles of ranch road/trail from Emery Canyon Pass up to Indian Grove
- Approximately 1.5 miles of ranch road/trail from the northeast boundary at Graham Creek to Indian Grove

The appropriate status of any existing trail that has not been specifically addressed will be analyzed in the City of Rocks trail plan.

The following chart describes the capacity of facilities for day use areas at the reserve, and indicates the availability of trailheads, interpretive waysides, and picnicking sites.

### Table 1: Day Use Activity Areas Accessible by Car

<table>
<thead>
<tr>
<th>Areas</th>
<th>Parking Spaces</th>
<th>Trailhead</th>
<th>Access Reason</th>
<th>Interpretive Wayside</th>
<th>Picnicking</th>
<th>Restrooms</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside Reserve</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Circle Creek Basin</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overlook</td>
<td>20 cars</td>
<td>yes, ridge access</td>
<td>orientation overlook to inner city</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>sign, garbage</td>
</tr>
<tr>
<td>Nicholson Ranch</td>
<td>5-10 cars</td>
<td>to interpretive trail</td>
<td>historic sites</td>
<td>yes</td>
<td>no</td>
<td>yes</td>
<td>sign, garbage</td>
</tr>
<tr>
<td>Inscription Rocks</td>
<td>5-10 cars</td>
<td>to short interpretive trail</td>
<td>historic site</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td></td>
</tr>
<tr>
<td>Twin Sisters View</td>
<td>5-12 cars</td>
<td>to California Trail</td>
<td>historic trail view</td>
<td>yes</td>
<td>yes</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>Corral Site</td>
<td>5-10 cars</td>
<td>no</td>
<td>observe modern ranching</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>seating</td>
</tr>
<tr>
<td>Turtle Rock</td>
<td>15-20 cars</td>
<td>to inner city loop &amp; accessible rim trail</td>
<td>scenic view, trail to inner city, climbing</td>
<td>yes</td>
<td>3-5 tables</td>
<td>yes</td>
<td>relocate garbage receptacles</td>
</tr>
<tr>
<td>Bath Rock</td>
<td>10-25 cars</td>
<td>to inner city &amp; accessible rim trails</td>
<td>scenic view, trail to inner city, climbing</td>
<td>no</td>
<td>5-8 tables</td>
<td>yes</td>
<td>redesign parking, relocate garbage receptacles</td>
</tr>
<tr>
<td>Parking Lot Rocks</td>
<td>6-10 cars</td>
<td>to inner city &amp; accessible rim trails</td>
<td>climbing</td>
<td>no</td>
<td>3-5 tables</td>
<td>yes</td>
<td></td>
</tr>
<tr>
<td>West Breadloaves</td>
<td>15-20 cars</td>
<td>north to Indian Grove</td>
<td>backcountry access, climbing, group camping, picnicking</td>
<td>no</td>
<td>yes</td>
<td>yes</td>
<td>sign</td>
</tr>
<tr>
<td>Indian Grove Overlook</td>
<td>3 cars</td>
<td>no</td>
<td>scenic view</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>sign, garbage</td>
</tr>
<tr>
<td>Twin Sisters Basin</td>
<td>5-7 cars</td>
<td>Pinnacle Pass, Twin Sisters</td>
<td>historic sites along trail</td>
<td>yes</td>
<td>no</td>
<td>yes</td>
<td>trail connects to stage stop</td>
</tr>
<tr>
<td>Trails Junction</td>
<td>5-7 cars</td>
<td>to California &amp; Salt Lake Alternate Trail</td>
<td>historic site along trail</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td></td>
</tr>
<tr>
<td>Outside Reserve</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Almo Entrance</td>
<td>5-10 cars</td>
<td>no</td>
<td>orientation</td>
<td>kiosk</td>
<td>no</td>
<td>no</td>
<td></td>
</tr>
<tr>
<td>Emery Canyon Entrance</td>
<td>5-10 cars</td>
<td>no</td>
<td>orientation</td>
<td>kiosk</td>
<td>no</td>
<td>no</td>
<td></td>
</tr>
<tr>
<td>Junction (Moulton)</td>
<td>3-5 cars</td>
<td>no</td>
<td>orientation</td>
<td>kiosk</td>
<td>no</td>
<td>no</td>
<td></td>
</tr>
<tr>
<td>Entrance</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Granite Pass View</td>
<td>3-5 cars</td>
<td>to California Trail</td>
<td>historic view</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>on BLM land</td>
</tr>
</tbody>
</table>
**Campgrounds**

**Tent Campground/Trailhead.** Prior to the relocation of existing campsites within the reserve, a campground with up to 50 primitive sites, sized for small vehicles, would be developed in the natural and recreational resource area and around the southwest corner of section 36. This area was selected because it is close to the rim, it is shaded, and the campground can be hidden from road and trail views. The campsites would include tables, tent pads, and fire grills. Two, 2-compartment vault toilets would service the pedestrian loop access system to the sites.

Access from the realigned east-west road would be along a 0.5 mile gravel access road into the campground. Trails leading to the rim, nearby summits, and to rocks would start here.

After campground development is completed, all former sites would be returned to natural conditions.

**Breadloaves Group Camping Area/Trailhead.** Design of a group camping area at Breadloaves would use shaded areas to the west of the existing site on the west side of the rocks.

This site has access to the well, is separated from other users, and allows good trail access to day use areas. Camping would be separated from the west rock faces to keep high-demand climbing routes accessible and unimpeded.

A two-compartment vault toilet would be installed at this location. Parking for camping, picnicking, climbing access, and trailheads would use the disturbed area with a setback from the western rock faces. The parking lot would be located to serve both the group site and trailhead area. The lot would be sized to accommodate 15–20 vehicles and horse trailers. One registration board for backcountry use to Indian Grove would be installed.

**Indian Grove Backcountry Camping Area.** A backcountry camping area with up to seven undesignated, unimproved sites for use by permit of up to 50 campers would be positioned adjacent to but not within the aspen landscape of the Indian Grove area. Access would be from the Breadloaves parking area.

**Backcountry**

Up to three single composting privies would be in the backcountry.

---

**Facilities Outside the Reserve**

The following orientation/information signs would be used inside the reserve. (See the signs portion of appendix D for definitions of sign types.)

**Regulation (type II) signs** would be at

- three entrances at the boundary or where entrance stations occur
- backcountry registration sites at Breadloaves and the Nicholson ranch
- information panels/bulletin boards at the primitive campground and the developed campground (these would be readable by pedestrians and car passengers and located within the site design to capture the attention of all occupants)

**Interpretive (12 type IV) signs** would be used

**Along Road**
- Circle Creek basin overlook
- Nicholson ranch
- Inscription rocks
- Twin Sisters
corral/historic rural setting
- Bath Rock
- Turtle Rock
- Trails Junction
- Twin Sisters

**Along Trails**
- Pinnacle Pass
- stage station
- homestead site

A bulletin case/text panel would be at the tent campground.

Because the Idaho Department of Parks and Recreation is intended to manage reserve facilities, including the visitor center/administrative complex and the developed campground, it has filed for a long-term lease of BLM lands through the Recreation and Public Purposes Act (43 U.S.C. 869 et seq.) program. Ownership would remain with the Bureau of Land Management for these sections. The retention of the administrative/visitor center site in federal ownership would allow opportunities for cost-sharing by the National Park Service, the Bureau of Land Management, the Idaho Department of Parks and Recreation, and others. The cooperative use with the Bureau of Land Management of the area of the proposed campground is expected to state that the Idaho Department of Parks and Recreation would administer the developed campground directly or through a concession contract or through a cooperative management agreement with the Bureau of Land Management.
The site design for the headquarters area, administrative and maintenance facilities, utilities for the headquarters site, housing, and the developed campground is more detailed than would normally be presented in a general management plan. It is intended to show generally what is anticipated to occur so that relatively accurate cost estimates can be prepared. This design, based on limited site work, would probably meet reserve needs. However, before any construction is undertaken, a design process, including the consideration of other alternatives, would be undertaken. The design that is actually constructed may differ from the single concept presented here. (See the Development Concept Plan Overview and Development Concept Plan, Administrative Headquarters Site maps.)

**Visitor Center/Entrance Station.** The visitor center would be a modest, approximately 9,500-square-foot building containing

- a lobby with a staffed information desk, a backcountry registration area, and a small publication sales area
- a 70-seat theater
- exhibit space and museum
- administrative office space
- restrooms for staff and public
- miscellaneous, HVAC, etc.
- multipurpose room (25-30 seats)

Parking for 35-45 cars, eight RVs and two buses (with capability to expand) would be provided at the Almo Junction site.

A staffed entrance station designed to accommodate fee collection would be built on the main road into the reserve, just west of the RV campground road junction, within sight of the visitor center.

**Administrative and Maintenance Facilities.** Administrative offices would be in the visitor center.

Maintenance operations, both covered warehousing, shop facilities, and open-air yard storage would be 1/2 to 3/4 mile south, west of the road that would continue to the developed campground. The complex would be fenced with a 6-foot barrier and screened with native vegetation. Views along the road to the campground and from a distance along the Utah entrance road would not include any of the structural or yard elements. The yard would include four 20- x 100-foot covered warehouses and a 220- x 300-foot open storage area.
Emery Canyon and Moulton Entrances

The orientation/information kiosks installed at the Emery Canyon and Junction (Moulton) entrance would be designed to fit the settings at the intersections of reserve roads with the Junction Valley Road. Pull-outs for cars/RVs would be incorporated into the site design at each location.

A staffed entrance station would be built at the junction of the Emery Canyon Road and Junction Valley Road.

Utilities for Headquarters Site

A sewage system would service most of the Almo junction site. The sewage system would be designed to meet state codes. Power would be provided by Raft River Rural Electric Association and come from overhead lines already at the junction. A new well would be drilled.

Developed Campground

A developed campground with up to 100 sites large enough for RV use would be developed outside the reserve, 1 mile south of the proposed visitor center on property owned by the Bureau of Land Management — 50 units could be developed initially, with 50 units added later as needed. (See the Development Concept Plan, Developed Campground map.)

The campground design would include electric and water hookups at each site, showers, two comfort stations, and 100 sites along two 1,200-foot loops. Minimum spur lengths would be 55 feet, with 100 feet allowed for pull-through, one-way, counterclockwise traffic. Proposed density would be five units per acre. Domestic water and sewage facilities would be designed to meet Environmental Quality and Clean Water Act requirements.

Adjacent to the campground and available to the local community would be a 100-seat (expandable to 200-seat) amphitheater for evening programs and interpretive activities. The amphitheater would be sited to take advantage of pedestrian access from the site and car access from other parts of the county. It would have the capability for multimedia presentations and future expansion. Parking for 20 cars would be provided.

An RV dump station would be hidden from the visitor area, on the east side of the campground between the campground and the visitor center site. This facility would be a double station and would be designed for easy access and service maneuverability.

Approximately 1 mile of improved road would be built to access the proposed developed campground. The road would originate from the entrance road.
50-UNIT CAMP LOOP
- Gravel roads and spurs
- 5 units per acre
- Spur length 55 ft.
- One-way traffic (counter-clockwise)
- Hardened use area adjacent to each spur
- Spur location determined by topography and existing vegetation
- Site utilities include electrical and water hookups

COMFORT STATION
- Accommodates 50 camping units
- Handicap accessible
- Parking off both loops
- Shower facilities
- Uses septic tank and drainfield
just west of the Almo junction and the proposed
visitor center site, and continue on to the camp-
ground. The road would cross one drainage, Circle
Creek, approximately 1/2 mile south of the visitor
center. Further study would be required to deter-
mine appropriate engineering treatment of this road.

The existing four-wheel-drive road would continue
past the developed campground and provide access
to other public lands. (Please see Development
Concept Plan Overview map.)

A hiking/bicycle trail would be developed from the
developed campground westward into the reserve
to encourage nonmotorized use.

### Signs

Orientation/information signs would be used outside
the reserve on interstate and state highways.
Requests to state highways to install signs would be
made at the following locations.

**Type I signs would be**
- I-84 south at Sublette exit (2)
- I-84 north/south at Malta exit (2)
- I-84 east/west at Bailey and Route 77 exits
- Junction of state routes 77 and 30 at Declo (2)
- Junction of Route 77 at Connor Corner (2)
- In Oakley (1)
- Route 27 leaving Oakley at junction with Birch
  Creek/Junction Valley Road (1) Almo Junction

**Specialty (type III) signs would be**
- two entrance signs at east and west junctions at
  Almo and Emery Canyon: wood and stone, 4'x8'
- one modified entrance sign at Junction
  (Moulton): wood and stone, 3'x5'

**Interpretive (type IV) signs would be used at**
- Granite Pass overlook

Bulletin cases/text panels would be located at the
visitor center, Emery Canyon entrance, Moulton
entrance, and RV campground.

Housing would be provided for up to 12 permanent
and or seasonal employees east of the proposed
operations area. Where existing housing is available
for purchase, it is the intent of cooperative manage-
ment to blend employees into the community.
Therefore, structures would be purchased on an
opportunity basis, where they meet management
needs, on sites where

- septic and water systems would be most suited
- structures would not be viewed by reserve
  visitors
- traffic from residences would not load onto the
  main north-south route through town, nor the
  east-west arrival route south of town
- presence of mature trees would help alleviate
  harsh weather conditions
- neighboring uses would not be negatively
  impacted by housing and would not negatively
  impact residential use

Before structures were converted for use as
government housing, management would take
whatever actions are necessary to bring them up to
National Park Service housing standards as stated in
NPS-36 and NPS-76.

Design for new housing structures would fit into the
textures, densities, and style of the Almo area. Units
would be situated in the landscape to gain the
benefits of passive solar, have snow-free entrances
and drives, create privacy between residences, and
to provide an interesting passive solar orientation to
the South Castle Rocks to the northwest.

A summary of development considered under the
proposal is shown in table 2 of Part Two of this
document. Site design considerations are described
in Appendix D, and specific development actions and
costs are shown in Appendix E.

To provide for the protection of the cultural and
natural resources of City of Rocks National Reserve,
it is necessary to set limits on the amount of public
use of the reserve resources. Facilities such as
parking lots were relatively small at the time the
planning process began. Public sentiment expressed
at public meetings indicated the desire to keep
development at a small scale. These expressed
desires are reflected in the plan.
The following limits have been established within the boundary of the national reserve:

Not to exceed:
- 50 primitive campsites
- 7 unimproved backcountry campsites (may be rotated)
- 3 primitive campground clusters at group campground
- 226 parking spaces at 13 sites within the reserve

As future conditions warrant, reserve management may establish additional limits on human activity within the reserve to protect resources. Use limits would also be established through the adoption of several action plans that would help to implement the general provisions of the comprehensive management plan. These action plans include the City of Rocks trail plan, climbing management plan, grazing management plan, cultural resource management plan, and natural resource management plan.

The National Park Service and the Idaho Department of Parks and Recreation recognize that additional surveys and compliance with the National Environmental Policy Act, section 106 of the Historic Preservation Act, and related laws, regulations, and guidelines would be required before implementation of some parts of the plan and before construction of some proposed facilities. This applies to lands where the federal government has full or partial interest.

To retain the rich detail and elements of area settlement patterns and ranching heritage design guidelines need to be developed before designing and constructing any facilities. Architectural guidelines need to be developed to guide design and construction of any structures associated with the reserve (housing, visitor center, restrooms, sign displays, trailheads, and fencing).

Phasing is contingent on funding. No plan implementation can take place without the necessary funding to undertake the proposed actions, including construction.

An interpretive plan, which would include details of the visitor center media and wayside treatments, would be needed during the first phase of development.

Some proposals, such as raising the development ceiling for the reserve, may require additional legislative authorization if federal funding is involved. Agreements would be needed with the Bureau of Land Management to lease land for the facilities outside the reserve, including the entrance stations.

It is suggested that the following proposed development be phased over the next 10 years (see Development Phasing Schedule). Participants responsible for these actions are included under each action.

100-site developed campground and amphitheater outside reserve with roads and utilities (e.g., water, septic, trailer dump station)

Before the day use areas are developed on the rim, camping would need to be closed so facilities can be designed and constructed for the day use areas.

The proposed developed campground is big enough to meet current demand for camping. It can be used for tent camping as well as recreational vehicles. People would not have to be turned away, just redirected. Current demand sometimes reaches 100 sites: City of Rocks has approximately 80 designated sites.

The amphitheater associated with the developed campground would be situated to overlook the California and Salt Lake Alternate trails coming out of Almo, a bonus for campers that would not be provided at the primitive campground. The primitive campground would be a recreational opportunity within the reserve setting that would not have the personal services and interpretive opportunities that the amphitheater would provide at the developed campground.

Participants: Idaho Department of Parks and Recreation has filed with Bureau of Land Management for a lease on lands proposed for the administrative/visitor center site and developed campground. Ownership would remain with the Bureau of Land Management for these sections of land. This would provide opportunities for cost-sharing by the National Park Service, Bureau of Land Management and other entities. Administration of the developed campground would be an Idaho Department of Parks and Recreation responsibility. Bureau of Land Management would continue to own the land, but the agreement or lease to Idaho Department of Parks and Recreation would allow the department to administer the campground directly or through concession contract.
Up to 50-site primitive campground/trailhead

As discussed in the preceding section on the developed campground, before day use areas are developed on the rim, camping on the rim would need to be closed so day use facilities can be designed and constructed.

While the proposed 100-site developed campground outside the reserve could accommodate the full existing camping demand in the reserve, many current campers enjoy camping within the reserve in a less-developed setting. Construction of the primitive campground within the reserve during the first phase of construction would allow the removal of the campsites from the rim while still providing campers the option to remain overnight in the reserve in a primitive campsite.

The primitive camping area would require more resource data and more sensitive and delicate design or treatment to be done well, and more time would be required to gather data and understand the primitive campground site prior to design — especially the wet areas. The area has been in a drought cycle, and the wetland patterns need to be understood in wet (nondrought) years before attempting to place a campground; for example, there were springs all over the hillside even during the recent drought cycle.

Participants: It is expected that this project, including compliance with guidelines on conservation of wetlands, would be funded by the National Park Service.

Interior road system and entrance stations for

east-west road
road from Junction (Moulton) Entrance to Twin Sisters
scaling back of north-south road from Y intersection with east-west road to Twin Sisters

Design and construct first overlook on the east side

Participants: Creative solutions would need to be found to relocate the county roads within the reserve. The federal government cannot spend money to relocate a county road unless special legislation is passed. Another solution would be for the county to acquire fee title to the roads and then transfer jurisdiction to the National Park Service.

Interpretive waysides related to the California Trail (other interpretive waysides would be undertaken in a later phase)

Participants: Waysides are expected to be provided by the National Park Service, Harpers Ferry Design Center

Visitor center/administrative offices

Participants: The land on which the visitor center would be built may be leased by the Bureau of Land Management to the state. This would provide opportunities for cost-sharing design and construction between the Bureau of Land Management, National Park Service, and others.

Remaining waysides and waysides for day use areas for recreation

Waysides describing other periods of history than the California Trail

Day use areas for recreation, including rim trails, parking, activity areas, secondary roads to overlooks, and waysides for day use areas

Of the day use areas, the one on the rim would have the highest priority

Participants: Waysides are expected to be provided by the National Park Service, Harpers Ferry Design Center. It is expected that both the National Park Service and the Idaho Department of Parks and Recreation would cooperate in the design and construction of the facilities.

Housing

Employee housing is expected to be part of the reserve's administrative complex at Almo Junction on land owned by the Bureau of Land Management.

Participants: The provision for employee housing is expected to be the responsibility of the Idaho Department of Parks and Recreation. The National Park Service would be expected to cost-share housing design and utility development for the housing area as part of a total development package. It is recognized that some permanent and seasonal staff might elect to reside in Almo or other nearby communities and thus reduce the need for additional housing at Almo Junction.
Maintenance support facilities

Participants: same as for visitor center

Backcountry camping in Indian Grove area

Participants: It is expected that this project would be funded cooperatively.

<table>
<thead>
<tr>
<th>Areas</th>
<th>Short-Term Phase</th>
<th>Medium-Term Phase</th>
<th>Long-Term Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside Reserve</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Circle Creek Basin Overlook</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Circle Creek Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Basin-Nicholson Ranch</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Inscription Rocks Wayside</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twin Sisters Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Corrals/HRS</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Turtle Rock</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Bath Rock</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Parking Lot Rocks</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>West Breadloaves</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Trails Junction Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Twin Sisters Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Primitive Campground</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Indian Grove Overlook</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Indian Grove backcountry camping</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Stabilize interior roads</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Realign interior roads</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td><strong>Outside Reserve</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Almo Entrance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Emery Canyon Entrance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Junction (Moulton) Entrance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Granite Pass View</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Visitor Center</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Trailer Dump Station</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Maintenance Facility</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Employee Housing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phase 1</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Phase 2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Developed Campground</td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
Until management is transferred to the state, the area would be administered by an NPS superintendent in Twin Falls and an Idaho Department of Parks and Recreation manager stationed in Almo.

The reserve’s operating budget for fiscal year 1993 was approximately $295,000. Of that amount, $195,000 was provided by the National Park Service and $100,000 by the state of Idaho.

Staff for the reserve, shown on the following chart, would be needed to implement the proposal.

The annual cost of the above combined salaries based on step 1 of all pay grades would be $600,000. An additional $300,000 would be required for operating expenses for a total annual operating expense of $900,000 in FY 93 dollars. The positions are described based on the NPS classification system. The state may use different titles for similar jobs.

It is recognized that funding for some specialized positions may be augmented by other entities, including the National Park Service, cooperating associations, volunteers, and others.

### Staffing and Operating Costs

<table>
<thead>
<tr>
<th>Division</th>
<th>FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Administration</strong></td>
<td></td>
</tr>
<tr>
<td>Park Manager (GS-12)</td>
<td>1.0</td>
</tr>
<tr>
<td>Administrative Technician (GS-5)</td>
<td>0.9</td>
</tr>
<tr>
<td>Administrative Officer (GS-7)</td>
<td>1.0</td>
</tr>
<tr>
<td>Clerk-Typist (GS-4)</td>
<td>1.0</td>
</tr>
<tr>
<td><strong>Resource Management</strong></td>
<td></td>
</tr>
<tr>
<td>Natural Resource Management Specialist (GS-11)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, Resource Management Specialist (GS-5)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, (GS-4)</td>
<td>0.7</td>
</tr>
<tr>
<td>Historian, (GS-7/9)</td>
<td>1.0</td>
</tr>
<tr>
<td><strong>Visitor Protection</strong></td>
<td></td>
</tr>
<tr>
<td>Chief Ranger (GS-11)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, Visitor Protection (GS-9)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, Visitor Protection (GS-5)</td>
<td>0.9</td>
</tr>
<tr>
<td>3 Park Rangers, General (GS-4)</td>
<td>1.8</td>
</tr>
<tr>
<td>Clerk-Typist (GS-4) to be shared with Interpretation and Visitor Services Division</td>
<td>0.7</td>
</tr>
<tr>
<td>Park Ranger, Fee Collection (GS-5)</td>
<td>1.0</td>
</tr>
<tr>
<td>4 Park Rangers, Fee Collection (GS-3)</td>
<td>1.8</td>
</tr>
<tr>
<td><strong>Interpretation and Visitor Services</strong></td>
<td></td>
</tr>
<tr>
<td>Chief of Interpretation (GS-11)</td>
<td>1.0</td>
</tr>
<tr>
<td>3 Park Rangers (GS-4)</td>
<td>1.8</td>
</tr>
<tr>
<td>Interpretive Specialist (GS-4)</td>
<td>1.0</td>
</tr>
<tr>
<td><strong>Maintenance</strong></td>
<td></td>
</tr>
<tr>
<td>Chief of Maintenance (WS-10)</td>
<td>1.0</td>
</tr>
<tr>
<td>Maintenance Worker (WG-8)</td>
<td>1.0</td>
</tr>
<tr>
<td>Maintenance Worker (WG-6)</td>
<td>0.9</td>
</tr>
<tr>
<td>4 Laborers (WG-5)</td>
<td>3.1</td>
</tr>
<tr>
<td>Clerk-Typist (GS-4)</td>
<td>0.7</td>
</tr>
</tbody>
</table>

**Total FTE:** 28.0
ADMINISTRATION AND MAINTENANCE

The reserve's administrative facilities are currently located in a building in Twin Falls leased by the National Park Service and in a building in Almo leased by the Idaho Department of Parks and Recreation. Both leases are from the General Services Administration. Maintenance support and visitor information are provided from the same state-leased structure in Almo.

Administrative and maintenance facilities would be replaced on a site adjacent to the reserve that is owned by the Bureau of Land Management.

Maintenance facilities would be at offices at the Almo junction, as part of the administrative complex and adjacent storage and yard. A total of 110,000 square feet of maintenance storage space would be needed — 10,000 square feet of covered warehousing and 100,000 square feet of open-air yard.

Disposal/boneyard/landfill arrangements would be coordinated with Cassia County. The reserve staff should minimize its need for waste or hazardous materials storage.

No housing is currently provided for reserve employees. Employees must find their own residences in the adjacent communities. However, there is not enough vacant housing in the town of Almo to accommodate the current staff. Housing would be built for up to 12 permanent and seasonal employees east of the proposed operations area. Where suitable housing in the community becomes available for purchase, it may be acquired on an opportunity basis for employee housing. (Please see the previous "Facilities Outside the Reserve, Housing" section for additional detail.) These numbers assume that some reserve staff would be local residents with their own housing.

Because the Idaho Department of Parks and Recreation has primary responsibility for the management of the area and bears resultant operational costs, it is intended that any and all fees generated from visitor use or concession fees of the City of Rocks National Reserve be collected, and used directly for the support of the operation of the reserve. It is recognized that additional mechanisms may be needed to implement these provisions.
ENVIRONMENTAL ISSUES

This environmental impact statement considers the environmental impacts of three alternatives for the Draft Comprehensive Management Plan for the City of Rocks. This plan must be in compliance with other applicable federal and state environmental laws and local regulations and ordinances. Consideration will be given to the protection of air and water quality (Clean Air Act and Federal Water Pollution Control Act), floodplains and wetlands (EO 11988 and 11990), and threatened and endangered plant and animal species (Endangered Species Act). Consideration will also be given to sections 106 and 110 of the 1966 National Historic Preservation Act and its implementing federal regulations, the Archeological Resources Protection Act of 1979, and the regulations of the Advisory Council on Historic Preservation. These acts and regulations are discussed in the resource sections to which they apply. The major environmental issues to be analyzed were identified through a series of public meetings and consultations with appropriate agencies and organizations (see "Consultation and Coordination" section). These issues are discussed below.

CULTURAL RESOURCES

Preservation of National Historic Landmark Values: The California Trail

In 1964 City of Rocks was designated a national historic landmark in recognition of its importance to the California Trail and the history of American westward overland emigration during the 1840s and 1850s. The national historic landmark boundaries only roughly coincide with the boundaries of the national reserve. Significant trail-related resources within the reserve include about 9 miles of the emigrant trail routes, including some of the best preserved segments of such trails in the nation, 13 "inscription rocks," on which the emigrants recorded their names and dates of passage on the granite, the principal encampment site along Circle Creek and the Twin Sisters landmark. The reserve's trail resources are greatly enhanced by the surrounding landscape, which still looks and feels much the same as it did when the emigrants passed through.

Most of these resources are currently in private ownership. Examples of resources in federal ownership are Camp and Turtle rocks. With the exception of the plowing that occurred on some sections in the early 1900s, the traditional land uses in the region have not caused any major disturbance to these resources, but the trail ruts and rock inscriptions have been slowly deteriorating as a result of natural weathering and inadvertent damage by people and grazing cattle. The recent threat of subdivision and residential home development poses a greater threat to trail resources and the surrounding landscape.

The comprehensive management plan identifies actions needed for the protection, management, and interpretation of the cultural values and historic resources associated with the national historic landmark designation of City of Rocks.

While the story of the California Trail is the most significant historical theme at City of Rocks, it is a relatively brief part of its history. Few buildings associated with the post-California Trail history of City of Rocks have survived. Some log structures still stand that were built during the early 1930s, with materials salvaged from an earlier stage station. The stone walls of a house constructed about 1903 (now known as the Nicholson house) suggest that early 20th century agrarian life at City of Rocks had not changed considerably from pioneer occupation of frontier homesteads, remnants of which still remain in the reserve. Among the surviving resources associated with historic cattle ranching operations in the reserve are cattle trailing routes, expanded grasslands with widely spaced fencelines, water sources, and corrals. The tapestry of land use patterns and images of this historic rural setting imparts an increasingly rare ambience and scenic quality reminiscent of the American West and thus constitutes a significant cultural value of the reserve.

Congress insightfully included the value of this rural character and described a vehicle for protecting it in the establishing legislation for the reserve. The legislation (PL 100-696) states that the management plan will identify those areas that would be properly zoned for private use subject to local ordinances designed to protect the historic rural setting. Congress understood that the pastoral patterns exhibited here were special and recognized the private sector's role in sustaining or destroying those images and patterns through its local ordinances.

Because the rural character was highlighted in the establishing legislation, one of the major issues addressed by the plan is whether the elements of the historic rural setting that post-date the California Trail period should be preserved and interpreted or whether they should be allowed to deteriorate,
which would lead eventually to the restoration of the earlier historic setting of the trail. This issue is closely tied to the interpretation and education concerns discussed below. Also, because some of the elements of the historic rural setting are still used by ranchers pursuing a traditional lifestyle in the reserve, the issue of private land use is discussed below.

### Protection of Archeological Resources

The reserve's more than 60 identified archeological sites are subject to damage from vandalism, cattle grazing, and development activities, which could result in irreversible losses of artifacts and cultural information, some of national significance. Because a comprehensive survey has not been conducted, additional significant sites likely remain unknown. Direction is needed for identifying, protecting, and managing prehistoric and historic archeological sites in the reserve.

### NATURAL RESOURCES

#### Air Quality

Protecting and maintaining scenic quality was among the reasons for establishing City of Rocks National Reserve. No air quality indicators are being monitored in the reserve now. Monitoring needs must be determined and a monitoring program instituted to find out if air pollutants are causing adverse effects on scenic quality and other natural resources. The plan provides recommendations for protecting air resources.

#### Geologic Resources

The protection of geological resources is important because the reserve was designated a national natural landmark for its nationally significant rock formations and the unusual processes that formed them. Rock climbing is very popular in the reserve and the Park Service supports technical rockclimbing as a legitimate recreational activity pursuant to NPS management policy. During scoping, some organizations and individuals were concerned that the use of certain technical climbing equipment alters the natural state of rock surfaces, and felt that such use violates NPS management policies and regulations. In recent years, climbing use at City of Rocks has dramatically changed with increased numbers of climbers and new climbing styles and technical equipment used. New technology, such as battery-powered rock drills, have substantially increased the amount of permanent climbing hardware attached to rock faces. Since 1991 however, a county ordinance has been in effect which restricts the use of drills and other power and audio equipment in the reserve. A study was also conducted to evaluate the effects of climbing on the Twin Sisters formation. In addition to technical climbing, rock scrambling is common among all types of users and is widespread throughout the reserve. Some people felt that the increasing use of chalk has also made visible chalk trails on rock faces. Natural rock cracks have been cleaned of dirt and small plants and lichen removed from rock faces with wire brushes. The plan recommends actions to encourage the use of low-impact climbing techniques and to study the effects of rockclimbing activities to determine if the natural state of rock formations or erosion processes in the reserve are being significantly altered. In addition to technical climbing, rock scrambling is common among all types of users and is widespread throughout the reserve.

Public Law 100-696 provided that the federally reserved water rights for that portion of Sawtooth National Forest acquired by City of Rocks National Reserve be transferred to the reserve. However, it excluded the creation of new federally reserved water rights for national park purposes.

To ensure adequate environmental conditions for wildlife and to perpetuate a natural ecological system, water requirements for City of Rocks National Reserve may prove to be much greater than that which can be provided through the exercise of reserved water rights and the state's appropriative rights. If additional water is required, the Park Service and the state of Idaho will need to develop strategies to obtain more water (in accordance with the substantive and procedural law of the state of Idaho) or alter the reserve's management objectives to function within the existing water rights.

Public Law 101-512 allows for hunting to continue in the reserve with the condition that hunting would be managed to minimize conflicts with other visitor uses. The management of the area may be transferred to the state of Idaho, and the Idaho Department of Fish and Game would continue to manage wildlife and hunting in the reserve according to NPS policies. During scoping some people felt that hunting and the use of firearms in the reserve conflicts with other recreational use and adversely affects wildlife in the reserve. The loss of hunting opportunities was also an issue.

The comprehensive management plan establishes broad objectives for wildlife management based on other reserve issues. A resource management plan that makes recommendations for wildlife management, hunting, and other natural resource concerns will be prepared after the comprehensive management plan is approved.
Threatened, Endangered, and Sensitive Species

There are no federally listed species that are known to occur in the reserve. However, the reserve contains potential habitat for ferruginous hawk and Townsend's bat, both designated by the Fish and Wildlife Service as category 2 species. There is only a limited amount of baseline information for these two species and other sensitive or rare species found in the reserve. Although some species inventories for plants and animals have been done, additional information about reserve species and their important habitat needs to be completed. Monitoring of rare and sensitive plant and animal components would be necessary to protect populations.

Domestic Livestock Grazing

The continuation of livestock grazing activities is important for maintaining the historic rural setting. There are 10 grazing allotments and 10 permittees in the reserve. Most of the individual allotments in the reserve also involve private, Bureau of Land Management lands, and Forest Service lands next to the reserve.

Several concerns need to be considered in the management of grazing within the reserve. The present level of grazing in specific locations may be damaging vegetation beyond the point of recovery. Grazing in sensitive resource areas such as riparian and wet meadow areas may be particularly damaging. Managing livestock to protect fragile wetlands and riparian areas is difficult because cattle are attracted by the large amount of forage and availability of water. Erosion associated with overgrazing may be affecting the water quality of streams and springs. Disease and competition for pasture are continuing concerns in managing both domestic livestock and native wildlife. Finally, as public use increases, there is the potential for conflicts between livestock and park visitors. The plan includes general proposals that address all of these concerns.

During early scoping and public involvement efforts for the City of Rocks comprehensive management plan, a topic of controversy focused on the continuation of livestock grazing in the reserve. A portion of the public wanted existing grazing rights maintained and livestock grazing continued in the reserve, while others felt that grazing was incompatible with the purpose of the reserve and should therefore be eliminated. The plan recommends actions that would ensure sound rangeland management, protect sensitive natural features, and provide strategies that would minimize conflicts between grazing and public use.

As a new unit of the national park system, City of Rocks lacks orientation, information, and interpretive services and media. This plan proposes a well-balanced visitor experience that provides opportunities for visitors to enjoy, understand, and appreciate the variety of natural and cultural resources. Specific media prescriptions will be identified through a separate interpretive prospectus, which will be carried out by the National Park Service. Once management of the reserve is transferred to the Idaho Department of Parks and Recreation, close cooperation will be necessary to ensure that the proposed actions proceed smoothly through the detailed planning, design, and construction phases.

The interpretive and educational potential of City of Rocks would depend in large part on the degree to which outstanding resources can be preserved and made accessible to the public. Because a large portion of the reserve, including most of the California Trail, is currently in private ownership, this would require acquisition of lands or interests in lands from willing sellers (see "Private Landowners and Livestock Grazing Permittees" on the following page).

A key interpretive issue is whether to focus almost exclusively on the California Trail story or to interpret the entire continuum of the area's history. The two action alternatives explore these two approaches. Visitors' understanding and appreciation of the area would be different, depending on which approach was selected.

Some of the traditional activities in the reserve would potentially conflict with interpretive and educational activities. For instance, improvements required for cattle grazing (fences, roads, water tanks) would intrude on the historic California Trail scene. Cattle also intimidate many people, and often the dung is offensive. Recreational activities, notably rockclimbing, would also intrude on a historic trail scene, especially in this area where rock outcrops formed the major landmarks along the trail. Finding ways to interpret the nationally significant stories at City of Rocks, while accommodating traditional land use, presents a major challenge.

Rockclimbing. The popularity of technical rockclimbing at City of Rocks has increased significantly in the last decade. Few restrictions are currently placed on the numbers of climbers, access routes, or equipment that can be used. As a result, cliff faces have been scarred, many social trails have been made to the rocks, and conflicts have occurred between climbers and nonclimbing visitors to the
reserve. The comprehensive management and climbing management plan would propose ways to accommodate climbing activities, while protecting the key resources and interpretive values of the reserve.

**Camping.** No designated campgrounds exist within the reserve. Visitors currently camp in 78 numbered campsites dispersed along the road. This scattered use has resulted in trash problems and landscape scars created by social roads. Conflicts have also arisen between campers and other visitors along the rim of the Silent City of Rocks. The feasibility and extent of camping in the reserve needs to be defined.

**Hunting.** Hunting is authorized by Congress as a compatible activity with City of Rocks and is to be managed in consultation with Idaho Fish and Game to ensure public safety and resource protection. Visitors expressed concern over hearing gunfire in the reserve in a 1991 visitor survey conducted in the reserve between August 30 and September 5, 1991 (NPS 1992).

**Accessibility.** Other than the current ranger/administrative office in Almo and the restrooms across from Bath Rock, few facilities in the reserve are accessible to people with disabilities. To provide full-spectrum accessibility to proposed facilities within the reserve, any developments must comply with the Uniform Federal Accessibility Standards and be applied during the design and construction of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended.

The design and construction of interpretive media and programs within buildings and on wayside exhibits must also promote full access by people with physical and mental disabilities.

**LOCAL COMMUNITIES AND ECONOMY**

Rural America is disappearing—subtle landscapes of fields and fencing are being replaced with suburban "ranchettes" and housing subdivisions. In Cassia County, Idaho, this rural image has been safe until now. In a county so homogenous in its heritage that zoning through gentleman's agreement has been effective, it is hard to realize that change brought about by the designation of City of Rocks National Reserve includes regulated zoning for the first time in the county's history.

In Almo, a gateway community of 175 to 250 people, providing for visitor services could change a one-intersection main street, where locals stroll unimpeded, into a trafficway for cars and RVs approaching the reserve. This small town, with fewer than 15 houses and only one general store, may be converted from a hardworking rural neighborhood into a tourist rest stop because of services required by visitors.

Visitors' need for lodging may create the largest structures in town. These could rival the turn-of-the-century store for visual prominence, or be of character, not sensitive to the architecture of the area. Another potential response to visitors' need for lodging could be construction of facilities in areas that would compromise the spaciousness of the open western countryside.

The plan for sees the likely need for acquisition of some private lands to increase interpretive and recreational opportunities and protect some wetlands inside the reserve. Such acquisitions would change established land-use patterns that could adversely impact private landowners. However, all interests in private property to be acquired for public purposes within the reserve would be only from willing sellers and would be compensated at fair market value for any interests to be acquired.

Most of the land in private ownership is used for domestic livestock grazing, which is important to the regional economy. Most of the public lands are divided into grazing allotments, and area ranchers rely heavily on federal rangelands. As increasing public use expands, the potential for conflicts between livestock and visitors on federal lands could increase.

Concern was expressed at public meetings regarding the costs of implementing the alternatives and the associated impacts on the local economy. The projected increase in number of jobs and the resulting tax revenue could affect the economy.
This section describes three alternatives that were analyzed as part of the development of the Draft Comprehensive Management Plan for the City of Rocks. The three alternatives are (1) no action/minimum requirements, (2) the proposed action (used interchangeably with the proposal), which provides for preservation and interpretation of a wide cross section of cultural and natural resources while accommodating most of the existing recreational and private grazing use, and (3) an alternative that would greatly enhance the preservation and interpretation of the California Trail in a primitive natural setting while reducing the amount of recreational use and private grazing in the reserve. Alternative 2 has been revised since the draft plan. (A list of changes is provided in appendix I.) The alternatives were developed around a common management zoning scheme but would differ significantly in the amount and location of lands included in each zone. The zoning scheme for alternative 2 has been revised since the draft plan, while the zoning for alternatives 1 and 3 remains the same. The zoning scheme and the uses that would occur in each zone are outlined below, followed by maps and narrative showing the zoning for each alternative.

A summary comparison of development for the alternatives is shown in table 2 at the end of this chapter. Additional detail concerning development may be found in appendix E.

The intent of the comprehensive management plan is described in the management zoning system below and for each alternative. The management position on acquisition of interests in lands will be further defined in a land protection plan. (Please see the "Management Authorities and Responsibilities" section in part one of this document.)

<table>
<thead>
<tr>
<th>Alternatives</th>
<th>California Trail Subzone</th>
<th>Natural Area Subzone</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Outstanding Features</strong> (major landmarks, trail remnants, inscription rocks, encampment area)</td>
<td><strong>Outstanding Features</strong> (research natural area)</td>
</tr>
<tr>
<td></td>
<td>Emphasis on preserving outstanding features and interpreting them to the public. (NPS acquires fee title on an opportunity basis.)</td>
<td>Emphasis on preserving outstanding features and interpreting them to the public. (Entire area currently in public ownership.)</td>
</tr>
<tr>
<td></td>
<td>• Walking, informal picnicking, nature viewing, photography</td>
<td>• Nonmanipulative research by permit, walking, photography, nature viewing</td>
</tr>
<tr>
<td></td>
<td>• No grazing</td>
<td>• No grazing</td>
</tr>
<tr>
<td></td>
<td>• No commercial or residential development</td>
<td>• No commercial or residential development</td>
</tr>
</tbody>
</table>

This zone would include subzones for the California Trail and the natural area (the two exceptional resource values identified for the reserve) and for the historic rural setting, the preservation and interpretation of which is one of the identified purposes of the reserve.
ALTERNATIVES, INCLUDING THE PROPOSED ACTION

General Natural Area

Emphasis on protecting important resource values. (NPS acquires fee title on an opportunity basis.)

- No grazing
- Hiking, informal picnicking, photography, nature viewing, minimum-impact climbing
- No commercial or residential development

Historic Rural Setting Subzone

Emphasis on preserving the historic rural setting that existed at the time the reserve was established. (NPS acquires development easements on an opportunity basis.)

Public Land

- Cross-country hiking, informal picnicking, photography, nature viewing, minimum-impact climbing
- Grazing continues
- No commercial or residential development

Private Land

- Recreation by permission of landowner only
- Reserve management would request that recreation be limited to the same uses listed for public land in this subzone
- Grazing continues
- No commercial or residential development

This zone would include areas for facilities needed to support visitor use and reserve operations.

Emphasis on providing facilities needed to support visitor use and park operations. (NPS acquires fee title on an opportunity basis.)

- Driving, bicycling, picnicking, camping, visitor education facilities
- No grazing
- No commercial or residential development

Private Land

Overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.

This zone would include subzones for the California Trail and the natural area (the two exceptional resource values identified for the reserve).

California Trail Subzone

Emphasis on preserving outstanding features (major landmarks, California trail corridor, trail remnants, inscription rocks, encampment area) and interpreting them to the public. For the purpose of zoning in alternative 2 (the proposal) the term California Trail includes the Salt Lake Alternate.

- NPS acquires fee title, visitor access and development easements on an opportunity basis
- No grazing in wetland and riparian areas on public land

Natural Area Subzone

Emphasis on preservation of exceptional natural resource values and providing recreational opportunities where appropriate.

Research Natural Area

Emphasis on protection of natural processes and conducting nonmanipulative research use by permit only.

- No grazing
General Natural Area

Emphasis on protecting important natural resource values and providing for a level of public and private use that does not degrade the natural qualities of the area. (NPS acquires fee title on an opportunity basis.)

- No grazing on wetland and riparian areas on public land

Natural and Recreational Resource Area

Emphasis on providing prime resource-based recreational opportunities in balance with the protection of natural resources. No grazing.

- Entire area in public ownership

Historic Rural Setting Zone

Emphasis on preserving the historic rural setting that existed at the time the reserve was established. (NPS acquires development easements on an opportunity basis.) Climbing and grazing use would be determined by the climbing and grazing management plans.

This zone would include areas for facilities needed to support visitor use and reserve operations.

Public Use and Development Zone

Emphasis on providing facilities needed to support visitor use and park operations. (NPS acquires fee title on an opportunity basis.)

Private Land

Overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.
# ALTERNATIVE I: NO ACTION

## CONCEPT

Alternative I constitutes the minimum requirements alternative. Under the no-action alternative there would be no significant change in present management or visitor use. Reserve managers would take the minimum actions necessary to meet legislative requirements, to protect natural and cultural resources, and to address health and safety concerns, but few additional interpretive or recreational programs or facilities would be provided. Livestock grazing would continue on private and most of the public land.

## MANAGEMENT ZONING

Management zoning would reflect minimum changes to existing conditions (see Alternative I map for zoning and development proposals).

All of the private and most of the public lands in the reserve would be placed in the historic rural setting subzone, where they would be managed to preserve and let visitors experience the historic resources and ongoing ranching activities that characterized the historic rural setting at the time the reserve was established. Livestock grazing would be the principal use of lands in this zone, although day recreation would be an allowable activity on the public lands. Livestock trailing would occur along the north-south and east-west road corridors.

There would be no California Trail subzone in the no-action alternative. Although most of the national reserve is included in a designated national historic landmark for its significant association with the California Trail, the majority of historic resources remain in private ownership, and actions by federal and state land management agencies to protect or interpret cultural resources have been and would be expected to remain minimal. No areas of special concern for cultural resources protection outside the reserve would be identified.

The research natural area would be placed in the natural area subzone, where it would continue to be managed to preserve the exceptional natural resource values of portions of the crescent-shaped rock outcrop. Private recreational use would not occur in this zone.

All of section 36 would be placed in the recreation zone. Principal uses in this zone would be hiking, picnicking, camping, and rock climbing, with management attention directed at natural resource values.

No special county zoning would be enacted for the reserve under this alternative.

The primary visitor attractions would continue to be the California Trail and the recreational opportunities in section 36. The educational experience that visitors received would be largely self-guided and self-determined. The current ranger/administrative station near Almo would remain as the only public contact point for the reserve. Interpretive media would be limited to the brochure distributed at the ranger station and other publications that might be sold there.

Rock climbing would be permitted on all rocks on public land except the inscription rocks, research natural area, and Pinnacle Pass. People could camp anywhere except the research natural area, and large groups could continue to camp behind Breadloaves. Hunting would be permitted in the reserve, except for section 36 and the research natural area where it is currently prohibited. People would have to obtain permission from landowners to enter, hike, climb, hunt, or camp on private property.

Grazing allotments and visitor use would continue to be managed under the existing management programs of the Bureau of Land Management, U.S. Forest Service, and Idaho Department of Parks and Recreation. Reserve staff would protect certain areas from further resource damage and control the continued growth of new sites as visitation increased. Actions to manage cultural resources would remain limited. Most significant resources would remain in private ownership. Private landowners could request technical assistance through existing state and federal programs, but the reserve would not be staffed to take an active role in facilitating use of these programs.

Climbing use on the Twin Sisters formation would continue. Picnicking would continue in proximity to Twin Sisters formation.

The existing road network, parking areas, campsites, restrooms, information kiosks, and picnic sites would be retained. Proposed development under this alternative is listed and compared to the development that would occur under alternatives 2 and 3 in table 2 at the end of this section. A detailed description of development actions for all alternatives is in appendix E.
PRESERVATION AND PUBLIC EDUCATION ZONE

Natural Area Subzone

Outstanding Features (research natural area): Emphasis on preserving outstanding features and interpreting them to the public; entire area currently in public ownership.
- Nonmanipulative research by permit, walking, photography, nature viewing • No grazing • No commercial or residential development

General Natural Area: Emphasis on protecting important resource values.
- Hiking, informal picnicking, photography, nature viewing, minimum-impact climbing • No grazing • No commercial or residential development

Historic Rural Setting Subzone: Emphasis on preserving the historic rural setting that existed at the time the reserve was established.

Public Land
- Cross-country hiking, informal picnicking, photography, nature viewing, minimum-impact climbing • Grazing continues • No commercial or residential development

Private Land
- Recreation by permission of landowner only • Reserve management would request that recreation be limited to the same uses listed for public land in this subzone • Grazing continues • No commercial or residential development

RECREATION ZONE: Emphasis on recreational use
- Climbing, camping, hiking, picnicking, photography, sightseeing • No grazing • No commercial or residential development

DEVELOPMENT ZONE: Emphasis on providing facilities needed to support visitor use and reserve operations.
- Driving, bicycling, picnicking, camping, visitor education facilities • No grazing • No commercial or residential development

NOTE: Private land overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.

ALTERNATIVE 1
NO ACTION

CITY OF ROCKS NATIONAL RESERVE

United States Department of the Interior
National Park Service
003 • 20042B • DSC • AUGUST 93

PRESERVATION AND PUBLIC EDUCATION ZONE

NATURAL AREA SUBZONE

OUTSTANDING FEATURES

HISTORIC RURAL SETTING SUBZONE

PRIVATE LAND

PUBLIC LAND

RECREATION

EXISTING FEATURES

CALIFORNIA TRAIL CORRIDOR
GRAVEL ROAD (no change)
CAMPING (defined sites)
TRAIL
LIVESTOCK TRAILING CORRIDOR
SALT LAKE ALTERNATE TRAIL
BEST PRESERVED WAGON RUT REMNANT
PASSES ON TRAIL
NATIONAL RESERVE BOUNDARY

NOTE: See alternative 1 discussion for additional facilities.
ALTERNATIVE 2: HISTORIC CONTINUUM (PROPOSAL)

CONCEPT

Alternative 2 would preserve and interpret a wide cross section of cultural resources representative of the continuum of history at City of Rocks, expand opportunities for recreational use (primarily developed camping), protect natural and scenic values, and leave portions of the reserve in private ownership.

MANAGEMENT ZONING

In the following zoning scheme certain private lands may be shown as included in a zone intended for public use because they were considered by the planning team to be the most suited for that use. In actuality, no private lands would be included in a public use zone without the acquisition, on an opportunity basis, of a sufficient public interest (such as an access easement, a preservation easement, or fee title) to allow for the proposed new use. (See Alternative 2 map for zoning and development proposals.)

Historic and Natural Preservation Zone

California Trail Subzone. This subzone would include the major landmarks, trail remnants, and inscription rocks associated with the California Trail. The foreground of the California Trail area would be approximately 0.5 mile wide along most of the trail corridor but would include Twin Sisters. Its purpose would be to protect the foregrounds of the views from the trails and to allow visitors to experience a landscape reminiscent of the trail period. Most uses within this zone would relate directly to the preservation and interpretation of California Trail-related resources. However, to minimize impacts on traditional private use, livestock grazing would continue to be allowed in some portions of the trail subzone. Twin Sisters, Pinnacle Pass, three of the best trail remnants, the inscription rocks, a portion of the Circle Creek encampment area, and the stage station would be enclosed, and cattle would be excluded from these areas to provide maximum resource protection and to allow visitors to enjoy the areas without having to be concerned about grazing cattle. The National Park Service would acquire fee title to these outstanding areas on an opportunity basis so that they could be enclosed and use could be focused exclusively on interpretive (educational) activities. Grazing and trailing would be excluded from wetlands and riparian areas on public land.

For the remainder of the lands within this zone, the National Park Service would acquire visitor access and development easements on an opportunity basis to allow visitors the opportunity to experience these areas in their currently undeveloped state. The National Park Service would seek sufficient interest in these lands to complement county zoning and to ensure that incompatible commercial or residential development did not occur in the historic viewshed.

Natural Area Subzone. This subzone would include most of the crescent-shaped rock outcrops of the Circle Creek basin, the ridgeline and northern slopes of the reserve, the research natural area, and most of the Indian Grove and Graham Peak areas. Use of this area would focus on natural resource preservation. The National Park Service would seek to acquire the private lands in this subzone on an opportunity basis to protect sensitive habitats and scenic vistas from livestock grazing and development. Grazing and trailing of livestock would be excluded from wetlands and riparian areas on public land in some portions of this subzone.

The use of the research natural area, which is under public ownership, would be nonmanipulative research, education, and other activities that would not detract from the area's research values. Use would be regulated through a permit system. Approximately 100 acres are proposed for addition on the western side.

Most of the private lands in the reserve, along with some public lands outside the historic and natural preservation zone, are in this subzone. The management intent would be to preserve the historic rural setting and to perpetuate ongoing ranching activities that captured the rural character of the reserve at the time of its establishment. Uses of lands in this subzone would include continued ranching use. Interpretive opportunities would be provided, and day recreation would also be a permitted activity on public lands. The National Park Service would acquire development rights on an opportunity basis to protect the open ranchland character of this subzone from incompatible development.

The area of public land adjacent to and west of the research natural area would be subject to more intense natural resource monitoring and management than other grazing areas to ensure that sensitive habitats were not degraded.
HISTORIC AND NATURAL PRESERVATION ZONE

California Trail Subzone: Emphasis on preserving outstanding features (major landmarks, trail remnants, inscription rocks, encampment area, California Trail corridor) and interpreting them to the public.

Foreground of California Trail

Emphasis on preserving the California Trail corridor and interpreting it to the public. Recreation uses not directly associated with the access or the enjoyment and interpretation of the California Trail would generally be precluded. Precluded activities would be the siting of recreation facilities such as campgrounds and picnic areas and recreation uses such as bicycling, climbing, or scrambling on the Inscription Rocks, Twin Sisters formation, Pinnacle Pass, and other physical features that have cultural significance. Grazing would be discontinued on areas shown in appendix J.

General Use

Emphasis on preserving outstanding features outside the foreground of the California Trail corridor.

Recreation uses not directly associated with access, enjoyment, and interpretation of the California Trail would generally be precluded. Climbing use would be determined based on the climbing management plan. Grazing would be discontinued on areas shown in appendix J. Grazing use in other parts of this area would be determined by the natural resource management plan and grazing management plan.

Natural Area Subzone: Emphasis on preserving exceptional natural resource values and providing recreational opportunities where appropriate.

Research Natural Area

Emphasis on protecting natural processes and conducting nonmanipulative research. Use by permit only. Grazing would not occur.

General Natural Area

Emphasis on protecting important natural resource values and providing for a level of public and private use that does not degrade the natural qualities of the area. Registration required. Grazing would be discontinued on areas shown in appendix J. Grazing in other areas would be determined by the natural resource management plan and grazing management plan.

Natural and Recreational Resource Area

Emphasis on providing prime resource-based recreational opportunities managed in balance with the protection of natural resources. No grazing.

HISTORIC RURAL SETTING ZONE

Emphasis on preserving the historic rural setting that existed at the time the reserve was established. Climbing and grazing use would be determined by the climbing and grazing management plans.

PUBLIC USE AND DEVELOPMENT ZONE

Emphasis on providing facilities needed to support visitor use and reserve opportunities.

NOTE: Private land overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.
This zone would include modest facilities essential to visitor enjoyment of resources, such as access roads, parking pulloffs, trails, picnic sites, tent camp sites, and comfort facilities. The National Park Service would acquire fee title to lands needed for development on an opportunity basis.

Cassia County would promulgate zoning to preclude commercial and industrial development within the reserve. Residential development in the reserve would be limited to one residence per owner of record at the time the enabling legislation was enacted. The county would adopt design guidelines to minimize the effects of residential development on the historic rural setting.

The protection of historic views extending beyond the reserve boundary would also be a priority. Areas of special concern for their historic landscape values would include:

- the foreground of the views along the entrance road from Almo, which is also the route of the historic trail and from which the rock outcrops are first sighted
- the view from the trail looking east toward Smoky Mountain
- the views to the south and east from Pinnacle Pass
- the foreground of the views from the segment of the trail west of the reserve boundary leading to Granite Pass, which was the next guiding landmark beyond Pinnacle Pass and a major milestone on the journey to California

Other areas would be of special concern because of their importance to visitors’ first impressions of the reserve. They would include the foregrounds of the views along the Oakley and Junction (Moulton) entrance roads.

The National Park Service, the Idaho Department of Parks and Recreation, and Cassia County would offer to work in partnership with landowners in these areas to encourage complementary management consistency with design guidelines designed to perpetuate a historic rural setting compatible with the one existing inside the reserve.

In addition to the California Trail story, stories would be told of the people who settled here, beginning with the prehistoric Indians and continuing through the Shoshones, the early cattlemen, the homesteaders, and the ranchers who run cattle in the reserve today. Some of the reserve's exceptional natural resource areas and habitats would also be interpreted to show how changes in vegetation and wildlife have resulted from climatic influences and human manipulation.

A new City of Rocks visitor center would be constructed outside the reserve at the Almo Junction. An east-west road would lead from the visitor center to interpretive waysides and trailheads at the Circle Creek Basin overlook, the Nicholson ranch, the inscription rocks, a high point overlooking the Twin Sisters basin, the rim of the Silent City, and Indian Grove. To reach the stage station and Twin Sisters areas, visitors would exit the west side of the reserve, travel south on the county road, and re-enter the reserve via the existing road farther south. A system of hiking and horseback riding trails would encourage visitors to leave their cars and spend time exploring the reserve on foot or horseback. The reserve staff would work closely with the surrounding communities to develop a loop tour route that would link related sites outside the reserve, greatly enhancing visitors' opportunities to see and experience sites related to the area's history.

The majority of climbing rocks would remain available to rock climbers; however, climbing would not occur in the research natural area where the activity would be visible from 1/4 mile of each side of the California Trail or in the Twin Sisters vicinity, Pinnacle Pass, the inscription rocks, and other physical features that have cultural significance. Trails would be designated to the more heavily climbed rocks to reduce the number of social trails to the rock faces. A climbing management plan developed with input from the local climbing community would define strategies for protecting sensitive resources from climbing impacts.

Primitive camping, group camping, and backcountry camping would be available within the reserve. A tent campground of up to 50 sites would be provided in the southwest corner of section 36, a three-group campground would be provided near Breadloaves, and up to seven backcountry sites would be available for up to 50 people in the Indian Grove area. A 100-site developed campground would be provided outside the reserve boundary phased in 50-unit increments.
The proposed action would establish a more systematic and comprehensive program for the preservation, protection, and interpretation of cultural resources. Archeological and historic sites would be inventoried, and resources illustrating the history of the area, including archeological sites at Indian Grove, California Trail landmarks and remnants, the inscription rocks, the stage station site, a historic homestead site, and the Nicholson ranch, would be preserved. A list of sites that could be interpreted is shown in table 2. All actions would comply with section 106 of the 1966 National Historic Preservation Act as amended (16 USC 470 et seq.) and its implementing federal regulations.

Reserve managers would strive to maintain the highest degree of integrity of the air, water, biological, geological, and scenic resources in the reserve by establishing a resource baseline to determine the present condition of these resources, monitoring changes to resource conditions, identifying and, if possible, mitigating the sources of changes. The picnic area adjacent to Twin Sisters and associated parking area would be relocated to the south side of the road across from Twin Sisters. Reserve managers would continue to cooperate with the Bureau of Land Management, U.S. Forest Service, state and local governments, and landowners to pursue compatible management on adjacent lands. A resource management plan would be developed to guide resource management. A detailed discussion of the topics to be covered in the plan is provided in part one of this document in the "Resource Management" section.

Management actions to protect the natural environment would include the following:

Some areas might be closed to recreational use during certain times to avoid adverse effects on sensitive resources, such as nesting golden eagles.

Wetlands would be protected from vegetation trampling, soil compaction and erosion, and pollution.

The use of recreation vehicles, including nonmotorized trail bikes and snowmachines, would be confined to roads and trails specifically designated for those uses.

Unauthorized roads and trails would be closed and allowed to revegetate.

Camping would be managed under a permit system and would be allowed only in designated campsites.

Heavily disturbed areas would be revegetated.

To help preserve the sense of quiet and awe that is a significant value associated with the City of Rocks, no noise-generating equipment, including generators, radios, or power tools, would be allowed away from the road corridors. No firearm use would be allowed except for the purpose of hunting.

For areas where grazing would be allowed, a grazing management plan directed at protecting the natural diversity of native biological communities would be developed and implemented.

Development inside the reserve would include the east-west road and the road from the Junction (Moulton) entrance to Twin Sisters with interpretive overlooks, four picnic areas, a primitive campground, and a system of hiking and horseback riding trails. A visitor center and administrative facility would be established outside the reserve boundary at the City of Rocks junction on the Almo road. A maintenance area, developed campground, and amphitheater would also be built outside the reserve on Bureau of Land Management property. The east-west road that crosses the reserve would be relocated south of the inscription rocks and the Silent City. Secondary dirt roads would be closed to all use except access to private land. Specific development under the proposal is compared to the development that would occur under alternatives 1 and 3 in table 2 at the end of this section. A detailed description of development actions for all alternatives is in appendix E.
ALTERNATIVE 3: CALIFORNIA TRAIL EMPHASIS

CONCEPT

Alternative 3 would greatly enhance the protection of the reserve's exceptional cultural, natural, and scenic resources and tell the California Trail story through a variety of media and interpretive programs, while allowing for reduced amounts of compatible recreational and private use.

MANAGEMENT ZONING

Most of the exceptional cultural, natural, and scenic resource areas in the reserve, including the landscape visible from the historic trails and the essential habitat for species of special concern, would be included in the California Trail subzone or the natural area subzone. Because most of these areas are now in private ownership, this alternative would require the acquisition of public interests in these lands on an opportunity basis. Outside the preservation zone, the public lands would be managed for recreational use, and the private lands would remain in livestock grazing. Livestock trailing would be allowed along the east-west road corridor between Almo and Oakley on a permit basis. (See alternative 3 map for zoning and development proposals.)

In the following zoning scheme certain private lands may be shown as included in a zone intended for public use because they were considered by the planning team to be the most suited for that use. In actuality, no private lands would be included in a public use zone without the acquisition, on an opportunity basis, of a sufficient public interest (such as an access easement, a preservation easement, or fee title) to allow for the proposed new use.

California Trail Subzone. The California Trail subzone would be expanded under alternative 3 to include not only the trail corridors and the Circle Creek basin, but also the foreground and the middle ground of the views seen from these areas. It would also include a portion of the western arm of the rock crescent to provide a silence overlook from which visitors could experience a quietness reminiscent of the trail period. The National Park Service would acquire fee title to these outstanding areas on an opportunity basis so that they could be available exclusively for interpretive (educational) activities. The management intent of this subzone would be to preserve the major landmarks, trail remnants, inscription rocks and viewshed associated with the California Trail and to give visitors the opportunity to walk the entire length of the trail while experiencing the trail and its historic landscape in a natural state, looking much as it did at the time of the overland emigration. Modern intrusions, such as roads, vehicles, corrals, grazing cattle, and recreational rockclimbing, would be removed from the scene.

Natural Area Subzone. The natural area subzone would be expanded over alternative 2 to include most of the rock crescent, the Twin Sisters ridge, and the habitats associated with them. Only a small portion of the crescent containing the most popular climbing rocks would be excluded from this zone. This subzone would also include an important stand of piñon/juniper woodland at the northern extent of its range.

Use of this area would focus on natural resource preservation. The National Park Service would acquire fee title on an opportunity basis to protect exceptional and important resource values. The research natural area would be expanded to encompass the entire area that was originally proposed. Use throughout this zone would generally be limited to helping the public see and learn about natural resources to the extent possible without causing resource damage. However, opportunities for backcountry day recreation, including dispersed hiking and climbing, would be available in the piñon/juniper woodland in the southeast portion of the reserve. As in the other alternatives, the proposed use of the Twin Sisters formation may be modified based upon research/data obtained during the moratorium on climbing use.

The front country recreation area, which is under public ownership, would include the portion of the southern arm of the rock crescent containing the most popular areas for hiking, picnicking, and rockclimbing. This area would be managed to support day recreation with attention to protecting natural resource values. No overnight use would occur in the reserve.

Historic Rural Setting Subzone. Three parcels of private land outside the exceptional resource areas would be placed in this subzone. Although the historic rural setting would not be an interpretive theme under this alternative, private grazing use would be considered a compatible use in areas outside the viewshed of the California Trail and...
away from the rock outcrops. These private lands would not be accessible to the public without the owners’ permission. The National Park Service would acquire development rights on an opportunity basis to protect the open ranchland character of this zone from incompatible development.

**Development Zone**

Only facilities essential to interpretation and day recreation in specific designated areas would be provided in the reserve. No backcountry trails or campsites would be provided. The National Park Service would acquire fee title to lands needed for development on an opportunity basis.

**COUNTY ZONING**

County zoning would be the same as described for alternative 2 and would include areas of special concern outside the reserve boundaries.

**VISITOR USE**

Greater emphasis would be placed on helping visitors experience the historic trails, while allowing them to maintain a sense of discovery and self-reliance. The routes of both the California Trail and the Salt Lake Alternate would be protected and made accessible at many points so that people could walk along as much or as little of the trail corridors as they wished. The trails would not be fenced because it would alter the wide-open character of the landscape as it appeared in 1843-69. The best preserved trail segments and the inscription rocks would be preserved for visitors to see, and a variety of programs would be provided inside the reserve to tell stories about the discovery and use of the trail route and other aspects of the great westward movement of Americans in the mid 1800s. Other aspects of the historic continuum would receive attention only to the extent of providing an interpretive and historical context for understanding the trail era.

As described under alternative 2, a visitor center would be established outside the reserve boundary at the Almo junction, and an east-west road would lead from the center to interpretive overlooks and day use areas inside the reserve. The road from the Junction (Moulton) entrance to Twin Sisters would lead to interpretive waysides and portions of the California Trail in the southern end of the reserve. The reserve staff would also work closely with the surrounding communities to develop a loop tour route that would link related sites outside the reserve.

The reserve would be managed as a day use area only, with development to support recreational use minimized to avoid intrusions into the historic scene.

The area open for rockclimbing would extend from just north of Bath Rock to the southern and western edges of the enlarged research natural area. No campsites would be available inside the reserve and no recreational trails would be developed. Visitors would be encouraged to walk and hike along the historic trail corridors following natural landmarks much as the emigrants did.

Reserve managers would seek to return the area as much as possible to a more natural setting without modern intrusions, but they would not attempt to re-create a trail scene with all the attendant activity and environmental impacts associated with the period of peak emigration. All cultural resources unrelated to the trail, including the Nicholson ranch buildings and the ranch buildings at the stage station site, would be inventoried, evaluated, and protected in accordance with a cultural resource management plan.

Management would also seek title to all lands visible from the trail corridors. Livestock grazing would be excluded from these public lands, and the vegetation visible from the trails would be managed as much as possible to create a more historic appearance. Reserve managers would work cooperatively with adjacent private landowners to restore the native grasslands and reverse the encroachment of piñon-juniper that has accelerated as a result of overgrazing and the absence of natural fire in the ecosystem. All actions taken to promote native species, simulate the effects of natural fire, and control noxious weeds would be developed after full consideration of all the concerns of the multiple owners and managers within the reserve. If suitable habitat could be maintained and incompatibility problems with domestic livestock could be solved, consideration would be given to reintroducing native wildlife, such as bighorn sheep.

The research natural area would be expanded to include more of the rock crescent that provides potential habitat for species of special concern and some vegetation types not found within the existing boundaries. This addition was part of the original proposal for the research natural area but was not subsequently included in the designated area.

As in alternative 2, reserve managers would strive to maintain the highest degree of integrity of the air, water, biological, geological, and scenic resources in the reserve by establishing a resource baseline to determine the present condition of these resources, monitoring changes to resource conditions, and
**ALTERNATIVE 3**

**CALIFORNIA TRAIL EMPHASIS**

**CITY OF ROCKS NATIONAL RESERVE**

United States Department of the Interior
National Park Service
003 • 20039A • DSC • AUGUST 93

---

**PRESERVATION AND PUBLIC EDUCATION ZONE**

**CALIFORNIA TRAIL SUBZONE**

- **Outstanding Features (major landmarks, trail remnants, inscription rocks, encampment area):** Emphasis on preserving outstanding features and interpreting them to the public.
  - Walking, informal picnicking, nature viewing, photography
  - No grazing
  - No commercial or residential development

**Public Access (entire trail corridor, encampment area):** Emphasis on allowing visitors to walk along the trail and to wander freely through the encampment area.
  - Walking: informal picnicking, nature viewing, photography; incidental, equipment-free scrambling on rocks
  - Grazing on public and private lands
  - No commercial or residential development

**Natural Area Subzone: Outstanding features (research natural area):** Emphasis on preserving outstanding features and interpreting them to the public (entire area currently in public ownership).
  - Nonmanipulative research by permit, walking, photography, nature viewing
  - No grazing
  - No commercial or residential development

**General Natural Area: Emphasis on protecting important resource values.**
  - Hiking, informal picnicking, photography, nature viewing, minimum-impact climbing
  - No grazing
  - No commercial or residential development

**Historic Rural Setting Subzone:** Emphasis on preserving the historic rural setting that existed at the time the reserve was established.
  - Cross-country hiking, informal picnicking, photography, nature viewing, minimum-impact climbing
  - Grazing continued
  - No commercial or residential development

**Public Land**
  - Recreation by permission of landowner only
  - Reserve management would request that recreation be limited to the same uses listed for public land in this subzone
  - Grazing continued
  - No commercial or residential development

**Private Land**
  - Recreation by permission of landowner only
  - Reserve management would request that recreation be limited to the same uses listed for public land in this subzone
  - Grazing continued
  - No commercial or residential development

**DEVELOPMENT ZONE:** Emphasis on providing facilities needed to support visitor use and reserve operations.
  - Driving, bicycling, picnicking, camping, visitor education facilities
  - No grazing
  - No commercial or residential development

**NOTE:** Private land overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.
identifying and, if possible, mitigating the sources of changes.

| DEVELOPMENT | Development inside the reserve would include a tour road with interpretive overlooks and four picnic areas. All facilities would be located where they would not be visible from the trail. A visitor center and administrative facility would be established outside the reserve boundary at the City of Rocks junction on the Almo road. A maintenance area would be built outside the reserve on Bureau of Land Management property. As in alternative 2, reserve managers would work cooperatively with representatives of Cassia County and the Federal Highway Administration to replace the north-south road that parallels the trail through the Twin Sisters basin with a new through-route that would skirt the south end of the reserve. The road to Twin Sisters from the southwest boundary would remain; however, the north-south connection retained in alternative 2 for local and private use would be removed. Other roads would end just inside the boundary to provide access points to the California Trail. The east-west road would be relocated south of the inscription rocks and the Silent City. Consideration would be given to eliminating commercial traffic except for local agricultural trucks on this route. Secondary dirt roads would be closed to all use except access to private land. Development is listed in detail and compared to the development that would occur under alternatives 1 and 3 in table 2 at the end of this section. Detailed development actions are listed in appendix E. |
An alternative that would seek to preserve the California Trail in a vast primitive setting would have discontinued all private use of the reserve, including domestic livestock grazing, which would have been incompatible with the setting. The alternative was rejected because (1) Congress indicated, through the type of zoning it specified, that some private use should continue within the reserve, and (2) responses to the alternatives workbook showed very little public support for this alternative.
### Table 2: Summary Comparison of Development, Alternatives 1-3

<table>
<thead>
<tr>
<th>Site</th>
<th>Alternative 1: No Action</th>
<th>Alternative 2: Proposal</th>
<th>Alternative 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Circle Creek Basin</td>
<td>Define parking at Nicholson ranch</td>
<td>Construct 1 mi. of 20-foot secondary road from east boundary to new Circle Creek basin overlook</td>
<td>Obliterate 3.5 mi. of 18’ gravel road from Nicholson ranch to west boundary</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interpretive wayside w/parking for 20 cars at the first Circle Creek basin overlook</td>
<td>Construct 4.0 mi. of 18’ gravel road from Nicholson ranch to the west boundary</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Obliterate 3.5 mi. of 20’ gravel road from Nicholson ranch to west boundary</td>
<td>Rip back 1.5 miles of 10’ hardened 4WD road to a 3’ natural surface trail corridor</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construct 4.0 mi. of 20’ gravel road from Nicholson ranch to the west boundary</td>
<td>Construct interpretive wayside w/parking for 5-10 cars at the Twin Sisters basin overlook</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Rip back 1.5 miles of 10’ hardened 4WD road to a 3’ natural surface trail corridor</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interpretive wayside/trailhead for 5-10 vehicles and 2 RVs at the Nicholson house</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1-2 compartment vault toilet</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interpretive wayside w/parking for 5-10 cars at the inscription rocks</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interpretive wayside w/parking for 5-10 cars at the Twin Sisters basin overlook</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interpretive wayside and parking for 5-10 vehicles and 2 horse trailers at corral site west of road junction</td>
<td></td>
</tr>
<tr>
<td>Rim/Silent City Day Use Area</td>
<td>Define and retain 15 parking/camping areas (approx. 6,000 sq. ft.) along rim</td>
<td>Obiterate and revegetate All parking/camping areas (approx. 16,000 sq. ft.) along rim</td>
<td>Obiterate and revegetate All parking/camping areas (approx. 16,000 sq. ft.) along rim</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 mi. of social trails</td>
<td>3 mi. of social trails</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 mi. of social roads</td>
<td>5 mi. of social roads</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Improve 2.5 mi. of existing hiking trails within the Silent City</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construct 1 mi. fully accessible trail from Turtle Rock to Parking Lot Rocks along the rim (existing trail alignment)</td>
<td>Construct 1 mi. fully accessible trail from Turtle Rock to Parking Lot Rocks along the rim (existing trail alignment)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1-2 compartment vault toilet</td>
<td></td>
</tr>
<tr>
<td>Site</td>
<td>Alternative 1: No Action</td>
<td>Alternative 2: Proposal</td>
<td>Alternative 3</td>
</tr>
<tr>
<td>---------------------</td>
<td>-------------------------------------</td>
<td>----------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Turtle Rock</td>
<td>None proposed</td>
<td>Construct picnic area (3-5 tables)</td>
<td>Construct picnic area (3-5 tables)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>15-20 space parking lot to accommodate day use, picnicking, rim trail access, and climbing access</td>
<td>6-10 space parking lot to accommodate day use, picnicking, climbing, and Silent City access</td>
</tr>
<tr>
<td></td>
<td></td>
<td>interpretive wayside</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1-2 compartment vault toilet</td>
<td></td>
</tr>
<tr>
<td>Bath Rock</td>
<td>Provide 3-5 picnic tables</td>
<td>Construct picnic area (5-8 tables)</td>
<td>Construct picnic area (5-8 tables)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Define 10-25 space parking lot to accommodate day use, picnicking, rim trail access, and climbing access</td>
<td>22-25 space parking lot to accommodate day use, picnicking, and climbing access</td>
</tr>
<tr>
<td></td>
<td></td>
<td>interpretive wayside</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construct 1-2 compartment vault toilet</td>
<td>Obliterate existing 25-car gravel parking lot</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking Lot Rocks</td>
<td>None proposed</td>
<td>Construct picnic area (3-5 tables)</td>
<td>Construct picnic area (3-5 tables)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6- to 10-car parking lot to accommodate climbing, rim trail access, and Silent City access</td>
<td>20-30 space parking lot to accommodate day use, picnicking, and climbing access for this area and Breadloaves</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1-2 compartment vault toilet</td>
<td></td>
</tr>
<tr>
<td>Breadloaves Group</td>
<td>Define sites</td>
<td>Improve/Construct</td>
<td>None proposed</td>
</tr>
<tr>
<td>Camping Area</td>
<td></td>
<td>trailhead for trail to Indian Grove with parking for 15 to 20 cars, service vehicles, and 2 trailers</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 group primitive campsites with tables, tent pads, and fire rings and parking for 3 cars each</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 two-compartment vault toilets</td>
<td></td>
</tr>
<tr>
<td>Primitive</td>
<td>None proposed</td>
<td>Construct Up to 50 primitive campsites, including tables, tent pads, and fire rings</td>
<td>Revegetate area</td>
</tr>
<tr>
<td>Campground/Trailhead</td>
<td></td>
<td>centralized parking for 10-50 vehicles</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 two-compartment vault toilets</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 mi. of trail to rim climbing area</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Improve 0.5 mi. of 18' gravel access road (existing 4WD alignment)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>4.8 mi. of hiking trail from the primitive campground: 1 segment to a high point; 1 segment to Twin Sisters</td>
<td></td>
</tr>
</tbody>
</table>
## Alternatives Considered, But Rejected

<table>
<thead>
<tr>
<th>Site</th>
<th>Alternative 1: No Action</th>
<th>Alternative 2: Proposal</th>
<th>Alternative 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indian Grove (North Area)</td>
<td><strong>Obliterate</strong>&lt;br&gt;1.5 mi of existing 4WD road/trail from Emery Canyon Pass to Indian Grove&lt;br&gt;1.5 mi of existing 4WD road up Graham Creek&lt;br&gt;Construct&lt;br&gt;7 mi of hiking and horseback riding trail from Breadloaves to Indian Grove (half in existing alignment)</td>
<td><strong>Obliterate</strong>&lt;br&gt;1.5 mi of existing 4WD road from Emery Canyon Pass to Indian Grove&lt;br&gt;Construct&lt;br&gt;7 mi of hiking and horseback riding trail from Breadloaves to Indian Grove (half in existing alignment)&lt;br&gt;Designate&lt;br&gt;Up to 7 unimproved backcountry campsites&lt;br&gt;3 parking spaces and overlook&lt;br&gt;3 backcountry composting type toilets</td>
<td><strong>Obliterate</strong>&lt;br&gt;1.5 mi of existing 4WD road/trail from Emery Canyon Pass to Indian Grove&lt;br&gt;1.5 mi of existing 4WD road/trail up Graham Creek&lt;br&gt;Construct&lt;br&gt;parking lot for 15-20 cars above Indian Grove overlook&lt;br&gt; <strong>Obliterate</strong>&lt;br&gt;vault toilet</td>
</tr>
<tr>
<td>Backcountry</td>
<td>None proposed&lt;br&gt;<strong>Obliterate</strong>&lt;br&gt;1.5 mi of existing ranch road&lt;br&gt;Construct&lt;br&gt;7 mi of hiking and horseback riding trail from Breadloaves to Indian Grove</td>
<td><strong>Obliterate</strong>&lt;br&gt;1.5 mi of existing ranch road&lt;br&gt;Construct&lt;br&gt;7 mi of hiking and horseback riding trail from Breadloaves to Indian Grove</td>
<td><strong>Obliterate</strong>&lt;br&gt;1.5 mi of existing ranch road</td>
</tr>
<tr>
<td>Twin Sisters Basin</td>
<td>None proposed&lt;br&gt;<strong>Rip back</strong>&lt;br&gt;2 mi of 16’ gravel road to create a minimally discernible ranch road for local use through the Twin Sisters basin&lt;br&gt;Construct&lt;br&gt;interpretive wayside/trailhead at the junction of the California Trail and Salt Lake Alternate (5-7 cars)&lt;br&gt;interpretive wayside with parking for 5-7 cars, 1 vault toilet, trailheads at Twin Sisters&lt;br&gt;<strong>Remove</strong>&lt;br&gt;2 vault toilets, picnic tables, and parking at Twin Sisters&lt;br&gt;Construct&lt;br&gt;4 mi of loop hiking trail between Twin Sisters and the stage station site&lt;br&gt;interpretive waysides at Pinnacle Pass and stage station site</td>
<td><strong>Rip back</strong>&lt;br&gt;2 mi of 16’ gravel road to create an unmarked, minimally discernible route for private use only through the Twin Sisters basin&lt;br&gt;Construct&lt;br&gt;interpretive wayside at Twin Sisters (15 cars) and at the junction of the California Trail and Salt Lake Alternate (3-5 cars)&lt;br&gt;<strong>Remove</strong>&lt;br&gt;2 vault toilets and parking on north side of Twin Sisters&lt;br&gt;Construct&lt;br&gt;4 mi of hiking trail from Twin Sisters to the stage station site</td>
<td></td>
</tr>
<tr>
<td>Site</td>
<td>Alternative 1: No Action</td>
<td>Alternative 2: Proposal</td>
<td>Alternative 3</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>OUTSIDE RESERVE Visitor Center</td>
<td>Existing ranger and administration station in Almo</td>
<td>Construct approximately 9,500 sq. ft. visitor center/administrative facility</td>
<td>Construct 7,500-9,000 sq. ft. visitor center</td>
</tr>
<tr>
<td></td>
<td>Existing parking for 20 cars</td>
<td>parking lot (35 to 45 cars, 8 RVs, and 2 buses)</td>
<td>parking lot (35 to 45 cars and 5 RVs)</td>
</tr>
<tr>
<td></td>
<td>Construct comfort station and new septic system and maintenance warehouse</td>
<td>well and septic system</td>
<td>well and septic system</td>
</tr>
<tr>
<td>Sanitary Dump Station</td>
<td>None proposed</td>
<td>double dump station septic tank, leachfield</td>
<td>None proposed</td>
</tr>
<tr>
<td>Reserve Headquarters/Operations/Employee Housing</td>
<td>Purchase or lease lots or housing for 2 permanent quarters and 4 seasonal quarters</td>
<td>Construct 12 permanent and/or seasonal quarters</td>
<td>Construct or purchase 6 permanent quarters</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10,000 sq. ft. of total maintenance storage space, including 8,000 sq. ft. covered shop space and warehousing</td>
<td>6 seasonal quarters 10,000 sq. ft. of total maintenance storage space, including 7,500 sq. ft. covered warehousing</td>
</tr>
<tr>
<td>Developed Campground</td>
<td>None proposed</td>
<td>Construct developed campground with 80-100 sites with hookups</td>
<td>None proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 mi. of 18' gravel access road (existing 4WD alignment)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>100-seat amphitheater (expandable to 200-seat) w/ 20-car parking lot</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>flush toilet facilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>well and sewage system</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>bulletin case</td>
<td></td>
</tr>
<tr>
<td>Almo Entrance</td>
<td>None proposed</td>
<td>Construct 5- to 10-car/3 RV pulloff and manned entrance station</td>
<td>None proposed</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construct 3-5 car pulloff and unmanned entrance kiosk</td>
<td></td>
</tr>
<tr>
<td>Emery Canyon Entrance</td>
<td>None proposed</td>
<td>Construct 5- to 10-car/3 RV pulloff and manned entrance station</td>
<td>Construct 3-car/RV pulloff and signs</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construct 3-5 car pulloff and unmanned entrance kiosk</td>
<td>3-car pulloff and signs</td>
</tr>
<tr>
<td>Junction (Moulton) Entrance</td>
<td>None proposed</td>
<td>Construct</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>3-5 car pulloff and unmanned entrance kiosk</td>
<td></td>
</tr>
<tr>
<td>Granite Pass View</td>
<td>None proposed</td>
<td>Construct wayside w/ 3-5 car pulloff</td>
<td>Construct wayside w/ 3-5 car pulloff</td>
</tr>
<tr>
<td>Roads</td>
<td>None proposed</td>
<td>None besides those described above</td>
<td>Construct</td>
</tr>
</tbody>
</table>
The earliest known cultures to inhabit present-day southern Idaho were big-game hunting peoples near the end of the Pleistocene Era. By 7,500 before the present, the cultural scene had evolved into the Desert Culture of the Archaic Period, emphasizing a seed and root gathering economy with grinding components. An exception to this generalization, however, has been found at the Weston Canyon rock shelter east of City of Rocks, where the inhabitants pursued a sheep and bison hunting economy that appears to have lacked a seed and root grinding component.

By 5,000-4,500 before the present, village life in pit houses had appeared along the Snake River in present-day southwestern Idaho. The peoples living in these villages relied partly on salmon for their diet. In recent times salmon have ascended the Snake almost to Shoshone Falls near Twin Falls. The history of the riverside villagers in southern Idaho spanned several thousand years. These villagers made pottery described as "Shoshon." The villages near the fishing falls were some 75 miles northwest of the City of Rocks — a three- to four-day walk for bands of adult foragers.

The identity of the inhabitants of southern Idaho during the two millennia before white contact is an issue of considerable debate. Many investigators have seen what they believe to be Fremont-style pottery in southern Idaho, and three sites at City of Rocks appear to have such artifacts. It is not known whether the pattern was traded or produced locally or if the people who made it knew how to grow crops like the sedentary Fremont cultures in Utah. Fremont ceramics have been found occasionally in late Fremont contexts (ca. 1400 A.D.), evoking thoughts of refugees from Utah. Often these shards are mixed in with those that can be linked with the Shoshone, suggesting that the two groups were living in proximity.

Prior to the 1840s Pocatello’s Northern Shoshone band ranged over a broad expanse of country from upper Goose Creek and the upper Humboldt-Thousand Springs area to Raft River, with City of Rocks as a part of its territory. More possessive than many other Northern Shoshone, they tended to exclude others from utilizing the region. Sometimes referred to as "wild wheat-eaters," Pocatello’s people were dependent on hunting and gathering of seeds and roots. They harvested pine nuts around City of Rocks. That crop, isolated from other pine nut areas farther south, gave Pocatello’s band a distinctive culture. Pocatello’s Northern Shoshone also went northwest to fish at Salmon Falls and east to Wind River where they sometimes wintered with Washakie’s Eastern Shoshone.

Competition between American and British fur trading interests accounted for white discovery and penetration of the City of Rocks area. Discovered in 1826 by Peter Skene Ogden’s Snake Brigade, a fur trapping effort organized by the British Hudson’s Bay Company, the Granite Pass and City of Rocks area offered little attraction to fur hunters because it possessed modest beaver resources. When Ogden’s trappers ascended the Raft River and crossed Granite Pass to reach Goose Creek on June 11, 1826, they concluded that the vicinity offered poor fur resources.

After Ogden turned his Snake Brigade over to John Work in 1830, he ascended the Raft River to Edwards Fork near City of Rocks, where he encountered a buffalo herd and six beaver, which his men caught. British trappers did not return to the City of Rocks country after Work concluded that it lacked enough beaver to justify further attention.

American mountain men who competed with Hudson’s Bay Company trappers attempted to find new routes between the Great Salt Lake and California. All the routes explored indicated exceptional problems for passage from Utah directly west into Nevada — findings that eventually led to a reexamination of Granite Pass. Returning from a California expedition in 1834 Joseph R. Walker followed an upper Humboldt-Goose Creek route that took him close to Granite Pass. After 1840 Walker and other mountain men shifted from trapping to guiding overland emigrant parties.

In 1842 Joseph B. Chiles brought a small California party back to Missouri to open a practical emigrant road for later migration. Chiles had been with the Bidwell-Bartleson party that had gone overland to California the previous year. The route used had proven that the Bonneville salt flat west of Salt Lake was unsuitable for wagon traffic. Ascending a Humboldt route already utilized farther west,
Chiles's party found that Granite Pass offered a practical emigrant route for California-bound traffic. Continuing past City of Rocks and descending Raft River, they used the existing Oregon Trail route to Fort Hall and Soda Springs. Chiles sent his main California Trail emigrant party via City of Rocks and Granite Pass in 1843 under the direction of Walker, his long-time friend, and thereafter regular California Trail emigrants passed through City of Rocks.

By 1846 Granite Pass and City of Rocks began to accommodate overland emigrants to Oregon. To avoid obstacles on the regular Oregon Trail, Jesse Applegate explored a southern Oregon connection to the California Trail, thus bringing Willamette Valley wagon trains that adopted Applegate’s route through City of Rocks and Granite Pass.

In 1848 Mormons passing overland from California to Salt Lake found that after passing through Granite Pass they could diverge over a new direct route from City of Rocks to Salt Lake without going to Fort Hall. H. W. Bigler’s Mormon battalion group, completing its long trip to Utah from California, met Samuel J. Hensley, who apprised them of such a route that he had just traveled. Abandoning plans to go to Fort Hall, Bigler’s men opened the new route (named the Salt Lake Alternate) in time to accommodate California Gold Rush overland wagon traffic that desired to detour via Salt Lake City on the journey west.

After crossing the Raft River, the California Trail swung south, leaving the northern Oregon Trail route and the Snake River. Proceeding south up the Raft River Valley, the California Trail turned west following Cassia or Cache Creek into the mountains. This route provided emigrants with a passage around the marshes of the upper Raft River to a narrow pass that took the wagon trains over the summit of the mountain. The City of Rocks provided sheltered campsites with a good water supply and pasturage for the emigrants’ animals. The section of the California Trail that passed through the City of Rocks itself was sometimes called the Fort Hall Road, and it passed near two large conical rock formations, called the Twin Sisters, at the southern edge of the City of Rocks. Just south of these landmarks, the California Trail connected with the Salt Lake Alternate. From the junction of the two trails the California Trail swung westward toward Granite Pass, which is visible on the horizon from the southwest boundary of the reserve and served as the next landmark on the trail to California. The trail continued southwestward over Granite Pass and on to Goose Creek, which it followed into northeastern Nevada through Thousand Springs Valley to Humboldt Wells and the Humboldt River.

Three major groups formed the overland migrations who passed through this area — pioneer families moving to California and Oregon, Mormons searching for a permanent settlement, and thousands of California 49ers heading west for the gold fields. The number of overland travelers reached its peak in 1852 when some 52,000 people passed over the California Trail and through the City of Rocks. Thus, the California Trail was the longest, most heavily traveled, and most significant route of westward overland emigration in 19th century American history. Many of the overland emigrants recorded their trips in diaries and other accounts, revealing considerable data on the trails and their impressions of City of Rocks, a landmark spectacle that soon gained widespread fame as a leading attraction along the California Trail. One such emigrant, James F. Wilkins, identified the monumental granite assemblages as "The City of Rocks" by August 12, 1849, and the appellation soon gained general acceptance.

At various times during the 1850s transcontinental mail and express service was conducted by way of City of Rocks and Granite Pass. This service, however, was hampered by severe winter weather, Indian attacks in the southern Idaho-northern Nevada region, and financial difficulties of the operators. Under one such mail contract in 1858, George Chorpenning built stations along his route at approximately 20-mile intervals, one of which was at Goose Creek west of Granite Pass and another of which may have been near or in City of Rocks at a site later used for a Boise-Kelton Road stage station.

The impacts of two decades of wagon traffic on his people’s way of life, which included overgrazing, depletion of game, and loss of other food sources, caused Pocatello to have his warriors attack an Oregon Trail emigrant party above Massacre Rocks on August 9-10, 1862, and several California Trail groups near City of Rocks in early August. These and other incidents, including six or more documented battles that took place near Almo after September 1860, in which a number of people were killed (the newspaper reports of which were often exaggerated), led to military retaliation at Bear River on January 29, 1863, where some of Pocatello’s people were camped with a substantial band of Cache Valley Shoshone. As a result of the military
pressure Pocatello agreed to negotiate a treaty at Box Elder, Utah, on July 30, 1863, providing compensation for the Indians in exchange for the emigrants' unobstructed access to their routes, including the vicinity of City of Rocks. By the late 1860s Pocatello decided that his band would be better off settled on Fort Hall Reservation, and he arranged for a Bannock Creek home. Thereafter, City of Rocks received little attention from the Shoshone except for small family groups that continued to travel there to harvest piñon pine nuts.

Following completion of the transcontinental railroad in 1869 a road was developed from Kelton, Utah, to Boise, Idaho, to provide a connection for postal service, express, and freighting operations between the railroad and the burgeoning mining communities of southern Idaho. As a result a stage station east of the junction of the old California Trail and Salt Lake Alternate just south of Twin Sisters at City of Rocks served the thriving Boise-Kelton traffic until 1882, when construction of the Oregon Short Line Railroad supplanted all stage and freight service through City of Rocks.

Responding in part to the growing market for meat by the expanding Idaho mining communities, cattle ranching began in the City of Rocks vicinity in 1875. A natural corral west of Castle Rock below Graham Peak led James Q. Shirley, who had joined Lou Sweetzer in introducing a herd of 2,000 Texas longhorns to upper Raft River, to fence a cove ranch site and build a modest ranch house at City of Rocks. Other ranchers soon moved into the area. By 1878 John Stines and Buck Holmes had built ranch cabins in Shirley's large corral area. In 1880 George Graham built a house a half mile from Shirley's cabin on a site still occupied by that area's major extant ranch structure. Graham's place also served as a local school from 1882 to 1916 when it and other nearby one-room schools were consolidated in Almo. Jensen's store, which continues as the Almo store, was first constructed in Shirley's City of Rocks cove.

Limited tracts of good ranch land in the City of Rocks area soon led to population expansion in adjacent areas. From the late 1870s to the early 1890s Mormon settlements began to dot the valleys adjacent to City of Rocks. These agricultural settlements depended on the City of Rocks area for their water supply. In 1878 George W. Emery, governor of Utah from 1875-80, developed an extensive ranch on the Raft River, employing a Mormon staff. A post office was established near

City of Rocks at Alamo (a Spanish term for cottonwood trees common to the area) in 1881. The name Alamo was contracted to Almo, and 15 Mormon families formed a church branch there in 1882, one year after a church had been organized at Elba on upper Cassia or Cache Creek. Mormon settlement between City of Rocks and Granite Pass resulted in the organization of a Mormon church ward at Moulton in 1916. Farther north, Mormon settlement around Oakley supported a church ward established in 1882.

Increasing precipitation following a severe drought that ended in the late 1880s, and newly developed dry farming methods led to expansion of crop planting in the City of Rocks area between the mid-1890s and the 1920s. Sagebrush was cleared, fences were built, and grain and hay crops were planted. Roads in and near City of Rocks were moved to section lines in places, and plowing brought surface changes to some California Trail segments. During this period the present road from Almo to Moulton was built across the City of Rocks area, although its alignment may have been improved during the 1930s.

At least six identifiable ranches were developed in the City of Rocks area during the 1895-1920 period. Four occupied Grahams Cove and Circle Creek sites, and surface evidence indicates that at least two ranches were established west of the stage station. The two most important ranch sites are Graham's ranch, which he sold to John Jacob Breusch in 1902, and Hull's Circle Creek ranch, which featured livestock raising.

More arid conditions and a severe agricultural depression after World War I resulted in retrenchment of dry farming operations in southern Idaho during the 1920s. Mechanized farm equipment eventually permitted some crop cultivation, but a continuing farm recession resulted in consolidation of farm holdings back into stock ranches and grazing operations in the City of Rocks area.

More recent utilization of the City of Rocks area includes fenced livestock ranches and tourist recreation. Section 36 was purchased as state park land in March 1973, and tourists have come to the area in increasing numbers during recent years to take advantage of opportunities for rockclimbing, hiking, picnicking, and camping. To preserve and interpret the significant natural and cultural resources of the area City of Rocks National Reserve was established in 1988.
An area of approximately 22 square miles (14,080 acres) in the City of Rocks vicinity (including a large area within the present reserve boundaries) was listed as a historic district on the National Register of Historic Places on October 24, 1963. The determination of the area's significance was based on its association with events that have made a significant contribution to the broad patterns of American history (criterion A). City of Rocks was designated a national historic landmark on July 19, 1964, and is listed in History and Prehistory in the National Historic Landmarks Program: 1987 under theme X, "Westward Expansion of the British Colonies and the United States, 1763-1898," subtheme D, "Western Trails and Travelers," facet 4, "California Trails and Settlement of California." The national historic landmark boundary was revised on August 6, 1987, to encompass some 12,480 acres.

The City of Rocks National Historic Landmark includes the valley and basins formed by spectacular granite monoliths through which the California Trail and the Salt Lake Alternate passed. The landmark boundary follows the north, east, and west sides of the City of Rocks valley and the Circle Creek and Twin Sisters basins and extends north to Castle Rock, the end of the stone monolith formations that can be viewed from the California Trail corridor. The landmark boundary stretches south to include a portion of Emigrant Canyon where the California Trail and the Salt Lake Alternate intersected below the prominent Twin Sisters formation.

This area includes some 9 miles of the California Trail and Salt Lake Alternate route corridors comprising some of the best preserved remnants of such overland emigrant routes in the nation. Within the landmark boundaries are emigrant inscriptions on 13 rocks, six small segments of the California Trail that have been identified as maintaining their original rut or defile contours, and the principal emigrant encampment site at City of Rocks in the Circle Creek basin. The narrow defile of the Pinnacle Pass incline over which the emigrant wagons crossed the ridge to pass out of the City of Rocks vicinity includes several features that provide a glimpse of the difficulties encountered by the emigrants as they traversed the rugged terrain of the overland trail. Among these are the wagon-wheel-worn rocks near the approaches to the pass and at its apex, and a cable-cut in the rock that may be the result of pulling braking the overland wagons over the steep grade.

The extent of the significant fabric of the California Trail includes not only the trail remnants, landmarks, and inscriptions rocks, but also the expansive landscape the emigrants observed as they crossed through the City of Rocks on their westward trek. Thus, the "viewshed," or the extent of the views seen from the two emigrant trails, is a significant feature of the national historic landmark.

The landscape visible from the trail corridors today still retains many of the attributes and features that guided and awed 19th century emigrants, although it will never again have all the character of that particular historic period. At the time of the overland emigration from 1842-69, City of Rocks was a primitive area, much wetter in Circle Creek and at Pinnacle Pass than today. Native bunch grasses and fescues prevailed in the basins, and coniferous forest covered the uppermost reaches of the surrounding hills. The trail corridor itself was probably littered with cast-off equipment and goods, was unsanitary, and was overgrazed. At any given time during the summer months, wagon parties were camped in Circle Creek basin, where water and forage sustained both animals and people. Game sightings might have included bighorn sheep and beavers. This wild but trammelled area was a crowded, transitory haven, where routes were created at random, the resources were for the using, and views included a steady stream of travelers.

Today City of Rocks is less trammelled, but also less wild. For all the changes that have occurred over the intervening 150 years, however, the landscape still looks and feels much the same as it did to the emigrants. For example, the first major impression is still one of enclosure. The vistas at City of Rocks are quite different from those on the surrounding open plains — they are defined by the encircling stone formations that alternately close in and open up, adding great variety to the scenery. The Circle Creek basin, where many of the emigrants camped because of the water and forage it offered, remains an open, expansive valley with a flowing creek, ringed by towering rock formations offering a sense of security and comfort to plains-weary travelers. The bighorn and beaver are gone, but coyotes still interrupt the nighttime silence. The Twin Sisters monolith, which appears on the southwest horizon beyond the inscription rocks, continues to provide a focal point and sense of direction across the next open valley, sometimes referred to as the Twin Sisters basin, to Pinnacle Pass. The area around Twin Sisters is a particularly important part of the trail viewshed, since this regional landmark could be
seen by people approaching from the east as well as
the north, and marked the junction of the California
Trail and Salt Lake Alternate. Emigrants passing here
knew they were a few days' ride out of Salt Lake
City and beginning the portion of their journey
across the desert.

For purposes of analyzing impacts on the California
Trail, the trail viewshed is considered to be the area
within the foreground (up to 1/4 mile on either side
of the identified route) and the middle ground (1/4
mile up to 3 miles) that comprises the significant
continuous view along the trail. The viewshed
contracts and expands following the topographic
edges of ridgelines that frame the scene. The distant
background is also an important part of the views
from the trail, but it is far enough in the distance
that land uses incompatible with the historic setting
are generally not discernable from the trail.

Three important views and their viewshed along the
California Trail warrant special attention (see the
California Trail Viewshed map). None contain high
degrees of scenic quality, but they are important
because they are views experienced by travelers
when trying to find their way along the trail. These
landmark views are

1. the view south toward Twin Sisters from
the California Trail corridor as the ground
rises into the basin in front of two spires

2. the view northwest towards Twin Sisters
along the Salt Lake Alternate Trail at the
stage stop

3. the view southwest to Granite Pass, 1/4
miles outside the southwest boundary of the
reserve

The first view is barren in the foreground, without
vegetation or groundform to frame the scene. The
viewer is directed to the focal point of the highest
two spires, but their dominance is lost in the jumble
of crags and peaks along the Twin Sisters ridge and
the lengthy distance from the viewer. Yet, the view
retains validity in immediately setting up the trail
course to Pinnacle Pass, once the lowest saddle
along the ridge.

The second view from the stage stop to Twin
Sisters is the most dramatic view of the spires.
From this angle, the separation of the two is
apparent. Their individual and distinctive forms and
textures are vividly perceived. Their strength as a
dominant focal point is more evident in the
shortened middle ground that makes them appear
close to the viewer.

The absence of competition from the serrated ridge
they lie in allows a sharp contrast within this view
of rolling sagebrush hills and smooth granite domes.

The third view is expansive and open, with no
foreground textures or containment. The distant
mountain pass is a subtle but important focal point
experienced from outside the reserve.

Aside from the cultural resource values associated
with the national historic landmark designation, the
most significant historic resources in the national
reserve are the stage station site and the Nicholson
house. The original structures that served the
Boise-Kelton stage traffic between 1869 and 1882
are no longer extant. The present log structures
near the stage station site at the junction of the
California Trail and Salt Lake Alternate just south of
Twin Sisters at the site were built during the early
1930s with materials salvaged from the earlier stage
station buildings. The rebuilt structures served
farming and ranching purposes. Despite these
changes, however, the historic landscape at the
stage station site retains much of its integrity and
affords the opportunity to interpret the significant
stage and freighting period.

The remnants of one farm or ranch structure
survive from the dry farming era (mid-1890s to
mid-1920s) at City of Rocks. Stone walls of a house
constructed by John Hull about 1903 on his Circle
Creek ranch (currently known as the Nicholson
house) afford the opportunity to interpret another
important chapter in the historic continuum of the
City of Rocks.

Other important historic resources affording
examples of other themes in the historical develop­
ment of City of Rocks include the remnants of
scattered homestead sites and a partially collapsed
log cabin along Circle Creek, near the Nicholson
house and a mica mine. Extant resources in the
reserve associated with historic cattle ranching
operations include scattered cattle trailing routes,
water sources, windmills, corrals, and fencelines.

Many of the various historic resources described in
this section not only serve as representative
examples of significant themes in the historic
continuum of the national reserve, but also
contribute to the ambience of the reserve's historic
rural setting. The historic rural setting is the sum total of ranching land use patterns and artifacts accumulated through 150 years of human use and development. It is the spacious open expanse and the fencelines, corrals, trailing routes, and water sources of ranching operations. It is the large acre, fenced fields and gravel roads on section lines. It imparts an increasingly rare and scenic quality reminiscent of the American West and thus constitutes a significant cultural value of the reserve.

At the time of establishment in 1988, and now, the historic rural setting in the reserve has an open, unbuilt character. Dense sagebrush or grass interspersed with sagebrush covers all the level to rolling terrain. Thick, dark stands of squat pinon pine and Rocky Mountain juniper blanket the hillsides. The northern end of the reserve has lush grasslands around springs and occasional aspen groves in broad drainages.

Sixteen ranchers trail cattle across the area in concentrated and staggered drives twice a year, and grazing activity covers all areas except most of the state-owned section 36. Prime summer pasture includes the Graham Creek and Walters Creek allotments and Circle Creek basin.

Dryland farming is no longer practiced, although fenced fallow fields are still apparent. Remnant historic structures at the stage station and the Nicholson ranch are abandoned and in disrepair. Fence lines of shaggy juniper and barbed wire fall on section and property lines, which breaks expanses of sagebrush. Unmilled posts and wire-form gates cross roads that are four-wheel-drive gravel. One small, seasonally used corral is near Elephant Rock. Winter conditions can range from windswept, frozen plains in the heart of the basins to deep, undisturbed snows in the Graham Peak drainages. The severe weather conditions require closure of the east-west route, and forces local traffic out of the reserve to the southwest along the north-south road. The north-south road also closes in the winter but later than the east-west route.

**ARCHEOLOGICAL RESOURCES**

Archeological surveys and testing have been carried out at the reserve over the past four years to assess the nature and extent of the reserve's archeological resources. The results of this effort have been provided to the state historic preservation officer and will be used to develop a long-term strategy for archeological investigations at the reserve as defined in a programmatic agreement covering sections 106 and 110 responsibilities.
| ETHNOGRAPHIC RESOURCES | Consultation with interested American Indian groups has begun under the direction of the regional anthropologist, who has met with representatives of the Fort Hall Shoshone-Bannock tribes. In addition to establishing a long-term consulting relationship with these tribes, which may have interests in several NPS sites, information is being sought regarding sites of special significance and interest to the tribes within City of Rocks, for which protection and management strategies will have to be developed. Tribal representatives of the Fall Hall, Shoshone-Bannock tribes came to the City of Rocks during 1993 to view plan proposals to assist in their review of the draft plan. |
AIR QUALITY

City of Rocks National Reserve has been designated a class II area for air quality purposes of controlling increases in air pollution under the Clean Air Act. Due to the low population density and lack of large emission sources near the reserve, air quality is generally very good. Air quality data for the reserve has not been systematically collected, and since the few air quality monitoring stations in the region are located near known pollution sources, the data from these stations probably does not represent City of Rocks air. High particulate matter concentrations occur in the reserve when strong winds increase dust emissions from exposed soils in agricultural fields or on dirt roads. Smog can sometimes be seen near the reserve when prevailing winds carry pollution from nearby population centers.

Air quality in the west-central United States, including southern Idaho, generally has the best visual quality anywhere in the country (Sisler et al., 1993). Craters of the Moon National Monument, the closest NPS air monitoring site to the reserve, has more pristine visual air quality than any other NPS monitoring site in the continental United States. However, air quality monitoring data at Craters of the Moon show a trend in deterioration, with significant decreases in visibility in recent years (NPS 1991, Malm et al. 1994). The reserve's air quality might be deteriorating similarly, because City of Rocks is located near the same air pollution sources affecting Craters of the Moon. Even slight increases in air pollutants could cause major decreases in visibility.

Air quality is important for health, visitor enjoyment, scenic vistas, and preservation of natural systems and cultural resources. Most elements of a park environment are sensitive to air pollution. Notable air-quality-related values at City of Rocks are the visibility and the scenery.

City of Rocks is in the northeast extremity of the Basin and Range Physiographic Province. The reserve is in the southern part of the Albion Mountains, bordered to the east by the Raft River valley and to the north by the Snake River valley. The most notable landscape features of the reserve are the very large number of monumental outcrops that surround the City of Rocks basin. Large numbers and areas of outcrops form the northern crescent-shaped backwall of the basin where it is highest. Lines of rock towers, including Twin Sisters, continue on the western perimeter of the basin. Smaller and more isolated towers jut from the floor of the basin. Elevations rise from 5,650 feet where Circle Creek meets the reserve boundary to 8,867 feet at the top Graham Peak to the north.

The landscape of City of Rocks has been sculpted from the upper parts of the Cassia batholith, a granitic pluton that intruded the older metamorphic rock of Green Creek complex about 30 million

TABLE 3: TEMPERATURE DATA, OAKLEY

<table>
<thead>
<tr>
<th>Measurement</th>
<th>Degrees Fahrenheit</th>
</tr>
</thead>
<tbody>
<tr>
<td>mean annual temperature</td>
<td>48</td>
</tr>
<tr>
<td>extreme recorded high</td>
<td>105</td>
</tr>
<tr>
<td>extreme recorded low</td>
<td>-27</td>
</tr>
<tr>
<td>average winter temperature</td>
<td>31</td>
</tr>
<tr>
<td>average winter daily minimum</td>
<td>21</td>
</tr>
<tr>
<td>average daily summer temperature</td>
<td>67</td>
</tr>
<tr>
<td>average daily summer maximum</td>
<td>83</td>
</tr>
</tbody>
</table>

TOPOGRAPHY AND GEOLOGY

109
years ago. The Green Creek complex contains some of the oldest rocks in the western United States, dated at about 3.5 billion years. The Twin Sisters represent the opposite sides of a contact between 3.5-billion-year-old precambrian metamorphic rock (southeast) and 70-million-year-old (or less) Cretaceous-Tertiary igneous rocks (northwest). The granite has eroded into a fascinating assortment of shapes as high as 200 feet. The range of altitude within which these outcrops are dispersed over slopes of the basin is unusually large. The smaller ones in the floor of the basin are more than 1,000 feet below the summits of the highest ones.

Rock formations in the reserve developed through an erosion process called exfoliation, during which thin rock plates and scales sloughed off along joints in the rocks. The joints, or fractures, probably resulted from contractions when the rock cooled or from expansions when overlying materials eroded away and eliminated confining pressure. Strongly developed vertical joints in the rocks caused the distinct north-south orientation of most of the rock formations. A second set of vertical joints orient east-west and are perpendicular to the first set. Third and fourth sets of dome-shaped and horizontal joints also formed. The dome-shaped joints resulted in the formation of the larger granite dome towers called bornhardts. Most of the remaining towers, large and small, are also bornhardt remnants. The horizontal joints resulted in the formation of the few rectangular shaped tors in the reserve. Some rectangular shaped rock formations in the reserve are actually bornhardt remnants.

Some outcrops of moderate height are neither tor-like nor bornhardt-like, and these include large, curved sheets of rock. Perched boulders are common, but large debris at the base of formations is rare. At a smaller scale the surfaces of many rocks were further shaped by case-hardening and weathering, resulting in numerous depressions on the rock surfaces. There are more than 500 panholes in one small area of the reserve. The most notable panhole is located on top of Bath Rock and frequently fills with water from rain or snowmelt.

The principal natural value of the reserve, and the main reason it was designated a national natural landmark, is that it demonstrates the exfoliation process on a small scale. The same process, on a much larger scale, shaped Half Dome in Yosemite.

The U.S. Soil Conservation Service has completed a preliminary soil survey for portions of the reserve. The majority of mountainside soils (slopes greater than 20 percent) are shallow (less than 20 inches to bedrock) and composed of very gravelly or cobbly loam or coarse sandy loam with large rock fragments exposed at the surface. The basin soils (slopes less than 20 percent) are moderately to very deep (greater than 60 inches to bedrock) and composed of loam or sandy or gravelly loam.

The majority of the soils in the reserve are highly erodible. Wind erosion potential is moderate for some soils in the reserve. Water erosion hazard is severe for most mountainside soils and moderate for basin soils. Soil erosion is greatest near roads on steep slopes and intermittent stream channels such as those tributary to Circle Creek and in Emigrant Canyon. Erosion in these areas has formed deep gullies wherever the soil-binding vegetation has been disturbed. Some of the exposed soil banks are over 8 feet high and nearly vertical with large clods of organic soil common near the bottom of these soil banks. In heavily grazed areas, most of the protective vegetative ground cover is lacking and soil is exposed. In undisturbed areas of the reserve watershed vegetation effectively protects soil from the erosional forces of wind, precipitation, and runoff.

Surface water is limited to a few small headwater streams and springs. Graham Creek, Circle Creek, and intermittent streams in Heath Canyon and Emigrant Canyon flow east toward the Raft River. Trail Creek drains west to Junction Creek, which courses around the southern end of the reserve to the Raft River. The headwaters of Emery Canyon flows from the northwest portion of the reserve west to Birch Creek, which eventually flows to Goose Creek. Both Raft River and Goose Creek flow into the Snake River.

Surface water in the reserve that flows to Goose Creek and Raft River is protected for use as agricultural water supply, cold water habitat, salmonid spawning, and primary and secondary contact recreation under Idaho water quality standards. Surface water in the reserve is used primarily for agricultural purposes. Water quantity and quality of the reserve streams and springs have not been extensively studied. Streamflows are reduced during the summer when water is diverted for agricultural purposes. The chemical components of the limited surface water quality data for the reserve are within criteria for designated uses.
Cattle concentrated in riparian zones accelerate soil erosion and contribute fecal coliforms to reserve streams and springs. Most of the soils in the reserve are highly erodible, and several severely eroded areas contribute sediment to streams during high flows corresponding to storm events and spring snowmelt. High stream sediment and associated turbidity can negatively affect stream organisms both in and outside the reserve far downstream from the source of particulate matter.

Little is known about the status of groundwater in the reserve. The chemical components of water in several wells tested in the reserve are within criteria for designated use. Groundwater use outside the reserve combined with recent drought is thought to have decreased water flow to springs in the region. Such effects may be occurring but have not been documented within the reserve.

Idaho’s water law is based on the doctrine of prior appropriation. Under this doctrine, the entity that first diverts water for beneficial use has the prior right to use the water, against all other appropriators who may wish to use water later. The federal government also may hold federal reserved water rights, which arise from the purposes for which the land is reserved. City of Rocks is entitled to federal reserved water rights on that portion of the reserve acquired from the Sawtooth National Forest, and the amount claimed is for the minimum necessary for national forest purposes.

The state of Idaho is currently conducting a water rights adjudication process for the Snake River basin, which includes City of Rocks. Under this process, all entities with water rights in the Snake River basin must file a water rights claim with the state. The purpose of the adjudication is to decide exactly how much Snake River water is currently allotted; where and how water is being used; and how much remains to be allotted. The National Park Service has filed federal reserved and state appropriative water right claims for City of Rocks National Reserve for the Snake River basin adjudication.

Sufficient water for all wildlife, stock, and visitor needs may not be provided through the exercise of limited reserved water rights designated by Congress for this unit. Where reserved rights are insufficient, appropriative water rights will be acquired.

City of Rocks was zoned as an area of minimal flooding by the Federal Emergency Management Agency. The creeks and drainages of the reserve are subject to flooding during summer months when thunderstorms can produce large quantities of precipitation in a localized area. The hazards from these summer floods are considered minimal.

Many small wetlands exist in the reserve, typically in riparian areas next to streams and springs. Because of the aridity of the region, these wetlands, although quite small, are important resources for many forms of life. Wetlands in the reserve have been mapped from aerial photos by the U.S. Fish and Wildlife Service and the National Park Service (see Vegetation map). The wetlands map for the reserve is for orientation purposes only and is not intended to represent jurisdictional wetland boundaries. Site-specific wetland studies would be required to identify the precise location of wetland boundaries.

The vegetation map was prepared by mapping professionals in the Geographic Information Systems Division of the Washington Office of the National Park Service, using the 1987, 1:40,000, National Aerial Photography Program, color infrared photography. Professionally accepted techniques for photointerpretation, mapping, and digitizing were used in the development of this product. However, the map has not been field-verified for accuracy. U.S. Fish and Wildlife Service National Wetland Inventory data have been merged with the mapped vegetation classes.

A total relief of 3,000 feet and a variety of exposures and rock/soil types produce many different types of vegetative communities in City of Rocks. Today most of the plant cover, except vegetation on steep, rocky exposures, is considerably changed from its natural condition. The changes over time were caused by a combination of man-induced factors, including intense grazing, dryland farming, fire suppression, brush control, seeding, development of roads and trails, and camping.

The dominant plant communities in the study area include (1) piñon/juniper woodlands and forest, (2) conifer/aspen woodlands and forests, (3) riparian scrub and herbaceous wetlands, (4) big sagebrush and grasslands, (5) mixed scrub, (6) mountain mahogany scrub, (7) high elevation meadows, and (8) other unvegetated areas (see Vegetation map and appendix C).
The arid open valley floors of the Circle Creek basin and upper Emigrant Canyon were originally covered with a mosaic of vegetation dominated by open stands of big sagebrush with an understory of native perennial grasses such as Idaho fescue. Today, most of the City of Rocks basin is covered by monotypic stands of big sagebrush interspersed with plants with little or no forage value, such as tansy mustard, rabbitbrush, and exotic Russian thistle, peppergrass, cheatgrass, and halogoton. Crested wheatgrass (another exotic) dominates the understory where private landowners and the Bureau of Land Management have improved range for livestock. Areas with sagebrush steppe vegetation in a natural condition are scarce in southern Idaho.

The piñon pine/juniper woodlands occur adjacent to the sagebrush areas in the rockier and rougher terrain of the reserve. These woodlands are dominated by single-leaf piñon pine and Utah juniper interspersed with mountain big sagebrush, curlyleaf mountain-mahogany, Rocky Mountain juniper, chokecherry, bluebunch wheatgrass, and Great Basin wild rye. The reserve contains the northernmost range of the single-leaf piñon pine. The piñon pine seed is edible and is gathered by local residents. The trees of this cover type may grow to 30 feet in height but are generally less than 15 feet tall. They are bushy and almost as wide as tall. When destroyed by fire, this type gives way temporarily to grass or shrubs.

The higher slopes are covered with mountain big sagebrush, mountain snowberry, serviceberry, and bitterbrush, with other shrubs, grasses, and herbs growing in the openings between the shrubs.

The mountain woodlands are characterized by groves of aspen, stands of Douglas-fir and lodgepole pine, or open meadows located on the upper stony/grassy slopes of the reserve. Quaking aspen communities occur in canyons containing perennial or intermittent streams. Narrowleaf poplar, thinline alder, serviceberry, chokecherry, and snowberry occur in the understory of the aspen groves. Rocky Mountain juniper occurs more frequently in the aspen understory than elsewhere in the area.

Riparian vegetation is limited to a small portion of the reserve adjacent to stream courses and springs. Riparian zones are associated with water and occur as important transition zones between aquatic and terrestrial communities. These transition zones have a greater quantity and diversity of plant species than adjoining land. They provide food, water, and cover...
for both wildlife and livestock. Overgrazing has altered much of the riparian areas in the reserve, causing accelerated soil erosion and elimination of typical riparian plant species. Typical riparian plants found in the reserve include aspen, willow, Rocky Mountain maple, box-elder, thinleaf alder, choke-cherry, rushes, sedges, and bluegrasses. Much of the riparian vegetation in the reserve is located in wetland areas mapped by the U.S. Fish and Wildlife Service.

**Mountain Mahogany Scrub (2.4% of the reserve)**  
On some higher mountain slopes of the reserve, stands of nearly pure curlleaf mountain mahogany are present. They occur next to or are surrounded by piñon/juniper on sites that are less rocky and steep. Other species found growing with the mountain mahogany includes limber pine, mountain snowberry, Idaho fescue, and bluebunch wheatgrass.

**High Elevation Meadows (2.0% of the reserve)**  
Mountain meadows near the upper ridges contain a combination of grasses, herbs, sedges, and wildflowers. Various species introduced through human activities, including wheatgrass, cheatgrass, halogeton, and others, are also present.

**Other Unvegetated Areas—Bare Ground/Rock (3.8% of the reserve)**  
This category includes the many exposed rock formations with colonies of various lichens and bare ground disturbance such as mining spoils.

**RARE AND SENSITIVE PLANT SPECIES**  
Preliminary field surveys have discovered the presence of three rare and sensitive plants. The reserve has been only partially surveyed and data are incomplete. There are no known federally listed or candidate plant species within the boundaries of City of Rocks National Reserve.

The Idaho Natural Heritage Program and the Idaho Native Plant Society maintain lists of plant species considered threatened or worthy of additional concern. Three plants on these lists are present in the reserve, including Simpson's hedgehog cactus, narrow-leaved Indian paintbrush, and Kruckeberg's swordfern (see appendix C).

The Simpson's hedgehog cactus is a solitary-stemmed cactus known to occur in rocky or sandy soils among low sage along the Graham Peak ridgeline. Future botanical surveys may find this cactus on other wind-swept slopes in the reserve. This cactus is widespread in southern Idaho. The primary threats to this species are exploitation from cactus collectors and any ground-disturbing activities.

The narrow-leaved Indian paintbrush is a perennial plant known to occur in rocky shallow soils along the ridge west of Indian Grove to Finger Rock. This variety is common outside Idaho in western Utah and eastern Nevada. The northernmost known occurrence of this variety of Indian paintbrush is in the reserve. The primary threat to this species is any ground-disturbing activity. Although the narrow-leaved Indian paintbrush is not palatable to cattle, heavy grazing may affect the plant.

The Kruckeberg's swordfern is found in the cool, moist micro-habitats in the granite formations at City of Rocks. The fern grows in rock crevices and normally is found at higher elevations than at City of Rocks. The primary threats to this species are trampling or removal by visitors along rockclimbing routes.

The diverse habitat of the reserve supports a large variety of mammals, birds, reptiles, and invertebrates. Streams in the reserve provide only marginal fish habitat and likely do not support any fish.

**Mammals**
A partial list of mammals in the reserve includes mountain lions, mule deer, rocky mountain elk, coyote, bobcat, badger, porcupine, red fox, cliff chipmunk, mountain cottontail and pygmy rabbits, blacktail jackrabbit, snowshoe rabbit, northern grasshopper mouse, merriam shrew, several species of voles, and a variety of bats. Pronghorn antelope and bison were probably common a century ago. Bighorn sheep were common throughout the area until the early 1900s. Hunting by settlers, range exploitation by domestic livestock, and disease transmitted by livestock led to the population decline.

City of Rocks has a large assortment of bird species and is a favorite area of local bird-watchers. The reserve provides excellent breeding and prey habitat for many raptor species including golden eagle, prairie falcon, red-tailed hawk, northern harrier, sharp-shinned hawk, Cooper's hawk, American kestrel, turkey vulture, and great-horned owl. Swainson's hawk and ferruginous hawk are less abundant in the reserve. Other common bird species includes blue grouse, sage grouse, piñon jay, Clark's nutcracker, common nighthawk, rock and mourning doves, cliff swallow, mountain chickadee, rock and house wrens, mountain bluebird, hermit thrush, solitary and warbling vireos, green-tailed towhee, Virginia's warbler, Brewer's blackbird, and various sparrows.
A number of reptile and amphibian species occur in the reserve area. Common amphibians that could be found near water in riparian areas include boreal toad, Great Basin spadefoot toad, and northern leopard frog. Typical lizard species include the western whiptail, western fence lizard, long-nose leopard lizard, sagebrush lizard, and northern desert horned lizard. Snakes include the western rattlesnake, Great Basin gopher snake, striped whipsnake, and wandering garter snake. The western rattlesnake is the only strongly venomous snake found in the reserve.

Invertebrates are common throughout the reserve, but data on insects, spiders, and mites are limited due to lack of studies.

No federally listed threatened or endangered species occur in the reserve. However, two category 2 candidate species, the ferruginous hawk and Townsend's big-eared bat, occur or may occur in the reserve and are under review by the U.S. Fish and Wildlife Service for consideration as endangered or threatened species (see Appendix B: Consultation with U.S. Fish and Wildlife Service, and Appendix C: Rare and Sensitive Species in or Near City of Rocks National Reserve).

Ferruginous hawks have been observed in the reserve and are known to nest nearby. This bird is very adaptable when selecting nest sites, and most of the reserve provides potential nesting habitat. Ferruginous hawks prefer to nest in trees but commonly nest on shrubs, rock outcrops, cliffs, manmade structures, and on the ground. They will build alternate nests (more than one nest) and regularly use nest sites from previous years. Eggs are typically layed in April and hatch in about 33 days. The young are ready for first flight at about 65 days of age. Ferruginous hawks are very sensitive to human disturbance during nesting periods.

Although no bat surveys have been completed within the reserve, surveys conducted near the reserve strongly suggest that Townsend's big-eared bats probably roost in rock caves within the reserve. These bats generally roost in areas easily reached by flying; therefore, they are seldom found in small cracks or crevices in rocks. They will roost in buildings or mines. Big-eared bats generally hibernate during the winter in caves and mines where temperatures range from 55 degrees Fahrenheit to just above freezing. They feed on insects and forage only late at night. Townsend's big-eared bats are extremely sensitive to close human presence and abandon roost sites after even the slightest disturbance.

Several other rare or sensitive animal species were identified during the scoping process that may require special protective management considerations (see "Consultation and Coordination" section and appendixes B and C). Some cliff-nesting raptor species, denning mountain lions, and roosting bats could be adversely affected by human activities in the reserve. Native animal populations will be protected unless they provide a direct threat to visitor safety.

Six breeding pairs of golden eagles (a relatively high density) were observed during a 1991 raptor survey. Their active nests were located in or near the reserve. Preferred nest sites are on cliffs or tall trees growing on steep slopes. A pair of birds may build more than one nest. Some nest sites are used year after year. Eggs are usually laid in March or April and hatch in about 45 days. The young are ready for first flight at about 65 days of age. Jackrabbits, cottontail rabbits, ground squirrels, and sage grouse are preferred food. Carrion is frequently eaten. Other small mammals, birds, reptiles, and fish are also occasionally eaten. Golden eagles are sensitive to human presence during breeding periods.

Six breeding pairs of red-tailed hawks and their nests were located in the reserve during the 1991 raptor survey. This species prefers nesting in tall trees well up a slope or on a ridge or hilltop, but will occasionally nest on cliff ledges. Breeding pairs occasionally reuse old nests during successive years. Eggs are layed anytime from March to early May and hatch in about 34 days. The young are ready for first flight at about 45 days of age and are dependent on adults for an additional 30 to 70 days. Red-tails feed primarily on small mammals. Birds, reptiles, fish, and carrion are also occasionally eaten.
In the reserve, prairie falcons usually select laying sites on sheltered cliff ledges at least 30 feet above the ground. Prairie falcons do not build nests but will scrape together any loose material available, such as gravel, at the laying site. Breeding birds commonly return to the same nest site of previous years. Eggs are normally laid in April and hatch in about 31 days. The young are ready for first flight in about 36 to 41 days. As soon as the young are capable of sustained flight, they leave the area. Favorite prey includes ground squirrels, and as many birds (such as maliard, sage grouse, rock dove, and sparrow) as opportunity allows. Occasionally eaten species include cottontails, jackrabbits, a few rodents, small common lizards, grasshoppers, and crickets. Breeding prairie falcon pairs are sensitive to human disturbance.

Mule deer occur in many varied habitats throughout southern Idaho. Mule deer require the juxtaposition of food, cover, and water like other cervids. Areas without water available within 1 mile show decreased use (Mackie 1970). Cover is used for both hiding and thermal regulation. Browse is the primary vegetation used by mule deer except in spring when herbaceous materials are preferred. Summer and winter ranges are most often geographically separate areas (Wallmo 1981).

Mule deer seasonally use habitat in and near the reserve. The abundance and availability of winter browse interspersed with pinion pine and juniper cover in southern portions of the reserve and east of Smoky Mountain and Cedar Hills provides important wintering habitat. Deer winter ranges are restricted by snow depths greater than 18 inches and reduced where snow depths are greater than 12 inches (USFWS 1982). Deer typically do not use the reserve area during severe winters. In the fall, deer move north to south through the reserve and east of the reserve to winter ranges, then retrace this route in the fall back to summer ranges. Large numbers of deer have been observed migrating along a corridor just east of Smoky Mountain and Cedar Hills (personal comm., Randy Smith, IDF&G 1994).

Mountain lions are common in the Albion Mountains and the reserve. The rugged terrain north and northwest of the Circle Creek basin has been identified as important denning habitat for the regional mountain lion population. Litters of usually two or three are born in the summer. Idaho State University biologists estimate the current reserve population to be three to six adults in winter with four kittens. Mountain lions prey upon a variety of other animals, with deer being the most common food. The reserve provides important migration and wintering habitat for mule deer, and mountain lions typically follow the seasonal movements of the deer. In the fall, lions move north to south from the denning area to the dense pinion/juniper covered slopes of the Smoky Mountains and Cedar Hills to the Utah narrows area, then they retrace this route in the spring. Mountain lions are sensitive to large numbers of people concentrated in denning areas.

The City of Rocks area has an unusually high diversity of bat species. Bat species collected in the area include the Townsend's big-eared bat, desert pallid bat, big brown bat, small-footed myotis, and silver-haired bat. The desert pallid bats have not been found elsewhere in southern Idaho. Cracks, crevices, and caves in the rock outcrops in the reserve provide suitable roosting habitat for bats. Roosting bats are sensitive to human disturbance, especially during hibernating periods.

Both the cliff chipmunk and pinion mouse are rare in Idaho. Cliff chipmunks are found on rock cliffs and pinion-juniper habitat in the reserve, which is the northernmost limit of their small range. The pinion mouse has been reported to occur in the City of Rocks area. (Larrison, E.J. and D.R. Johnson 1981). However, no pinion mice were collected within the reserve during recent small mammal surveys. Pinion mice prefer open woodland and brushy areas, especially pinion and juniper covered hillsides like those in the reserve, where they eat a variety of seeds, berries, and insects.

National natural landmarks are nationally significant natural areas designated by the secretary of the interior. To be nationally significant, a site must be one of the best examples of a type of biotic community or geologic feature in its physiographic province. City of Rocks was designated a national natural landmark in 1974 because it contains the best example of bornhardt rock formations in the region, and probably the country, and possesses considerable scenic beauty.

Research natural areas are part of a national network of field ecological areas designated for research and education and/or to maintain biological diversity. The research natural area is set aside permanently and is managed exclusively for approved nonmanipulative research—research that samples but does not alter the existing condition. Prior to City of Rocks becoming a unit of the
national park system, the Bureau of Land Management and U.S. Forest Service designated a 312-acre undisturbed area of the reserve as a research natural area to preserve important vegetation types with unique and special characteristics and outstanding examples of geological processes of scientific interest. The research natural area is located among rock outcrops north of the City of Rocks basin, where the rugged terrain effectively protected most of the vegetation in the area from cattle grazing and other uses. The special features of the site are the high degree of habitat and floristic diversity: the area contains the northern limit of the piñon-juniper vegetation type, an example of a sagebrush steppe vegetation type in a rare natural condition, and excellent examples of bornhardt rocks formed by exfoliation processes.

### Superior Views

1. The view from the Almo Park road, southeast, across and above Indian Grove. The viewer is in an elevated position (the view is below and away) on a cliff edge with visibility extending to the Raft River. Mountains are 20 miles away. This view is the most expansive in the reserve and contains the greatest variety of texture, form, and depth. It is the most dramatic and vivid of all the inventoried views.

2. The view from the Almo Park road looking southeast across Taylor's springs and pasture area. The viewer is in a normal position (at grade) along sweeping, lush fields that serve as a setting for many of the peculiar and individual rock massings/fins of the upper Silent City of Rocks. This view has abundant ephemeral images such as cloud displays, cattle, and seasonally changing color.

3. The views north into the Silent City from Bath and Turtle rocks and the view southeast into the Silent City from Parking Lot Rocks. These views are rim overlook views, where the viewer is slightly elevated, with good enclosure, expansive displays of rock, intricate depth, and strong background focal points, one of Graham Peak and one of distant Twin Sisters. These views can appear chaotic just from the sheer quantity of rock form. These three views are so similar in composition, their scenic quality is nearly equal.

4. The view from Emery Canyon Pass south and east into the reserve. The viewer is at grade looking into the core of the reserve.

This view is in an area of unique wetland/springs activity, fairly contained, with considerable depth to strong rock focal points in the background. The suggestion of water adds an ephemeral highlight.

5. The view from the northwest boundary up to Emery Pass. The viewer approaches the pass from below, with a shortened view to a strong rock focal point. Water, cattle, seasonal color, and cloud display combine to create a lush, vivid landscape, unique in City of Rocks.

### Excellent Views

6. The view west into the Silent City from Circle Creek basin. The viewer stands in a well-defined broad bowl. Enclosure is good with ridges and rock groupings forming walls around the view. The basin form loses the focal point possibility, although Graham Peak is evident. Variety in textures and forms is greatly enhanced by the rocks, climbing out of the basin onto the horizon.

7. The view on the trail from Pinnacle Pass north toward the Circle Creek basin. The viewer is perched in a slot between rock walls looking over a broad basin. Sagebrush hills roll into the basin and onto the north ridge of the Silent City. This view is expansive, but not particularly vivid.
SCENIC VIEWPOINTS & VIEWSHEDS
CITY OF ROCKS NATIONAL RESERVE
United States Department of the Interior
National Park Service
003 • 20049 • DSC • AUG 94

Mountainous ridges with alpine meadows reflect Great Basin geomorphology.

Typical view: Sagebrush cover is typical of the Snake River plain.

Weathered rock spines with rare evergreen cover create the dramatic expression that is City of Rocks.
8. The view from Circle Creek Basin Overlook provides a panoramic view into the Basin and includes Graham Peak and Twin Sisters.

Generally, superior scenic quality is concentrated in the north, within the Silent City, on its edges, and from overlooks above it. The first five views are full, detailed, vibrant landscapes with depth contributing the critical element to their greatness. The remaining two scenic views get their strength from enclosure created in the middle of the views, giving the viewer a sense of one big expansive room.
VISITOR USE

Overview

Existing Visitor Use Levels. Because City of Rocks is a new unit of the national park system, the National Park Service has not begun to record visitation statistics. The Idaho Department of Parks and Recreation has intermittently kept data on visitation and estimates that the area received 42,000 visitors in 1988 and between 75,000 and 80,000 visitors in 1989.

The only detailed visitation data comes from a 5 1/2-month study conducted by the Bureau of Land Management in 1987. Specifically the study covered the snow-free period from Memorial Day through mid-November. The report states, "It is suggested that peak use of the City of Rocks occurs in the April 15 to June 15 period; however, no data has been collected to support or disprove this use pattern." A summary of the results is shown in table 4.

Table 4: 1987 Visitation

<table>
<thead>
<tr>
<th>Dates</th>
<th>Recorded Visitation</th>
<th>Projected Visitation</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/24 - 5/27</td>
<td>2,667</td>
<td></td>
</tr>
<tr>
<td>5/28 - 6/30</td>
<td>5,919</td>
<td></td>
</tr>
<tr>
<td>7/1 - 7/31</td>
<td>7,368</td>
<td></td>
</tr>
<tr>
<td>8/1 - 9/1</td>
<td>6,765</td>
<td></td>
</tr>
<tr>
<td>9/3 - 10/1</td>
<td>4,879</td>
<td></td>
</tr>
<tr>
<td>10/2 - 10/29</td>
<td>2,579</td>
<td></td>
</tr>
<tr>
<td>10/30 - 11/12</td>
<td>1,522</td>
<td></td>
</tr>
<tr>
<td>Subtotal</td>
<td>31,699</td>
<td></td>
</tr>
<tr>
<td>Projection for the remainder of 1987</td>
<td>14,800</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>46,500</td>
<td></td>
</tr>
</tbody>
</table>

Daily figures revealed that heaviest visitation occurred on weekends. "Normally, there is a 40- to 70- percent increase in the number of visitors on a Saturday or Sunday as compared to a weekday." Based on the area available for parking and constraints on placement of parking areas, visitation is expected to level out at 80,000 to 100,000 visitors per year.

Visitation figures for 1990 to 1994 from the Idaho Department of Parks and Recreation are shown in table 5.

Table 5: 1990-1994 Visitation

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>January-March</td>
<td>13,856</td>
<td>10,200</td>
<td>16,530</td>
<td>9,079</td>
<td>8,753</td>
</tr>
<tr>
<td>April</td>
<td>8,320</td>
<td>8,288</td>
<td>9,576</td>
<td>6,023</td>
<td>4,684</td>
</tr>
<tr>
<td>May</td>
<td>9,285</td>
<td>11,360</td>
<td>12,573</td>
<td>9,247</td>
<td>9,176</td>
</tr>
<tr>
<td>June</td>
<td>8,786</td>
<td>15,317</td>
<td>14,064</td>
<td>10,856</td>
<td></td>
</tr>
<tr>
<td>July</td>
<td>9,597</td>
<td>11,408</td>
<td>9,297</td>
<td>11,652</td>
<td></td>
</tr>
<tr>
<td>August</td>
<td>9,701</td>
<td>11,183</td>
<td>10,442</td>
<td>11,052</td>
<td></td>
</tr>
<tr>
<td>September</td>
<td>11,306</td>
<td>11,708</td>
<td>11,468</td>
<td>11,343</td>
<td></td>
</tr>
<tr>
<td>October</td>
<td>7,349</td>
<td>10,644</td>
<td>11,312</td>
<td>5,782</td>
<td></td>
</tr>
<tr>
<td>November</td>
<td>3,312</td>
<td>5,579</td>
<td>2,172</td>
<td>5,141</td>
<td></td>
</tr>
<tr>
<td>December</td>
<td>3,400</td>
<td>*</td>
<td>1,234</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>85,081</td>
<td>95,507</td>
<td>97,764</td>
<td>81,409</td>
<td></td>
</tr>
</tbody>
</table>

*December 1992 through March 1993

Throughout the study period, data also were collected on the percentage of visitors engaged in various recreational activities. The results of that data are shown in table 6. Although horseback riding was observed during the study, this activity was not reflected in the surveys.

Table 6: 1987 Percent of Visitors Participating in Activities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Camping</td>
<td>31.9</td>
</tr>
<tr>
<td>Rock climbing</td>
<td>31.4</td>
</tr>
<tr>
<td>Sightseeing</td>
<td>14.5</td>
</tr>
<tr>
<td>ORV use</td>
<td>6.1</td>
</tr>
<tr>
<td>Mountain biking</td>
<td>4.9</td>
</tr>
<tr>
<td>Picnicking</td>
<td>6.4</td>
</tr>
<tr>
<td>Hiking</td>
<td>5.0</td>
</tr>
</tbody>
</table>

More recent visitor use data comes from a survey conducted by the Cooperative Park Studies Unit at the University of Idaho between August 30 and September 5, 1991. The following excerpts from the results help profile visitors to the reserve:

Sixty-four percent of visitors were in family groups. Sixty-five percent of visitors were visiting City of Rocks for the first time.
Thirty-six percent of visitors were 21 to 35 years old.

Visitors from foreign countries comprised 6 percent of the visitation to the reserve. Seventy-eight percent of American visitors came from Idaho and Utah.

Fifty-eight percent of visitor groups spent less than a day at the reserve. Of this group, 74 percent stayed four hours or less. Fifty-five percent of the visitors who stayed more than one day spent between two and five days.

Sightseeing (70 percent), rockclimbing (58 percent), photography (47 percent), hiking (44 percent), tent camping (35 percent), and picnicking (32 percent) were the most common activities reported by visitors during their stay.

Most visitors (58 percent) said no other visitor activity affected their visit. Those visitors (42 percent) who answered yes to this question listed watching rockclimbing, obnoxious campers, crowds, and gunfire as activities that affected their visit. The survey did not specify whether these effects were positive or negative.

**Interpretive/Educational Opportunities**

As a new unit to the national park system, no interpretive facilities, media, or programs are provided at City of Rocks. No signs on the major highways direct people to the reserve, and few signs inside the reserve identify or interpret significant resources. A building outside the reserve near Almo is currently used as a temporary ranger station where visitors can get basic information and orientation.

Inside the reserve, roadside signs direct visitors to the Silent City, although no on-site media is provided to interpret the significance of the resources. The California and Salt Lake Alternate trails are marked only by small yellow T-shaped markers, installed by the Oregon-California Trail Association. Pinnacle Pass is marked by a broken, faded, homemade sign erected by a Boy Scout troop.

**Recreational Opportunities**

The multitude of impressive rock formations within the reserve and the topography of the rural landscape provide a wealth of recreational opportunities. The 1987 BLM study and the 1991 visitor survey clearly showed that camping, hiking, and rockclimbing are major recreational activities within the reserve. Most activity occurs on the weekends; visitors in the area during the week are usually climbers.

Other forms of recreation include picnicking, horseback riding, mountain bicycling, motorcycling, off-road vehicle (ORV) use, hunting, cross-country skiing, snowmobiling, pine nut gathering, sightseeing, and photography. Most of the recreational uses are concentrated in section 36.

The use of the reserve for rockclimbing, camping, and sightseeing dramatically in the last decade. City of Rocks has achieved national and international attention in the climbing communities, and climbers now represent the highest percentage of reserve users.

Currently, few regulations, staff, or facilities exist to control the location, volume, or extent of recreational activities that may conflict with other visitors.

**Climbing.** The popularity of City of Rocks for rockclimbing has increased significantly in the past decade, even though the NPS feasibility study conducted in 1973 did not mention climbing as a recreational activity.

Many climbers come to the reserve from nearby Pocatello, Idaho Falls, and Boise, Idaho, the greater Salt Lake City, Utah, area and from Jackson, Wyoming. Based upon a 1991 user survey, roughly 40 percent of all climbers come from Utah, 35 percent from Idaho, and 25 percent from other states or foreign countries. During a competition held in 1989, however, climbers arrived from 27 states and four foreign countries. Climbing literature also has promoted the exceptional challenges offered in the reserve, and the number of national and international users continues to grow.

The favorite climbing areas listed by respondents to the visitor information survey were: Bath Rock, Breadloaves, Dolphin, Elephant Rock, Parking Lot Rock, Morning Glory Spire, Twin Sisters, and Window Rock.

Well over 600 climbing routes are in the reserve. The establishment of new routes has been greatly reduced since a county ordinance prohibited the use of power drills. Permanent bolts are visible on some rock faces. Numerous social trails have been created by climbers seeking access to rock faces, resulting in some serious erosion problems.
Rockclimbing opportunities occur on some private lands inside the reserve. While climbers, along with other users, are directed to obtain landowners permission prior to entry on private land, some incidents of trespass have occurred.

**Camping.** Demographics indicate that most campers come from Idaho and Utah. A further breakdown shows that roughly 50 percent of the campers are from Idaho, 40 percent from Utah, and 10 percent from other states.

Visitors currently camp in designated campsites, with section 36 receiving the greatest use. People like to camp near the rim of the Silent City, and large groups often camp in an area behind Breadloaves. Backcountry camping also is permitted anywhere on public land, and campers can obtain permission from landowners to camp on private property.

The 1987 BLM survey identified 51 campsites within section 36. The report states that at no time were all the sites occupied. "At the busiest of times, such as Labor Day Weekend, only 35 of the 51 sites were occupied. Even so, this level of use gives the appearance of saturation with the unoccupied sites being close to occupied sites and having little visual screening. The empty sites usually did not offer privacy."

Reserve officials believe that the number of sites continued to grow from 1987 until 1992, when designated campsites were limited to 78 sites.

Public campgrounds are in the north portion of the Albion Mountain division of Sawtooth National Forest, which abuts the northern boundary of the reserve. However, due to high resource impacts in the Albion Mountain unit, the Forest Service plans to phase out its camping facilities.

Camping is permitted on BLM land holdings adjacent to the reserve. These areas are managed primarily for grazing, and no formal campsites exist on these lands.

Public camping areas are on adjacent public lands administered by the Forest Service and Bureau of Land Management. At least nine private campgrounds operate within a 50-mile radius of the reserve; the closest one is in the Burley area.

**Hunting.** Hunting poses a danger to visitor safety in the reserve. Currently, hunting is restricted only from section 36. Other recreational activities (such as camping and hiking) also may occur anywhere on public lands. This creates potential safety hazards that would be difficult to manage. Special legislation allows hunting to continue in the reserve, and charges the superintendent with establishing management policies to ensure public safety.

**Accessibility.** The temporary ranger station near Almo has been retrofitted for mobility impaired, including access to the restroom. The restrooms in the parking lot across from Bath Rock are also accessible. No other accessible facilities are currently provided.

The reserve is in Cassia County, one of eight counties in the south-central Idaho region known as the Magic Valley. Cassia County represents 14.6 percent of the region's total population and ranks third in the state for total farm income. This income includes crops from developed croplands and products from agricultural processing centered in Burley. The county's population grew by more than 14 percent from 1970 to 1980 and decreased by 18 percent from 1980 to 1990. The growth of individual communities, including Cassia County, is shown in table 7.

**TABLE 7: POPULATION OF ADJACENT COMMUNITIES**

<table>
<thead>
<tr>
<th>Community</th>
<th>1970</th>
<th>1980</th>
<th>1990*</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albion</td>
<td>229</td>
<td>286</td>
<td>305</td>
<td>+31</td>
</tr>
<tr>
<td>Burley</td>
<td>8,079</td>
<td>8,525</td>
<td>8,702</td>
<td>+7</td>
</tr>
<tr>
<td>Declo</td>
<td>251</td>
<td>276</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Malta</td>
<td>196</td>
<td>196</td>
<td>171</td>
<td>-13</td>
</tr>
<tr>
<td>Oakley</td>
<td>656</td>
<td>663</td>
<td>635</td>
<td>-3</td>
</tr>
<tr>
<td>Cassia County</td>
<td>20,300</td>
<td>19,532</td>
<td></td>
<td>-4</td>
</tr>
</tbody>
</table>

*Based on census data

Most of the small towns surrounding the reserve were established by Mormon settlers, and Mormons currently dominate the area.

The economic base of Cassia County is agriculture and the agriculture-related industry. Major employers include Simplot Foods, The South Idaho Press, Boise Cascade, and Del Monte. Burley is the county seat and serves as the wholesale and retail trade center for the eastern portion of the Magic Valley.

The county's land use and ownership patterns generally reflect those of the region. Rangeland
covers 68 percent of the county, and 28 percent of the land is used for agriculture. Fifty-seven percent of the county’s land is controlled by the federal government and 40 percent is privately owned. Unincorporated lands of Cassia County are zoned by the county as a "multipurpose zone." Zoning of incorporated lands is the responsibility of the incorporated units.

Almo, the closest town to the reserve, lies 2 miles east. The current population in the vicinity of the unincorporated town is about 175-250, according to local officials. It is not identified in the census data because it is unincorporated. Although statistics show the population as 15 inside the town’s limits, locals living 3 to 10 miles out consider themselves part of Almo. The post office has approximately 50 boxes, and there are two rural mail routes.

The layout of the consolidated part of Almo is typical of Mormon colonies (Arrington 1979). Elements include a wide north-south main street, the ward church one block off the main intersection, the school and store at this junction, houses and barns clustered around the main intersection, and fields radiating away from the town center. This pattern evolved from the European farm village and was successfully developed by homogenous religious and immigrant groups in the Midwest and Utah/Idaho, including the Amana colonies in Iowa, the Amish colonies in Pennsylvania, and various ethnic settlements in Minnesota, Wisconsin, and Iowa. Inherent in this layout was a communal use of water and a convenient communication and social network.

Structures in town originally were made with logs harvested from the hills behind Almo and milled there. Limited use of locally quarried white-quartz granite replaced log construction by 1900. The advent of a brick operation in Almo supplied materials to Albion and Declo and allowed for fine masonry early in the life of surprisingly remote locations. The Tracy store in Almo, the hotel in Declo, and the normal school in Albion are excellent examples of the craftsmanship achieved using the russet native sandstone brick.

The store/post office serves as the primary commercial center of the community. The elementary school, diagonally across from the store, is also a sandstone brick building that doubles as the community meeting hall. The ward church is the predominant social center with church-sponsored sporting and other events. The reserve’s administration log building, previously a residence, is the only other nonresidential use in the town.

The quality of life in Almo is quiet, peaceful, family-centered, and community-oriented according to interviews with residents. Local crime is nearly nonexistent. Citizens claim they can walk out their door and hear the sounds of the wind and their neighbors’ chickens 1/4 mile away. They also describe themselves as quiet, private folks who are comfortable and content with their lives. As in many rural locations, youthful restlessness causes departures. Within the last eight years, some of the former residents have returned to the Almo area to raise their families, which may account for the increase in enrollment at the elementary school.

Land uses adjacent to town include dryland farm fields and the cemetery. Visual details include hayfields that crowd into the town edge; houses, barns, and yard gates that stand close to the gravel county road; bridges constructed of peeled logs; and fences with crafted wooden gates. Horses occasionally graze unrestrained within the road right-of-way and cattle graze in nearby pastures. Occasional driving of cattle between pastures is typical in the road right-of-way.

On the other side of the reserve, corrals and loading chutes, along with dilapidated buildings from a small ghost town, suggest a more rugged pioneer existence. Gray, weathered log and wood-shingled structures in Moulton seem timeless. Unmilled logs and milled lumber are used for livestock containments in this area. Remnants of a historic line camp indicate a more recent tie to ranching and cattle raising operations on this side of the reserve. Lands are privately owned, in sagebrush cover, and in grazing use, with no current structures visible from roads exiting the reserve.

The town of Oakley, 17 miles from the reserve, on the western side of the Albion mountains, is the predominant commercial and residential center in southern Cassia County. The town was settled by colonizing Mormons at the same time as the eastern side. Historically, it served as the religious center of the county, with the larger stake house located here, until Burley became the county seat. The town has a developed downtown district of commercial and residential uses that has been designated a national historic district. Quarrying of mica-like sheets of ferrous-colored Oakley stone has created the major industry in town. This stone, suitable for veneer and paving applications, can be
seen throughout the region as well as on buildings in town. The recent renovation of the historic opera house included Oakley stone paving on the lobby floor.

Statistically, the town is about six times larger than Almo, has a slightly higher rental vacancy rate, and a population that is thinner in the ranks through the young adult to middle-age group than either the county average or the eastern side of the mountains. The town is surrounded by mostly potato and sugar beet fields that are irrigated.

**Community Services**

**Fire Protection.** There are five special fire protection districts in Cassia County. Because Almo and Elba are not within a fire district, no unit will respond.

**Police.** The sheriff’s department in Burley coordinates with reserve staff to respond to medical and search and rescue emergencies. A deputy is assigned to the town of Almo specifically for this purpose. A telephone response often requires an hour or more from Burley, 50 miles away.

**Health Care.** Quick response unit service is provided in the town of Oakley, however, representatives from these services state they do not have funds in their budgets to respond to emergencies in the reserve. Cassia Memorial Hospital in Burley has 42 beds. City of Rocks has a quick response unit that responds to the reserve with backup from Malta and Burley.

**Housing.** Census data shows rental vacancy rates of 9.2 percent countywide, 0 percent in Almo, 20 percent in Oakley, 10 percent in Burley, and 14.3 percent in Albion. Locals that were interviewed claim that rentable residences are not available in Almo. Albion, 20 miles north of Almo, is the closest town where apartments/houses can be rented.

**Schools.** There are 15 schools in Cassia County administered by three school districts. The total enrollment in 1987 was 5,177.

Elementary schools are in Almo, Oakley, Albion, Declo, and Malta. Secondary schools are in Malta, Oakley, and Burley. Enrollment at the Almo Elementary school is 30. Within the last eight years it has shown a small but steady rise.

High schools are in Burley, Declo, and Malta. Community education programs are offered in Burley and Malta. The curriculum is coordinated with College of Southern Idaho in Twin Falls and Idaho State University in Pocatello. The mean educational level for Cassia County residents is 12.2 years.

Most of the private land in and surrounding the reserve is used for domestic livestock grazing. Livestock grazing is important to the regional economy. Most of the public lands are divided into grazing allotments, and the area ranchers rely heavily on federal rangelands. The U.S. Forest Service, Bureau of Land Management, and now the National Park Service administer 10 allotments in and around the reserve. Currently, there are 10 permittees grazing cattle on 6,981 acres of public land in the reserve with an estimated 504 active animal-unit months (AUMs). Livestock are grazed on another 5,234 acres of privately owned land. Grazing is excluded from the remaining 2,331 acres of public land in the research natural area, state-owned section 36, and other federal land not within a grazing allotment. In addition to the 10 allotments in the reserve, the Almo Flat allotment located entirely outside the reserve could also be affected. There is one permittee grazing cattle on 1,134 acres of federal, 640 acres of state, and 174 acres of private land within the Flat Allotment with about 253 active AUMs. The heaviest cattle grazing occurs from June through October. Ranchers that graze cattle in or near the reserve frequently trail cattle across the reserve from one allotment to another. Table 8 shows the allotment sizes and approximate active AUMS in the reserve.

Limited commercial facilities are available in the small communities immediately adjacent to the reserve. Although services are currently limited to groceries, gasoline, and basic camping supplies in these communities, a full range of services is available within a 50-mile radius of the reserve. In this area visitors can find lodging, camping, restaurants, gasoline, automobile services, and many other necessities.

The communities of Burley and Twin Falls offer the greatest volume and variety of services. Both have an abundance of motels, gas stations, and restaurants. Twin Falls is served by commercial airlines and bus companies. Shoshone, 30 miles north of Twin Falls, has a train station at which the Union Pacific Railroad and Amtrak stop.

At least nine private campgrounds operate within a 50-mile radius of the reserve. Several are in the Burley area.
TABLE 8: PRIVATE ALLOTMENTS AND APPROXIMATE AUMs IN THE RESERVE

<table>
<thead>
<tr>
<th>Allotment (number of permittees)</th>
<th>Allotment Size</th>
<th>Approximate Active AUMs</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Approximate Total Acres</td>
<td>Reserve Acres (Percent on Federal Land)</td>
</tr>
<tr>
<td>Graham Creek (1)</td>
<td>3,186</td>
<td>2,665 (100%)</td>
</tr>
<tr>
<td>Walter Creek (1)</td>
<td>1,715</td>
<td>898 (99%)</td>
</tr>
<tr>
<td>Circle Creek (1)</td>
<td>1,474</td>
<td>1,118 (100%)</td>
</tr>
<tr>
<td>Trail Canyon (3)</td>
<td>2,891</td>
<td>1,365 (64%)</td>
</tr>
<tr>
<td>Tracy Lane (1)</td>
<td>641</td>
<td>395 (93%)</td>
</tr>
<tr>
<td>Heath Canyon (1)</td>
<td>2,745</td>
<td>1,674 (58%)</td>
</tr>
<tr>
<td>Smoky Mountain (1)</td>
<td>1,127</td>
<td>31 (100%)</td>
</tr>
<tr>
<td>Junction Seeding (8)</td>
<td>6,520</td>
<td>66 (100%)</td>
</tr>
<tr>
<td>Moulton (1)</td>
<td>654</td>
<td>150 (0%)</td>
</tr>
<tr>
<td>Sparks Basin (1)</td>
<td>3,141</td>
<td>173 (0%)</td>
</tr>
<tr>
<td><strong>Total (10)</strong></td>
<td><strong>24,094</strong></td>
<td><strong>8,535 (0%)</strong></td>
</tr>
</tbody>
</table>

1Includes public and private range
2Some permittees graze cattle on two or more of the listed allotments

Tourism literature (a color brochure entitled Touring Mini-Cassia Land, and a single-page map entitled "City of Rocks Loop Tour") promotes a 75-mile loop tour beginning at Burley. The brochure suggests traveling to Oakley on Route 27, then on to City of Rocks. The map directs people to Declo, Malta, Albion, Elba, Almo, City of Rocks, Oakley, and back to Burley.

According to the "1992 Visitor Services Project" draft report, the per capita expenditure of a visit to City of Rocks is $19.04.

FACILITY ANALYSIS

Regional Access Roads

Two exits from I-84 provide the most convenient access to the reserve. About 15 miles east of Burley, I-84 bends southeast toward Salt Lake City. On this portion of the interstate the Sublett/Malta exit allows visitors to travel west to Idaho Route 77, then turn south onto the county road to Elba and Almo. The Declo exit (just west of Burley) takes visitors south on Route 77 past Albion. Travelers then turn west onto the county road to Elba that later turns south to Almo. Another popular route is I-84, east along Idaho route 41 to Stravell, Naf, and Almo or Stravell, Bridge, and Almo. The 1991 visitor survey found that approximately 75 percent of visitors entered the reserve from the east side. Another access option from Burley follows Idaho Route 27 south to Oakley. The unpaved Birch Creek Road from Oakley leads to the Emery Canyon Road, which enters the west side of the reserve. (See the Vicinity map in part one of the document.)

The county roads on either side of the reserve will no longer be maintained by the state. Cassia County does not have funds to maintain them, and it is feared that the condition of the roads will continue to deteriorate.

There are no signs on the interstate highway for City of Rocks. There is one sign at the intersection of Route 77 and the county road to Elba and one along the road from Oakley.

Applying factors of 2.8 visitors per vehicle to total number of visitors estimated by the Idaho Department of Parks and Recreation (between 75,000 and 80,000 visitors in 1989) indicates that 26,800 to 28,600 vehicles enter the reserve via the various access routes.

The Idaho Department of Parks and Recreation has recently leased a log building just south of Almo to use as a temporary headquarters and visitor center. The structure lies outside the reserve boundary near the east entrance. This is currently the only visitor contact center for the reserve.

The Idaho Department of Parks and Recreation has recently leased a log building just south of Almo to use as a temporary headquarters and visitor center. The structure lies outside the reserve boundary near the east entrance. This is currently the only visitor contact center for the reserve.

Before entering the reserve on the northeast, Cassia County 77 follows the historic California Trail alignment for 2.5 miles out of Almo, climbing 300-400 feet as it approaches the boundary. Inside the reserve the road gains another 400 feet in elevation to the Y intersection, 2.5 miles inside the reserve. Proceeding northwest to the Emery Canyon Pass exit, the road steadily gains another 800+ feet in the 2- to 3-mile stretch to the pass. The road levels out for a brief quarter mile, where an abandoned Forest Service road trace to Almo Park enters on the north. This road trace, previously USFS Road 562, and now being reclaimed, follows a draw 2.5 to 3 miles up to Indian Grove. Forest Service access to Almo Park
has been relocated along a new gravel alignment to the west and within the reserve. The primary reserve road leaves the unit 0.75 mile from Emery Pass and makes a quick descent down Emery Canyon and Birch Creek drainage 16 miles to the town of Oakley.

Proceeding south from the Y, the road climbs over a slight saddle and then descends gently to a point 1.25 miles south of the intersection, where it makes a right-angle turn to the west, along section lines, heading for a slot pass through the Twin Sisters ridge. This road alignment was blasted through by the Civilian Conservation Corps in the 1930s in an effort to create a safer traverse than Pinnacle Pass, the only other opening in this forbidding ridge of monolithic rock. Pinnacle Pass lies 0.25 mile to the southeast of the road. The road descends rapidly from the ridge to a draw below, swings around a substantial rise and exits the reserve about 2.5 miles from Twin Sisters, heading west towards Moulton and Granite Pass. The road makes a criss-cross pattern and follows the California Trail for most of its length. A mile and a half before the exit, a gated, well-defined side road comes in from the east, paralleling the Salt Lake Alternate. Visitors can walk along this road to the stage stop site. This road exits the reserve about 2 miles east of the junction with the north-south road.

Four-wheel-drive roads up Trail Creek, Graham Creek, Heath Canyon, and Graham Peak (8,867 feet elevation) offer additional access into the reserve.

Traces of four-wheel-drive roads also head up Circle Creek draw and follow the bases of ridges like Smoky Mountain.

Many social roads have been created along the rim above the Silent City. Paralleling the main reserve road and cutting in the scant quarter mile to the edge, loops take off and break into the road at a number of random spots. Most of these roads have been worn by the desire to get to scenic views on the rim to the northeast, popular rock faces, and ad hoc campsites. Resource damage in the form of land denuded of vegetation is most evident here.

Parking areas have been defined at Bath Rock and at the Twins Sisters picnic area. The Bath Rock area measures 50 by 200 feet and holds 25 cars. It is gravel and is informally contained by milled post and pole split-rail fencing. This area, which contains a new restroom facility, serves people using Bath Rock for technical climbing and scrambling and provides access to rim overlooks into the Silent City.

15-car parking area on the north side of Twin Sisters is also gravel. It services the picnic area and provides climber access to the Twin Sisters ridge.

Pull-off, informal parking occurs at

- the well site—five cars
- numerous campsites along the rim and main road—60+ cars
- the Breadloaves formation—50 cars
- Parking Lot Rocks—a cul-de-sac turnaround—three to six cars
- the Nicholson house—five cars

No designated trails exist, but visitors have hiked, biked, and ridden nearly everywhere in an effort to reach climbing rocks, to find backcountry experiences, and to seek overlooks. The climbing guide suggests hiking and mountain biking uses on most of the four-wheel-drive roads. Seven loop routes are described for mountain biking use. These routes go up Trail Creek and around the back side of Twin Sisters, down Emigrant Canyon, through Circle Creek, up through the Silent City by way of North Circle Creek, up through Indian Grove, up to Graham Peak/Almo Park, and outside and around the entire reserve. Many of these routes cross private property and require gate openings and closures. Horseback riders use all the canyons and the main road when trailing cattle, and they occasionally ride up Circle Creek basin to Indian Grove for leisure.

One vault toilet at the Twin Sisters picnic area is set on the rock ridge. Although placement is visually acceptable, lack of accessibility is obvious.

Two vault toilets behind Bath Rock are more typically located side by side, out in the open. A new vault toilet at the north end of the parking lot is of rough sawn cedar and brown in color. The surrounding light rock and dark green piñon pine do little to soften the visual intrusion of this structure. Weathering of the wood over time may change the harsh contrast.

A formal picnic area at Twin Sisters, built by the Bureau of Land Management, has three tables nicely tucked into the rocks and piñons on the north side of the ridge. Each site has a wonderful view to the north. The trail to this area continues to an Picnic Areas archaeological site that is fenced with chain-link and not accessible to the public.
Informal picnicking occurs at any rim campsite that is not occupied and at the group campsite at Breadloaves.

In 1986 some 51 informal camping sites were identified along the rim of the Silent City, adjacent to the main road. None had improvements, although fire rings were established by users. Campsites have increased as the area's popularity has grown, and camping use is restricted to 78 designated campsites. In addition, Breadloaves serves group camping and can handle 25 cars and 25 tents.

Utilities

Two overhead powerlines from Raft River Rural Electric cross the reserve from southwest to northeast following the south and east sides of the reserve roads from Moulton to Almo.

Water is pumped at one public location in the reserve at Emery Spring. New facilities include a hand pump for a 75-foot deep well.

No main lines or septic systems exist in the reserve.

Dams

A survey is underway at the reserve for all dams on federal property. If we propose to acquire land, dams on that land will be evaluated. The National Park Service will place dams within the reserve or affecting the reserve on the NPS official inventory of dams. All stream control structures that affect the reserve will become subject to the National Park Service Dam Safety Program (NPS-40). It is anticipated that the only dams that will be found in the reserve are small earthen ones used for stock watering.

Hazardous Waste

Before any acquisition of realty is completed, the applicability of Secretarial Order 3127 and 602 DM 2 will be considered. These documents require the performance of a hazardous waste survey prior to any acquisition. If any pollution is subsequently discovered, the responsibility for purchase approval rests with the Office of the Assistant Secretary for Policy, Budget and Administration.

The hazardous waste survey will include a comprehensive survey for evidence of underground storage tanks that may exist within the property boundaries. This should include a survey of past and present sources for heating of any structures that may be or have been on site. Should evidence of an underground storage tank be encountered, a subsurface investigation will be conducted to assess for possible releases to the environment.

If any landfills, dump sites, or other evidence of spills and leaks are found or are suspected to be within the park boundaries, the sites would be investigated for hazardous materials contamination in accordance with Environmental Protection Agency and Departmental Guidelines.

Within its boundaries, the City of Rocks had one mining claim, declared abandoned and void by the Bureau of Land Management in February of 1991. The only workings were two shallow bulldozer cuts, each 500 feet long. There are also two abandoned sand and gravel pits; both are partially reclaimed. A plugged and abandoned exploratory oil well and two abandoned mica mines are on private land within the unit's boundary. Local residents believe that the quartz at the abandoned mica mines may have economic value. However, small, the mines could be reopened. The NPS Mining and Minerals Branch briefly examined the gold and mica sites. In their current condition, heavy metals do not appear to be concentrated or accessible at these sites, hence degradation of groundwater quality is probably not a concern. However, secondary impacts from reactivating the mines could cause groundwater contamination. The Mining and Minerals Branch also reviewed plugging data for the well site. The well appears to be properly plugged. An improperly plugged well or contaminated soil at the well site (e.g., if chemicals or petroleum products were spilled at the site) may also lead to groundwater contamination. The reserve suspects that soil contamination is inhibiting plant growth within a 30-foot diameter of the well casing. The site should be investigated to determine factors inhibiting plant growth. Contaminates may also be washed into the surface waters. Erosion at all mine sites may also cause degradation of surface waters. To closely examine mine and well impacts to surface and groundwater, the reserve may contact the Mining and Minerals Branch and the Water Quality Division for assistance.
To most observers City of Rocks appears to be a highly natural area. The marks left by people — in the form of trails, homesteads, fields, and other modest developments — have been relatively insignificant in scale. Because the area was never heavily settled or developed, the few historic sites and structures have been left alone to slowly melt into the landscape, providing a relatively complete picture of the many periods of the area’s history. The area remains highly scenic, with a colorful and richly textured mix of enclosed and expansive views created by the rocks, vegetation, and occasional signs of human settlement.

But the land is not pristine. The natural biological diversity and riparian and wetland habitats of the reserve have been substantially altered by decades of road and facility development, domestic livestock grazing, fire suppression, dryland farming, seeding, and brush control. These activities, which have helped shape the livelihoods and the quality of life of generations of Cassia County residents, have unavoidably resulted in irretrievable losses of soil and the introduction of highly competitive nonnative plants that are nearly impossible to eliminate. As a result, the original vegetative communities and the distinct assemblage of animals dependent upon them have been permanently lost. The vegetation and habitats evolving today are different from those that existed before human uses occurred.

Unlike farming, livestock grazing has appeared to be a sustainable use of this landscape. However, the decreasing biological diversity and degradation of wetlands is causing a decline in natural productivity that is affecting the amount of forage available for wildlife and livestock. More recent recreational uses are also diminishing the biological diversity of the reserve.

Human use would continue to shape and be shaped by the natural and cultural environments at City of Rocks. The exact character of that relationship would differ, depending on which alternative was implemented.

### ALTERNATIVE I
(NO ACTION)

The no-action alternative would allow continued intensive use of natural habitats and cultural areas for public recreation and private livestock grazing and residential and commercial development with only the legal minimum action taken to protect resource values. The principal impacts, including the unavoidable adverse impacts, of this management strategy would be as follows:

Slow deterioration of historic sites and structures and archeological sites related to the California Trail and other periods of the reserve’s history would continue. This would be an irreversible loss of historic and archeological values.

Modern developments and incompatible activities would intrude into the historic views from the California Trail and the reserve’s historic rural setting. This would cause a long-term but theoretically reversible impact, although the investments involved for new development would make its removal unlikely in the foreseeable future.

Disturbance of 88 acres of soils, vegetation, and habitat for campites, roads, trails, and private development (0.6 percent of the reserve) would continue, causing a long-term but reversible effect.

Degradation and reduced productivity of natural plant and animal communities caused by domestic livestock grazing and suppression of natural fire would continue on 89 percent of the reserve, including 95 percent of the riparian and wetland areas. The productivity of damaged riparian areas and wetlands, damaged upland areas, and severely eroded areas would be substantially diminished for extremely long time periods. Even with possible future changes in grazing management and rehabilitation of these areas, long-term impacts and diminished productivity would be expected to last for many years. Soil loss would be irretrievable.

A total of 12,215 acres of public and private land for livestock grazing would continue to be available. However, the natural productivity of this land would continue to be decreased by loss of soils and invasions of woody species and nonnative plants.

All public lands for rockclimbing and other recreational activities, including tent and RV camping, would continue to be available.
The impacts of rockclimbing would continue.

These impacts include soil compaction and erosion; vegetation damage and wildlife disturbances; impacts associated with the use of bolts, motorized drills, chalk, and the creation and reinforcement of hand and foot holds; the accumulation of litter and human wastes; increased foot and vehicle traffic around popular climbing areas; impacts to the park experience and wilderness values for other park users and visitors, including visual impacts of climbers and equipment; and increased administrative activities such as search and rescue. Impacts can be found on approach and descent routes, bivouac sites, and climbing staging and viewing areas, as well as the rock itself. FR Vol 58, No 112/June 14, 1993.

The character of surrounding communities would be changed by weekend traffic, and the integrity of Oakley Historic District could be compromised because of new construction.

Reserve visitor expenditures and expenditures from reserve operations and construction could benefit the economy.

**ALTERNATIVE 2 (PROPOSAL)**

Alternative 2 would manage public recreation and private livestock grazing to accommodate these uses while minimizing their adverse impacts on the natural and cultural environment. The principal impacts, including the unavoidable adverse impacts, of this management strategy would be as follows:

Historic sites and structures and a small number of archeological sites related to the California Trail and other periods of the reserve’s history would be stabilized and preserved. Archeological resources would be managed in accordance with section 110 of the NHPA and an archeological research and management plan to be developed in consultation with the state historic preservation office.

Modern development and incompatible activities in the historic views from the California Trail and the reserve’s historic rural setting would be reduced and managed to minimize the potential for future intrusions.

An additional 52 acres of soils, vegetation, and habitat inside the reserve would be disturbed by increasing visitor use and new campsites, roads, trails, and parking. This disturbance would be partially offset by the restoration of 28 acres of currently disturbed areas, for a net disturbance of 24 acres. The total area of land disturbance for new facilities outside the reserve would be 77 acres. Although in the very long term, these changes would be reversible and the natural biological productivity could return to the area, it would be unlikely in the foreseeable future. Although most developed areas could be restored to previous conditions over time, the use of the land and financial resources to implement this alternative would, in the practical sense, be an irretrievable commitment of resources. In areas that were restored, the natural biological productivity would be expected to increase indefinitely.

Domestic livestock grazing would continue to degrade and reduce the natural long-term productivity of plant and animal communities in areas where grazing would continue. The diminished productivity of damaged riparian areas and wetlands, damaged upland areas, and severely eroded areas would be difficult to reverse and would continue indefinitely. Even with the changes in grazing, fire management, and rehabilitation of these areas, long-term impacts and diminished productivity could be expected to last for many years. Eventually, however, the effect of these practices would be a gradual increase in natural diversity within and among species populations, biotic communities, and the landscape as a whole on lands within the reserve. Native perennial grasses and forbs would increase in extent and diversity as the preponderance of woody species, such as big sagebrush and piñon pine, was reduced. Some nonnative plant species are well established in the reserve, and it would not be feasible to eliminate many of them. Also, continued livestock grazing would presumably continue to introduce additional nonnative species into the reserve in future years.

Grazing could be phased out on an unknown amount of lands to be identified for resource protection in the resource management plan and grazing management plan. The local economy could be somewhat adversely affected by a reduction in agricultural-related employment and local expenditures. The gradual recovery of the natural productivity of this land might eventually increase its forage value.
A high percentage of rock formations would be available for climbing and hiking, and resources would be available within the reserve for tent camping and primitive tent camping. Climbing use would be regulated according to the climbing management plan.

The character of surrounding communities would change because of increased car and bus traffic and economic activity.

The integrity of the Oakley Historic District could be compromised because of potential incompatible development in response to tourism.

Economic benefits from visitor expenditures would likely remain the same as now, and reserve expenditures for operations and construction would be of much greater economic benefit than alternative 1 and about the same as alternative 3.

<table>
<thead>
<tr>
<th>ALTERNATIVE 3 (CALIFORNIA TRAIL EMPHASIS)</th>
</tr>
</thead>
</table>
| Alternative 3 would focus on the maintenance and enhancement of the reserve’s exceptional historic and natural resource values and would limit traditional grazing and recreational uses to those that could be accommodated without any potential for adverse effects on those values. The principal impacts, including the unavoidable adverse impacts, of this management strategy would be as follows:

- Historic sites and structures related to the California Trail, including foreground and middle ground of the views seen from the trail, would be stabilized, preserved, and interpreted. Other historic and archeological resources would be inventoried and evaluated to determine the appropriate level of treatment.

- Modern development and incompatible activities in the historic views from the California Trail would be eliminated, and management would minimize the potential for future intrusions.

- An additional 21 acres of soils, vegetation, and habitat inside the reserve would be disturbed by increasing visitor use, roads, and trails, and restoration of 28 acres of currently disturbed areas, for a net restoration of 7 acres. The total area of land disturbance for facilities and roads outside the reserve would be 77 acres.

Although in the long term these changes would be reversible and the natural biological productivity could return to the area, it would be unlikely in the foreseeable future. Most developed areas could be restored to previous conditions over time, but the use of the land and financial resources to implement this alternative would, in the practical sense, be an irretrievable commitment of resources. In areas that were restored, the natural biological productivity would be expected to increase indefinitely.

Production of natural plant and animal communities in most areas of the reserve, including most riparian and wetland areas, would gradually recover as livestock grazing was phased out.

Grazing on public lands within the reserve would be eliminated and the availability of private land for livestock grazing would be significantly reduced because reserve managers would seek to acquire most of the land inside the reserve on an opportunity basis. The land inside the reserve available for grazing would decrease by 11,424 acres, resulting in a loss of forage to local ranchers; local economy could be adversely affected by a reduction in agricultural-related employment and local expenditures.

About 48 percent of rock formations would be available for climbing and all opportunities for camping on lands inside the reserve and protection of rock formations from permanent damage from some climbing methods would be eliminated.

The character of surrounding communities would change because of increased traffic; however, there would be a possible advantage to local communities in providing lodging accommodations.

Economic benefits from visitor expenditures would likely remain the same as now, and reserve expenditures for operations and construction would be of much greater economic benefit than alternative 1 and slightly less economic benefit than alternative 2.
### IMPACTS ON THE CULTURAL/VISUAL ENVIRONMENT

**HISTORIC RESOURCES**

**National Historic Landmark Values:**

**The California Trail**

The principal cultural resource values of the national historic landmark consist of the emigrant trail corridors, intact trail remnants and inscription rocks, and the viewshed seen from the trail corridors. These values would be adversely affected by several actions: New ground disturbance would cause further damage to the trail corridors and destroy the integrity of the intact trail remnants. People or cattle rubbing against the rock inscriptions would result in the loss of these resources. Modern intrusions in the foreground or middle ground of the views from the trails, including structures, roads, fences, or other nonhistoric elements such as automobiles and recreationists, would result in the loss of the historic landscape values of the trails. Failure to protect and preserve the principal cultural resource values of the national historic landmark would result in their continuing deterioration or loss.

The trail viewshed could also be degraded because natural areas could be diminished by private development and visitor/reserve development.

**Alternative 1.** Cultural resource management actions would remain limited. Although most of the national reserve is included in a designated national historic landmark, the majority of the significant resources remain in private ownership, and actions by federal and state land management agencies to protect or interpret cultural resources have been minimal.

Under this alternative cultural resources and their associated values inside the national reserve would be left to deteriorate naturally, consistent with visitor safety requirements and the provisions of federal historic preservation laws and NPS Management Policies. Resources outside the reserve would not receive any special attention.

The likelihood of damage to preserved intact remnants of the California Trail from new ground disturbance would be high. The rock inscriptions would continue to suffer defacement from people or cattle rubbing against them. Damage to trail remnants and inscription rocks would be irreversible.

The historic landscape (the foreground and middle ground of views from the California Trail and Salt Lake Alternate corridors), the three individual historic views, and visual experience would likely suffer adverse impacts from the development of private residences, roads, and fences, and the introduction and/or proliferation of other nonhistoric elements such as automobiles, overhead utilities, cattle grazing operations, and recreational activities. Development would probably occur in two of the three dominant basins in the reserve. Changing the open character of the major portion of the viewshed, the basin floors, by adding residential development, would completely alter the values for which the reserve was set aside.

The trail viewshed would also continue to be compromised by road crossings in four places and by the reserve road paralleling the trail for most of its 6 miles, obviously breaking across the foreground of three major views. The constant traffic and overhead utilities would continue to disrupt and degrade the visual experience.

**Conclusion.** The California Trail remnants and the inscription rocks would continue to deteriorate as a result of natural weathering and human activity, and views from the trail would likely be degraded by incompatible development. The existing natural condition of the trail viewshed would likely be lost in a few years.

**Alternative 2.** The proposal would establish a systematic and comprehensive program for the preservation, protection, and interpretation of the broad cross section of cultural resources in the national reserve. This would provide for the preservation of cultural resources illustrating the historic continuum of the area.

All actions would comply with section 106 of the 1966 National Historic Preservation Act as amended (16 USC 470 et seq.) and its implementing federal regulations. Compliance would be in accordance with the programmatic memorandum of agreement between the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and the National Park Service.

Preservation/stabilization and interpretation of the inscription rocks/encampment area, the Twin Sisters/Pinnacle Pass area, and the California Trail corridor would ensure their long-time protection for public enjoyment. All on-site media and devices to interpret these resources would be designed and
placed to avoid impacts and to minimize visual intrusion on the historic scene.

The potential for damage to trail remainants and features caused by new ground disturbance or for damage to emigrant rock inscriptions caused by cattle or people rubbing against them would be minimal.

The acquisition and protection of outstanding resource areas and the realignment of some public roads would minimize modern intrusions in the foreground of the views from the trail. The only modern intrusions within 1/4 mile of the main trail corridor would be some fencelines and grazing cattle in some sections of the trail (cattle would be excluded from other sections). Development easements on private property would help limit intrusions in the middle ground of views from the trail. However, the middle ground would still contain some modern intrusions, including roads, parking lots, automobiles, fencing, and other minor ranch-related structures (such as windbreaks or water tanks), grazing operations, recreationists, and possibly residences if development easements could not be acquired from willing sellers.

Portions of all three important trail viewpoints would be protected by public ownership. Identifying areas of special concern outside the reserve boundary would help ensure that limited views from the California Trail, including the foreground view along the California Trail corridor between City of Rocks and Granite Pass, would be protected through county zoning specified to discourage any structural development.

Views would also be protected through the relocation of the east/west road to the south by eliminating two road crossings of the viewshed corridor and trail. Downsizing of the road across Twin Sisters basin and burying overhead utilities would eliminate many of the intrusions from the predominant views to and from Pinnacle Pass and, in turn, lessen the impact on the naturalness of the historic landscape of the California Trail. The existing undeveloped character of the sloping hillside would be retained and the basin section would be restored to a more natural grassland condition, except for the presence of cattle and fences.

**Conclusion.** The long-term preservation of historic trail remainants and inscription rocks would be ensured, and the foregrounds of the views from the trail would be protected from incompatible intrusions. The visual qualities of the trail viewshed, including naturalness, would be protected through county zoning, acquisition of remaining development rights on an opportunity basis, cooperative management, and design that would include only nonstructural, modern-day ranching images.

**Alternative 3.** A more systematic and comprehensive program for the protection, preservation, and interpretation of cultural resources in the reserve would be established. The California Trail story would be told through a variety of media and programs while protecting the reserve’s exceptional cultural resources and allowing for reduced amounts of compatible recreational and private use. The acquisition and preservation management of all the trail-related resources and most of the other exceptional cultural resources in the reserve, including the landscape visible from the historic trails, would ensure the long-term preservation of this exceptional cultural area. Because most of these areas are now in private ownership, this alternative would require the acquisition of public interests in these lands from willing sellers. The best preserved intact trail remainants and the emigrant rock inscriptions would be preserved and interpreted. Therefore, all potential for damage to trail remainants caused by new ground disturbance or to the rock inscriptions by people or cattle rubbing against them would be eliminated.

All actions would comply with section 106 of the 1966 National Historic Preservation Act as amended (16 USC 470 et seq.) and its implementing federal regulations. Compliance would be in accordance with the programmatic memorandum of agreement between the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and the National Park Service.

Discontinuing grazing and removing fences would help preserve the wide-open character of the landscape as it appeared in 1843-69. The potential for private development in the viewshed would be eliminated through fee acquisition; however, some public facilities, including the road across the reserve, an access road into Pinnacle Pass, and four visitor parking areas with interpretive waysides would intrude upon the historic scene. All on-site media and interpretive devices would be designed and placed to minimize their visibility.
As in alternative 2, identifying areas of special concern outside the reserve boundary would help ensure that significant views from the California Trail, most notably the view toward Granite Pass, would be protected from incompatible development through county zoning.

Views would be protected, as described in alternative 2, through the relocation of the east/west road to the south by eliminating two road crossings of the viewshed corridor and trail. Closure of the road across Twin Sisters basin would eliminate most of the vehicles, utilities, and roads from the predominant views to and from Pinnacle Pass, which would lessen the impact on the naturalness of the historic landscape.

Fee-simple ownership of the entire extent of the trail viewshed would remove all ranching nuances from the view. Through vegetation management, a combination of native grasses and forbs would be introduced to reasonably create a workable facsimile of natural trail conditions and a healthy ecological system.

As a result, the viewshed would appear less rigid than under present conditions. Wind action and direction could be noticed in a predominantly grassland system, adding ephemeral values and greater scenic quality.

This alternative opens up the Salt Lake Alternate to full protection and public access. Visitors could view both the historic remnants of the stage stop and the undeveloped primitive character of Emigrant Canyon. Removal of braided road alignments in the canyon would also help to restore the character of area.

**Conclusion:** The long-term preservation of historic trail remnants and inscription rocks would be ensured, and the entire viewsheds visible from the historic trails would be protected from all incompatible intrusions except facilities for visitor access and interpretation. Vegetation management in the California Trail viewshed would enhance the viewshed by increasing its naturalness.

Additional access to the Salt Lake Alternate Trail and full management for restoration of a more natural scene would increase the integrity of the viewshed seen from the California Trail corridor.

The historic rural setting would be adversely affected by elimination of historic structures or features as a consequence of deterioration by natural forces or destruction by human activity or modern development. Intrusions into the foreground of views associated with the historic rural setting caused by incompatible development for commercial, residential, or recreational use would result in the loss of the cultural and scenic qualities reminiscent of the American West.

**Alternative 1.** Historic resources unrelated to the California Trail but contributing to the ambience of the reserve's historic rural setting would not be afforded protection or preservation treatment. Thus, these resources could be eliminated by the effects of natural deterioration or human activity. Incompatible commercial and residential development would be likely to intrude into the foreground of the viewsheds of these historic resources, adversely impacting their contextual significance and detracting from their contribution to the historic rural setting.

The north-south road through Almo to the reserve turnoff might be paved because of the pressure to reduce dust and meet visitor demands for convenience. Suggestions to pave the 17-mile main entrance route from Utah into Almo are currently being considered.

If retirement homes or seasonal residences were built in the reserve, unseen areas from the trail might experience a change in use from open range to residential. The historic rural setting values within the reserve would not change, but residential uses outside the reserve might cause problems if contemporary structures are built on previously vast, undeveloped landscapes.

County zoning would determine the extent that strip commercial development would have on the historic rural setting and would attempt to minimize the effects of structures and subdivisions on areas around the historic setting.

**Conclusion:** The historic rural setting would be degraded by a loss of contributing historic elements and the intrusion of incompatible modern features. County zoning would determine the effects of residences within the reserve and commercial uses along road corridors on the historic setting of the reserve.
**Alternative 2.** Significant cultural resources associated with the principal themes of the historic continuum — the Nicholson house, the stage station, a homestead site, and traditional ranching sites — would be afforded the same level of preservation management as key trail-related resources, thereby ensuring their long-time protection for public enjoyment. All on-site media and devices to interpret these resources would be designed and placed to avoid impacts and minimize visual intrusion on the historic scene. The acquisition of development easements would minimize intrusions from incompatible commercial or residential development.

Road relocations, treatments to keep the surfaces gravel, parking areas located to remain hidden from the predominant east-west route, interpretive waysides and their parking areas situated to minimize visual intrusions to the open basins, and the intention of most visitor-related development to be absorbed into the town core patterns would all contribute to the intent of keeping the existing rural setting.

Land within the foreground of the trail corridor would be directly controlled by federal interest. Other lands in the reserve remaining in private ownership would be zoned for ranching uses, with county jurisdiction and implementation joint with reserve management. Uses on these lands could include structures, but grazing and ranching practices would be the predominant use.

Other sites in the reserve would be left as is, and surface and subsurface remains would be allowed to deteriorate naturally, consistent with visitor safety requirements and the provisions of federal historic preservation laws and NPS Management Policies.

Areas of special concern outside the reserve, the entrance roads in from Junction Valley and Almo junction are recommended for county zoning that would protect these areas from any kind of commercial strip development.

The landscape would be retained in its current visual condition. Existing ranching uses would continue, leaving the landscape open, with scattered pastures of cattle and a legible human presence. Design guidelines would apply ranching images to any reserve and nonreserve development.

**Conclusion.** The long-term preservation of significant resources associated with the historic continuum and the protection of views from incompatible commercial development would perpetuate the reserve’s historic rural setting.

**Alternative 3.** Under this alternative all historic resources unrelated to the California Trail and Salt Lake Alternate, including the Nicholson house and the ranch buildings at the stage station site, would be inventoried and evaluated to determine the appropriate level of treatment, subject to visitor safety requirements and the provisions of federal historic preservation laws and NPS management policies.

Any sense of contemporary ranching would be removed from the California Trail subzone and natural area subzone, leaving the landscape unfenced, without livestock and modern intrusions within the complete trail viewshed and only slightly less primitive in the remainder of the reserve. Design guidelines would sculpt town-related development and encourage a similarly spacious approach to the trail viewshed outside the reserve.

**Conclusion.** Nonhistoric resources that contribute to the reserve’s historic rural setting would eventually be lost in the California Trail subzone and the natural area subzone.

Most of the known archeological sites are delicate and vulnerable to relic hunter depredations. Many of the sites have been picked over, damaged by relic collectors, obscured by depositions, or disturbed by farming and grazing operations. Further deterioration or destruction of the archeological sites in the reserve by natural forces or human activity would result in the loss of significant resource values associated with the prehistoric and historic evolution of the area.

**Alternative 1.** Treatment of archeological sites would require consultation with the Idaho state historic preservation officer. Archeological resources would be protected where possible from adverse effects of development; however, sites would remain subject to natural deterioration, inadvertent damage by human activity, and vandalism, and some sites would eventually be lost.
**Conclusion.** Archeological resources would remain highly susceptible to natural deterioration, inadvertent human damage, and vandalism, and some important resources would be lost.

**Alternative 2.** A comprehensive inventory and survey would identify and establish the significance of archeological sites throughout the reserve, thereby helping ensure their long-term preservation. Where possible, areas with known concentrations of archeological resources would be avoided as development sites.

Before earth-disturbing activities commenced, archeological testing would be conducted to determine the nature and extent of the archeological resources to be effected. Testing would be carried out in consultation with the Idaho state historic preservation officer in order to avoid or minimize effects or, failing that, to mitigate effects. Consultation with the state historic preservation officer would also be conducted for treatment of historic sites with archeological elements, such as some cultural resources associated with the California Trail and the Salt Lake Alternate and the homesteading era.

Public use of such facilities as campgrounds, picnic areas, trails, and interpretive sites would affect nearby archeological resources. Easily accessible resources would be vulnerable to surface disturbance, vandalism, and theft. New trails could increase the likelihood of archeological sites being disturbed, and resources would be vulnerable to inadvertent or deliberate destruction. Vandalism and inadvertent damage to known archeological resources would be partially mitigated by initiating on-site patrols, monitoring to detect vandalism, illegal collection, and other deterioration, and educating visitors about the value of these resources and the importance of protecting them. However, nationally significant sites would have first priority, and the protection of other sites would depend on manpower and budget constraints. It is likely that some archeological sites would be subject to damage from vandalism, cattle grazing, or development activities, resulting in irreversible losses of artifacts and cultural information of regional or local significance.

**Conclusion.** A comprehensive program of identification, evaluation, preservation, protection, and interpretation would help ensure the long-term preservation of important archeological resources throughout the reserve, although some resource of regional or local significance might be lost.

**Alternative 3.** Under alternative 3 archeological sites would be treated the same as described for alternative 2.

**Conclusion.** Archeological resources would remain highly susceptible to natural deterioration, inadvertent human damage, and vandalism, and some important resources would be lost.

**Alternative 1.** The lack of recording of cultural sites and archeological artifacts within the reserve would result in the loss of collections data and the continued deterioration of artifacts.

**Alternatives 2 and 3.** The recording of cultural sites and the collection of interpretive artifacts would result in the accumulation of data on the history of the reserve area. Systematic management of the museum collection would benefit the curation of individual items and the preservation of archeological and historic resources.
IMPACTS ON THE NATURAL/VISUAL ENVIRONMENT

INTRODUCTION

This section addresses direct, indirect, and cumulative effects on the natural environment of implementing the proposal or any of the alternatives for the comprehensive management plan plus all of the known possible projects or programs administered by others in the region, including county private land use zoning in and near the reserve, management of land by the U.S. Forest Service and Bureau of Land Management, Air Force training flights over the reserve, and the state air quality program regarding redesignation of the reserve as a class I area.

Analysis of impacts was based on the best available information. Information used included the City of Rocks Reserve Geographic Information System (GIS) database created and maintained by the Park Service in Denver, personal communications with those knowledgeable about reserve resources (see "Consultation and Coordination" section), and other documents about reserve resources and use impacts. The GIS database for City of Rocks contains current information on various natural and developed components of the reserve.

Specific impact topics were selected for discussion focus, and to allow comparison of the environmental impacts of each alternative. The following biological and physical resources and attributes were selected as impact topics because they were identified as important or exceptional during planning:

- natural quiet
- rock formations
- natural biological diversity
- species of special concern (raptors, bats, rare and sensitive plants)
- riparian areas, wetlands, and floodplains
- air resources
- scenic quality

Several animal species identified as rare or sensitive in the reserve (piñon mouse, cliff chipmunk, and mountain lion) were dismissed from further consideration for the following reasons. Mountain lions would be sensitive to concentrated visitor use in their denning habitat; however, none of the alternatives, including the proposed action, would increase or concentrate uses in areas of the reserve identified as mountain lion denning habitat. The piñon mouse (if they occurred in the reserve) and cliff chipmunk would be sensitive to loss of their habitat. None of the alternatives, including the proposed action, would cause the loss of their preferred habitat and are not in need of any additional protection other than that generally afforded by the state of Idaho and the National Park Service.

The natural quiet of the reserve is valued by visitors as a quality to be experienced and as a condition that enhances opportunities to hear natural sounds and to view wildlife that may be frightened away by unnatural noises. The natural quiet of the reserve would potentially be adversely affected by any activities in or adjacent to the reserve causing unnecessary or excessive unnatural sounds. These activities include operation of motorized equipment and tools, discharge of firearms, low-elevation aircraft overflights, operation of motorized vehicles and off-road vehicles, and use of sound devices, such as radios.

For purposes of analysis, it was assumed that a decrease in the above activities would reduce unnatural noise levels. It was also assumed that activities causing unnatural noise would be most intrusive on the visitor experience in the preservation/education zone.

Alternative 1. No additional protection of natural quiet would occur under this alternative. The natural quiet of the reserve would increasingly be broken by such sounds as RV generators, discharging firearms, vehicle engines, low-flying aircraft, and radios. These unnatural sounds would interfere with visitors' ability to hear the natural sounds of wildlife or the wind moving through the vegetation, and they might frighten wildlife, reducing visitors' opportunities to view different animals. Increasing levels of visitor use and noise-causing activities would be expected to increase the duration, frequency, and levels of noise and affect larger and larger areas.

Conclusion. Increasing levels of unnatural noise would degrade visitors' opportunities to experience natural quiet and sounds and to view wildlife.

Alternative 2. Natural quiet in most areas of the reserve would be protected by restricting the use of motorized equipment or tools, motor vehicles, or sound devices outside the development zone.
ENVIRONMENTAL CONSEQUENCES

As visitor use increased, the frequency and duration of noise from vehicle traffic would be expected to increase near the road corridors. Enhancing motor touring through the reserve as part of the proposed tour loop would also increase noise levels, particularly along the east-west road through the reserve. However, limiting the use of the north-south road between Register Rock and Twin Sisters to only local landowners would reduce vehicle use along this road.

Restricting the use of firearms to established hunting seasons would eliminate this source of noise for most of the year, although noise from discharging firearms would still occur during established hunting seasons. If the U.S. Air Force was willing to cooperate with reserve managers, noise from low-level aircraft overflights might also be reduced.

Short-term impacts would be caused by noise-generating equipment during construction or demolition of facilities and roads.

The cumulative effect of all actions would be reduced noise levels in the preservation/education and recreation zones. Thus, visitor opportunities to experience natural quiet and sounds and to view wildlife in these zones would be improved.

**Conclusion.** Noise-causing activities would be reduced in most of the reserve, resulting in improved opportunities to experience natural quiet and sounds and to view wildlife.

Rock formations would be adversely affected if the natural state of the formation was permanently altered or if rock and soil erosion was accelerated.

Rock climbing and scrambling are activities that have the greatest potential for impact on rock formations in the reserve. Most rocks in the reserve appear to be resistant to damage, but some formations are actually very fragile and susceptible to degradation caused by human activities. The slow-growing lichens, mosses, and other vegetation on rock surfaces and in cracks and crevices are also very sensitive to disturbance.

**Alternative 1.** Under this alternative no additional actions would be taken to protect the nationally significant rock features of the reserve. In the absence of resource inventories and impact monitoring, the effects of climbing on rock formations would remain uncertain and impacts unmitigated.

Repeated climbing on the more than 600 climbing routes in the reserve and the use of various techniques to create new routes would continue to erode rock, soil, and vegetation from rock surfaces to some degree.

The use of certain climbing hardware to protect climbs would continue to cause permanent damage to rock surfaces. Although the hardware used by most climbers today for temporary protection would cause very little rock damage, this would not be the case for the permanently fixed hardware (bolts and rappel anchors) used to protect difficult climbs on
smooth-faced rocks. Such fixed protection has become increasingly popular in the reserve and would be expected to cause considerable damage to rock faces in the future. (Fixed protection is attached by first drilling a hole in the rock using a portable battery-powered drill. A bolt is secured in the hole using either an expansion device or epoxy. The number of bolts on each existing route in the reserve varies anywhere from none to more than 15 bolts.)

Permanently placed hardware, such as expansion bolts, would continue to exist on many established climbing routes. While the addition of new climbing routes is expected to be minimal, repeated ascents of existing climbs could be expected to cause additional abrasion to rock surfaces.

Climbers would also continue to affect rock surfaces through cleaning and chiseling and using gymnastic chalk (calcium carbonate). Cleaning of loose material from hand-holds and rock surfaces is done to improve safety along the climbing route. Cleaning activities such as breaking off loose rock flakes and using brushes to scrub away loose material would cause the rock surfaces along routes to become smoother and freer of lichens, mosses, dirt, and loose rock. In some places, climbers have chiseled the rock to create new hand-holds. White gymnastic chalk contrasts with the natural color of the rock and could cause a pH change that could adversely affect lichens, mosses, and rocks.

Improvement of climbing routes by drilling, chipping, or chiseling would continue to cause permanent damage to rock surfaces. An increasing number of climbers with no limitations on route numbers or improvements would result in increasing areas of disturbance and erosion on rock features and increasing intrusions on the natural scenic landscape.

**Conclusion:** Climbing activities in the reserve would continue to cause permanent damage to rock surfaces; however, the long-term effects of this damage on significant geologic formations would remain unknown.

**Alternative 2.** Rock formations and associated vegetation and soils in the reserve would benefit from a climbing management program emphasizing protection of resources. Rock surfaces and habitat would be inventoried, and impacts would be monitored to identify and mitigate adverse effects. Closing the inscription rocks to climbing and scrambling would protect rock surfaces with historic inscriptions from abrasions and would thus help to preserve the historic inscriptions. Temporary closure of restoration areas would be imposed when necessary. Minimal impact climbing techniques would be encouraged, and chipping or gluing of holds or intentional removal of vegetation or sound rock would be prohibited on public land. Also, requiring a permit to use power drills to install climbing bolts probably would slow the development of new climbing routes on other formations in the reserve. The use of gymnastic chalk would be discouraged where necessary to reduce its potential adverse effects.

Some additional disturbance and possibly permanent rock damage might be caused by visitors installing climbing bolts and establishing an unrestricted number of new routes in areas where climbing would be allowed. If monitoring determined that this damage was having a significant effect on the significant rock formations, additional mitigating actions would be implemented to protect natural landmark values. The prohibition of climbing on Twin Sisters would help protect the formation.

The net effect of all actions under this alternative would be an increase in impacts on rock formations, although the effect would not be as great as it otherwise would be if not mitigated by the climbing management program.

**Conclusion:** The potential for adverse impacts on rock formations would be greatly reduced by monitoring and mitigating climbing impacts and addressing climber education and use practices.

**Alternative 3.** Impacts would be similar to those described for alternative 2, except about 52% of the rock formations would be closed to climbing and protected from all potential impacts.

**Conclusion:** The potential for adverse impacts on rock formations would be greatly reduced by closing 52 percent of the formations to climbing and by monitoring and mitigating climbing impacts in other areas.

Potential adverse effects on the biological diversity of the reserve include invasion of native plant habitats by competitive nonnative species; disturbance and alteration of natural plant communities by domestic livestock grazing, ground-disturbing developments, and human use; development of overly mature plant communities because of suppression of natural fires; and climatic changes resulting from environmental factors.
Existing plant communities have been considerably changed by intensive grazing by domestic livestock and other past events, including dryland farming, droughts, fire suppression, brush control, seeding, development of roads and trails, and camping. This has resulted in a dominance of woody perennials and highly competitive nonnative plants, loss of vegetative cover, and severe soil erosion in many areas of the reserve. For purposes of analysis grazing would be excluded from the research natural area, section 36 and all other federal lands not within a grazing allotment.

**Alternative 1.** Under this alternative no additional actions would be taken to protect the natural biological diversity. Overgrazing by domestic livestock and fire suppression would continue to have the greatest detrimental effect on vegetative diversity in the reserve. Livestock would continue to graze on approximately 12,913 acres in the reserve. Livestock would continue to select the most palatable and nutritious forage plants, with the result that the most valuable plants (native perennial grasses and forbs) would suffer the greatest damage. When the most palatable plants were gone, others would be eaten until only the least-utilized plants, such as big sagebrush, remained. Once established, both the woody and nonnative plants would be resistant to reestablishment of native perennial herbaceous species. The dominance of woody species and invasion of nonnative plants would further reduce the already substantially reduced amount of available forage for both wildlife and livestock, representing a major long-term loss of productivity.

Lack of natural fire would continue to favor big sagebrush, piñon pine, and juniper, allowing these woody species to spread and become overly mature.

Increasing recreational activities, such as camping, hiking, rockclimbing, biking, and offroad vehicle use, would continue to eliminate vegetation from heavily used areas. Use of offroad vehicles would continue to disturb the vegetation cover, resulting in new trails and roads. Many miles of these scarred corridors have been created in the past and more would be expected to develop in the future. Development of dispersed campsites would continue to eliminate vegetative cover among the rock formations.

Increasing rock-climber traffic in the reserve would increase the already large number of steep approach trails following direct lines to the rocks and denuded staging areas at the bases of the rocks. Water runoff from some trails on steep terrain would contribute to the already severe soil erosion, trenching, and loss of vegetation occurring in these areas. Some of the most severe erosion has occurred adjacent to maintained roads on steep grades. The acceleration of soil erosion caused by various land uses would cause a long-term loss in productivity.

An estimated 88 acres of vegetation in the reserve would continue to be displaced by campsites, roads, trails, and facilities. Possible future developments on private property within the reserve could result in additional long-term loss of vegetation.

The cumulative effect would be a major reduction in natural biological diversity in the reserve.

**Conclusion.** Existing agricultural and fire management practices would continue to favor woody perennials and nonnative species. Possible private development would continue to destroy vegetation and accelerate soil erosion, contributing to an ongoing major reduction in natural biological diversity in the reserve.

**Alternative 2.** Natural biological diversity would benefit from elimination of grazing on 283 acres of existing public allotments in the upper south fork of Circle Creek basin and riparian habitat identified for closure. Over the long term, if the National Park Service were able to acquire wetland and riparian areas from willing sellers, an additional 260 acres of now private wetland and riparian areas would be protected from the direct impacts of livestock grazing. Grazing may also be eliminated from other lands identified in the resource management plan and grazing management plan. Natural biological diversity would also benefit from a grazing management program directed at protection natural vegetative communities of public lands throughout the reserve and on private lands where landowners choose to participate. Under this program, impacts from grazing would be continually inventoried and monitored to help develop methods of protecting native vegetation and soils, and domestic livestock grazing would be reduced or eliminated from public lands determined to be unsuitable for grazing. In addition, any grazing allotments vacated in the reserve would be reallocated to adjoining permittees, but with no additional AUMs. This would result in fewer cattle being grazed in the reserve and less impacts. Grazing would continue to introduce nonnative plants to the reserve, and elimination or control of nonnative species may be very difficult.
The development of a fire management plan with prescriptions for allowing prescribed fire use and permitting natural fires to burn within the reserve would help ensure a heterogeneous natural landscape with diverse habitats. Natural fire would be excluded as necessary to protect lives, private property, range developments, cultural resources, and visitor facilities.

Approximately 52 acres of currently undisturbed or minimally disturbed land would be directly affected by construction of proposed roads, trails, parking lots, and campgrounds. Impacts would range from complete vegetation removal and light excavation, grading, and surfacing, to selective tree cutting and brush removal for vista improvement and fuel reduction around structures, campgrounds, and other public use areas. At the same time, an estimated 28 acres currently disturbed by campsites, roads, and trails would be rehabilitated. The elimination of dispersed camping and offroad vehicle use, consolidation of the trail system, and rehabilitation of existing disturbed areas would help restore the natural vegetative cover in additional areas. The net effect of the proposal would be an increased disturbance of about 24 acres. The total acreage outside the reserve disturbed by development of the visitor center complex roads, trails, and entrance parking would be about 77 acres.

Implementation of zoning ordinances by Cassia County could limit development on private land in the reserve and thus reduce the potential for additional vegetative disturbance.

The cumulative effect of all actions under this alternative would promote natural biological diversity in the reserve but increase the total area of vegetative disturbance.

**Conclusion.** Elimination of grazing on up to 543 acres and prescriptions for fire would have a beneficial effect on natural biological diversity. Acquiring private lands with the owner's consent would eventually provide additional long-term protection. Grazing would continue to adversely affect up to 9,895 acres; however, management methods would be implemented to reduce existing grazing impacts. Proposed development would result in a net loss of approximately 24 acres of vegetation in the reserve and 77 acres outside the reserve.

**Alternative 3.** Eliminating the adverse effects of grazing and allowing prescribed natural fires to burn would increase natural diversity on at least 11,424 acres of the reserve. Approximately 21 acres of currently undisturbed or minimally disturbed land would be directly affected by new development. About 28 acres of currently disturbed areas would be restored for a net restoration of 7 acres. The kinds of effects would be similar to those described for alternative 2. The total acreage outside the reserve disturbed by development of facilities and roads would be 77 acres.

**Conclusion.** Elimination of grazing on 11,424 acres, establishment of a more natural fire regime, and a net reduction in disturbed areas under this alternative would have the greatest beneficial effect on natural biological diversity in the reserve. Proposed development would result in a net gain of approximately 7 acres of vegetation in the reserve and net loss of 90 acres outside the reserve.

<table>
<thead>
<tr>
<th>SPECIES OF BIOLOGICAL CONCERN</th>
<th>SPECIES OF SPECIAL CONCERN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raptors</td>
<td></td>
</tr>
</tbody>
</table>

A wide variety of raptors use the reserve during some part of their annual activities, either for nesting, feeding, roosting, or migration. The concentration of high cliffs at City of Rocks provides excellent nesting habitat that attracts large numbers of raptors, including golden eagles, prairie falcons, red-tailed hawks, American kestrels, and possibly ferruginous hawks, a candidate threatened and endangered species. Raptors are most susceptible to human disturbance during nesting. While some raptors are tolerant of human activities below them, they are most susceptible to the disturbance caused by humans near the nest at the same level or above them. The degree of tolerance varies between species, with the golden eagles and ferruginous hawks being the most susceptible to disturbance. Raptors would be adversely affected if activities caused abandonment of nest sites or increased raptor mortalities.

**Alternative 1.** The potential for accidental disturbance of nesting raptors by visitors would probably be highest under this alternative, especially in the more popular climbing areas, near dispersed campsites, and along the road through the rock formations. During courtship adults might avoid suitable nest sites where humans were present. Human disturbances could also cause abandonment of a nesting site or result in the death of the chicks. If suddenly disturbed, adults might leave the nest quickly, crushing or puncturing the eggs or injuring or knocking the young out of the nest. Human disturbance could cause adults to stay away from nests for extended periods of time, during which
the eggs and small young would be particularly vulnerable to chilling, overheating, and dehydration, as well as predation. Wind, precipitation, and direct sunlight would greatly aggravate such situations. The times of exposure to adverse conditions would be greatest for timid species, such as golden eagles, which would stay away from the nest for a long time waiting for intruders to leave the area. If nests were disturbed when nestlings were older, but still not of normal fledgling age, the young might attempt flight earlier than normal, resulting in increased injury, loss, or vulnerability to predation.

Vegetative disturbance by grazing cattle, concentrated visitor traffic, or land development could indirectly impact raptor species by reducing nest substrate availability, reducing prey diversity and possibly abundance, and increasing prey vulnerability.

Possible future developments on private property within and adjacent to the reserve, such as cabins, houses, and commercial buildings, could result in long-term loss of nesting or prey habitat. The degree of impact would depend on the location, type, and extent of development. Disturbance of nesting raptors could also result during low-level overflights by the U. S. Air Force.

**Conclusion.** Increasing visitor use, potential private development, continued grazing, and low-level overflights could result in a decreased number of successfully breeding raptors and possible decreased raptor survival in the reserve compared to existing conditions.

**Alternative 2.** The elimination of dispersed camping near rock formations would benefit raptors by reducing potential human disturbance to nesting raptors and their prey. Nesting raptors would benefit from a climbing management program directed at protecting raptors from accidental disturbance. Closing occupied nesting areas to visitors during the breeding season would also reduce impacts. In other areas, some raptors would probably avoid nesting on suitable cliff habitat because of the presence of climbers, particularly in the natural and recreational resource zone, where use would be heaviest. In the case of the Twin Sisters, its closure to climbing use would help protect raptors that use this formation.

The grazing and vegetation management program would probably result in increased diversity and abundance of prey as vegetation recovered to more natural conditions over time. Implementation of a zoning ordinance by Cassia County that would limit future development on private lands in the reserve could also benefit raptors. If the U. S. Air Force was willing to cooperate with reserve managers, impacts from low-level overflights could be reduced.

The proposed tent campground would probably cause raptors to move away from the immediate area, which includes the rock outcrop known as Nematode.

**Conclusion:** The elimination of dispersed camping, seasonal closures of nesting areas to climbing, closure of Twin Sisters to climbing and implementation of a climbing management program would probably increase raptor survival and nesting success within the reserve compared to the existing condition.

**Alternative 3.** Raptor nesting habitat would be improved by eliminating disruptive human activities (camping, rockclimbing, road traffic) from many habitat areas where they are now occurring. The protected area would be expanded to include 47 percent of the cliff habitat in the reserve. Some raptors would probably avoid nesting on suitable cliff habitat in the recreation zone because of climbers.

The abundance and diversity of raptor prey species would be expected to increase throughout the reserve as a result of livestock grazing being phased out of all but a few scattered parcels of private land.

The combined effects of all actions under this alternative would probably be increased raptor survival and increased raptor nesting success within the reserve compared to the existing condition.

**Conclusion:** The elimination of dispersed camping, closure of some areas to climbing (protecting 47 percent of cliff habitat), implementation of a climbing management program, and realignment of the road would probably increase raptor survival and nesting success within the reserve compared to the existing condition.

Rocky mountain mule deer would be adversely affected if deer habitat in or near the reserve was reduced. Extensive disturbance of vegetation could reduce deer use of both the disturbed area and adjacent habitat. The abundance and availability of winter browse interspersed with cover is the primary mule deer limiting factor; therefore, the loss of deer winter habitat would be the most severe type of impact.
Alternative 1. No additional actions would be taken to restore natural habitat used by deer. Overgrazing by domestic livestock and fire suppression would continue to favor overly mature stands of woody species and further reduce the amount of preferred forage available to deer. An estimated 88 acres of potential deer habitat in the reserve would continue to be displaced by existing campsites, roads, trails, and facilities. Possible future developments on private property could result in additional long-term loss of deer habitat.

Conclusion. Existing agricultural and fire management practices, current land cover disturbance on 88 acres, and potential private development would adversely affect deer habitat.

Alternative 2. Deer habitat would benefit from the implementation of a fire management plan with prescriptions for allowing prescribed fire use and permitting natural fires to burn within the reserve. Fire would promote growth of a variety of young successional stages of shrubs and forbs which are preferred deer forage. Deer habitat would also benefit from a grazing management program directed at protecting natural vegetative communities.

Potential deer habitat on 52 acres would be adversely affected by development of facilities, roads, trails, and campgrounds within the reserve. At the same time, an estimated 28 acres of exiting disturbance would be rehabilitated to more natural conditions. The net effect of the proposal would be a loss of about 24 acres of potential deer habitat inside the reserve. Outside the reserve, development of the visitor center complex and campground would adversely affect about 77 acres of habitat heavily used by deer during migration between winter and summer ranges. Deer would likely seek alternate routes around the complex. This habitat would also be lost to deer that use the area during mild winters.

Conclusion. Prescriptions for fires, management of grazing to promote natural vegetation, and land cover restoration would benefit deer habitat. Proposed development would result in a net loss of about 24 acres of deer habitat in the reserve and 77 acres outside the reserve.

Alternative 3. Deer habitat would benefit by eliminating the adverse effects of grazing and allowing prescribed fires to burn. New development would eliminate about 21 acres of potential deer habitat. About 28 acres of potential deer habitat would be restored for a net gain of 7 acres inside the reserve. Outside the reserve, development of the visitor center complex and new through-route south of the reserve would adversely affect about 77 acres of deer habitat.

Conclusion. Elimination of grazing, establishment of a more natural fire regime, and a net reduction in disturbed areas would have a beneficial effect on deer habitat. Proposed development would result in a net gain of about 7 acres of potential deer habitat in the reserve and a net loss of 77 acres outside the reserve.

Most bats are intolerant of direct human disturbance and may abandon a roost if continually disturbed. Townsend’s big-eared bats (a candidate threatened and endangered species) are extremely sensitive to close human presence and abandon roost sites after even the slightest disturbance and usually do not return. Other activities that occur in the reserve typically do not adversely affect bats. Bats would be adversely affected if visitor activities caused abandonment of roosting sites or increased bat mortalities.

Alternative 1. The potential for accidental disturbance of roosting bats by increasing numbers of visitors would be highest under this alternative, especially in the more popular climbing areas. No additional actions would be taken to inventory roosting habitat in the reserve or to prevent visitors from disturbing bats. Some bats disturbed by visitors, especially Townsend’s big-eared bats, would probably abandon their roosts, which would decrease bat survival rates.

Conclusion: The effects of increasing numbers of visitors climbing on an increasing number of rock formations with potential bat habitat could decrease the number of roosting bats in the reserve and possibly decrease bat survival.

Alternative 2. Throughout their habitat bats would benefit from programs that would inventory and monitor roosting sites and manage all recreational activities to protect bats from accidental disturbance. Identified Townsend’s big-eared bat habitat would be strictly protected. Enhanced roosting opportunities would increase bat survival in the reserve.

Conclusion: Greatly reducing the potential for accidental disturbance of roosting bats would result in additional available roosting habitat and increase bat survival over existing conditions.
Alternative 3. About 52 percent of potential bat roosting habitat would be closed to all recreational activities, thus eliminating the potential for accidental disturbance of bats by visitors. Impacts would be similar to the impacts of alternative 2, because most adverse effects could be avoided by management of recreational activities.

Conclusion: Eliminating most of the potential for accidental disturbance of roosting bats would result in additional available roosting habitat and increase bat survival over existing conditions.

| RARE AND SENSITIVE PLANTS | Domestic livestock grazing, recreational activities, and development could affect rare and sensitive plant species in the reserve. Rare and sensitive plants would be adversely affected if their habitat or population in the reserve was reduced. Preliminary botanical surveys in the reserve have found three plants considered rare or sensitive in Idaho, including Simpson's hedgehog cactus, narrow-leaved Indian paintbrush, and Kruckeberg's swordfern. Until botanical surveys are completed for the reserve the extent of these populations are uncertain. Other rare or sensitive plants, including threatened or endangered species, could also be found in or near the reserve. The primary threats to Simpson's hedgehog cactus are exploitation from cactus collectors and any ground-disturbing activities. The primary threat to the narrow-leaved Indian paintbrush is any ground-disturbing activity. Both of these species are unpalatable to cattle and generally are not affected by grazing; however, cattle might trample these plants. The primary threat to the Kruckeberg's swordfern is from visitors trampling or removing the plants along climbing routes. |

Alternative 1. Under this alternative no additional actions would be taken to protect rare or sensitive plants in the reserve. Simpson's hedgehog cactus and narrow-leaved Indian paintbrush would be protected from trampling by livestock or people in the research natural area but would remain susceptible to these impacts in most of the remainder of the reserve. Possible future ground-disturbing activities, including development of private land or new trails, roads, or campsites, could also result in the long-term loss of these rare and sensitive plants if it occurred in their habitat.

Kruckeberg's swordferns and their habitat could be adversely affected by visitor traffic or removal of plants from climbing routes wherever they occurred in visitor activity areas.

The cumulative effects of visitor use, potential private development, and continued levels of grazing could potentially reduce habitat and populations of rare and sensitive plants in the reserve.

Conclusion: Increasing unrestricted visitor use, potential private development, and continued high levels of grazing could potentially reduce habitat and populations of rare and sensitive plants in the reserve.

Alternative 2. Rare or sensitive plants would benefit from inventories to identify habitat and from programs to educate visitors about rare or sensitive plants in the reserve and how to help protect them. If any threatened or endangered plant was found, its habitat would be strictly protected. Rare and sensitive plant habitats would be avoided wherever possible during planning and construction of the proposed new roads, trails, parking lots, and visitor facilities in the development zone and outside the reserve. Other public and private uses would not be limited specifically to protect rare or sensitive plants, but these species would benefit indirectly from the closure of certain areas to livestock grazing, rockclimbing, camping, and other activities and from the management of grazing and recreation on public lands throughout the reserve. New land use zoning for private land in the reserve could also potentially reduce activities that might disturb rare or sensitive plants. Rehabilitation of existing disturbed areas could possibly restore rare and sensitive plant habitat.

The combined effect of all actions under this alternative would protect most rare and sensitive plants and their habitat and could potentially increase habitat and populations of rare or sensitive plants in the reserve.

Conclusion: Most rare or sensitive plants in the reserve would be protected.

Alternative 3. Impacts would be similar to the impacts described for alternative 2.

Conclusion: Most rare or sensitive plants in the reserve would be protected.

The Park Service has developed final procedures for implementing Executive Orders 11988, "Floodplain Management," and 11990, "Protection of Wetlands" (45 FR 35916 as amended on August, 1982 by 47 FR 36718), and these procedures were followed in this planning effort. Alternatives were developed that would avoid or mitigate the adverse impacts.
associated with all new development in floodplains and wetlands on public lands. No floodplains have been mapped along streams in the reserve. Because all of the streams are high- to medium-gradient streams of relatively small size, it was assumed that 100- and 500-year floodplains do not extend far beyond the riparian areas associated with the streams. Most of the wetlands are associated with streams, springs, and seeps.

Mismanagement of certain agricultural uses, including overgrazing of livestock, have had a major adverse impact on riparian vegetation and habitat in the reserve and are considered the major threat to these areas in the future. Riparian areas and wetlands would be adversely affected if any physical or biological modification of the habitat occurred, or water quantity was diminished to levels below the minimum needed to protect dependent lifeforms. (See table 9 for riparian and wetlands affected by domestic livestock grazing.)

### Table 9: Riparian and Wetlands Affected by Domestic Livestock Grazing

<table>
<thead>
<tr>
<th>Long-Term Impact</th>
<th>Riparian And Wetland Acres Affected (Percent of Total Area)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Alternative 1</td>
</tr>
<tr>
<td>Directly Affected by Livestock Grazing</td>
<td>688 (95%)</td>
</tr>
<tr>
<td>Protected from Direct Livestock Grazing</td>
<td>36 (5%)</td>
</tr>
</tbody>
</table>

**Alternative 1.** Under this alternative, there would be no changes in current agricultural management practices, and about 688 acres of riparian areas and wetlands in the reserve would continue to be adversely affected by domestic livestock grazing and the agricultural use of water. Cattle would continue to be attracted by the large amount of forage and availability of water in riparian areas and would tend to concentrate in those areas, where they would continue to introduce nonnative plants, overgraze protective vegetation, and reduce soil stability by trampling. Loss of protective riparian vegetation and unstable soils would continue to accelerate soil erosion, elevate stream sediment loads, and change stream flows and morphometry. Diversion of water from streams or springs for irrigation and stock-watering during low water periods could reduce stream flows below the minimums required to support dependent life forms. The consequences of destroying natural riparian vegetation, increasing soil erosion, and diverting water could include reductions in abundance, biomass, species diversity, reproductive success, and survival of dependent wildlife and aquatic life. Eventually, the total area of wetlands and riparian vegetation in the reserve damaged by agricultural uses would likely be reduced.

Existing agricultural water developments and road segments in wetlands would remain and continue to adversely affect wetlands. New developments under this alternative would not adversely affect wetlands or floodplains on public land. Any new development, such as road or trail crossings or construction of facilities on private land could result in additional loss of riparian habitat and wetlands.

**Conclusion:** Continuing agricultural uses and any development would continue to cause major adverse impacts on about 95 percent of the wetland and riparian habitat in the reserve. Eventually, the total area of existing wetlands in the reserve and their long-term productivity would be reduced. Only about 5 percent of the riparian and wetland habitat in the reserve would continue to be protected from livestock use or developments.

**Alternative 2.** Under this alternative, domestic livestock grazing and trailing activities on public lands would be excluded from wetlands and riparian areas in the foreground of the California Trail subzone, the Research Natural Area, the General Natural Area, and some damaged wetlands and riparian areas on public lands in any zone. This would result in the protection of 220 acres of riparian and wetland areas within these zones.

Damaged riparian habitat on public lands would be restored, riparian communities would be expected to recover to more natural conditions, and wetland acreages might increase in some areas.

Any riparian and wetland areas on private lands included in the foreground of the California Trail subzone or the wetland/riparian area of Circle Creek basin outside the foreground that are placed in public ownership through a willing seller acquisition would be protected as well. Approximately 260 acres of riparian and wetland areas currently exist on private land within this subzone and the portion of Circle Creek outside the subzone. Based on a wetlands inventory to be done after the completion of the comprehensive management plan, other wetlands and riparian areas land may be pursued for.
opportunity purchase and managed for wetland and riparian area preservation. Where wetlands and riparian areas occur on private land, private landowners would be encouraged to protect these areas. Technical assistance would be provided to private landowners upon request. Assuming all private land in the California Trail subzone was acquired with the owner’s consent, grazing and agricultural uses of water would directly impact up to 244 acres of wetland and riparian areas in all other areas of the reserve (see table 9). Some impacts are expected to remain. A large amount of forage in riparian areas and the strong preference of livestock for these areas would continue the need for a concerted grazing management program. When the grazing management plan is completed and methods instituted to manage livestock in these areas, conditions in wetland and riparian areas on public land should improve. The grazing management plan would include strategies to develop alternate water sources to move stock water tanks away from wetland areas. In addition, grazing management at City of Rocks would fence out certain wetland and riparian areas to protect resources. Fenced-out areas would include portions of the South Fork of Circle Creek basin, Taylor Springs, and Mahogany Springs.

As grazing allotments changed over time, subsequent revisions to the grazing management plan would identify additional areas where wetland and riparian areas may be protected. Through these actions, the large majority of grazing impacts on publicly owned riparian areas would be mitigated. The grazing management plan would identify areas where grazing is inappropriate and should be discontinued. This could reduce the total area of wetlands and riparian areas directly affected by livestock grazing. In addition, any grazing allotments vacated in the reserve would be reallocated to adjoining permittees but with no additional AUMs. This would result in fewer cattle being grazed in the reserve and less impacts to wetlands and riparian areas.

Some wetland and riparian areas on private lands would probably continue to be adversely affected by grazing and diversion of water from streams for irrigation and stockwatering. The extent of impacts on privately owned wetlands and riparian areas would depend on the level of cooperation between private landowners and reserve managers to use wetland protection methods in the grazing management plan. Acquiring private lands with owners’ consent would help protect additional wetland and riparian areas.

Existing structures and facilities now located in potential wetlands includes several road crossings, a segment of road near Emery Canyon, and a few stock watering tanks. The Emery Canyon road segment would be rerouted away from wet areas and rehabilitated to recover approximately 1.7 acres of wetlands. The rerouted road segment would also be easier to maintain and safer for vehicle use during wet periods. New wetlands disturbance caused by the rerouted road segment might be unavoidable, however, a net gain in wetland acres would be expected. The existing location of most wetland road crossings would not change. In addition, damaged wetland and riparian areas on public lands would be actively restored, wherever feasible. Riparian communities would be expected to eventually recover to more natural conditions, and historic wetlands might recover in some areas.

The only new development that could possibly disturb riparian areas includes a few stream crossings for new roads and trails in the development zone.

The only other new development that would occur near wet areas on public land in the reserve would be the primitive campground in the southwest corner of section 36. The campground and access to it would be designed and located to ensure that there would be no modifications in or near wetlands that would cause direct or indirect adverse impacts. No other development on public land that would adversely affect wetlands would be allowed. There are no floodplains or wetlands that would be affected by the proposed visitor center and administrative facility outside the reserve.

New land use zoning for private land in the reserve implemented by Cassia County would reduce the potential for development in riparian areas and wetlands or the need for additional water.

There are no floodplains or wetlands that would be affected by the proposed visitor center and administrative facility site outside the reserve.

The total cumulative impact on wetlands and riparian areas is composed of past impacts, external impacts, and impacts predicted under this alternative. Past land use activities have had a major adverse impact on most wetlands in the reserve (see "Affected Environment" section). The primary external threat is diversion of water from wetlands by water rights owners. The severity of past and external impacts ranged from light grazing to severe
soil erosion, dewatering, and loss of wetland vegetation. The consequences include reductions in abundance, biomass, species diversity, reproductive success, and survival of dependent wildlife and aquatic life. Wetland and riparian impacts on a regional scale are also major and widespread. Because of past and external impacts in the reserve and region, the beneficial impacts of this alternative would have a beneficial cumulative impact on wetlands and riparian areas.

**Conclusion:** The proposed action would have beneficial effects on wetlands and riparian areas, including a net gain in wetlands over present conditions. Approximately 66% of the riparian and wetland habitat in the reserve would eventually be protected from direct livestock use and gradually recover to more natural conditions. Livestock use would adversely affect the remaining 34% but to a lesser extent than at present. The proposed developments would be mitigated where necessary to protect floodplains and wetlands.

**Alternative 3.** Grazing and trailing activities would be excluded from all wetland areas on public lands in the reserve. The potential extent of this protection would be much greater under this alternative. Assuming that all lands identified for inclusion in the California Trail subzone and natural area subzone were acquired and placed in public ownership, this would protect about 597 acres of riparian areas and wetlands in the reserve from the direct impacts of grazing. Within these areas damaged riparian habitat would be restored, riparian communities would eventually recover to more natural conditions, and wetlands acreages might increase in some areas. The remaining 131 acres of wetlands and riparian areas would be privately owned. The extent of impacts on privately owned wetlands and riparian areas would depend on the level of cooperation between private landowners and reserve managers to protect wetlands.

Impacts associated with new and existing development or potential private development would be the same as described for alternative 2.

**Conclusion:** This alternative would have the greatest beneficial effects on wetlands and riparian areas, including a net gain in wetlands over present conditions. Approximately 82 percent of the riparian and wetland habitat in the reserve would be protected from agricultural uses and gradually recover to more natural conditions. Livestock grazing and agricultural use of water would adversely affect up to 18 percent of the wetlands and riparian habitat on private land in the reserve. New developments on public lands would be mitigated where necessary to protect floodplains and wetlands.

Air pollution, even at concentration levels below national ambient standards, can harm vegetation, degrade visual quality, and diminish visitors’ enjoyment. Air resources would be adversely affected if emissions increased ambient pollutant concentrations to above any state or federal ambient air quality standards or if there were reductions in the regional visual range.

**Alternative 1.** If the reserve remained a class II area, a moderate increase in air pollution from outside sources and future industrial sources could occur, possibly increasing visible pollutant levels and reducing the range of visibility. Increases in visitor traffic and continued local traffic would cause slight increases in automobile emissions and dust from unpaved roads in the reserve. Existing agricultural and recreational uses would continue to damage protective vegetation and expose more soil to wind erosion, resulting in increased dust emissions from the reserve. Cattle trailing would also result in temporary increases in airborne dust. Potential development of private lands could cause short-term localized increases in emissions during construction activities.

**Conclusion:** Slight increases in dust and vehicle emissions and additional pollution from outside sources would adversely impact the reserve’s air quality and possibly reduce the range of visibility.

**Alternative 2.** Possibly redesignating the reserve a class I area would prevent any further impairment of visibility from major emitting outside sources or future industrial sources.

In the reserve the amount of automobile emissions and dust from unpaved roads would be expected to remain about the same. Enhancing motor touring through the reserve as part of the proposed tour loop could increase vehicle emissions and dust, particularly along the east-west road through the reserve. Managing the use of the north-south road between Register Rock and Twin Sisters primarily for local ranch use would reduce vehicle-related air pollution along this road.
Reduction of grazing in some areas, revegetation of disturbed areas, and implementation of the grazing management plan would help protect soils from wind erosion and also reduce dust emissions. Cattle trailing would continue to result in temporary increases in airborne dust.

Short-term emissions would result from construction of proposed facilities within and outside the reserve. Machinery emissions and increased airborne dust from construction activities would decrease air quality in the vicinity of the project sites. Normal conditions would return when construction was completed.

Implementation of zoning ordinances by Cassia County and acquisition of development easements and other land interests by reserve managers would limit development on private land and reduce the potential of emissions related to private land development.

Any prescribed burns and campfires in the reserve would result in temporary decreases in air quality.

The total cumulative impact on air quality is composed of past impacts, external impacts, and impacts predicted under this alternative. At times, air quality would be severely affected by smoke from wildland fires, including prescribed burns, prescribed natural fires, and wildfires that occur in the surrounding areas. Air pollutants originating from urban and point sources in the region could affect visibility and precipitation chemistry. Past land disturbances, particularly roads, have also exposed soils to wind erosion that contributes to airborne dust.

**Conclusion**: Possible redesignation of the reserve as a class I area and management of other dust- and emission-producing activities would help ensure the protection of the reserve's good air quality and visibility.

**Alternative 3.** Impacts would be the same as those described for alternative 2, except that eliminating the north-south road in the reserve would reduce vehicle traffic slightly more in the reserve. Possibly redesignating the reserve a class I area would prevent any further impairment of visibility from major emitting outside sources or future industrial sources. Providing a new paved road around the reserve and removing the north-south road would reduce local vehicle traffic in the reserve. In the reserve the amount of automobile emissions and dust from unpaved roads would be expected to remain about the same, although emissions in the region immediately surrounding the reserve might increase slightly.

Elimination of grazing in most areas and revegetation of disturbed areas would help protect soils from wind erosion and also reduce dust emissions. Cattle trailing would continue to result in temporary increases in airborne dust.

Short-term emissions would result from construction of proposed facilities within and outside the reserve. Machinery emissions and increased airborne dust from construction activities would decrease air quality in the vicinity of the project sites. Normal conditions would return when construction was completed.

Implementation of zoning ordinances by Cassia County and acquisition of development easements by reserve managers would limit development on private land and reduce the potential of emissions related to private land development.

Any prescribed burns in the reserve would result in temporary decreases in air quality.

**Conclusion**: Possible redesignation of the reserve as a class I area and management of other dust- and emission-producing activities would help ensure the protection of the reserve's good air quality and visibility.

Protecting and maintaining scenic quality was one of the primary reasons for establishing the reserve. The ad hoc structures, fuel storage tanks, rock scars, vegetation loss, bright-colored slings, shiny bolts or pitons, white chalk, and the presence of climbers and ropes on the rock formations alter the natural appearance of the rock formations and could be considered intrusive to visitors who desire to view the scenic landscape in a natural state. Studies of scenic quality have found that people regard a natural landscape as being more scenic than a human-altered one or one that includes other humans.

Examples of adverse effects on scenic quality are the loss of air quality, the loss of solitude in the viewing experience, and the loss of naturalness in the important viewsheds. Clarity is affected by dust and smoke. Visitors sense of solitude is lost when people are concentrated at limited viewpoints and when
adjacent uses create noise within the viewing area. Naturalness in views is lost when development of any kind is seen in the foreground or incongruent, contemporary land use and development changes the character of the middle ground.

**Alternative 1.** Vehicular use along the Almo park road would continue without access to the Indian Grove overlook, view 1, the most outstanding and vivid landscape view. (See the Scenic Viewpoints map for location of views.) The access to this bluff would remain in private grazing use, discouraging foot traffic to this point. The road would continue to provide a vivid display of view 2 across Taylor’s fields.

Vehicular traffic along the rim and camping sites that monopolize rim overlook areas would continue. In some areas of the current east-west road, use continuing on the alignment would contribute dust and perpetuate noise that would affect nearby rim activities. Camping uses would effectively shut off other visitor uses from the rim at Turtle Rock and Parking Lot Rocks. The noise and dust from vehicles parking at Bath Rock would continue to affect climbers and visitors walking along the overlook. Comfort stations that obstruct views and garbage cans and signs inappropriately placed would continue to adversely affect overlooks along the rim into the Silent City (view 3).

The road alignment in from Emery Canyon would continue to provide a display of two important views, 4 and 5.

Vehicular use across Twin Sisters basin, including the first view of Twin Sisters over the rise, view 7, would continue; however, pedestrians would share the viewpoint with cattle, cars, and commercial traffic. In addition, nebulous zoning on private lands could result in residential development in the foreground of views 6 and 7, which are the strongest views of unaltered trail vistas.

Existing entrances on the east and west sides of the reserve would be developed and would include commercial services. Although these views are not as outstanding scenically as the seven views described in the "Affected Environment" section, they are important and need to be protected.

**Conclusion.** The most outstanding and vivid landscape view would not be accessible to the public. Scenic quality would progressively degrade along the rim, could be destroyed along the trail, and would maintain existing levels at the Emery entrance. Arrival views could become so cluttered with commercial development that the scenic quality would be greatly diminished at the entrances.

**Alternative 2.** The proposal would allow for continued pedestrian, visual access by way of a trail and road from Indian Grove to view 1. View 2 across Taylor’s field would remain unchanged include a new trail from Breadloaves.

Design within the vicinity of view 3 would remove car traffic, which would reduce noise and dust. The realignment of the road away from the rim and the removal of campsites would exclude these intrusions from the viewing experience, reclaiming a more natural scene. Climbing management strategies would help distribute this activity away from the rim and allow for less crowding and visitor conflicts.

The proposed road realignment would make view 4 inaccessible by car. It would be available to trail users only. View 5 would remain unchanged.

Under the proposed action, key viewpoints along the trail, views 6 and 7, would be protected as long as park development was situated to avoid intrusion. The reduction of the road corridor crossing Twin Sisters basin to a private use only trail would result in eliminating a large source of traffic and modern intrusions to an otherwise natural scene. Control of private land uses through county zoning and acquisition would keep the two views natural and free of development.

The new east-west road alignment would provide a new ridgetop view overlooking the city and a new hillside view overlooking all of the inscriptions rocks and Circle Creek basin.

Designed trail loops would access new views from an unnamed summit, west of the primitive campground, and vistas to the city from alignments circumnavigating the city.

Arrival corridors — Almo junction into the reserve on the east and from Junction Valley floor and Emery Canyon into the reserve on the west — have been identified as important viewsheds in this proposal.

County zoning, technical assistance, and cooperative management agreements would set up scenic setbacks for development and keep these corridors
free of nonconforming commercial uses. Guidelines would provide image control for new residential uses.

**Conclusion.** Scenic quality would be enhanced by site design and visitor management along the rim and the California Trail and by county zoning and design guidelines to protect the historic rural setting along arrival corridors.

**Alternative 3.** Scenic quality would be best under this alternative because of increased naturalness caused by managing the majority of the reserve for the California Trail historic period and for preservation of the natural resources and by removing the north-south road. All of the Circle Creek and Twin Sisters basins, a silence overlook into the Silent City, and all of the California Trail corridor within the reserve would be managed under the California Trail subzone, outstanding features. Another large portion of the reserve, including most of the northern portion and the eastern border of the reserve, would be managed under the natural area subzone, outstanding features. All the private land in these two areas would be acquired in fee title and modern activities and associated development would be removed so that use could be focused exclusively on resource preservation and interpretive (educational) activities.

Emphasis on the California Trail would create the same scenic/interpretive car stops as described under the proposal. Views 1, 2, and 3 would also be enhanced through better road design and access. View 4 would be seen from a pedestrian trail rather than from a road. View 5 would remain the same. Views 6 and 7 would be protected through direct acquisition, guaranteeing the most authentic natural scene possible. This action would enhance the trail.

The absence of camping and trail networks would keep the non-California trail area mostly inaccessible, except for one cross-country route from Nicholson ranch to Indian Grove. Trailhead access at Emigrant Canyon and Graham Creek would allow historic pedestrian views of Twin Sisters and Graham Peak to be seen. Presenting the Twin Sisters view from the stage stop as seen approaching on foot along the Salt Lake Alternate would enhance the pristine and undeveloped viewing opportunity and, in turn, the scenic quality. Additional historic views along the trail corridor and along the Salt Lake Alternate would be made available.

Scenic quality along the rim would be improved. Views 6 and 7 would be protected as much as possible, enhancing the natural quality of the entire California Trail corridor and the reserve.

**Conclusion.** Scenic quality would be the best under this alternative because of increased naturalness caused by managing the majority of the reserve for the California Trail period and because of preservation of natural resources and removing the north-south road.
IMPACTS ON THE SOCIOECONOMIC ENVIRONMENT

<table>
<thead>
<tr>
<th>VISITORS</th>
<th>Interpretive and educational opportunities would potentially be adversely affected by</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>degradation of resource quality caused by a loss of resources or modern intrusions into the historic viewshed (see the discussion of impacts on cultural resources, above) or degradation of scenic quality (see the discussion of impacts on natural resources above) barriers to use caused by lack of access or conflicting activities inadequate information or interpretation</td>
</tr>
<tr>
<td></td>
<td><strong>Alternative 1.</strong> The loss of historic features and the introduction of modern intrusions could greatly diminish visitors’ experience of the California Trail and the historic rural setting. Rather than seeing the trail as a rutted route through a vast wilderness, visitors would see a graded road with modern vehicles coming and going almost continuously, fencelines, unrestricted recreational use, and private residences. This would make it difficult for anyone to imagine a historic scene and could confuse some people’s understanding of historic conditions. Similarly, opportunities to experience the grandeur and awesome quiet of the Silent City of Rocks would be diminished by the sights and sounds of camping and other recreational uses that are concentrated in this area.</td>
</tr>
<tr>
<td></td>
<td>In almost all cases visitors would need to create their own opportunities to learn about and experience the resources and how they fit into the area’s natural and human history. The public would be able to view major features along the road corridors, including the encampment area, some of the inscription rocks, the California Trail corridor, Pinnacle Pass, and Twin Sisters; however, the only formal opportunities to get out of their cars and explore the landscape on foot would be at viewpoints overlooking the Silent City and at Pinnacle Pass. Campers would continue to preempt prime sites along the rim of the Silent City, making it difficult for day visitors to use that area. Opportunities to walk along portions of the California and Salt Lake Alternate trails (more than 95 percent of which are in private ownership) or to other points of interest would be limited. Visitors would first need to get permission from individual private landowners, which would be difficult because the owners live outside the reserve boundary. In all areas of the reserve, except section 36 and the research natural area, people would encounter numerous fences and cattle.</td>
</tr>
<tr>
<td></td>
<td><strong>Conclusion.</strong> Visitor understanding and appreciation of the California Trail and the historic continuum would be impaired by a lack of preservation of and public access to many key resources and by competing recreational activities.</td>
</tr>
<tr>
<td></td>
<td><strong>Alternative 2.</strong> Protecting and providing access to a variety of historic resources would greatly enhance people’s understanding and appreciation of the California Trail and the historic continuum. The acquisition and protection of outstanding resource areas, together with road relocation and development easements on private property, would make it possible for visitors to walk along 1- to 2-mile-long sections of the historic trail. They could experience high scenic quality and the foreground free from any development or modern recreational uses in a manner similar to that of the 19th century emigrants. Providing easements for visitors to walk the entire length of the historic trail through the reserve would encourage more people to have a longer, more realistic trail experience. However, they would still find segments where they would encounter fences, cattle, some vehicular traffic, and (if development easements could not be obtained) modern structures. The road realignments included in this alternative would pull modern intrusions away from many of the key resources (while still allowing visitor access) and give visitors better opportunities to experience the resources in a historic setting with a greater degree of naturalness.</td>
</tr>
<tr>
<td></td>
<td>The National Park Service would create multiple opportunities for people to learn about and experience the historic trails and the historic continuum. In addition to walking the historic trails, visitors could drive to viewpoints where their attention would be directed to the Nicholson ranch and Circle Creek basin, inscription rocks, the Silent City, the historic trail corridor through the Twin Sisters basin, Pinnacle Pass and Twin Sisters, the junction of the California Trail and Salt Lake Alternate, Granite Pass, and the stage station site.</td>
</tr>
</tbody>
</table>
In some of these locations visitors might encounter other park users (i.e. climbers) which, depending on their expectations, could either add to or interfere with their enjoyment of the resources. Hiking trails would provide access to the interior of the Silent City, Indian Grove, and other prominent viewpoints in the reserve. Information and interpretive services at the visitor center and two kiosks would help visitors find and take advantage of all these opportunities and to understand where the different resources fit into the historic continuum.

The highway 77/27 designated loop tour route would encourage people to visit related natural and historic resources outside the reserve, where they could gain a better understanding of the historic continuum.

**Conclusion.** Visitors would have a variety of opportunities to understand and appreciate both the California Trail and the area's full historic continuum with minimal distractions from conflicting development or competing activities.

**Alternative 3.** Acquisition and preservation of the entire viewshed of the California Trail and the surrounding natural environment would allow visitors to follow the historic trails for 9 miles, experiencing a setting much like that experienced by the 19th century emigrants. The landscape would be free of fences, cattle, and all modern intrusions except for low-profile interpretive waysides at key locations.

The National Park Service would create excellent opportunities for people to learn about and experience the California Trail and the Salt Lake Alternate. In addition to walking the historic trails, visitors could drive to viewpoints where their attention would be directed to the Circle Creek basin, inscription rocks, the Silent City, the historic trail corridor through the Twin Sisters basin, Pinnacle Pass and Twin Sisters, and the junction of the California Trail and Salt Lake Alternate. Hiking trails would be developed to provide access to the interior of the Silent City, Indian Grove, and prominent view points in the reserve.

Other aspects of the historic continuum would receive attention only to the extent of providing an interpretive and historical context for understanding the trail era. Significant resources (natural, cultural, and scenic) would be interpreted through wayside exhibits in a context that related directly to the California Trail.

**Conclusion.** Visitors would have excellent opportunities to understand and appreciate the California Trail without being distracted by conflicting development or competing activities. No opportunities would be available to experience the historic continuum of the region's history.

**Rock Climbing.** Rock climbing in some areas of the reserve would potentially be restricted or denied because of resource management decisions.

**Alternative 1.** Climbers would continue to have access to all of the rocks that are currently in public ownership. (See table 10 for availability and changes in favorite climbing rocks for all alternatives.) These include most of the challenging rock faces within the reserve, including those in section 36 and the portion of Twin Sisters ridge in public ownership. Climbers, like other visitors, would need to obtain owner permission before planning ascents on rocks on private property.

Climber access to the historic inscription rocks would depend on the discretion of private landowners and on peer pressure from other climbers, since the climbing community has published guidelines against climbing on these rocks.

**Conclusion.** Current climbing activities within the reserve would not be affected.

**Table 10: Accessibility of Popular Climbing Rocks for Alternatives 1-3**

<table>
<thead>
<tr>
<th>Favorite Climbing Rocks*</th>
<th>Alternative 1</th>
<th>Alternative 2</th>
<th>Alternative 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parking Lot Rocks</td>
<td>available</td>
<td>available</td>
<td>available</td>
</tr>
<tr>
<td>Elephant</td>
<td>available</td>
<td>available</td>
<td>not available</td>
</tr>
<tr>
<td>Breadloaves</td>
<td>available</td>
<td>available</td>
<td>available</td>
</tr>
<tr>
<td>Bath</td>
<td>available</td>
<td>available</td>
<td>available</td>
</tr>
<tr>
<td>Dolphin</td>
<td>available</td>
<td>available</td>
<td>available</td>
</tr>
<tr>
<td>Window</td>
<td>available</td>
<td>available</td>
<td>available</td>
</tr>
<tr>
<td>Twin Sisters</td>
<td>available</td>
<td>not available</td>
<td>not available</td>
</tr>
<tr>
<td>Morning Glory</td>
<td>available</td>
<td>available</td>
<td>available</td>
</tr>
</tbody>
</table>

*from mail-in response to visitor information sheet, Newsletter #2
Alternative 2. Climbers would continue to have access to most of the challenging rock faces within the reserve, including all of those in section 36, where climbing activity is concentrated. Parking lots near the popular climbing areas in the natural area subzone, natural and recreational resources area (see Alternative 2 map) would be improved. Of the eight favorite climbing rocks listed by climbers in response to the visitor information survey, climbing on seven of the formations listed would continue, and climbing on one would be discontinued.

Acquisition and protective management of most of the historic inscription rocks would make these rocks inaccessible for climbing. The climbing community supports this restriction through published guidelines against climbing on historic inscriptions rocks.

Restricting climbing and other activities in the viewshed from the California Trail, including Twin Sisters, would make some routes inaccessible to climbers. Of the eight favorite climbing rocks, seven would be available for climbing. Twin Sisters would be closed to climbing for resource protection purposes.

Because the decision was made to emphasize the protection of the cultural resource values of Twin Sisters formation, the preclusion of active recreational uses on and around the Twin Sisters formation, including camping, picnicking, and climbing, would necessitate visitors to engage in these activities in other designated areas of the reserve. In the case of climbing activities, numerous other climbing rocks would remain available within the reserve for recreational use. However, because the Twin Sisters provides the only multipitch climbing experience within the reserve, the some 380 people that annually climb the Twin Sisters formation (based on registration data collected during the 1993 season) would need to seek that experience at other sites within the general region.

In addition, the research natural area (including Steinfels Dome, half of Grey Wall, and half of Road Map Wall) would be closed to recreational use. Use would be by permit only, consistent with research objectives.

All areas in the reserve identified as potential endangered or threatened species habitat would be continually monitored for the presence of these species. If they were present, temporary closures of certain areas to climbing or other recreational activities might be necessary.

This alternative would place more land in public ownership; however, climbers would still need to obtain permission before planning ascents on rocks on private property.

Conclusion. Most of the popular climbing rocks and climbing routes would remain accessible to climbers; however, climbers would find more restrictions than exist now, designed to help prevent potential damage to resources and conflicts with other reserve experiences.

Alternative 3. Climbing would be allowed in the natural area subzone, front country recreation area, which would be reduced under this alternative. Climbing and most other recreational activities would be excluded from both the outstanding feature zones (California Trail and Natural Area subzones).

Conclusion. Most of the popular climbing rocks would remain accessible to climbers; however, climbers would find more restrictions than exist now, designed to help prevent potential damage to resources and conflicts with other reserve experiences.

Camping. Camping would potentially be affected by barriers to use caused by lack of campsites or changes in the character of campsites.

Alternative 1. People could continue to camp along the rim of the Silent City, behind Bath Rock, and on public lands in other front country and backcountry locations where camping currently occurs. As use increased, managers might limit the amount of additional camping opportunities to protect resource values. People would need to get permission from the landowner to camp on private property.

No facilities, such as fire pits, comfort stations, or picnic tables, would be available.

Because grazing would continue throughout much of the reserve, campers might encounter cattle or dung in or near their campsites.

Conclusion. This alternative would have minimal impacts on current camping activities. Conflicts with cattle might continue to reduce the quality of some people's camping experience.
**Alternative 2.** Visitors would still have the opportunity to tent camp in the reserve. Restricting front country camping to a primitive campground would change the character of the camping experience, in that people would not be able to disperse as much as they might choose. However, the consolidated camping experience would be closer to the way the emigrants and Native Americans camped in this area. Depending on the capacity of the campground (10-50 sites) and the backcountry camping area (up to 10 sites), opportunities for camping within the reserve boundary would be less. Some campers would enjoy the convenience of nearby comfort stations. Because RV camping (100 sites) would be relocated outside the reserve, it would be less likely that tent campers would be disturbed by the noise from RV generators.

Relocating RV camping to a new developed campground outside the reserve might disappoint some RV campers who enjoyed camping on the rim of the Silent City; however, they would have more conveniences in the new campground, including electrical hookups and a sanitary dump station. More sites would be available in the new developed campground, making it easier for people to find a campsite.

**Conclusion.** Overall, counting the 100-site developed campground outside the reserve, more camping opportunities would be available, although the character of the camping experience would change.

**Alternative 3.** Camping would not be allowed in the reserve.

**Conclusion.** Visitors would no longer have an opportunity to camp in the reserve.

**PUBLIC SAFETY AND ACCESSIBILITY**

**Hunting Hazards**

**Alternative 1.** Hunting, hiking, camping, and other visitor use would be allowed to occur simultaneously on all public lands within the reserve except section 36 and the research natural area, where hunting would continue to be prohibited. The conflict between hunting and other recreational uses could place some park users in dangerous situations that would be difficult to manage. Potential safety hazards would be greatest during hunting seasons; however, since some animals may be hunted year-round in Idaho, some hazard would exist at all times. Hunters would need permission from individual landowners to hunt on private lands.

**Conclusion.** The conflict between hunting and other visitor activities could place some park users in dangerous situations, especially during hunting seasons.

**Alternative 2.** This alternative would provide greater separation between hunters and other visitors by prohibiting hunting in the California Trail subzone and the front country recreation area of the natural and recreational resource area, as well as in the research natural area. This would eliminate the potential safety hazards to visitors in the most heavily used portions of the reserve. However, a hazard would continue to exist in some portions of the general natural area, on grazing portions of the natural area subzone, and on public lands in the historic rural setting zone. Hunters would need permission from individual landowners to hunt on private lands.

**Conclusion.** Hunting hazards would be eliminated in the most heavily used portions of the reserve; however, some park users might still be in dangerous situations in the more remote parts of the reserve.

**Alternative 3.** This alternative would provide the greatest separation between hunters and reserve visitors engaged in other pursuits such as climbing or walking the California Trail. Prohibiting hunting in the California Trail zone (which would be larger in this alternative than in alternative 2) and in the recreation zone would eliminate this hazard from approximately half the reserve. Because no camping would be allowed in the reserve, no campers would be endangered by hunting.

**Conclusion.** Hunting hazards would be eliminated from approximately half the reserve, and no campers would be at risk because no camping would be allowed.

**Alternative 1.** The ranger/information station near Almo would be accessible to people with disabilities. This would include the information desk area and the restroom. Harpers Ferry Design Center guidelines for interpretive media would be followed in the production of brochures or other media.

Inside the reserve, picnic areas would be retrofitted to provide accessible sites, including tables and access to the tables from the parking areas. The restroom facilities at Bath Rock would also be accessible. Since no other developments would exist
in the reserve, access to key resources or camping sites would not be provided.

**Conclusion.** People with disabilities would generally be confined to their vehicles to tour the resources of the reserve, making the quality of their experience minimal at best.

**Alternatives 2 and 3.** The new visitor center facility would be fully accessible to people with disabilities. All interpretive media would comply with the Harpers Ferry Design Center accessibility guidelines. The building itself and all the developments inside the reserve would be designed in compliance with federal disability guidelines. Thus, visitors with disabilities would have access to pullouts and parking areas, picnic areas, waysides, restrooms, and (in alternative 2 only) the primitive, group, and developed campgrounds.

**Conclusion.** Access to significant resources would be provided through physical or programmatic design.

<table>
<thead>
<tr>
<th>PRIVATE LANDOWNERS AND LIVESTOCK GRASSING PERMITTEES</th>
</tr>
</thead>
</table>
| Livestock are grazed on 10 allotments covering 24,094 acres of private and public range on U.S. Forest Service, Bureau of Land Management, state, and reserve land by 10 individual permittees. Currently, there are approximately 1,592 active animal unit months (AUMs) available for the 10 allotments, with an estimated 504 active AUMs available in the reserve. For purposes of analysis, active AUMs in the reserve were estimated by multiplying the percent of the allotment in the reserve times total active AUMs for each allotment; 6,981 acres of the allotments in the reserve cover federal land (see the "Affected Environment" section). Livestock are grazed on an additional 5,234 acres of private land. To avoid double-counting in the impact analysis, all private rangelands in the reserve were treated separate from federal rangeland in the allotments. Impacts on ranchers and grazing permittees are primarily related to changes in the amount of grazing that might occur under each alternative. Adverse impacts could occur if the economic health or viability of an individual or group is threatened because of the loss of grazing opportunities on both private and public lands. (See table 11 for a comparison of changes in allotments, AUMS, and federal and private range under each alternative.) This impact analysis was based on 1994 acreages of public and private land in the reserve. Recent land acquisitions have changed the amount of private and public land available for grazing in the reserve. Therefore, the numbers in the draft EIS are slightly different.

**Alternative 1.** Grazing allotments would continue to be administered by the U.S. Forest Service and Bureau of Land Management. Grazing would continue on all public and private land except where it is already excluded in the research natural area, section 36, and other federal lands not within a grazing allotment.

**Conclusion:** The actions in this alternative would not affect grazing permittees or private landowners.

**Alternative 2.** Grazing would continue in existing allotments on public land determined appropriate for such use in the resource management plan and grazing management plan. The area of public grazing allotments that would be closed to grazing includes 206 acres in the south fork of Circle creek basin, and about 77 acres of riparian habitat near streams and springs. The Research Natural Area, section 36, and other federal lands not within an existing grazing allotment would continue to be closed to grazing. Range improvement investments such as fences and water developments on any rangelands identified for closure would be lost. Permittees that grazed cattle on the remaining available rangeland would be required to keep tighter control on the movements of their stock. Areas closed to grazing would be fenced or barricaded to keep domestic stock out. This would place a greater burden on permittees/ranchers to ensure that grazing livestock did not enter these areas. Employment and local expenditures related to livestock grazing could be decreased because of reductions in grazing in the reserve. Outside the reserve, the proposed visitor complex and campground would reduce the amount of rangeland in the Almo Flat allotment by 4%, adversely affecting one permittee.

Total active AUMs available in the reserve could be reduced through land acquisition or by existing permittees vacating grazing allotments. Grazing allotments in the reserve that were vacated would be allocated to remaining or adjoining permittees with no increase in AUMs for those permittees. In these cases, the same number of AUMs would be permitted for larger allotments, and the total number of AUMs available in the reserve would decrease.

Ranchers would continue to be allowed to trail cattle across the reserve along designated stockways.
**Conclusion:** Closing 283 acres to grazing on public allotments and reducing the total number of AUMs as permittees vacate allotments would have adverse economic impacts on ranchers/permittees. Affected private landowners would be compensated with the fair market value of their property. The local economy would be adversely affected because grazing would be reduced, and related employment and expenditures would be diminished.

**Alternative 3.** Grazing would be phased out on 11,424 acres of private and public land for an 88 percent reduction in total rangeland currently available for grazing in the reserve. Permittees would not be allowed to graze on 6,981 acres, or 100 percent of the public rangeland, on eight allotments in the reserve. This change would represent a loss of about 504 active AUMs that would affect 10 permittees. Grazing would be phased out on an additional 3,745 acres of private rangeland, assuming that all lands identified for inclusion in the California Trail subzone and natural area subzone were acquired and placed in public ownership in exchange for the fair market value of the property. Range improvement investments such as fences and water developments on closed rangelands would be lost. The property owners that grazed cattle on the remaining available private rangeland would be required to keep tighter control on the movements of stock. Areas closed to grazing would be fenced or barricaded to keep domestic stock out, which would place a greater burden on the rancher to ensure that grazing livestock did not enter these areas. Employment and local expenditures related to livestock grazing would be decreased because of reductions in grazing in the reserve.

Ranchers would continue to be allowed to trail cattle across the reserve along designated stockways.

**Conclusion:** Closing 10,726 acres, or 88 percent, of the public and private rangeland to grazing in the reserve would have an adverse economic impact on 10 permittees. Affected private landowners would be compensated with the fair market value of their property. The local economy would be adversely affected because grazing would be reduced and related employment and expenditures would be diminished.
Within East Cassia County, the quality of living in Almo could be degraded by increased traffic, dust, and congestion through town on the north-south main street. Competitive demand for services, incompatible development such as commercial development placed too close to residential areas, additional residences constructed because of employment directly or indirectly related to the reserve, and potential increases in crime, garbage, and pollution could affect the quality of life of Almo residents.

Within 10 years, annual visitation is anticipated to stabilize at about 80,000 visitors under all alternatives. If current traffic patterns continued, about 30,000 visitors (39 percent) would come to the reserve through Almo, another 41.9 percent would arrive from the southeast, and the remaining 20 percent would arrive from the west through Oakley. About 4,300 would visit between April and October, with 500 arriving on a busy weekend. An estimated 200 cars would drive by the Almo intersection at Tracy’s store each weekend day, with an average of 35 cars between 9 A.M. and 3 P.M.

In West Cassia County, the quality of living in Oakley could be affected similarly to Almo. Oakley could be affected by increases or decreases in traffic and congestion along the east-west main street through town, by inappropriate character of any new commercial and residential development within the limits of the designated historic district, or the competitive demand for services at stores and stations among local residents and visitors, and by an influx of reserve employees or employees of any new businesses that might result from the presence of the reserve.

Using the anticipated annual visitation of 80,000 and 47 percent of visitors using this route to exit the area, visitor traffic could reach 60 cars each hour from 4 to 8 P.M. According to the visitor use survey, almost half the visitors leave through Oakley, and only 10 to 15 percent arrive through Oakley.

The cars exiting the reserve and traveling through Oakley to Burley would enter Oakley from the west, travel along the main street, and turn north, leaving the downtown area. Small businesses and an occasional vacant lot face the street, with a local grocery and service station at the east-west/north-south intersection. There are Oakley stone storage bins stacked in side lots. Parking along this portion of the main street is undefined on both sides of the street, which is completely within the Oakley National Historic District. Visitors would be looking for restrooms, restaurants, and/or lodging facilities. There are no stop signs or lights along this route.

Traffic and parking congestion on the main street would make it more difficult for pedestrians to cross the main street from 4 to 8 P.M. Unlike Almo, grocery store customers would not necessarily increase from this group of visitors, leaving current local shopping patterns uninterrupted. Traffic slowing down at the north-south/east-west intersection might cause a stacking problem during this time.

A few summer seasonal reserve employees might choose to live in Oakley, but because Oakley is not accessible from the reserve during the winter, reserve operations would be concentrated in Almo, limiting new federal/state construction to the east side of the county.

**Alternative 1.** Traffic under this alternative would continue to increase gradually. Local residents already remark about the heavy congestion on weekends when it is half the potential volume. Most of the 16 ranchers who trail cattle through the city have quit doing so on weekends. It is likely that the remainder would choose to move cattle only during midweek as competition with cars for use of the road corridor increased during weekends in June and October, the prime trailing time.

The paved highway ends 1/4 mile north of the Tracy store in Almo. The store and its parking are on gravel, and increased traffic on this road would cause more dust to become airborne and later settle on surfaces within 25 feet of the road corridor. Pedestrians at the store would be affected the most and may choose to move indoors or undertake their activities farther from the road edge. None of the residences along this route are close enough to the road to be affected.

The store lot is just off the main road with undefined parking for about six vehicles. The lot is also used by recreationists who shop at the equipment store next door. Local residents and a fair number of visitors also use the store. Increasing visitor traffic would contribute to congestion at the store parking lot and might encourage cars to line the side street to the east and possibly across from the store along the main street, increasing conflicts between pedestrians and cars.

The lack of efforts by the National Park Service or Idaho Department of Parks and Recreation to
ENVIRONMENTAL CONSEQUENCES

provide additional overnight accommodations would allow local communities or other private groups to provide such facilities. Without design guidelines or other controls by local entities, new construction could compromise the integrity of the Oakley Historic District.

Conclusion. Increased weekend traffic on the main north-south road would affect cattle trailing, the road corridor, and outside uses around the Almo intersection at Tracy’s store. Demand for parking at the store might cause pedestrian/car conflicts. Local communities or private groups could be given the opportunity to provide overnight accommodations. In Oakley, the integrity of the historic district could be compromised.

Alternative 2. Arrival traffic on the north-south route would increase because the visitor center would likely draw people from the region. Although cars would continue to be the predominant means of getting to the reserve, buses with school groups and tour groups would also contribute to traffic congestion. These groups would visit on weekdays during the off-season. Although the traffic would not affect peak loading times on the road, it would affect the typically quiet and low-use days. Prearranged tours and school groups would probably drive directly to the visitor center and bypass the store.

A 100-seat amphitheater (expandable to 200 seats) for summer evening outdoor programs at the developed campground and 70-seat auditorium at the visitor center would draw people from the developed campground, campsites in the reserve, and areas as far away as Burley on weekend nights. This draw would be equally split east and west of the Albion mountains and add 25 to 30 cars driving through Almo within a 30- minute early evening time frame and a later evening departure.

In response to the increased visitor concentration at the campground, county enforcement staffing might increase by one patrol person stationed in the Almo area.

A seven-site backcountry campground inside the reserve would decrease traffic from the campground into town because it would replace campsites on the rim with 20 to 50 percent fewer sites. This traffic would continue to occur at less congested times and would be dispersed throughout the day during unsuitable hours for climbing or socializing at camp. Although stay limits would be imposed and fees charged, demand would keep this campground full. This demand would probably continue to come from the climbing community. Times of bicycle use would vary with the weather, the need for a shower, and individual needs for supplies or equipment. The availability of the campground on the east side of the reserve might increase the number of visitors who depart via routes on the east side.

This alternative includes construction that could involve local as well as nonlocal workers over a period of two to five years. Traffic generated from construction commuting would cause dust and conflicts with farm traffic on weekday mornings and evenings.

The proposed campground, when full (most weekends and from July through Labor day), would draw up to 300 people (100 vehicles) to an area 2 miles southwest of town. Travel to the store for supplies from this campground would concentrate in the late afternoon and the early evening. Camping uses could add 25 to 50 cars/hour in the peak hours in late afternoon both arriving and traveling to the store. Many RV users bring bicycles. Biking would increase on the road into town and also into the reserve, in the early evening, as a way to haul supplies and as a recreational activity.
east side might decrease the demand for overnight camping facilities in Oakley.

**Conclusion.** Increased weekend traffic around Almo would create similar effects as alternative 1. In addition, bus and tour uses midweek would create traffic-generated problems and diminish pedestrian activities. Bike and car traffic from the RV campground to the store and increased traffic to visitor center programs would increase congestion. Construction traffic could conflict with farm traffic. Mountain bike use would likely decrease in relation to decreased primitive campsites, and car use would continue to disperse.

However, traffic and tourism might increase in Oakley because of increased facilities and information in support of the loop tour.

**Alternative 3.** The visitor center in Almo would be retained, as described under the proposal. School and tour traffic would again be high in April, May, September, and October. Additional emphasis on the trail interpretive storyline would draw greater numbers of trail history enthusiasts, possibly in tours. Local attendance at weekend evening programs would be the same as in the proposal; however, the size of the facilities might be smaller because of the absence of camping.

Traffic generated by the tour loop and information network might increase traffic through Oakley because people might choose the historic district as a destination on the loop. Food and lodging demands that give the image of historic values would likely require more facilities. Design guidelines would accommodate the demand while retaining the contributing character of the district.

**Conclusion.** Levels of dust, congestion, and town traffic could increase in Almo similar to alternative 2. Without information on private sector proposals for lodging, effects of traffic patterns in and around Almo cannot be predicted. As private accommodations developed, traffic would continue in and around the store in Almo.

Traffic generated by the tour loop and information network might increase traffic through Oakley because people might choose the historic district as a destination on the loop. Food and lodging demands that give the image of historic values would likely require more facilities. Design guidelines would accommodate the demand while retaining the contributing character of the district.

**Conclusion.** Levels of dust, congestion, and town traffic could increase in Almo similar to alternative 2. Without information on private sector proposals for lodging, effects of traffic patterns in and around Almo cannot be predicted. As private accommodations developed, traffic would continue in and around the store in Almo.

Traffic generated by the tour loop and information network might increase traffic through Oakley because people might choose the historic district as a destination on the loop. Food and lodging demands that give the image of historic values would likely require more facilities. Design guidelines would accommodate the demand while retaining the contributing character of the district.

Lodging needs would probably increase in Oakley, and without Park Service or state support to provide additional facilities, local communities and private groups could provide facilities. The new construction could compromise the integrity of the Oakley Historic District if executed without adherence to design guidelines that describe the key elements of the district. Provision of additional facilities and information about the loop tour might increase visitation to the historic district.

---

The money generation model prepared by the Office of Social Science, Socioeconomic Studies Division, National Park Service (1990), has been used to estimate the economic benefits associated with reserve visitor expenditures, expenditures by the federal and state government in staffing and operating the reserve, and expenditures by federal and state government for constructing facilities for the reserve. The model provides estimates on how tourism expenditures and federal and state expenditures benefit three important components of the local area economy: new sales as measured by increased purchases of goods and services by nonlocal tourists; increased sales tax and income tax revenues; and number of new jobs created. It estimates the economic benefits to the local economy resulting from monies that come into the local economy from outside sources. It is driven by visitor and park expenditure data and does not consider economic benefits such as enhanced real estate values, improved recreational and cultural opportunities for local residents, or improved community services that derive from the reserve.
The three types of economic benefits that were considered were sales benefits, tax revenue benefits, and job benefits. Sales benefits consist of income to local area businesses or individuals for goods and services that they provide as a result of expenditures by nonlocal park visitors and federal government expenditures. Tax benefits consist of increases in local area tax revenues that result from expenditures by nonlocal park visitors and federal and state government expenditures. Job benefits consist of the new jobs that are created in the local area as a result of expenditures by nonlocal park visitors and federal and state government expenditures.

Current park visitation levels are between 80,000 and 100,000. Based on the assumption that parking cannot be significantly increased because of area available for parking in the reserve and constraints on the placement of parking, visitation is expected to level out at the current level. Therefore, under existing conditions and all the alternatives, estimated economic benefits resulting from park visitor expenditures would remain the same under all alternatives. Using the estimated 80,000 visitors per year, sales benefits from tourism would be $1,169,818, tax revenue would be $87,169, and job benefits would be 47. If visitation were higher, these figures would increase.

Cassia County and the Twin Falls area would benefit from federal and state expenditures for salaries, operating costs, and construction that would enter the local economy through increased sales, increased taxes, and creation of jobs. Where construction contractors and workers have businesses and homes outside the local counties, it is possible that benefits from construction may not all benefit the local economy under each alternative because some money they received might be spent outside the area.

Cassia County would benefit if other parties made park-related expenditures. For example, restaurants, antique shops, or additional bed-and-breakfasts might open, and existing businesses might expand. Such activities would increase sales, tax revenues, and jobs in the county. However, further market analysis would be necessary to determine how many and what kinds of businesses might open.

**Alternative 1.** There would be long-term benefits from reserve visitor expenditures and operating costs. Based on reserve salaries and operating costs of $295,000, total sales benefits would total approximately $590,000 per year, tax revenue benefits would be $77,880 per year, and 24 long-term jobs would be created. There would be short-term benefits from gross construction expenditures. These benefits would occur only during construction. Based on gross construction costs of $2.4 million, total sales benefits would be about $4.8 million, tax revenue benefits would be $636,000, and 192 jobs would be created.

**Conclusion.** Economic benefits from reserve visitor expenditures would likely remain the same as now. Expenditures by federal and state government to operate the reserve would generate $590,000 in sales benefits each year, $77,800 in tax revenue benefits each year, and 24 additional long-term jobs in the local economy. If all the development proposed for alternative 1 were constructed, over the life of the plan, short-term benefits arising from construction would be total sales of about $4.8 million and tax revenues of about $636,000, and 192 short-term jobs would be created.

**Alternative 2.** There would be long-term benefits from reserve salaries and operating costs. The reserve would hire 28 additional employees. Based on reserve salaries and operating costs of $900,000, total sales benefits would total approximately $1.8 million per year, tax revenue benefits would be $237,600, and 73 long-term jobs would be created. There would be short-term benefits from gross construction expenditures. These benefits would occur during construction. Based on gross construction costs of $39.1 million, over the life of the plan, if all proposed development was constructed, total sales benefits would be about $78.2 million, tax revenue benefits would be $10.3 million, and 3,128 short-term jobs would be created.

**Conclusion.** Economic benefits from reserve visitor expenditures would likely remain the same as now. Twenty-eight additional jobs would be added to the local economy through hiring to staff the reserve. Expenditures by federal and state government to operate the reserve would generate about $900,000 per year in sales benefits, $236,799 per year in tax revenue benefits, and 73 additional long-term jobs in the local economy. If all the development proposed for alternative 2 were constructed, over the life of the plan, short-term benefits arising from construction would be total sales benefits of about $78.2 million and tax revenue benefits of about $10.3 million, and about 3,128 short-term jobs would be created.
Alternative 3. There would be long-term benefits from reserve salaries and operating costs. The reserve would hire 16 additional employees. Based on a reserve salaries and operating costs of $615,000, total sales benefits would total approximately $1,230,000, tax revenue benefits of $162,360, and 49 jobs would be created. There would be short-term benefits from gross construction expenditures. These benefits would occur during construction. Based on gross construction costs of $39 million, total sales benefits would be about $78 million, tax revenue benefits would be $10.3 million, and 3,120 short-term jobs would be created.

Conclusion. Economic benefits from reserve expenditures would likely remain the same as now. Sixteen additional long-term jobs would be added to the local economy through hiring to staff the reserve. Expenditures by federal and state government to operate the reserve would generate $1.2 million in sales benefits, $162,360 in tax revenue benefits, and 49 additional long-term jobs in the local economy. If all development proposed for alternative 3 were constructed, over the life of the plan, short-term benefits arising from construction would be sales benefits of $78 million and tax revenue benefits of $10.3 million, and 3,120 short-term jobs would be created.
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>The California Trail remnants and inscription rocks would continue to deteriorate as a result of natural weathering and human activity, and views from the trail would likely be degraded by incompatible development.</td>
<td>The long-term preservation of historic trail remnants and inscription rocks would be ensured. Although natural weathering and some human activity would continue, the foregrounds of the views from the trail would be protected to the maximum extent possible from incompatible intrusions.</td>
<td>The long-term preservation of historic trail remnants and inscription rocks would be ensured. Although natural weathering and some human activity would continue, the entire viewshed visible from the historic trails would be protected from all incompatible intrusions except facilities for visitor access and interpretation.</td>
<td></td>
</tr>
<tr>
<td>Historic Rural Setting</td>
<td>The historic rural setting would be degraded by a loss of contributing historic elements and the intrusion of incompatible modern features.</td>
<td>The long-term preservation of significant resources associated with the historic continuum and the protection of views from incompatible commercial or residential development would perpetuate the reserve's historic rural setting.</td>
<td>Historic resources that contribute to the reserve's historic rural setting would eventually be lost.</td>
</tr>
<tr>
<td>Archeological Resources</td>
<td>Archeological resources would remain highly susceptible to natural deterioration, inadvertent human damage, and vandalism, and some important resources would be lost.</td>
<td>A comprehensive program of identification, evaluation, preservation, protection, and interpretation would help ensure the long-term preservation of National Register eligible archeological resources throughout the reserve.</td>
<td>Archeological resources would remain highly susceptible to natural deterioration, inadvertent human damage, and vandalism, and some important resources would be lost.</td>
</tr>
<tr>
<td>Natural Resources</td>
<td>Increasing levels of unnatural noise would increasingly degrade visitors' opportunities to experience natural quiet and sounds and to view wildlife.</td>
<td>Noise-causing activities would be reduced in most of the reserve, resulting in increased opportunities to experience natural quiet and sounds and to view wildlife.</td>
<td>Noise-causing activities would be reduced, resulting in increased opportunities to experience natural quiet and sounds and to view wildlife.</td>
</tr>
<tr>
<td>• Natural Quiet</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Rock Formations</td>
<td>Climbing activities in the reserve would continue to cause permanent damage to rock surfaces; however, the long-term effects of this damage on significant formations, would remain unknown.</td>
<td>The potential for adverse impacts on rock formations would be reduced by monitoring and mitigating climbing impacts and addressing climber education and use practices through a climbing management program and discontinuing climbing on Twin Sisters.</td>
<td>The potential for adverse impacts on rock formations would be greatly reduced by closing 52 percent of the formations to climbing and by monitoring and mitigating climbing impacts in other areas.</td>
</tr>
<tr>
<td>• Natural Biological Diversity</td>
<td>Agricultural and recreational uses would continue to have a major adverse impact on natural biological diversity in the reserve.</td>
<td>Elimination of grazing on up to 543 acres and prescriptions for fire would have a beneficial effect on natural biological diversity. Acquiring private lands with the owner's consent would eventually provide additional long-term protection. Grazing would continue to adversely affect up to 9,895 acres; however, management methods would be implemented to reduce existing grazing impacts. Proposed development would result in a net loss of approximately 24 acres of vegetation in the reserve and 77 acres outside the reserve.</td>
<td>Elimination of grazing from most of the reserve, implementation of grazing management and fire management plans, new county land use zoning, and rehabilitation of disturbed areas would benefit the natural diversity of vegetative communities in the reserve.</td>
</tr>
<tr>
<td>• Species of Special Concern</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Raptor</td>
<td>Increasing visitor use, potential private development, continued grazing, and low-level overflights could result in a decreased number of successfully breeding raptors and possibly decreased raptor survival in the reserve compared to existing conditions.</td>
<td>The elimination of dispersed camping, closure of some areas to climbing, implementation of a climbing management program, and realignment of the road would probably increase raptor survival and nesting success within the reserve.</td>
<td>The elimination of all dispersed camping, closure of some areas to climbing, implementation of a climbing management program, and realignment of the road would probably increase raptor survival and nesting success within the reserve compared to the existing conditions.</td>
</tr>
<tr>
<td>Deer</td>
<td>Existing agricultural and fire management practices, current land cover disturbance on 88 acres, and potential private development would adversely affect deer habitat.</td>
<td>Prescriptions for fires, management of grazing to promote natural vegetation, and land cover restoration would benefit deer habitat. Proposed development would result in a net loss of about 24 acres of deer habitat in the reserve and 77 acres outside the reserve.</td>
<td>Elimination of grazing, establishment of a more natural fire regime, and a net reduction in disturbed areas would have a beneficial effect on deer habitat. Proposed development would result in a net gain of about 7 acres of potential deer habitat in the reserve and a net loss of 77 acres outside the reserve.</td>
</tr>
</tbody>
</table>
## Summary of Impacts

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Bats</td>
<td>The effects of increasing numbers of visitors climbing on an increasing number of rock formations with potential bat habitat could decrease the number of roosting bats in the reserve and possibly decrease bat survival.</td>
<td>Greatly reducing the potential for accidental disturbance of roosting bats would result in more bats roosting in the reserve and increase bat survival over existing conditions.</td>
<td>Eliminating most of the potential for accidental disturbance of roosting bats would result in more bats roosting in the reserve and increase bat survival over existing conditions.</td>
</tr>
<tr>
<td>Rare and Sensitive Plants</td>
<td>Increasing unregulated visitor use, potential private development, and continued high levels of grazing could potentially reduce habitat and populations of rare and sensitive plants in the reserve.</td>
<td>Most rare or sensitive plants in the reserve would be protected.</td>
<td>Most rare or sensitive plants in the reserve would be protected.</td>
</tr>
<tr>
<td>Wetlands, Riparian Areas, and Water Quality</td>
<td>Continuing agricultural uses and any additional development would continue to alter and destabilize riparian communities, degrade water quality, and threaten the survival of dependent wildlife and aquatic species.</td>
<td>The proposed action would have beneficial effects on wetlands and riparian areas, including a net gain in wetlands over present conditions. Approximately 66% of the riparian and wetland habitat in the reserve would eventually be protected from direct livestock use and gradually recover to more natural conditions. Livestock use would adversely affect the remaining 34% but to a lesser extent than at present. The proposed developments would be mitigated where necessary to protect floodplains and wetlands.</td>
<td>Approximately 82 percent of riparian and wetlands habitat would be restored to more natural conditions, ensuring the survivability of dependent wildlife and aquatic species.</td>
</tr>
<tr>
<td>Air Resources</td>
<td>Slight increases in dust and vehicle emissions and additional pollution from outside sources would adversely impact the reserve’s air quality and possibly reduce the range of visibility.</td>
<td>Possible redesignation of the reserve as a class I area and management of other dust- and emission-producing activities would help protect the reserve’s good air quality and visibility.</td>
<td>Possible redesignation of the reserve as a class I area and management of other dust- and emission-producing activities would help ensure the protection of the reserve’s good air quality and visibility.</td>
</tr>
<tr>
<td>Scenic Quality</td>
<td>The most outstanding and vivid landscape view would not be accessible to the public. Scenic quality would progressively degrade along the rim, could be destroyed along the trail, and would maintain existing levels at the Emery entrance. Arrival views could become so cluttered with commercial development that the scenic quality could be greatly diminished at the entrances.</td>
<td>Scenic quality would be enhanced by site design and visitor management along the rim of the Silent City of Rocks and the California Trail, and by county zoning and design guidelines to protect the historic rural setting along arrival corridors.</td>
<td>Scenic quality would be greatly enhanced under this alternative because of increased naturalness caused by managing the majority of the reserve for the California Trail period and natural resources and by removing the north-south road.</td>
</tr>
<tr>
<td>Visitors</td>
<td>Visitor understanding and appreciation of the California Trail and the historic continuum would be impaired by a lack of preservation of and public access to many key resources and competing recreational activities.</td>
<td>Visitors would have a variety of opportunities to understand and appreciate both the California Trail and the area’s full historic continuum with minimal distraction from conflicting development or competing activities.</td>
<td>Visitors would have excellent opportunities to understand and appreciate the California Trail without being distracted by conflicting development or competing activities; however, no opportunities would be available to experience the historic continuum.</td>
</tr>
<tr>
<td>Visitors</td>
<td><strong>Interpretive/Educational Opportunities</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recreation</td>
<td>Current climbing activities within the reserve would not be affected.</td>
<td>Most of the popular climbing rocks and climbing routes would remain accessible to climbers; however, climbers would find more restrictions than exist now, designed to help prevent potential damage to resources and conflicts with other reserve experiences.</td>
<td>Most of the popular climbing rocks would still be accessible to climbers, although fewer than in alternatives 1 and 2. Climbers would find more restrictions than exist now, designed to help prevent potential damages to resources and conflicts with other reserve experiences.</td>
</tr>
<tr>
<td>Rock Climbing</td>
<td></td>
<td>Visitors would continue to have opportunities for an overnight experience in the reserve, although the character of the experience would change to consolidated tent camping for all but a few backcountry users.</td>
<td>Visitors would no longer have an opportunity to camp in the reserve.</td>
</tr>
<tr>
<td>Camping</td>
<td>This alternative would have minimal impacts on current camping activities. Conflicts with cattle might continue to reduce the quality of some people’s camping experience.</td>
<td><strong>Visitors</strong></td>
<td><strong>Visitors</strong></td>
</tr>
</tbody>
</table>

### Notes:
- **Visitor** understanding and appreciation of the Visitors would have a variety of opportunities to understand and appreciate both the California Trail and the area’s full historic continuum with minimal distraction from conflicting development or competing activities. 
- **Visitors** would have excellent opportunities to understand and appreciate the California Trail without being distracted by conflicting development or competing activities; however, no opportunities would be available to experience the historic continuum.
- **Visitors** would have a variety of opportunities to understand and appreciate both the California Trail and the area’s full historic continuum with minimal distraction from conflicting development or competing activities.
- **Visitors** would have excellent opportunities to understand and appreciate the California Trail without being distracted by conflicting development or competing activities; however, no opportunities would be available to experience the historic continuum.

### Summary:
- **Visitors** would have a variety of opportunities to understand and appreciate both the California Trail and the area’s full historic continuum with minimal distraction from conflicting development or competing activities.
- **Visitors** would have excellent opportunities to understand and appreciate the California Trail without being distracted by conflicting development or competing activities; however, no opportunities would be available to experience the historic continuum.
### Environmental Consequences

<table>
<thead>
<tr>
<th><strong>Alternative 1: No Action</strong></th>
<th><strong>Alternative 2: Historic Continuum (Proposal)</strong></th>
<th><strong>Alternative 3: California Trail Emphasis</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Safety Related to Hunting Hazards</strong></td>
<td>Hunting hazards would be eliminated in the most heavily used portions of the reserve; however, some park users might still be in dangerous situations in the more remote parts of the reserve.</td>
<td>Hunting hazards would be eliminated from approximately half the reserve, and no campers would be at risk because camping would be prohibited.</td>
</tr>
<tr>
<td><strong>Accessibility</strong></td>
<td>Access to significant resources would be provided through physical or programmatic design of public facilities and select trails.</td>
<td>Same as alternative 2</td>
</tr>
<tr>
<td><strong>Private Landowners and Livestock Grazing Permittees</strong></td>
<td>Private landowners and grazing permittees would not be affected.</td>
<td>Closing 11,424 acres or 88 percent of the public and private rangeland to grazing in the reserve would have an adverse economic impact on 10 permittees. Affected private landowners would be compensated with the fair market value of their property.</td>
</tr>
<tr>
<td><strong>Socioeconomic Environment</strong></td>
<td>Increased weekend traffic on the main north-south road would affect cattle trailing, the road corridor, and outside uses around the Almo intersection of Tracy's store.</td>
<td>Without information on private sector proposals for lodging, effects of traffic patterns in and around Almo cannot be predicted. As private accommodations developed, traffic would increase. Levels of visitation similar to alternative 2 could continue to cause dusty situations caused by increased vehicular traffic.</td>
</tr>
<tr>
<td><strong>Character of Surrounding Communities</strong></td>
<td>Local communities could be provided the opportunity to provide overnight accommodations. In Oakley, the integrity of the historic district could be compromised.</td>
<td>Demand for lodging would probably increase in Oakley, and local communities could have the opportunity to provide overnight accommodations. New construction could compromise the integrity of the historic district, unless infill development were architecturally sympathetic to the historic character of the community. Additional information about the loop tour could increase visitation.</td>
</tr>
<tr>
<td><strong>Economy</strong></td>
<td>Based on continued visitation of about 80,000 visitors per year, sales benefits from tourism would continue to be about $1.2 million, tax revenues about $87,000, and job benefits about 47. Expenditures by federal and state government to operate the reserve would generate $590,000 per year in sales benefits, $77,800 per year in tax revenue benefits, and 24 additional long-term jobs in the local economy. If all development proposed were constructed, over the life of the plan, short-term benefits arising from construction would be total sales benefits of about $4.8 million and tax revenue benefits of about $636,000, million, and 192 short-term jobs would be created.</td>
<td>The local economy would be adversely affected because grazing would be reduced, and related employment and expenditures would be diminished. Based on continued visitation of about 80,000 visitors per year, sales benefits from tourism would continue to be about $1.2 million, tax revenues about $87,000, and job benefits about 47. Sixteen additional jobs would be added to the local economy through hiring to staff the reserve. Expenditures by federal and state government to operate the reserve would generate $1.2 million in sales benefits, $162,360 in tax revenue benefits, and 49 additional long-term construction jobs in the local economy. If all development proposed were constructed, over the life of the plan, short-term benefits arising from construction would be total sales benefits of $78 million and tax revenue benefits of about $10.3 million, and 3,120 short-term jobs would be created.</td>
</tr>
</tbody>
</table>
# PREPARERS, CONTRIBUTORS, AND CONSULTANTS

## PLANNING TEAM

<table>
<thead>
<tr>
<th>National Park Service Representatives</th>
<th>*Mary Magee, Natural Resource Specialist and Team Captain, Denver Service Center</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Dave Pugh, Superintendent, City of Rocks National Reserve</td>
</tr>
<tr>
<td></td>
<td>Keith Dunbar, Chief of Planning, Pacific Northwest Regional Office</td>
</tr>
<tr>
<td></td>
<td>*Harlan Unrau, Cultural Resource Specialist, Denver Service Center</td>
</tr>
<tr>
<td></td>
<td>*Laura Rotegard, Landscape Architect, Denver Service Center</td>
</tr>
<tr>
<td></td>
<td>*Paul Lee, Interpretive Planner, Harpers Ferry Design Center/Denver Service Center</td>
</tr>
<tr>
<td></td>
<td>*Steven Culver, Natural Resources Specialist, Denver Service Center</td>
</tr>
<tr>
<td></td>
<td>*Gail Slemmer, Writer-Editor, Denver Service Center</td>
</tr>
</tbody>
</table>

## State of Idaho Representatives

<table>
<thead>
<tr>
<th>John Crowe, Supervisory Development Planner, Idaho Department of Parks and Recreation, Boise, ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ned Jackson, Park Manager, Idaho Department of Parks and Recreation, Almo, ID</td>
</tr>
</tbody>
</table>

## State, County, and Local Representatives

| John Adams, Chairman, Cassia County Commissioner, ID                                             |
| Thomas Clark, Businessman, Oakley, ID                                                            |
| Bill Jones, Rancher and Retired Teacher, Almo, ID                                                |
| Charles Ward, Rancher, Malta, ID                                                                 |

## CONTRIBUTORS

| Yvonne Ferrell, Director, Idaho Department of Parks and Recreation, Boise, ID                     |
| Gary Johnson, Site Planning Section, Branch of Planning, Western Team, Denver Service Center    |
| Dr. Maurice Nyquist, Chief Geographic Data Technologies Branch, GIS Division, WASO, National Park Service |

## CONSULTANTS

| Janet Runas, Geographic Information Specialist, Denver Service Center                           |
| Mike Zavori, Physical Science Technician, Data Technologies Branch, GIS Division, WASO, National Park Service |
| Gary Waggoner, Botanist, Data Technologies Branch, GIS Division, WASO, National Park Service   |
| Susan Stitt, Senior Biological Scientist, Data Technologies Branch, GIS Division, WASO, National Park Service |
| Michael Britten, Wildlife Biologist, Rocky Mountain Regional Office, National Park Service     |
| Gordon Atkins, Outdoor Recreation Planner, Pacific Northwest Regional Office, National Park Service |
| Maura Longden, Park Ranger, City of Rocks National Reserve, National Park Service             |
| Dan McGlothlin, Hydrologist, Water Resources Division, WASO, National Park Service             |
| Steve DeBenedetti, Resource Management Specialist, NPS Pinnacles National Monument, Paicines, CA |
| Tom John, Botanist, Volunteer, City of Rocks National Reserve, National Park Service           |
| Sidney Covington, Geologist, Minerals and Mining Branch, WASO, National Park Service           |
| Eric Hauge, Air Quality Specialist, Air Quality Division, WASO, National Park Service          |
| Craig Patterson, Environmental Engineer, Denver Service Center, National Park Service          |
| Dr. Ed Starkey, Oregon State University, CPSU National Park Service, Corvallis, OR             |
| Dr. Gerald Wright, Idaho University, CPSU National Park Service, Moscow, ID                     |
PREPARERS, CONTRIBUTORS, AND CONSULTANTS

John Burghardt, Geologist, Minerals and Mining Branch, WASO, National Park Service

Fred York, Regional Ethnographer, Pacific Northwest Regional Office, National Park Service

Joan Huff, Visual Information Technician, Denver Service Center

Sandy Schuster, Editor, Denver Service Center

Anne Shewell, Visual Information Specialist, Denver Service Center

Philip Thys, Visual Information Specialist, Denver Service Center

Robert H. Todd, Cartographic Technician, Denver Service Center
CONSULTATION AND COORDINATION

THE SCOPING PROCESS

Public meetings, planning newsletters, a mail-in public response form, and a workbook of alternatives were included in the scoping process for the comprehensive management plan for City of Rocks National Reserve. Their purpose was to identify all issues and alternatives that should be considered in planning and to keep the public informed throughout plan formulation. In January 1990, a press release announced the intention of the National Park Service to prepare a comprehensive management plan and accompanying environmental documents for the reserve. The announcement described the purposes and strategies to be developed, and it announced five public meetings. In December 1990 a second set of four public meetings were announced. During the spring of 1991, the National Park Service decided that an environmental assessment would not adequately support the City of Rocks comprehensive management plan effort based on scoping results. In response to this decision June 1991, a notice of intent was placed in the Federal Register to prepare an environmental impact statement for this project.

The National Park Service held a series of public involvement meetings to gather information concerning the public's needs, desires, and expectations regarding the future of City of Rocks National Reserve. The meeting schedule was as follows:

- January 22, 1990: Almo, Idaho
- January 23, 1990: Pocatello, Idaho
- January 24, 1990: Twin Falls, Idaho
- January 25, 1990: Ogden, Utah
- December 12, 1990: Pocatello, Idaho
- December 13, 1990: Salt Lake City, Utah
- January 9, 1991: Boise, Idaho
- January 10, 1991: Sun Valley, Idaho

Comments were recorded at each meeting and later printed in two planning newsletters. Comments from the first five meetings were in the first newsletter and from the second four in the third newsletter. The newsletters were sent to everyone on the City of Rocks mailing list. The second newsletter included preliminary draft planning concepts for City of Rocks and an attached mail-in response form asking for comments on the preliminary draft planning concepts and recreational use at City of Rocks. A third newsletter included a summary of responses to the mail-in form.

In August 1991 an Alternatives Workbook was released to the public, requesting people's opinions about the preliminary alternatives for the City of Rocks comprehensive management plan. Four alternatives plus two tour concepts for outside the reserve boundaries were included in the workbook. Approximately 800 copies of the workbook were mailed, and over 200 responses were received. All responses were due on October 1, 1991, and subsequently analyzed by the planning team. In addition, two public meetings in Idaho were held to provide information and answer questions about the workbook and draft alternatives. The meeting schedule was as follows:

- August 28, 1991: Boise, Idaho
- August 29, 1991: Burley, Idaho

In January 1992, the National Park Service held a meeting in Burley, Idaho, with owners of private land in the reserve. The purpose of the meeting was to discuss alternatives and possible revisions and how they could affect private landowners if implemented.

The major issues raised during scoping and addressed in the CMP/EIS are listed herein.

Historic values
Historic rural setting
Archeological resources
Scenic quality
Natural quiet
Geological resources
Air quality
Water resources
Water rights
Vegetation and natural biological diversity
Soil erosion
Threatened and endangered species
CONSULTATION AND COORDINATION

Sensitive wildlife habitat
Rare or sensitive plants
Reintroduction of native species
Fire management
Wildlife and wildlife management
Private land and landowners rights
Development on private land in the reserve
Domestic livestock grazing and grazing rights
Cattle trailing through the reserve
Hunting
Elimination of grazing from the reserve
Rock climbing regulations
Rock climbing equipment use
Visitor use
Vehicle use, including ORVs
Firewood use
Camping and campgrounds
Fees
Reserve development, including roads, trails, parking, picnic areas, signs, visitor center, and utilities and sanitary facilities
Development on private land
Development outside the reserve
Cost of development and administration
No development in the reserve
Interpretation
Impacts on local communities
County and community services
Public access and accessibility
Public involvement
Zoning, including public and private land
Firearm use
Trespassing on private land (visitors and livestock)
Impacts on local economy

CONSULTATION WITH OTHER AGENCIES, INSTITUTIONS, AND LOCAL INTERESTS

The planning team responsible for developing the City of Rocks plan included representatives from the following agencies and communities:

- Idaho Department of Parks and Recreation
- Cassia County Commission
- Oakley
- Almo
- Malta

The CMP/EIS team received literature or information from several agencies and institutions during preparation of this document.

Government

William Boggs, District Recreation Planner, Burley District Office, Bureau of Land Management, Burley, ID
Ken Fuller, Burley District Office, Bureau of Land Management, Burley, ID

Dr. Barry Keller, Professor, Dept. of Biological Science, Idaho State University, Pocatello, ID
Dr. John Laundra, Professor, Dept. of Biological Science, Idaho State University, Pocatello, ID
Dr. Charles Trost, Professor, Dept. of Biological Science, Idaho State University, Pocatello, ID

Jeffery Bohr, District Conservationist, Soil Conservation Service, Burley, ID
Jim Chard, Range Conservationist, Burley District, U.S. Forest Service, Burley, ID
Zeke Zimmerman, Burley Ranger District, U.S. Forest Service, Burley, ID
Craig Groves, Idaho Natural Heritage Program, Idaho Department of Fish and Game, Boise, ID
George Stephens, Data Manager, Idaho Natural Heritage Program, Idaho Department of Fish and Game, Boise, ID
Charles Lobdell, Field Supervisor, Boise Field Office, U.S. Fish and Wildlife Service, Boise, ID
Randall Smith, Regional Wildlife Biologist, Idaho Dept. of Fish and Game, Jerome, ID
Bob Toll, Park Manager, Eldorado Canyon State Park, Eldorado Springs, CO
Bill Dalton, Appraiser, County Assessors Office, Cassia County Courthouse, Burley, ID
Shirley Povlsen, County Treasurer, County Tax Collector's Office, Cassia County Courthouse, Burley, ID
Charles Lobdell, Field Supervisor, Boise Field Office, U.S. Fish and Wildlife Service, Boise, ID
Tom Greene, Idaho State Historical Society/State Preservation Office, Boise, ID
Larry Jones, Idaho State Historical Society/State Preservation Office, Boise, ID
Merle Wells, Idaho State Historical Society/State Preservation Office, Boise, ID
Kent Malin, Utah State Historical Society, Salt Lake City, UT
<table>
<thead>
<tr>
<th>LIST OF AGENCIES AND ORGANIZATIONS TO WHOM COPIES OF THE ENVIRONMENTAL IMPACT STATEMENT ARE BEING SENT</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal Agencies</strong></td>
</tr>
<tr>
<td>Advisory Council on Historic Preservation</td>
</tr>
<tr>
<td>Department of Agriculture</td>
</tr>
<tr>
<td>Forest Service</td>
</tr>
<tr>
<td>Burley District</td>
</tr>
<tr>
<td>Intermountain Region</td>
</tr>
<tr>
<td>Department of Defense</td>
</tr>
<tr>
<td>Department of the Air Force</td>
</tr>
<tr>
<td>Department of the Interior</td>
</tr>
<tr>
<td>Bureau of Indian Affairs</td>
</tr>
<tr>
<td>Bureau of Land Management</td>
</tr>
<tr>
<td>Burley District</td>
</tr>
<tr>
<td>Fish and Wildlife Service</td>
</tr>
<tr>
<td>Regional Office</td>
</tr>
<tr>
<td>Boise Field Office</td>
</tr>
<tr>
<td>Department of Transportation</td>
</tr>
<tr>
<td>Federal Highway Administration</td>
</tr>
<tr>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td><strong>Idaho Congressional Delegation</strong></td>
</tr>
<tr>
<td>Senator Dirk Kempthorne</td>
</tr>
<tr>
<td>Senator Larry E. Craig</td>
</tr>
<tr>
<td>Representative Mike Crapo</td>
</tr>
<tr>
<td>Representative Larry LaRocco</td>
</tr>
<tr>
<td><strong>State of Idaho</strong></td>
</tr>
<tr>
<td>Governor Cecil D. Andrus</td>
</tr>
<tr>
<td>Senator Denton Darrington</td>
</tr>
<tr>
<td>Senator B. Joyce McRoberts</td>
</tr>
<tr>
<td>Senator Laird Noh</td>
</tr>
<tr>
<td>Representative Lee Barnes</td>
</tr>
<tr>
<td>Representative Celia R. Gould</td>
</tr>
<tr>
<td>Representative Douglas R. Jones</td>
</tr>
<tr>
<td>Representative Steve Antone</td>
</tr>
<tr>
<td>Representative Bruce Newcomb</td>
</tr>
<tr>
<td>Department of Parks and Recreation</td>
</tr>
<tr>
<td>Department of Fish and Game</td>
</tr>
<tr>
<td>Department of Agriculture</td>
</tr>
<tr>
<td>Department of Commerce</td>
</tr>
<tr>
<td>Department of Transportation</td>
</tr>
<tr>
<td>Department of Water Resources</td>
</tr>
<tr>
<td>Historic Preservation Officer</td>
</tr>
<tr>
<td><strong>County and Local Governments</strong></td>
</tr>
<tr>
<td>Mayor Dennis Smith, Oakley, ID</td>
</tr>
<tr>
<td>Mayor Doug Vollmer, Twin Falls, ID</td>
</tr>
<tr>
<td>Mayor Rolland Zollinger, Bliss, ID</td>
</tr>
<tr>
<td>Mayor J. Darrington, Declo, ID</td>
</tr>
<tr>
<td>Mayor Gene Heller, Gooding, ID</td>
</tr>
<tr>
<td>Mayor Jim Kelly, Albion, ID</td>
</tr>
<tr>
<td>Mayor Frank Bauman, Burley, ID</td>
</tr>
<tr>
<td>Cassia County, ID</td>
</tr>
<tr>
<td>County Commissioner John Adams</td>
</tr>
<tr>
<td>County Commissioner Weldon Beck</td>
</tr>
<tr>
<td>County Commissioner Norman Dayley</td>
</tr>
<tr>
<td>Gooding County, ID</td>
</tr>
<tr>
<td>County Commissioner Rod Hohnhorst</td>
</tr>
<tr>
<td>County Commissioner Robert Tupper</td>
</tr>
<tr>
<td>Twin Falls County, ID</td>
</tr>
<tr>
<td>County Commissioner Jim Fraley</td>
</tr>
<tr>
<td>County Commissioner Robert Thackery</td>
</tr>
<tr>
<td>County Commissioner Norma Blass</td>
</tr>
<tr>
<td>County Commissioner Marvin Hempleman</td>
</tr>
<tr>
<td><strong>Shoshone-Bannock Tribes</strong></td>
</tr>
<tr>
<td>Harold Durfee</td>
</tr>
<tr>
<td>Curtis Durfee</td>
</tr>
<tr>
<td>William D. Jones</td>
</tr>
<tr>
<td>Olen H. Ward</td>
</tr>
<tr>
<td>Cordell Sheridan</td>
</tr>
<tr>
<td>J.E. Tracey, Inc.</td>
</tr>
<tr>
<td>R.O. Jones and Sons, Inc.</td>
</tr>
<tr>
<td>Glen W. Jones</td>
</tr>
<tr>
<td>Lyle D. Woodbury</td>
</tr>
<tr>
<td><strong>PRIVATE LANDOWNERS AND GRAZING PERMITTEES</strong></td>
</tr>
<tr>
<td>Merlin Stock, Retired USFS District Ranger, Burley, ID</td>
</tr>
<tr>
<td>Albert E. Nicholson, Owner of Nicholson ranch, Rupert, ID</td>
</tr>
<tr>
<td>Charles A. Wellner, Chairman, Idaho Natural Areas Coordinating Committee, Moscow, ID</td>
</tr>
<tr>
<td>Lex H. Kunau, President, Cassia County Abstract Company, Burley, ID</td>
</tr>
<tr>
<td>Glenn Draper, Cassia County Historical Society and Museum, Burley, ID</td>
</tr>
<tr>
<td>Arlene Huber, Cassia County Historical Society and Museum, Burley, ID</td>
</tr>
<tr>
<td>Rachel Martindale, Cassia County Historical Society and Museum, Burley, ID</td>
</tr>
<tr>
<td>Family History Center (Genealogical Library), Burley, ID</td>
</tr>
<tr>
<td>Idaho State Library, Boise, ID</td>
</tr>
<tr>
<td>Thomas H. Hunt, National Trails Preservation Officer, Oregon - California Trails Association, Office of National Historic Preservation, Palo Alto, CA</td>
</tr>
<tr>
<td>Dr. Blair Csuti, Adjunct Associate Professor, Idaho University, Coop. Fish and Wildlife Research Unit, Moscow, ID</td>
</tr>
<tr>
<td>Governor Cecil D. Andrus</td>
</tr>
<tr>
<td>Senator Denton Darrington</td>
</tr>
<tr>
<td>Senator B. Joyce McRoberts</td>
</tr>
<tr>
<td>Senator Laird Noh</td>
</tr>
<tr>
<td>Representative Lee Barnes</td>
</tr>
<tr>
<td>Representative Celia R. Gould</td>
</tr>
<tr>
<td>Representative Douglas R. Jones</td>
</tr>
<tr>
<td>Representative Steve Antone</td>
</tr>
<tr>
<td>Representative Bruce Newcomb</td>
</tr>
<tr>
<td>Department of Parks and Recreation</td>
</tr>
<tr>
<td>Department of Fish and Game</td>
</tr>
<tr>
<td>Department of Agriculture</td>
</tr>
<tr>
<td>Department of Commerce</td>
</tr>
<tr>
<td>Department of Transportation</td>
</tr>
<tr>
<td>Department of Water Resources</td>
</tr>
<tr>
<td>Historic Preservation Officer</td>
</tr>
<tr>
<td><strong>Idaho Congressional Delegation</strong></td>
</tr>
<tr>
<td>Senator Dirk Kempthorne</td>
</tr>
<tr>
<td>Senator Larry E. Craig</td>
</tr>
<tr>
<td>Representative Mike Crapo</td>
</tr>
<tr>
<td>Representative Larry LaRocco</td>
</tr>
</tbody>
</table>
The provisions of the 1990 servicewide programmatic agreement for consultation with the Idaho State Historic Preservation Office (SHPO) and the Advisory Council on Historic Presentation on the City of Rocks Comprehensive Management Plan have been followed throughout the development of the plan. Invitations to both offices have been extended to participate in all significant phases of the planning process. Representatives of the SHPO and the advisory council have provided comments on the initial workbook of alternatives, participated in public planning meetings and workshops, and attended special meetings at the reserve and the Pacific Northwest Regional Office to discuss specific preservation issues. Most recently, the Idaho state historic preservation officer participated in an in-depth review of the plan, held at the Pacific Northwest Regional Office on June 14, 1993, which also involved representatives of the National Park Service and Idaho Department of Parks and Recreation. Comments received from the SHPO and the advisory council have been taken into account in planning for additional resource studies of the reserve, as well as in evaluating the impacts of the proposed alternatives.

Consultation with interested American Indian groups has begun under the direction of the regional anthropologist, who has met with representatives of the Fort Hall Shoshone-Bannock tribes. In addition to establishing a long-term consulting relationship with these tribes, which may have interests in several NPS sites, information is being sought regarding sites of special significance and interest to the tribes within City of Rocks, for which protection and management strategies will have to be developed. It is expected that an ongoing relationship will continue through completion of the planning process and establishment of a management direction for the reserve and its resources.
This section includes a summary of comments received through letters and public meetings following the release of the City of Rocks Draft Comprehensive Management Plan/Development Concept Plan/Environmental Impact Statement on November 16, 1993. All oral and written comments were considered by the National Park Service according to the requirements of 40 CFR 1503.

About 250 comment letters were received from governing bodies, government agencies, organized interest groups, private landowners, and individuals during the comment period. All letters from governing bodies, government agencies, interest groups, and private landowners are reprinted in this section. Also included are reprints of letters from individuals that raised points needing clarification or that were chosen to represent the range of issues included in the individual letters. An additional 170 individuals sent preprinted postcards identifying the no action alternative as the one they preferred.

The Park Service's responses to all substantive comments are also included in this section. Some comments called for clarification of information in the draft document; others required text modifications, which have been made in the final document and identified in the Park Service responses. No responses are provided to comments that only expressed opinions and did not identify a needed text clarification, correction, or modification.
Dear Ms. Magee:

Mike Barnes of my staff spoke with you on the last week of November 1993, relative to the City of Rocks National Reserve Management Plan and Environmental Impact Statement. We appreciate your sending this office a copy of the plan.

Since receiving the plan, we have reviewed it and noticed that some public lands administered by the Utah Bureau of Land Management will be impacted sometime in the future by the proposed alternative #2. More specifically, the plan recommends improving the Upper Raft River Narrows road from a gravel surface to a hard surface, page 44. Additionally, a new road is recommended for construction from an existing road located in the NE1/4, section 12, T. 14 N., R. 17 W., SLM, to another existing road located in the S1/4, section 8, T. 14 N., R. 16 W., SLM. The connection would create a southern loop south of the City of Rocks for commercial and through-traffic. According to the time schedule on page 56, planning would begin in 1998 and construction beginning sometime after 2001.

We request this office be placed on your mailing list for future activities relative to the City of Rocks. We also request that we be notified when planning begins on the road reconfiguration.
Enclosed you will find the planning documents we operate under in managing the public lands in Box Elder County. We are currently in the beginning phase of amending the Box Elder Resource Management Plan.

Should you have any questions or comments, please write me or call Mike Barnes of my staff at (801) 977-4300.

Sincerely,

[Signature]

Leon E. Berggren
Bear River Resource Area Manager

Enclosures (2)
Record of Decision
EIS
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>United States Department of the Interior</strong>&lt;br&gt;<strong>BUREAU OF LAND MANAGEMENT</strong>&lt;br&gt;Burley District Office&lt;br&gt;Route 5, Box 1&lt;br&gt;Burley, Idaho 83318&lt;br&gt;<strong>January 13, 1994</strong>&lt;br&gt;Regional Director&lt;br&gt;National Park Service&lt;br&gt;Pacific Northwest Region&lt;br&gt;83 S. King St.&lt;br&gt;Suite 212&lt;br&gt;Seattle, WA 98104&lt;br&gt;Dear Sir:&lt;br&gt;We have reviewed your comprehensive management plan for the City of Rocks and found it to be a rather impressive looking document, with considerable depth of content. It is a very ambitious plan that appears to need a large measure of funding to implement what is proposed. This concerns us in relation to current and projected Federal funding levels, and in terms of the plan's focus. Nevertheless, after a review of the plan, we feel that prior to any implementation measures, a series of meetings between the BLM and NPS will need to be held to address our interests and concerns.&lt;br&gt;We want to take the liberty at this time to express our comments and concerns about the document in more detail. These comments range from plan focus, wildlife, and livestock grazing to land status, fire management, Christmas tree cutting, etc.&lt;br&gt;&lt;br&gt;1. The focus on preservation, interpretation and recreation is commendable, but we wonder if there is not a need to address another aspect in the plan. This aspect is rural revitalization as an integral part of a long-term strategy to help struggling rural communities within the Malta-Almo-Oakley area through facilitating development of their tourism industries. The plan instead appears to address social costs and private sector initiatives in the socioeconomic equation, but is largely silent in recognizing tourism is an important policy tool in rural revitalization efforts.&lt;br&gt;2. Although we noted that all the plan's alternatives would not change the visitation benefits due to limited parking facilities in the reserve, we wonder if there couldn't be positive impacts on off-farm employment opportunities, commercial recreation and the like. For $58.5m in project costs, the plan appears very ambitious as an in-house development, particularly with regard to the generous staffing levels for the 14k acre park, yet the spinoffs seem marginal for the communities affected. As a major strategy shift, we wonder why some of the proposed projects such as the new administrative/visitor center couldn't be located in Almo and incorporated into employee housing. Perhaps additional parking areas could be located within these small towns whereby shuttle services could be provided for the transport of visitors.</td>
<td>1. Recognizing that parks are integral parts of larger regional environments, the National Park Service will work cooperatively with others to anticipate, avoid, and resolve potential conflicts, to protect park resources, and to address mutual interests in the quality of life for community residents, considering economic development as well as resource and environmental protection. The text under &quot;Management Authorities and Responsibilities&quot; was changed to address regional economic development planning. The EIS does address impacts of visitor tourism on the local communities and economy.&lt;br&gt;2. Comment noted.</td>
</tr>
<tr>
<td>COMMENTS</td>
<td>RESPONSES</td>
</tr>
<tr>
<td>----------</td>
<td>----------</td>
</tr>
<tr>
<td>Even the proposed RV facilities could be placed at locations outside the reserve within some of the small communities thus stimulating tourism. Perhaps as a start, the NPS needs to coordinate closely with the City of Rocks Chamber, recently formed to encourage tourism.</td>
<td>3. The text of the &quot;Summary&quot; section was changed.</td>
</tr>
<tr>
<td>2. Page vi, Alternative 3, paragraph 4: What species of native wildlife is being referred to here? Is there a need?</td>
<td>4. The proposed action (alternative 2) does not call for the &quot;cutoff of grazing&quot;. The quantified impacts of reducing grazing under alternative 3 are covered under the &quot;Environmental Consequences&quot; section.</td>
</tr>
<tr>
<td>3. Page vii, paragraph 3. Can the cutoff of grazing be realistic? What are the quantified impacts from such a proposal?</td>
<td>5. The text of the &quot;Environmental Consequences&quot; section was changed.</td>
</tr>
<tr>
<td>4. One of our major concerns is the need to address grazing leases in the area. Some of the proposals will certainly cause significant adverse effects to livestock permittees holding grazing permits in three small allotments. These effects would result from the proposed developments outside the Reserve boundaries in the proposed action and to a lesser degree in alternative 3. On one of the allotments, the Almo Flat allotment, the operations and housing areas are proposed to be constructed. This area is grazed in the spring (4/1-4/20) and again the fall (11/15-12/26). The visitor center and RV dump station are proposed within the Circle Creek allotment. This area is grazed during May each year. And in the Smokey Mountain allotment, the water storage tank, amphitheater and RV campgrounds are proposed to be constructed. This area is grazed during the spring, early summer (5/5-6/23 by cattle and 5/5-6/11 by horses).</td>
<td>6. No grazing management plan for the reserve has been approved. The proposed plan calls for the development of a grazing management plan under the &quot;Resource Management&quot; section and appendix F.</td>
</tr>
<tr>
<td>Were the draft allotment management plans developed for the City of Rocks NR ever approved? This plan made no mention of them.</td>
<td>7. Comment noted. The map symbol legend for the &quot;Existing Ownership Grazing and Ranching&quot; map was changed.</td>
</tr>
<tr>
<td>5. On page 24, there is need to show land status better. For example, the USFS lands can't be determined, and the land status is lacking outside the reserve boundary and its proximity. Also, we noted that some of the map symbols (O) are not shown on the legend.</td>
<td>8. Comment noted.</td>
</tr>
<tr>
<td>6. On page 30, we noted that the maintenance/housing area on BLM public lands is shown in the wrong location. It should be in the NE4 NW4 of Section 34 rather than in Section 33. Also, the RV campground is shown too far south (see inset map on page 32).</td>
<td>9. Specific strategies for managing hunting and the use of firearms to ensure public safety and visitor enjoyment would be developed as part of the resource management plan for the reserve.</td>
</tr>
<tr>
<td>7. On page 38, within the wildlife management section, we noted the statement that hunting would be allowed if it did not compromise public safety, visitor enjoyment, etc. This needs some clarification. For example, what sort of impacts would trigger a ban on hunting? A few complaints? Would there be safety zones established around the campsites or would limits be placed on when hunting could take place. Perhaps hunting could be allowed in the fall/winter hunting seasons and eliminated in the spring/summer seasons. Also, plinking and target shooting should be addressed.</td>
<td></td>
</tr>
<tr>
<td>COMMENTS</td>
<td>RESPONSES</td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
</tr>
<tr>
<td>8. On page 51, the description of the maintenance/operation facility is not correct—rather than one mile southwest of the road to the RV park, it is really 1/2-3/4 mile.</td>
<td>10. The text was changed.</td>
</tr>
<tr>
<td>9. On page 51, it should be noted that the Idaho Dept. of Parks and Recreation has filed for a lease only on the Administrative site. The RV campground is on BLM public lands and could be developed through a cooperative management agreement.</td>
<td>11. The DCP overview map was changed.</td>
</tr>
<tr>
<td>10. The RV campground conceptual design needs to be modified. On page 52, the inset map shows the road dead-ending at the campground, limiting access to the public lands; although, we note that it does show how access beyond the campground could work. Is this the method for access from the campground? Then the last paragraph on page 52, should say that the existing four-wheel drive road would continue past the RV campground and provide access to other public lands. And last, the inset map shows private land south of Section 33. It should be reflected as public land.</td>
<td>12. Comment noted.</td>
</tr>
<tr>
<td>11. The map on page 54 should show the existing four-wheel drive road that would bypass the campground and provide access to other public lands.</td>
<td>13. Such design decisions will be made later during the design phase.</td>
</tr>
<tr>
<td>12. Will there be a road or roads provided from the RV loops? We noted that the loops depicted on page 54 limit egress by forcing visitors to go totally around each loop before exiting. The comfort stations are located deeply within the park, forcing amphitheater participants who need relief to search around for a restroom facility. Further, what are the provisions for containment of escaped fires and illegal cutting of adjacent trees/brush. The attached conceptual plan (attachment A) eliminates many of those deficiencies noted above, however we are concerned that this development could destroy much of the natural character of the park. We would not want to be a party to a mini-Disney World.</td>
<td>14. Comment noted. The text in the &quot;Environmental Consequences&quot; section was changed.</td>
</tr>
<tr>
<td>Also, we noted that this facility would impinge on our Christmas tree cutting area. The pinon pine resource is limited within the region and is quite important to the public as a Christmas tree source. We want to seriously ponder the opportunity costs of releasing these lands for other uses.</td>
<td>15. The map scale was changed.</td>
</tr>
<tr>
<td>13. On page 55, we noted that the scale indicated an inch equals 100 feet. It really looks like one inch equals 200 feet.</td>
<td>16. The text was changed.</td>
</tr>
<tr>
<td>14. On page 56 we noted that the Idaho Dept. of Parks and Recreation has filed for a lease only for the Administrative/Visitor Center site, not the RV park. This RV park would be under a cooperative management agreement with the BLM, NPS, IDPR.</td>
<td>17. The plan proposes to phase development of the campground, building only 50 sites initially. If use indicates that 80 sites would be adequate, the option of building only 30 additional sites would be available. However, more than a total of 100 sites could not be built without further National Environmental Policy Act Compliance.</td>
</tr>
<tr>
<td>15. We noted that current camping demand sometimes reaches 100 sites. How often is this? Would 80 sites be adequate?</td>
<td></td>
</tr>
<tr>
<td>COMMENTS</td>
<td>RESPONSES</td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
</tr>
<tr>
<td>18. On page 57, under Housing, we have the same comments as above.</td>
<td>18. The text was changed.</td>
</tr>
<tr>
<td>19. In the map on page 79, we noted the maintenance/housing area is in the wrong location. It should be closer to the visitor center. Also, the RV campground is shown too far southwest (see inset map on page 52).</td>
<td>19. Comments noted.</td>
</tr>
<tr>
<td>17. We noted that nothing was mentioned about the possibility of developing a joint Back Country Byway project that would allow visitors to see sections of the California Trail and interpret some of the history of the area. It would be a draw for additional visitation. We envision this trail being entitled the, Pioneer Trail Back Country Byway. It would run from 154 through Malta, City of Rocks, to Oakley then down to the Utah border.</td>
<td>20. Specific impacts were addressed under the &quot;Environmental Consequences&quot; section. The text was changed.</td>
</tr>
<tr>
<td>21. On page 154 in the Natural Biological Diversity section, we would like to see addressed more specifically the major adverse impacts that agriculture and recreation are having on the natural biological diversity in the reserve. What is the nature of the impacts? Are there studies cited to document these impacts?</td>
<td>21. The text in the &quot;Affected Environment&quot; and &quot;Environmental Consequences&quot; was changed.</td>
</tr>
<tr>
<td>19. We are concerned that the plan does not appear to address big game in any detail. The lower eastern edges of the Smokey Mountain/Cedar Hills area is a winter range for mule deer, and the area receives a small amount of elk use in the fall and possibly the winter. A mature bull elk was seen by BLM personnel in 1992, in the proposed RV park area. There seems to be some opportunity for winter habitat improvement/expansion in the area south of Almo. While summer use of the proposed RV park would not impact wintering deer, it is possible that spring, fall and winter use of the RV park and/or presence of an administrative facility and employee housing could have unforeseen impacts on big game movement patterns in the vicinity.</td>
<td></td>
</tr>
</tbody>
</table>

We thank you for allowing us the opportunity to review this plan. If you should have any questions concerning our comments, please feel free to call Bill McNally or Marv Bagley at 208-678-5514.

Sincerely,

[Signature]

Marvin Bagley
District Manager

Attachment
Memorandum

To: Mary Magee, Planning Team Captain, National Park Service, Denver Service Center - TWE, Denver, Colorado

From: Mike Dunn, Physical Scientist, Environmental and Regulatory Analysis

Subject: Draft Comprehensive Management Plan/Development Concept Plan/Environmental Impact Statement (EIS), City of Rock National Reserve, Cassia County, Idaho

February 8, 1994

It may be worth while to include a few statements in the Final plan concerning mineral resources and mining on lands within the City of Rocks National Reserve. Even though the Federal lands are most likely withdrawn from this resource use, much of the Reserve is private land on which mineral resource development could still conceivably take place.

Enclosed for your information is a printout from our Mineral Industry Location System (MILS) database listing properties identified in and around the City of Rocks National Reserve. The majority of these properties appear to be associated with resources weathered from the areas granitic rock. Noted exceptions include metals from the White Mica Mine and minor geothermal occurrences. Economic development of resources from any of these sites is not foreseeable.

Mineral-related activity that is still likely to occur however, includes excavation of material from private land, such as decomposed granite, for local road improvement, and recreational rock hounding and placer mining. Concerning the issue of material for road improvement, it may suffice to establish sources outside of the Reserve for both Federal and private land owners use for road maintenance and improvement. A management policy addressing the use or non-use of this material from within the Reserve should be included in the plan.

The White Mica Mine area and any other area with pegmatities are likely attractions for rock hounding activity because of the assortment of coarse mineral crystals that can be found there. Any mine workings in the area, such as the White Mica Mine, should be checked for physical hazards so that unwary recreationists cannot seriously injure themselves. These mines should then be either reclaimed or made into managed recreation sites. In any case, the management plan should address some sort of action for mine workings within the Reserve.
Thank you for this chance to review and comment on your draft management plan and EIS. If you have any questions or find need for any mineral-related assistance with this or any other NPS area, please give us a call at (509) 353-2700.

Mike Dunn

Enclosure
### COMMENTS

<table>
<thead>
<tr>
<th>United States Forest Service</th>
<th>Sawtooth National Forest</th>
<th>Boise Ranger District</th>
<th>Rt. #3, 3880 Overland</th>
<th>Burley, Idaho 83318-3342</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Telephone: (208) 878-0450</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reply To: 1950 (2310)  
Date: January 31, 1994

Regional Director  
National Park Service  
Pacific Northwest Region  
6 S. King Street  
Seattle, WA 98104

Dear Sir:

We have reviewed the Comprehensive Management Plan and draft Environmental Impact Statement for the City of Rocks National Reserve. We are impressed with the presentation as well as the description of the preferred alternative. Your proposed action is very ambitious and seems to us to be on the right track.

We do, however, have some concerns associated with the proposal and the analysis presented in the Comprehensive Management Plan and Draft Environmental Impact Statement. May we offer the following suggestions:

1. Livestock Grazing:

   On page three of the Plan, you mention that the overriding issue to be resolved by the draft plan is to find a balance between historic and natural resource preservation, public education and recreation, and private use within a relatively small geographic area. Continuing, you mention that tension created by the overlapping values of the reserve challenges planning to find a common ground and to emphasize the ways in which various uses can be mutually supportive rather than focusing on potential conflicts. We agree with the need to balance all uses and demands on natural resources that will aid in preserving the historic as well as be sensitive to current needs. After reviewing your document livestock grazing and its associated impacts are significant to all aspects of this plan. Throughout the document, livestock impacts on visual quality, recreation experience, cultural and historical artifacts and values, riparian areas, biodiversity, etc. are all mentioned. In keeping with historical preservation, livestock grazing or the presence of livestock was a very important part of early immigrant’s lives. Visual quality as well as biodiversity can be enhanced by using livestock as a tool to meet these visual and biodiversity objectives. As discussed in the Plan and the DEIS, one of the private uses that Congress expects to occur in the Reserve is livestock grazing. The Plan, with the exception of the elimination of cattle from some areas in the reserve, does not address management options for reducing and/or eliminating grazing conflicts and impacts within the reserve.

2. At least one cattle allotment spans across the boundaries of the reserve and the National Forest. We feel the plan has the potential to affect the National Forest grazing program on that allotment. A more detailed plan for grazing within the Reserve will help us assess the types and degree of affect the Plan may have on the Forest grazing program. Substantial changes to grazing in the reserve could have a variety of impacts on both Forest and BLM grazing programs. It appears there is a potential for
### COMMENTS

<p>| | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>The Park Service recognizes that livestock can be used as a management tool under the &quot;Vegetation and Soils&quot; section of the proposed action by calling for developing and implementing a grazing management plan directed at protecting the natural diversity of native biological communities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>The text was changed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>The text was changed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>The proposed action does not call for the introduction of bighorn sheep. The Park Service recognizes the problems of introducing native wildlife, such as bighorn sheep. Under alternative 3, reintroductions would only be considered if these problems could be resolved (see &quot;Resource Management&quot; section under alternative 3).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Comment noted. Hunter use in the reserve will be discussed in more detail in the resource management plan.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### RESPONSES

<p>| | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>The Park Service recognizes that livestock can be used as a management tool under the &quot;Vegetation and Soils&quot; section of the proposed action by calling for developing and implementing a grazing management plan directed at protecting the natural diversity of native biological communities.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>The text was changed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>The text was changed.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>The proposed action does not call for the introduction of bighorn sheep. The Park Service recognizes the problems of introducing native wildlife, such as bighorn sheep. Under alternative 3, reintroductions would only be considered if these problems could be resolved (see &quot;Resource Management&quot; section under alternative 3).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Comment noted. Hunter use in the reserve will be discussed in more detail in the resource management plan.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### COMMENTS

<table>
<thead>
<tr>
<th>4. Recreation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Camping is addressed on lands administered by the Bureau of Land Management, but we were unable to find where there was any analysis of the effects of your proposal upon camping and recreation pursuits on National Forest land adjacent to the City of Rocks. We see dramatic increases in dispersed recreation in the Aline Park area, by people coming from the City of Rocks or waiting to camp in the City of Rocks when it's full. There is also &quot;overflow&quot; at some developed sites in Howell Canyon. Extensive recreational development and anticipated increase in visitors to the Reserve as a result of the Plan will further increase the number of users on adjoining Forest land. This impacts associated with this use are similar to those you are familiar with and include littering, sanitation problems, increased the danger, vegetative and ground disturbance, etc. Existing Forest camping accommodations during a typical summer, would not support up to one half of the visitors to the reserve as they try to escape the heat. How the reserve is managed will have a substantial effect on the way the adjoining National Forest lands are managed. It would be helpful to know what expectations you may have as it relates to management of adjacent National Forest land that may affect your proposal. NEPA requires that agencies analyze and display cumulative effects in EIS's. You need to include a discussion of the cumulative effects that implementation of your preferred alternative will have on the areas outside of the reserve impacted by your proposal. This discussion should include an analysis of the effects of increased recreation use on adjacent areas outside of the reserve that may be impacted by your proposal.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9. Air Quality</th>
</tr>
</thead>
<tbody>
<tr>
<td>You propose to change the existing classification from Class II to Class I. While maintaining air quality is certainly a worthy goal, it would be helpful if you discuss the consequences of making that change. Remember that the prescribed burning program will be affected by that change and your burning &quot;windows of opportunity&quot; will be much more restricted as well as further restricting prescribed burning operations outside of the Reserve.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10. Soils/Riparian</th>
</tr>
</thead>
<tbody>
<tr>
<td>Since management of riparian areas is such an important issue to all of us, I wanted to point out what we believe is a statement on page 6 to say &quot;managing livestock to protect fragile wetlands and riparian areas...&quot; We would suggest you eliminate the word fragile in describing those areas. There is no question about the ecological importance of wetlands and riparian areas, but most of these are not particularly fragile in a sense that they can recover rapidly from disturbance compared to the other areas.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>12. Social/Economic</th>
</tr>
</thead>
<tbody>
<tr>
<td>One area we feel was overlooked, and we understand it is not your intent, was the area of rural revitalization. We feel the economic planning for the Aline-Oatley-Albion area should be an integral part of your plan. This plan addresses social costs as well as private sector initiatives, but needs to expand to explore tourism as an important factor in rural revitalization. The Farm Bill of 1990 has given responsibility to the Fit to assist with Rural Revitalization Through Forestry. The communities of Oatley and Albion both qualify for the program at present and are involved. We would be more than willing to assist in the planning efforts in this area.</td>
</tr>
</tbody>
</table>

### RESPONSES

<table>
<thead>
<tr>
<th>8. The text was changed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Comment noted.</td>
</tr>
<tr>
<td>10. The text was changed.</td>
</tr>
<tr>
<td>11. The state of Idaho would be responsible for designating the reserve as a class I airshed. Issues such as prescribed burning would be addressed during the redesignation process.</td>
</tr>
<tr>
<td>12. The Park Service disagrees with the suggested change. Wetlands and riparian areas are extremely sensitive to livestock grazing. The Park Service agrees that, in some cases, riparian areas can recover rapidly if disturbance activities cease.</td>
</tr>
<tr>
<td>13. Please see response 1 to the BLM.</td>
</tr>
</tbody>
</table>
We hope that our input will help you in your analysis process. We thank you for allowing us to participate in the review of this impressive analysis. We look forward too, to a continuing good relationship with the National Park Service and the Idaho State Parks and Recreation Department in the implementation of the Comprehensive Management plan.

Sincerely,

DONALD E. PETERSON
District Ranger

cc: Supervisors Office
Burley District Office - BLM
Idaho Fish and Game Dept. - Region 3
COMMENTS

August 29, 1994

Dear Mr. Odegaard:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (draft EIS) for the City of Rocks National Reserve. We received this draft EIS on August 23, 1994. Our review was conducted in accordance with the National Environmental Policy Act and Section 309 of the Clean Air Act, for issues for which EPA has statutory authority or jurisdiction. This draft EIS constitutes the comprehensive management plan evaluating two alternatives for grazing and rock climbing, and sightseeing. Based on our review, we have rated all of the action alternatives in the DEIS as LO, Lack of Objections. This rating will be published in the Federal Register.

We have the following comments for clarification:

1. Page 139 suggests that cooperation would have to occur between non-federal and federal landowners to achieve wetland and riparian protection goals. We agree that cooperation among landowners is critical to achieving this. The final EIS should explain how this would occur. Enclosed is a copy of EPA Region 10’s Riparian Policy.

2. The final EIS should explain how the grazing and land management issues included in this draft EIS relate to the Eastside Ecosystem Management Project, which covers the entire Interior Columbia River Basin. While focused on Bureau of Land Management and Forest Service lands, it may include lands managed by other federal agencies. Please contact: Jeff Blackwood, Project Manager, Eastside Ecosystem Management Project, 112 East Poplar Street, Walla Walla WA 99362, phone (509) 522-4030.

3. Another process that will affect grazing on public land is described in the Rangeland Reform '94 Draft EIS, and the Bureau of Land Management and U.S. Forest Service Rules to Revise Grazing Practices. The standards and guidelines

RESPONSES

1. The draft EIS text pertained to wetland impacts on private land. Technical assistance and wetland protection methods in the grazing management plan will be available to willing landowners to help protect wetlands on private land. Also, cooperative responsibilities for grazing permittees, the reserve, BLM, and FS to protect riparian areas and wetlands will be included in the grazing management plan.

2. The FS and BLM are administering the Eastside Ecosystem Management Project to develop a ecosystem management strategy for the interior Columbia River Basin. Because City of Rocks is within the Columbia River Basin reserve managers will participate in this project where appropriate. The resources management plan and grazing management plan will incorporate relevant strategies developed under this project that will help protect the Columbia River Basin ecosystem and achieve reserve purposes.

3. Comment noted.
4. Claire Hong was contacted on September 14, 1994 and no response to her comments was necessary.

Thank you for the opportunity to review this draft EIS. Please contact Wayne Elson at (206) 553-1463, if you have any questions about our review of this document.

Sincerely,

Joan Cabreza, Chief
Environmental Review Section

Enclosure

cc: Mary Magee, NPS Denver Service Center
PURPOSE AND SCOPE

This document establishes Region 10 EPA policy on the management of riparian areas, primarily those affected by nonpoint source (NPS) activities. EPA recognizes that riparian areas serve many important functions and possess numerous values, including a major role in maintenance of the quality of the Nation's waters. The national intent of Congress to protect and improve the Nation's waters is established in the Clean Water Act. Riparian areas can provide many uses, such as: recreation, forage, and timber. EPA recognizes that riparian areas can be used for these and other activities if management practices are implemented that protect or restore natural functions.

This policy will:

1) Alert local, state, and federal land managers, owners, and users to EPA's concerns in the riparian area planning and management process
2) Assist the states in Region 10 with the implementation of riparian area protection or improvement in their management programs
3) Provide guidance to Region 10 personnel in the execution of EPA's responsibilities under the National Environmental Policy Act (NEPA), the Clean Air Act, and the Clean Water Act.

DEFINITION

Riparian areas are zones that influence and are strongly influenced by an adjacent aquatic environment. They occur as complete ecosystems or as an ecotone between aquatic and terrestrial ecosystems, but have distinct vegetation and soil characteristics because of seasonally free and unbound soil moisture. These areas are associated with rivers, lakes, reservoirs, and intermittent, or perennial streams. They may also be adjacent to springs, seeps, wetlands, and ephemeral streams.

Topographic relief and presence of depositional soils most strongly influence the extent of water regimes and associated riparian zones. Thus, the boundary of a riparian area varies from site to site and must be determined for each specific location. Some riparian areas are defined as wetlands. Others are not, because they do not possess the necessary hydrologic water regime, a predominance of hydric soils, or a prevalence of hydrophytic vegetation as described in the Federal Manual for Identifying and Delineating Jurisdictional Wetlands.

Environmental Protection Agency
### FUNCTIONS AND VALUES

Healthy riparian areas are critical to environmental quality. Their presence increases landscape and species diversity and productivity. Continuous interactions occur between riparian areas, aquatic, and terrestrial ecosystems through exchanges of energy, nutrients, and movement of plant and animal species. Specific functions resulting from these interactions vary considerably from area to area. Their value is relative to these functions, and the potential that they have to carry out these functions. Some of the functions include:

- Water quality protection and improvement
- Habitat for aquatic and terrestrial life
- Improved channel and bank stability
- Flood storage and desynchronization
- Groundwater recharge and discharge
- Sources of primary production (detritus) for streams
- Aesthetics

### RIPARIAN MANAGEMENT POLICY

#### Review of Section 319 Projects and Proposals

EPA considers the protection, improvement, and restoration of riparian areas and the abatement of NPS pollution affecting riparian areas as a high priority for funding through Section 319 of the Clean Water Act. EPA will expect to see riparian areas addressed in all watershed improvement grant proposals. Attention will be focused on the condition of the riparian areas and the expected impact on riparian areas by treatment in the entire watershed.

#### Review of NEPA Documents and Natural Resource Management Plans

EPA will expect riparian areas to be addressed in environmental impact statements and program or project plans. EPA will consider functions and values in assessing riparian area project impacts. EPA will actively promote alternatives which reduce or minimize adverse environmental impacts to riparian areas. Recommended alternatives should protect, restore, or improve riparian area functions and values.

#### Protection of Designated Water Uses

EPA recognizes that healthy riparian areas are valuable and critical to the protection of designated water uses and meeting states' Water Quality Standards. EPA expects States and their Designated Management Agencies to recognize riparian functions and include degraded riparian areas when assessing water use impairments.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Monitoring of Riparian Areas</strong></td>
<td></td>
</tr>
<tr>
<td>EPA believes riparian area monitoring should be a high priority for any NPS management program. Monitoring is critical for land managers to evaluate their success in meeting their objectives for improving and protecting riparian areas and water quality. When monitoring results indicate violations or other problems, adjustments can be made in the practices implemented on the riparian area and the entire watershed (&quot;feedback loop&quot;). EPA will actively promote environmental monitoring at a level consistent with the condition of the riparian area and the sensitivity of the designated water uses.</td>
<td></td>
</tr>
<tr>
<td><strong>Public Education and Involvement in Riparian Areas</strong></td>
<td></td>
</tr>
<tr>
<td>EPA will use reviews of Section 319 grant proposals, NEPA documents, program and project plans, conferences, prepared presentations, information exchanges, and distribution of written materials to increase the awareness of and responsibility for healthy riparian areas. EPA will also encourage and support efforts that directly involve people in local activities to protect, improve, and restore healthy riparian areas. The goal of these actions is to have a motivated, educated public who understand the value of and critical need for healthy riparian areas.</td>
<td></td>
</tr>
<tr>
<td><strong>Site-Specific Prescriptions</strong></td>
<td></td>
</tr>
<tr>
<td>EPA will encourage and support innovative solutions to site specific problems in riparian management.</td>
<td></td>
</tr>
</tbody>
</table>
LEGAL AUTHORITIES


   "The objective of this chapter is to restore and maintain the chemical, physical and biological integrity of the Nation's waters..."
   (f) It is the national policy that programs for the control of NPS pollution be developed and implemented in an expeditious manner so as to enable the goals of this Act to be met through the control of both point and nonpoint sources of pollution.

2. National Environmental Policy Act (42 U.S.C. 4321 et seq.) states in part:

   "The Congress authorizes and directs that, to the fullest extent possible...all agencies of the Federal Government shall...identify and develop methods and procedures...which will ensure that presently unquantified environmental amenities and values may be given appropriate consideration in the decision-making along with economic and technical considerations."

3. Clean Air Act (Section 309) (42 U.S.C. 7609, Public Law 91-604 12(a), 84 Stat. 1705) requires:

   the EPA to review and comment in writing on the environmental impact of any matter relating to the duties and responsibilities granted pursuant to the Act or other provisions of the authority of the Administrator, contained in any: (1) legislation proposed by a Federal department or agency; (2) newly authorized Federal projects for construction and any major Federal action, or actions, other than a project for construction, to which Section 102(2)(C) of Public Law 91-156 applies; and (3) proposed regulations published by any department or agency of the Federal Government.

Dana A. Rasmussen
Regional Administrator
EPA, Region 10

3-12-91

Date
United States Department of the Interior

FISH AND WILDLIFE SERVICE

911 NE 11th Avenue
Portland, Oregon 97232-4181

Memorandum

To: Regional Director, Pacific Northwest Region
   National Park Service, Seattle, Washington

From: Regional Director, Region 1
   Fish and Wildlife Service, Portland, Oregon

Subject: Review of Draft Comprehensive Management Plan and Environmental Impact Statement (Draft Plan and EIS) for the City of Rocks National Reserve, Cassia County, Idaho

The U.S. Fish and Wildlife Service (Service) has reviewed the document entitled Draft Comprehensive Management Plan and Environmental Impact Statement (Draft Plan and EIS) for the City of Rocks National Reserve. We offer the following comments for your use and information when preparing the final documents.

The Draft Plan and EIS attempt to balance human use of the City of Rocks National Reserve (Reserve) and protection of its important natural resources, and provide an analysis of issues relating to fish and wildlife and their habitats. The Service prefers Alternative 3 because its implementation provides for maximum protection of wildlife resources and emphasizes rehabilitation of wetlands and riparian habitat. In addition, continued public use of the Reserve would accommodate efforts to restore and protect the natural resources of the Reserve.

The Service understands that elimination of grazing from public lands within the Reserve could have economic impacts on surrounding communities and that there may be public opposition to Alternative 3. This opposition would likely occur despite the greater gains in natural productivity that the elimination of grazing would provide. If the elimination of grazing on the Reserve is determined not to be in the public interest, we recommend a compromise plan which would range between the extremes of livestock management strategies in Alternatives 2 and 3e. This compromise plan would afford more protection of the natural resources of the Reserve than Alternative 2 while reducing but not eliminating grazing on 12,913 acres of public lands. Timing and duration of grazing are other management strategies which may be employed to effectively reduce the overall effects of grazing on natural resources.

The Service's Boise Field Office (BFO) is available to provide technical assistance in restoring wetlands and riparian areas and in completing a comprehensive inventory of natural resources within the Reserve, especially for rare and sensitive species. A number of species that are candidates for listing under the Endangered Species Act (Act) occur in the Reserve. There may be opportunities to enter into conservation agreements with the Service for inventory and management of these species. The BFO also is available to

1. The "Natural Resources" section of the proposed action was changed.
assist in identifying opportunities for conservation agreements. The BFO’s
address and phone number are as follows:

U.S. Fish and Wildlife Service
Boise Field Office
4696 Overland Road, Room 376
Boise, Idaho, 83705
(208)334-1931

Pursuant to section 7 of the Act, we have attached an updated list of
threatened and endangered species which may occur within Reserve boundaries.
In addition, we have expanded the list to include candidate species. This
updated list (#1-4-95-SP-49) replaces the original list (1-4-90-SP-192, dated
April 3, 1990), and is appended as Appendix B of the Draft EIS. If the Draft
Plan is not finalized within 180 days of this letter, another updated species
list is required under the Act’s implementing regulations. Although there are
still no listed threatened or endangered species known to the area, two
additional candidate species have been included on the list. This change
reflects updated status information from the Idaho Conservation Data Center,
Idaho Department of Fish and Game, in Boise.

Section 7(a)(1) requires Federal agencies to use their authorities to promote
the purposes of the Act for listed species, and we encourage agencies to
conserve candidate species in an effort to preclude listing. Based on
information provided in the Draft Plan and EIS, Alternative 3 is consistent
with the purposes of section 7(a)(1) of the Act, and provides for conservation
of candidate species to preclude their listing. Alternative 3 includes
management plans which protect bat populations and may benefit the Townsend’s
big-tailed bat, a category 2 candidate species. These plans also consider
raptor species which include the ferruginous hawk, another category 2
candidate species. Although there is no specific management information
related to rare plant populations, the general approach of Alternative 3
provides direction for protection of those species and eventual development of
specific management plans for rare plant populations.

We appreciate the opportunity to comment on the City of Rocks National Reserve
Draft Plan and EIS. Please refer any questions or comments to Alison Beck
Haas of our Boise Field Office at (208)334-1931 or Merle Richmond on our
Regional Office staff at (503)231-2068.

Attachment

original signed by:

Dan Weathers
### AS REQUESTED
LISTED AND PROPOSED ENDANGERED AND THREATENED SPECIES, AND CANDIDATE SPECIES, THAT OCCUR WITHIN THE CITY OF ROCKS SPECIES LIST NO. PWS 1-4-94-SP-69

<table>
<thead>
<tr>
<th>LISTED SPECIES</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PROPOSED SPECIES</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CANDIDATE SPECIES</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Davis’ Wavewing (C2) (Cympopterus davidi)</td>
<td></td>
</tr>
<tr>
<td>Ferruginous Hawk (C2) (Buteo regalis)</td>
<td></td>
</tr>
<tr>
<td>Townsend’s Big-eared Bat (C2) (Plecotus townsendi)</td>
<td></td>
</tr>
<tr>
<td>Kruckeberg’s swordfern (3c) (Polyalthia kruckebergii)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OTHER SPECIES</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Narrow-leaved Indian Paintbrush (Castilleja angustifolia var. flavescens)</td>
<td>INPS Category 2</td>
</tr>
<tr>
<td>Simpson’s Hedgehog Cactus (Pediocactus allemeni var. robustior)</td>
<td>BLM Sensitive</td>
</tr>
<tr>
<td>Cliff Chipmunk (Tamias dorsalis)</td>
<td>State Species of Special Concern</td>
</tr>
<tr>
<td>Pallid Bat (Antrozous pallidus)</td>
<td>Presently No Status</td>
</tr>
<tr>
<td>Pinon Bat (Pteronotus leuc)</td>
<td>Presently No Status</td>
</tr>
</tbody>
</table>
GENERAL COMMENTS:

C2 - Category 2 Taxa for which information now in possession of the U.S. Fish and Wildlife Service indicates that proposing to list as endangered or threatened is possibly appropriate, but for which conclusive data on biological vulnerability and threat are not currently available to support proposed rules. Further biological research and field study may be needed to ascertain the status of taxa in this category.

3c - Category 3 Taxa that have proven to be more abundant or widespread than previously believed and/or those that are not subject to any identifiable threat. If further research or changes in habitat indicate a significant decline in any of these taxa, they may be reevaluated for possible inclusion in categories 1 or 2.

INF 2 - State Priority 2 Taxa likely to be classified as Priority 1 within the foreseeable future in Idaho, if factors contributing to their population decline or habitat degradation or loss continue.

Sensitive Species - Sensitive species are those designated by the state director, usually in cooperation with the state agencies responsible for managing the species as sensitive. They are those species that are: 1) under status review by the Service/National Marine Fisheries Service; or 2) whose numbers are declining so rapidly that federal listing may become necessary; or 3) with typically small and widely dispersed populations; or 4) those inhabiting ecological refugia or other specialized or unique habitats.

Species of Special Concern - Amphibians, Reptiles, Birds, Mammals
Native species which are either low in numbers, limited in distribution, or have suffered significant habitat losses. The list includes three categories of species:
A) species which meet one or more of the criteria above and for which Idaho presently contains or formerly constituted a significant portion of their range (i.e., priority species),
B) species which meet one or more of the criteria above but whose populations in Idaho are on the edge of a breeding range that falls largely outside the state (i.e., peripheral species), and
C) species that may be rare in the state but for which there is little information on their population status, distribution, and/or habitat requirements (i.e., undetermined status species).
COMMENTS

State of Idaho
DEPARTMENT OF WATER RESOURCES
1301 North Orchard Street, Statehouse Mall, Boise, Idaho 83720-9000
Phone: (208) 334-7900 FAX: (208) 332-7866

December 29, 1993

Yvonne S. Ferrell
Idaho Department of Parks and Recreation
Statehouse Mall
Boise, Idaho 83720-8000

Dear Ms. Ferrell

We have reviewed the Comprehensive Management Plan, Development Concept Plan and Environmental Impact Statement for the City of Rocks National Reserve and submit the following comments.

1. The Draft Plan states federal reserved water rights may not meet wildlife, stock and visitor needs (Draft Plan at 103). Idaho Department of Parks and Recreation or the National Park Service may need to acquire additional water rights, or change place and nature of use on current water licenses to implement proposals or provide for increased visitor needs in the future. A change in point of diversion of an existing water right requires an approved transfer. If water is fully appropriated in this basin, there may be difficulty in providing water for some of the proposals.

2. The Idaho Water Resource Board’s minimum stream flows for Circle Creek and tributaries are not acknowledged in the Draft Plan. The minimum stream flow rights may further restrict additional water development of the reserve.

We appreciate the opportunity to comment on the Draft Plan. Please call if you need clarification or additional information.

Sincerely,

[Signature]
R. Keith Higgins
Director

cc: John Crowe - IDPR

RESPONSES

1. The quantity of water required to meet the purposes of the reserve would be determined. The limited water supplies would be considered during the design phase of the proposed facilities. Design modifications may be required based on the availability of water.

2. Circle Creek water on public land would likely not be developed for reserve purposes under the proposed action.
January 27, 1994

We appreciate the opportunity to review and comment on the forementioned document. However, we have a serious concern regarding the blatant bias against hunting found throughout the Plan. This is contrary to the enabling legislation (P.L. 101-512) which provides for hunting on the Reserve. We find it interesting that you go to painstaking lengths to protect traditional and cultural uses of the land without addressing hunting and trapping activities, yet, on page 9 you acknowledge these were the first activities to occur in the area.

Early in the process of developing the CMP/DEIS, Idaho Dept. of Fish and Game (IDFG) recommended a thorough and complete analysis of hunting. We were told by National Park Service that they preferred not to deal with the details of hunting in the Plan but that a hunting plan would be developed later. We reluctantly accepted this approach and expected the CMP/DEIS to simply recognize hunting is allowed within the Reserve and explain that details will be analyzed in a separate document. In our opinion, this plan has taken both approaches by saying a "hunting plan" will be developed (page 47) and yet with the CMP/DEIS you restrict when and where hunting is permitted (page 38). We find this situation to be totally unacceptable.

Throughout the document we will cite numerous locations where we feel it is appropriate to address hunting activities, in a positive nature, as a traditional, cultural, and a rural way of life in the City of Rocks National Reserve.

Front Cover: "Draft" should have appeared on the cover, not just on the binding.

Page 1, line 4: Hunting and trapping should be included as a "traditional use" in the area.

Page iv, column 2, paragraph 3: You make the statement, "Natural quiet in the reserve would be protected by prohibiting the use of motorized equipment, motor vehicles or sound devices outside the development zone." Based on your discussions on pages 131 and 132, we assume firearms are not "sound devices", but this should be clearly defined.

1. Trapping of wildlife by the public in the reserve was not specifically authorized by federal law. Therefore, trapping in the reserve will not be allowed on public land in accordance with the NPS Management Policies.

2. See response 1. The plan on page 47 of the draft recognizes hunting as a traditional use.

3. The text was changed.
COMMENTS

Page v, column 2, paragraph 3: It should be noted that management of wildlife species within the State of Idaho, including the Reserve, is the responsibility of the IDFG as stated in Idaho Code, section 36-104.

Page v, column 2, paragraph 2: The sentence regarding "Conflict between hunting and other visitor activities could be dangerous for some reserve users." should be deleted as there is no basis for this statement. You should address the ramifications of development at the Reserve encouraging more people to the area and what impact that will have on hunting opportunity.

Page vi, column 2, paragraph 2: The sentence, "In areas that were restored, the natural biological productivity would be expected to increase indefinitely." is incorrect. It may return to a level of productivity similar to that which existed before development but it will not increase indefinitely.

Page vi, column 1, paragraph 2: Hunting should be addressed in a similar light to maintaining grazing. Like grazing, hunting is a traditional use of Reserve lands and is part of the historic way of life in this area. You should also note hunting is an activity which is expressly addressed in legislation. We recommend a paragraph be added in this section to address hunting as a traditional use of the land.

Page 7: The PLANNING PROCESS should describe how you plan to handle a detailed analysis of hunting (please refer to the second paragraph of this letter). If you do opt for a separate hunting plan, you should describe the process to be used and a projected completion date (Step Four?).

Page 7, column 1, paragraph 1: The purpose of the Plan is stated under the PLANNING PROCESS but not specifically under PURPOSE AND NEED for the Plan.

Page 7, column 2, paragraph 2: Significant authority is granted to the NPS for the management of native animal populations. Congress, in exercise of its power under the Constitution, directed that the secretary of the interior manage animal life in national park system units. The Park Service would work cooperatively with the IDFG in carrying out the animal management program for the reserve.

RESPONSES

4. Significant authority is granted to the NPS for the management of native animal populations. Congress, in exercise of its power under the Constitution, directed that the secretary of the interior manage animal life in national park system units. The Park Service would work cooperatively with the IDFG in carrying out the animal management program for the reserve.

5. The text in the "Summary " and the "Environmental Consequences" sections was changed.

6. The text was changed.

7. See response 4.

8. The text was changed.

9. The plan on page 47 of the draft recognizes hunting as a traditional use.

10. See response 4.
### COMMENTS

- **Page 8, column 2, paragraph 1:** Hunting should be acknowledged as an activity to be preserved and protected as part of the "historic western rural setting and culture".

- **Page 9, column 2, paragraph 3:** Grizzly bear should be included as a species which once inhabited this area but is no longer present.

- **Page 13, column 1, paragraph 1:** Once again, hunting and trapping should be listed as traditional activities and contributing to the "ambience" of the area within the Management Objectives.

- **Page 14, column 2:** Grazing activity is not an "integral component of the sagebrush steppe ecosystem". It should be noted that grazing has been an integral factor in the degradation of the sagebrush steppe ecosystem (as referenced on page 104, paragraph 1). Native perennial bunch grasses have been replaced throughout the west by non-native invaders, such as cheatgrass, in response to grazing pressure. Disappearance of wildlife species (page 9) can be tied to the degradation of the native sagebrush steppe ecosystem and should be so noted.

- **Page 15, column 2:** IDFG should be included in the Management Authorities and Responsibilities section. PL 101-512 provides for hunting in the Reserve and consultation with the state agency having jurisdiction over hunting activities (IDFG). IDFG has jurisdiction over hunting and management of any wildlife in the state (including the Reserve), as stated in Idaho Code 36-104. National Park Service should also consult existing IDFG species management plans which have been developed and include the City of Rocks area. The species plans referenced in the bibliography are outdated.

- **Pages 18-21:** MANAGEMENT ZONING: This section fails to acknowledge hunting in any way as a traditional and contemporary use of wildlife resources within the Reserve. This is especially important since an interim county zoning ordinance is currently in place to regulate hunting and use of firearms within the Reserve boundaries.

- **Page 20, column 2:** The Reserve does not contain "essential habitat for the region's mountain lion population" any more than it contains essential habitat for mule deer or bobcat. This overlay should be removed or many other species should be added.

- **Pages 19-21:** Again, hunting should be acknowledged in this section as a traditional and contemporary use of the land.

- **Page 28:** Hunting should be addressed under the Management Zone section. We find it puzzling that you consider hunting more damaging than livestock grazing in the California Trail Subzone. To classify hunting as a "potentially damaging activity" in this area and not classify grazing in the same light is inconsistent.

- **Page 38, column 2, paragraph 3:** The statement that "Hunting would only be allowed in the reserve if it did not compromise public safety or more significant purposes of the reserve such as visitor enjoyment, protection of historic features, and protection of natural resources, including other species." should be removed. If these standards are applied to hunting they should also be applied to rock climbing, grazing, ranching, and all other recreational activities which take place in the Reserve. This paragraph sets up the scenario to eliminate all hunting! Why is the priority to allow hunting placed below all other activities on the Reserve when it is specifically provided

### RESPONSES

- **11.** The text was changed.

- **12.** See response 2.

- **13.** The text was changed.

- **14.** The text was changed.

- **15.** See response 4.

- **16.** Comment noted.

- **17.** See response 9. Management zoning for the plan and alternatives was based primarily on resources. Hunting is a recreational activity, not a resource.

- **18.** The text was changed.

- **19.** See response 2.

- **20.** Congress recognized that hunting was secondary to other reserve purposes by directing the secretary to designate zones "where and periods when no hunting may be permitted for reasons of public safety, administration, floral and faunal protection and management, or public use and enjoyment (PL 101-512)."
for in the enabling legislation because of public demand?

Although trapping is prohibited on federal and state land within the Reserve, it is allowed on private land within the Reserve. The Plan should make this point clear. IDFG still sets seasons and regulations, as they pertain to wildlife, on these lands because wildlife in Idaho belong to the people of the State of Idaho.

Page 40, column 1, paragraph 2: Grazing has caused a change in the plant communities to encourage sagebrush and non-native grasses. Native plant communities will be difficult to restore without changes in livestock management practices. Treatments should consider changes in livestock numbers and restoration of areas with native plant species.

Page 41, column 1: There should be some interpretation about how trapping first lead explorers to the area and how hunting in the area was necessary to replenish meat and supplies along the California and Oregon trails. We consider the roles of hunting and trapping as significant historical activities and feel they should be acknowledged in the interpretive history of the area.

Page 47, column 1: We commend you for recognizing hunting as a "traditional and compatible use of the Reserve." within this section. If hunting will be restricted "based on public safety, administration, floral and faunal protection and management of public use and enjoyment." then rock climbing, grazing, ranching and all other recreational activities should have the same standards and restrictions.

Page 64, column 2, paragraph 4: The statement "During scoping some people felt that hunting and the use of firearms in the Reserve conflicts with other recreational use and adversely affects wildlife in the Reserve." should be quantified. You should also consider the statement on the following page: "Many people wanted existing grazing rights maintained and livestock grazing continued in the Reserve.... The use of the words some and many are relative terms and should not be used. To identify these as important issues and omit other issues identified during scoping (e.g. some people were concerned that hunting opportunities would be lost at the Reserve) is biased. These statements should be quantified, entirely removed, or included with a list of all the issues identified during scoping.

Page 66, column 1, paragraph 2: You head the section "Hunting Hazards". We don't see any other recreational activities treated in the same manner. For instance would you head a section, "Rock Climbing Scars", "Camping Damage" or "Grazing Damage"? This paragraph should be removed.

The statement is made, "While hunting was not a popular activity in 1991 visitor survey, some visitors expressed concern over hearing gunfire in the reserve." Please provide detail of the survey techniques. Was it a random sample survey? Was it done geographically? Was it conducted during the hunting season as well as during the general visitor season?

Page 66, column 2, paragraph 3: There is no data presented regarding what economic value hunting and fishing have in this area. It should also be recognized as influencing the local economy. We can assist in compiling economic statistics at your request.
<table>
<thead>
<tr>
<th>Comments</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 27, paragraph 1: Hunting should be mentioned as continuing under the enabling legislation at the City of Rocks within the No Action Alternative.</td>
<td>27. Continuation of hunting is mentioned under the &quot;Visitor Use&quot; section of the no-action alternative.</td>
</tr>
<tr>
<td>Page 28, paragraph 2: Once again, IDFG is the agency responsible for managing wildlife resources within the Reserve. This statement should be included.</td>
<td>28. See response 4.</td>
</tr>
<tr>
<td>Page 29, paragraph 4: The statement, &quot;No firearm use would be allowed other than during established hunting seasons.&quot; should be removed or the precise hunting seasons and species should be spelled out. Please refer back to the second paragraph of this letter.</td>
<td>29. The text was changed.</td>
</tr>
<tr>
<td>Pages 30-34. Hunting and trapping are documented as having historic and prehistoric significance in the City of Rocks area. A proportional effort should be made to preserve and defend hunting and trapping values as it made on grazing and ranching.</td>
<td>30. The text was changed.</td>
</tr>
<tr>
<td>Page 31, paragraph 2: Denning mountain lions are not considered rare or a sensitive animal species in the City of Rocks area (see next page, &quot;Mountain lions are common in the Albion Mountains and the reserve.&quot;). This reference should be stricken.</td>
<td>31. The expert on mountain lions in this region considers denning mountain lions within the reserve to be sensitive to high levels of human presence (John W. Laundre, letter to Steve Culver, March 29, 1990).</td>
</tr>
<tr>
<td>Page 32, paragraph 2: Denning mountain lions are not considered rare or a sensitive animal species in the City of Rocks area (see next page, &quot;Mountain lions are common in the Albion Mountains and the reserve.&quot;). This reference should be stricken.</td>
<td>32. The text was changed.</td>
</tr>
<tr>
<td>Page 33, paragraph 4: The statement that, &quot;activities such as hunting create serious safety hazards in light of the increasing visitation,&quot; is unproven and has no basis.</td>
<td>33. The statement misquotes the document. The statement quoted refers to annual visitor counts. Annual visitor counts were not expanded to reflect visitor opinion as the comment suggests. A method commonly used at NPS units was used to conduct the most recent visitor survey at the reserve. See NPS (1992) for a detailed description of procedures and limitations of the survey.</td>
</tr>
<tr>
<td>Page 34, column 2, paragraph 4: The statement that, &quot;activities such as hunting create serious safety hazards in light of the increasing visitation,&quot; is unproven and has no basis.</td>
<td>34. The text was changed.</td>
</tr>
</tbody>
</table>
hunting accident is a remote possibility at best as indicated by national statistics1. The death rate for non-hunting participants killed due to a hunting accident was 0.001 person per 100,000 people. This compares to death rates of 18.6 for automobiles, 8.6 for home accidents, 8.6 for falls, 5.0 for poisoning, 2.6 for fires, 1.7 for suffocation, 0.04 for being hit by lightning and 0.02 for bee-stings per 100,000 people. We have no documentation of accidents, "near-misses" or injuries associated with hunting in the City of Rocks area. We recommend this line be removed.

Page 114, column 2, paragraph 2: Once again the "Hunting Hazard" heading is a display of the National Parks Service bias against hunting. As previously stated, there is no documentation that hunting should be considered a "hazard" to park visitors.

Page 131, column 2: You refer to the "discharge of firearms" as having an adverse impact on the "natural quiet" of the Reserve but you refuse to acknowledge far more common sounds. For instance, shouldn't sounds such as farm equipment operating on adjacent ranches be considered in the same light? The greatest impact to "natural quiet" will be increased vehicle traffic in and adjacent to the Reserve. We recommend a study be conducted to document the frequency of firearm discharge within the Reserve and what percentage of visitors recognize gunfire as a nuisance.

Page 146, column 1, paragraph 6: Extensive coverage is once again given to "Hunting Hazards" to portray hunting in a negative light. This paragraph is unwarranted and should be removed.

Page 149: No economic data is presented for hunting and fishing in the City of Rocks area. Unit 55, which the Reserve is included, has 1,725 controlled hunt permits for deer and a general deer archery season. It also has various bird seasons and a mountain lion season. We would be pleased to work with the National Park Service to generate the economic figures for fish and wildlife values.

Page 157: IDFG is listed as an agency with which you consulted, however, our input does not appear to have been utilized in writing this document. We would appreciate the opportunity to discuss our concerns with the National Parks Service and arrive at wording in this document which would be acceptable to both agencies.

It is not our intent to promote the City of Rocks as a "hunting area". However, we feel it is imperative that hunting be given the proper historical perspective and the right to hunt in the City of Rocks area is preserved. We are committed to working with the National Parks Service and Idaho Dept. of Parks and Recreation to accomplish these objectives.

My staff is available to provide additional consultation or to provide necessary data. Please contact Dave Parrish or Randy Smith to coordinate your information requests.

Sincerely,

Craig Knale

for Carl H. Nellis
Supervisor, Magic Valley Region

cc: Natural Resource Policy Bureau
    IDFG-Rose
    IDFG-Smith
    NPS-Twin Falls (Pugh)
    USFWS-Boise
January 30, 1994

Charles H. Odegaard  
Regional Director, National Park Service  
Pacific Northwest Region  
909 First Avenue  
Seattle, WA 98104

RE: Comments on the Comprehensive Management Plan/Development Concept Plan/Environmental Impact Statement for City of Rocks

Dear Mr. Odegaard:

Thank you for the opportunity to provide comments on the above referenced document. Given the cultural significance of this region, both archaeologically and historically, our office is particularly concerned about the proposed management issues for the City of Rocks National Reserve.

In general, we found the document to be vague, redundant, and often inconsistent with respect to the treatment of cultural resources. A recurring problem in the development of long-term reserve planning and management strategies was the virtual lack of consideration of prehistoric archaeology. Part of this oversight may stem from the fact that a comprehensive archaeological inventory has not yet been undertaken within the reserve boundaries. While recognizing the importance of the California Trail and its historic archaeological components, it is also vital to remember that this region has a prehistory that extends at least 10,000 years beyond the brief period of Euroamerican emigration. The limited archaeological work that has been done to date within the reserve attests to the presence of important prehistoric sites, and the ethnographic accounts of piñon nut exploitation in this area by the Shoshoni makes it scientifically unique for Idaho. The minimalist approach to prehistory is further evidenced by the proposed staffing under the resource management section (p. 59) calling for an Historian (GS-7) rather than a cultural resource specialist who would be trained to deal with both prehistoric and historic resource management. Perhaps the basic problem with the approach that has been taken in the compilation of this document is that it is difficult to develop a management plan for cultural resources with an insufficient data base.
COMMENTS

Charles H. Odegaard  
Page 2  
January 30, 1994

There are a number of other issues of a general nature that merit comment. The primary purpose behind the establishment of the reserve is clearly defined in Section 201(a) of the enabling legislation, and the intent should be the determining goal in the development of the management plan. The uniqueness of the Reserve concept presents interesting management challenges, but ones that can certainly be addressed successfully through the promotion of cooperation among interested parties and agencies. But the underlying philosophy for planning, development, and ongoing management should not lose sight of the intent of the legislation.

It would have been appropriate during the formulation of the plan if more interested groups would have been represented on the planning team—to wit, state and local historical societies, the Shoshone-Bannock Tribe, trails preservation groups, BLM, Fish and Game, as well as the Forest Service. Each of these agencies could have made important contributions in the early planning process.

Rock climbing is a recent recreational activity in the area that has raised a number of concerns. In order to maintain the scenic quality and adequately preserve the historic and cultural resources, climbing should not be allowed in the view shed of the California Trail. All identified historic rocks should also be off limits to climbing including the Twin Sisters. The sport is a legitimate recreational use that should be continued within the context of park regulations in other less sensitive areas of the Reserve.

A close working relationship with private landowners is essential if cultural resources are to be protected. They should be represented in all management decisions. Willing seller acquisition of private lands within Circle Creek Basin and south of Pinnacle Pass should be pursued. Long term management plans should also include adequate interpretation and preservation of the Granite Pass viewed. Granite Pass is second only to South Pass in importance as an emigrant trail pass. The route between City of Rocks and Goose Creek would make a nice addition to the Back Country Historic By-Ways program managed by the Bureau of Land Management.

Specific comments include the following:

1. (p. 7) Planning Process, Step Three—there is no mention here of the required consultation with SHPO and the Advisory Council on Historic Preservation.

2. (pp. 12-13) Cultural Resource Management—California Trail components well-defined, but no mention of prehistoric sites with the possible exception of, "identify, inventory, protect, and preserve archaeological resources."

3. (p. 22) Cultural/Visual Resources (map)—without a comprehensive archaeological survey within the reserve, this map is meaningless. It is quite possible that there exist "exceptional resource areas" that have yet to be identified.

RESPONSES

1. Regulation of all climbing outside the 1/2-mile-wide corridor of the California Trail will be deferred to the climbing management plan, which will be submitted to the state historic preservation officer and the advisory council for review and comment.

2. Agreed. However, consultation with the state historic preservation officer and the advisory council is mentioned in the "Environmental Issues" section of the EIS and is documented in the "Consultation and Coordination section" of the EIS.

3. Agreed. A comprehensive archeological survey is called for in the "Resource Management, Archeological Sites" section of the plan.

4. The present map is based on our present available database. We are asking for a comprehensive reservewide archeological survey that may cause us to change the map. However, until we have further information, we must act on the information we do have.
COMMENTS

Charles H. Odegaard
Page 3
January 30, 1994

4. (p. 28) Management Zones, California Trail Subzone—first sentence of this section should read, ". . . and give visitors the opportunity to walk along side the entire length of the California Trail. . . ."

5. (p. 28) Management Zones, California Trail Subzone—it is our opinion that "minimum-impact climbing" as defined in this section would be exceedingly difficult to enforce.

6. (p. 30) Management Zoning map—the improvement to a 45 mph gravel road with new alignments noted on the map is not adequately addressed in the text. This work could have multiple detrimental impacts to cultural resources, including feeling and association. Also, who will pay for a road that is well outside of the Reserve?

7. (pp. 34-37) Resource Management, Cultural Resources—This section of the report does a decent job of dealing with many of the cultural resource issues, but again is weak in its recognition of the significance of prehistory. There is never once any discussion of what types of prehistoric sites have been recorded, or what types of prehistoric sites might be anticipated given location, regional prehistory, resource availability, etc.

8. (p. 43) Visitor Use, Interpretive Trails, Historic Emigrant Trails—First sentence should read, "Walking along side the California Trail and Salt Lake Alternate. . . ." As on page 28, one is given the impression that visitors will be encouraged to walk directly on the historic trails.

9. (p. 48) General Development, Facilities Inside Reserve, Roads and Trails—A clearer illustration showing the proposed road and trail changes would be appropriate. These types of developments have a great potential for impacting cultural resources.

10. (p. 59) Staffing and Operating Costs (table)—As noted above, there is no provision for a cultural resource specialist who could fulfill the requirements of an archaeologist and an historian.

11. (pp. 129-130) Environmental Consequences, Archaeological Resources, Archaeological Site Disturbance—This section contradicts what is said about the implementation of a comprehensive archaeological inventory, evaluation, and protection plan under Alternative 3 on p. 125 in the overview of major impacts. Here it states, "Other historic and archaeological resources would be inventoried and evaluated to determine the appropriate level of treatment." On p. 130, the document states, "Under alternative 3 archeological sites would be treated the same as described for alternative 1 [no action]," which indicates there would be no inventory or treatment plan.

12. None of the alternatives as they are presented in this document are fully satisfactory for implementation in our view. Climbing should be limited to those areas that will have minimal impacts on the geological as well as the cultural features within the Reserve. We would favor

RESPONSES

5. The text was changed.

6. References to minimal impact climbing have been deleted. Climbing will be addressed in the climbing management plan.

7. Realignment of the road would require consultation with the state historic preservation officer and Advisory Council for Historic Preservation to ensure that there were no adverse impacts to cultural resources. References to the road outside the reserve have been deleted.

8. The text was changed.

9. The text was changed.

10. A trails plan is called for in the plan and in appendix F. Preparation of the trails plan would describe trails management and require consultation with the state historic preservation officer and the Advisory Council for Historic Preservation.

11. The text was changed.

12. The text was changed.

13. The issue of restrictions on climbing if any have been deferred to preparation of the climbing management plan. Consultation with the state historic preservation officer will be part of preparation of that plan.
COMMENTS

a blending of elements between the proposed plan (Alternative 2) and the California Trail emphasis (Alternative 3) that would relegate climbing to areas that would not detract from the historical/natural elements in the reserve, provide for public education through interpretive signage, and minimize the impacts to cultural resources.

In sum, we feel that there are a number of issues that require further clarification and/or should be included in the planning process prior to the initiation of this undertaking. We believe that there are workable solutions to many of these points of contention that will ultimately be beneficial to all concerned parties. We look forward to providing continuing input into this project.

Sincerely,

[Signature]

Robert M. Yoder II, Ph.D.
Deputy State Historic Preservation Officer

cc: Stephanie Toothman, NPS-PNRO
Claudia Nissley, Advisory Council on Historic Preservation
House of Representatives
State of Idaho

TO: National Park Service
Almo Hearings
December 14, 1993


The combined Comprehensive Management Plan/ Development Concept Plan and Environmental Impact Statement for the City of Rocks National Reserve represents a huge expansion in scope compared to the 1986 National Park Service "Study of Management Alternatives in the City of Rocks Area". As State legislators from this area emphasized in 1991 (attached), this document established a reference point from which current planning for the City of Rocks evolved.

As a brief observation, development costs for the City of Rocks National Reserve were initially estimated to be in the range of $1,654,950 for a "reserve" and $2,608,200 for a National Park Service "memorial" site. Accordingly, The City of Rocks Act appropriated $2,000,000 to "...carry out the provisions of this title." Today, development costs for Alternative Two are estimated at $58,462,118; an increase in scope approximately twenty-nine times greater than originally envisioned. Although not related on a one-to-one basis, the impacts to landowners and commercial users of the City of Rocks can also be expected to be more heavily impacted than originally envisioned simply because of the additional zoning and regulatory actions expected from county commissioners.

From the standpoint of development funding alone, it is doubtful that the Idaho legislature will meet more than a small percentage of the projected cost. In fact, the proposed cost is so high for Alternative Two (Alternative Three is unacceptable because grazing is abolished) that the Idaho legislature may question the reason to be involved at all. A similar legislative position was recently taken when state "primacy" costs under the Clean Water Act escalated beyond a reasonable ability of the state to meet such costs given other priorities.

Additional consideration of these issues will be required prior to the suspense date for formal response. However, there has been no change to the issue paper submitted by area legislators in 1991 (attached) as those positions would now be related to various sections of the updated plan. This is especially true in regard to current adjustments to the concept of "private use zones".

1. This document was reviewed and considered.

2. This document was reviewed and considered.
January 26, 1994

Regional Director
National Park Service
Pacific Northwest Region
83 S. King Street, Suite 212
Seattle, Washington 98104

Dear Sir:

Re: Comprehensive Management Plan for City of Rocks

Having read the Comprehensive Management Plan for City of Rocks and having been instrumental in the creation of the City of Rocks National Historic Reserve, I am interested in the management plan adopted.

Probably I would have preferred Alternative 1 with a limited amount of disruption to present uses with protection of the historic natural resources; i.e., inscription rocks, California Trail, etc. Recognizing that "people pressure" is increasing significantly, I support Alternative 2, the preferred plan, but at a less grandiose manner than presented.

The Idaho '94 fiscal year appropriation for the Department of Parks and Recreation is only slightly over $16 million including dedicated funds. To expect that Idaho could or would participate in a $58 million (Page 9, Appendix E) development scheme is not realistic, especially considering that initial estimates for development of the Reserve were about $2 million. I would suggest a downsizing will be necessary to make the Reserve a viable development project.

Pages 38 and 47 of the management plan refer to hunting. I disagree with limitations on hunting on any part of the reserve. Hunting sage grouse, deer, and mountain lions is a well established historical use.

References to grazing are also of interest (Pages 39 and 65, Comprehensive Plan). Grazing must be continued at about normal levels as protection of grazing rights was one of the reasons the reserve concept was established in lieu of a "park" or "monument."
January 26, 1994
Page 2

COMMENTS

Any reference to or consideration for wetlands in the City of Rocks is absurd, federal law notwithstanding. Anyone even remotely familiar with the City of Rocks knows that it is in every way a "water poor" area. No provisions should be made for any consideration of wetlands or riparian protection (Page 40 and 65, Comprehensive Plan).

I applaud the thorough nature of the Park Service appraisal of all the resources of the City of Rocks and the inclusion of Almo and Cassia County residents in the planning process. Their concerns must come first as they are the ones most impacted by everything that occurs in the Reserve.

The Comprehensive Management Plan booklet is a significant historic document in its own right.

Best wishes in your very difficult work. I look forward to working with the National Park Service on this project into the future. I also look forward to the time that management can be transferred to the Idaho State Park Service.

Sincerely,

[Signature]

Denton Darrington, Chairman
Judiciary and Rules Committee

cc: Mary Magee, Planning Team Captain
National Park Service

RESPONSES

1. Executive Order 11990 ("Protection of Wetlands") requires that leadership be provided by involved agencies to minimize the destruction, loss, or degradation of wetlands. The NPS "Floodplain Management and Wetlands Protection Guidelines" (45 FR 36916 [minor revisions in 47 FR 36718]) provide procedures for carrying out this order. The order and guidelines direct the National Park Service to consider factors relevant to a proposal's effect on the survival and quality of wetlands by maintenance of natural systems, including conservation and long-term productivity of existing flora and fauna, species and habitat diversity and stability, and hydrologic utility. Management of wetlands is also subject to section 404 of the Clean Water Act (33 USC section 1251 et seq.).
COMMENTS

CASSIA COUNTY WEED CONTROL
1451 OVERLAND AVE COURTHOUSE
BURLEY, IDAHO 83318

January 25, 1994

Regional Director
National Park Service
Pacific Northwest region
83 S. King St., Suite 212
Seattle, WA. 98104

Dear Sir:

I am writing about the comprehensive Management Plan for the City of Rocks National Reserve. I see several concepts of the plan that the park service fails to address. The first being the control of noxious weeds in accordance with the State of Idaho noxious weed law. The federal government is required to conform to State law. The federal government is required to implement the same law as the state under the Federal Noxious Weed Law Sec. 15. They are also required to adequately fund this program. The plan does not address the vegetation management plan for roadways and campsites within the park boundaries. Without the proper plan, undesirable plants will take over the park boundaries and cause a hardship on the local economy and area ranchers.

The cost of the solid waste material needs to be addressed so that the local taxpayer does not have to pay the price of getting rid of other peoples garbage. These people do not pay any local property taxes. The Federal Government needs to pay their fair share if they want to have a National Reserve, without the local taxpayer having to foot the bill.

The local economy cannot lose its tax base. By closing areas of the park to livestock grazing, you cause area ranchers to sell livestock because they rely on that portion of the grazing system for their operation. As we reduce the area livestock revenue, we also reduce our tax base, therefore affecting our schools as well as our local economy. If we are going to reduce our tax revenues and buying powers in order for the people from back east to have a playground for summer vacations, we need to give fair compensation to area ranchers for any changes and hardships that are caused to them and their families. We need to continue to keep our local economy strong.

RESPONSES

1. Control of noxious weeds and vegetation management would be addressed in more detail under the resource management plan (see "Natural Resources" section). Costs of controlling noxious weeds on federal and state land would be included as part of the operating budget.

2. Costs of solid waste management would be included as part of the operating budget.
<table>
<thead>
<tr>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>The attitude of the local and federal park people needs to be overhauled. In the meeting held in Almo, Idaho on December 14, 1993, Mr. Ned Jackson displayed the type of attitude that I feel is totally unacceptable for a government employee. He gave the impression to have a total disregard for the feelings and concerns of the local community. In his statements to Mr. Tom Bennett he demonstrated that the Park Service is going to do what they want with the park and to hell with the concerns of the local people.</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Thank you for your time and effort in reviewing my concerns with this problem.</td>
</tr>
<tr>
<td>Sincerely,</td>
</tr>
<tr>
<td>GORDON O. EDWARDS</td>
</tr>
<tr>
<td>CASSIA COUNTY</td>
</tr>
<tr>
<td>WEED SUPERVISOR</td>
</tr>
</tbody>
</table>

| RESPONSES |
February 11, 1994

TO THE PERSONAL ATTENTION OF:
Charles H. Odegaard, Director
Pacific Northwest Region
National Park Service
909 First Ave.
Seattle, WA 98104-1060

Re: City of Rocks Draft Comprehensive Management Plan

Dear Mr. Odegaard:

I am writing to ask you to give your personal attention to the draft Comprehensive Management Plan ("CMP") for the City of Rocks National Reserve.

The Access Fund is concerned that the draft CMP imposes a vision of the City of Rocks that is inconsistent with current and historic visitation at the Reserve. We are also concerned that the planning team for the draft CMP is pursuing its own agenda, while disregarding the concerns of climbers, who constitute the largest visitor group at City of Rocks.

We believe that without the direct intervention of your office, the final CMP for City of Rocks will establish an unworkable management framework for the Reserve, will create lasting enmity between Reserve management and climbers, and will require the eventual intervention of the NPS to revise the CMP and its implementing structures.

Our concerns regarding the draft CMP are set forth in detail in the enclosed comment letter. Our central concerns may be summarized as follows:

1. In general, the proposed alternative in the draft CMP establishes a heavy-handed system of visitor management, one which encourages visitation that is passive, deferential, and brief. Climbers' characteristic visitation patterns and
Charles H. Odegaard  
February 11, 1994
Page 2

**COMMENTS**

behaviors, including an intimate familiarity with and visible presence on the rock, use of technical equipment, a preference for semi-primitive campsites close to climbable formations in the Reserve, longer stays at such campsites, and an exuberant athleticism, would all be discouraged. The draft CMP’s management approach is not appropriate for City of Rocks, which is a climbing resource of international renown.

2. The draft CMP exudes a pervasive hostility towards climbing. This hostility is reflected in a number of ways, including its sweeping restrictions on climbing in the Reserve. These restrictions forbid climbing entirely in certain areas and dictate where certain types of equipment may be used. It is noteworthy that no such restrictions are placed on hiking, which may have comparable or even greater impacts than climbing.

This hostility is most pronounced in the draft CMP’s single-minded micro-management of climbing, the apparent purpose of which is to pre-empt any exercise of local management discretion within the Climbing Management Plan for City of Rocks (which presently exists in interim form). For the CMP and the Climbing Management Plan to integrate in a properly tiered planning process, the CMP should set forth general policies and objectives, while the Climbing Management Plan would concern itself with the details of implementing these policies and objectives as they concern climbing. Under the draft CMP, by contrast, there is nothing to be managed in the Climbing Management Plan except enforcement of the draft CMP’s draconian strictures on climbing.

The Access Fund, in cooperation with local climbers, has spent a good deal of time developing the present Interim Climbing Management Plan for the City of Rocks, and we do not believe that it should be dismissively swept aside by the strictures proposed in the draft CMP.

The draft CMP also proposes to ban the use of fixed climbing anchors in most of the Reserve. Fixed anchors are an integral and traditional aspect of climbing, are necessary for safe ascents and descents on all types of rock, and are used at all major climbing areas in the U.S. While management of fixed anchors to minimize their impacts is certainly appropriate, and has been addressed in the Interim Climbing Management Plan for City of Rocks, a total ban on their use at the Reserve is unwarranted. The draft CMP presents no information or rationale to support such a radical restriction.

**RESPONSES**

1. The proposed plan has designated specific hiking trails and recommended mitigation to help reduce impacts of dispersed hiker use. Equipment restrictions don’t apply to hikers because they do not use power tools or “fixed anchors.”

2. The text was changed.

3. The draft plan does not place a total ban on the use of “fixed anchors” in the reserve. The final plan defers any decision on use of fixed anchors to the climbing management plan.
This ban directly conflicts with the mandates of NPS-77, Natural Resources Management Guidelines, which requires that limitations on recreational uses be the minimum necessary, be imposed on a graduated scale beginning with indirect controls, be based on the results of research, and be directly related to the accomplishment of specific management objectives or the resolution of specific documented impacts. NPS-77 at 73, 75. The ban on fixed anchors does not meet these requirements.

3. The draft CMP effectively abolishes camping in the Reserve in favor of a highly developed RV campground outside the Reserve. The draft CMP proposes a semi-primitive campsite in the Reserve, but this campsite is not shown on the development schedule, and the proposed site is described as problematic, suggesting little commitment to its construction. At the same time, the draft CMP proposes to eliminate the existing informal and much-enjoyed campsites in the Reserve. The net result would be the elimination of the inexpensive, semi-primitive campsites close to climbing resources that climbers prefer, and the displacement of climbers and other campers to a developed and urbanized RV campsite outside the Reserve. This arrangement would facilitate visitor management, including enforcement of the proposed (and we believe questionable) day use permit system, at the expense of climbers' and other campers' ability to enjoy the experience of camping among the rock formations of the Reserve.

4. The planning process for the CMP largely ignored the concerns of climbers. Although climbers constitute the great majority of reserve visitors, the planning team did not include a single climber, and little effort was made to include climbing staff of the Reserve or climbing organizations in the planning process. For instance, the large climbing community in Salt Lake City was ignored until climbers insisted that a public meeting be held there. This approach towards the largest user group in the Reserve is inappropriate and inexplicable.

Please understand that the Access Fund supports the development of a CMP for the Reserve, as well as a Climbing Management Plan, and is pleased to contribute to reasonable systems for the management of climbing at City of Rocks. We understand that climbing use of the Reserve is heavy and is likely to continue to grow. We appreciate that there have been conflicts over how best to manage climbing in the Reserve. However, valid concerns about climbing impacts and climbing management do not legitimate the draft CMP's pervasive bias against climbing, its attempt to radically alter traditional use.

4. The proposed plan recommends establishing as many as 57 campsites at two different areas within the reserve for primitive camping. In addition, several group campsites would be established in the reserve. These new campsites would offset the removal of about 45 undesignated campsites from high quality scenic areas along the rim (see "General Development" section).
patterns at City of Rocks, and the lack of participation afforded climbers and camping groups in the planning process.

The Access Fund is asking you to step in and restore integrity to the planning process at City of Rocks. Specifically, we ask you to withdraw the current draft CMP, reconstitute the planning team to include climbers, including climbing rangers on the Reserve staff, and reinitiate the planning process in a manner more conducive to public participation. The Access Fund would be pleased to assist and contribute to this effort in any way we can.

Thank you for your consideration of this request.

Yours very truly,

[Signature]

Paul M. Minault
National Access Coordinator

Enclosure

cc: Charles Clapper, Assistant Director, Denver Service Center (w/encl)
    David A. Pugh, Superintendent, City of Rocks (w/encl)
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
</table>
| 2318 Kensington Ave.  
Salt Lake City, UT 84108  
February 1, 1994 | |

Regional Director  
National Park Service  
Pacific Northwest Region  
83 S. King Street Suite 212  
Seattle, WA 98104

Re: City of Rocks National Reserve Draft Comprehensive Management Plan

To Charles Odegaard, NPS Regional Director and Interested Persons:

This letter represents the Access Fund’s comments on the Draft Comprehensive Management Plan (CMP), Development Concept Plan, and Environmental Impact Statement for the City of Rocks National Reserve.

The Access Fund is a national non-profit organization of climbers dedicated to preserving the nation’s climbing resources and assuring climbers’ access to these resources. The Access Fund acquires threatened natural lands, finances studies of sensitive plant and wildlife resources, publishes low-impact climbing and other education materials for climbers, and cooperates with land management agencies in the development of policy and implementation of management plans concerning climbing.

At the City of Rocks the Access Fund has cooperated with the Park Service for over four years in resolving resource problems, donating considerable time and money to the NPS and Idaho Dept. of Parks and Recreation management efforts. Many of the climbers that regularly visit the City of Rocks are members of the Access Fund.

Climbers are an important part of the modern history of the City of Rocks. They began visiting regularly in 1962. Climbers organized citizens’ clean-ups of the City in 1970’s and 1980’s. They have donated labor to build trails to control erosion and allow easier access for all visitors. Through the Access Fund, climbers have donated over $5000 for the purchase of toilet facilities which are being used by all visitors. With a desire to preserve the area for future generations, climbers have supported the concept and establishment of the City of Rocks as a National Reserve for the protection not only of its cultural and natural resources but of its unique recreational resources.

Development Under the Proposed Alternative is Excessive.

Before discussing comments directly related to the Draft Plan it is appropriate to first look at the Reserve and its purpose. The City of Rocks National Reserve was created by Congress 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.” After reading this draft plan one must wonder if what Congress intended and what the NPS is proposing are the same. For instance, it would appear that the NPS has adopted the view that “if we build it, they will come”. Thus, the draft plan calls for the development
The Draft CMP: The City of

The draft CMP exudes a relentless hostility towards climbing and severely restricts many aspects of climbing at the City of Rocks without any objective data to support the restrictions. The Reserve is very small and has limited resources of interest to the casual visitor. Even with the proposed developments few new opportunities will be created or be enhanced. Thus, many of the potential visitors will follow the current pattern of visiting the Reserve for only a few hours before traveling on. Instead of kiosks and large interpretive centers would not a self guided tour with interpretive literature better serve the same purpose? It does not appear that the NPS fully considered this approach.

The comments below relate mostly to climbing and camping at the City of Rocks National Reserve. Climbers fully support many basic aspects of this plan in regards to such items as the preservation of the California Trail, protection of endangered and threatened species, and preservation of the natural surroundings. However, we have many objections to how the plan proposes to accomplish these goals.

The Planning Process Ignores the Concerns of Climbers

Although climbers form 75–90% of the visitors to the City of Rocks (depending on which data are used), there are no climbers on the planning team. Consequently, the planning team has made many erroneous assumptions and decisions concerning climbing in the Reserve. Although the planning team did consult with the NPS Climbing Ranger on staff at the City of Rocks, many climbing related issues still have not been adequately addressed.

The public meeting process has also been inadequate, given that the majority of visitors to the Reserve come from Idaho and Utah. Most of the planning meetings were not held near cities such as Salt Lake City where the majority of climbers reside but in smaller local communities in Idaho. Eventually, one meeting was held in Salt Lake City, but only at the request of concerned climbers. The three meetings on the draft CMP were all held in Idaho, thus making it more difficult for Utah residents to attend. Further, these meetings were set up only as informational meetings, not allowing for public comment.

The Draft CMP Unfairly Discriminates Against Climbing.

The draft CMP exudes a relentless hostility towards climbing and severely restricts many aspects of climbing at the City of Rocks without any objective data to support the restrictions. No other recreational activity within the Reserve comes under such scrutiny. This tone and this unfounded discrimination against climbing is completely inappropriate for a plan to manage the City of Rocks, one of the nation’s outstanding rock climbing resources.

The Draft CMP Pre-Empts the Need for a Climbing Management Plan.

Under the draft plan, there is no need for a Climbing Management Plan; such a plan would simply rubber stamp the severe and unfounded restrictions of the draft Plan. For example, of the 10 subzones in the draft plan, climbing is prohibited in three sub-zones (California Trail and Natural Resource Area Outstanding Features, and California Trail Public Access Area), fixed anchor use, which is integral to climbing, is prohibited in four zones (California Trail - General Use, Natural Area - General Use Area, Backcountry Area and Public Land), and un-
restricted climbing is permitted in only one zone (Natural Area - Front Country Recreation).

The draft Plan should offer general guidance for the preparation of a climbing management plan, in terms of policies and objectives within specific zones. The implementation of those policies and objectives should properly take place within the far more detailed Climbing Management Plan. In this fashion, a true tiered planning process will take place. Management decisions within the Climbing Management Plan will apply Comprehensive Management Plan policies and objectives on a site-specific basis, incorporating all relevant data in a flexible and discretionary fashion. By contrast, the draft Plan pre-empts any significant discretion in preparing and implementing a Climbing Management Plan.

Specific Comments on the draft CMP -

Management Objectives

The draft CMP fails to acknowledge the importance of the Reserve’s outstanding recreational resources, instead giving priority to the management of recreational activities. (p. 14). The City of Rocks is a climbing resource of international renown. The draft CMP must include among its objectives the preserving of and provision for all types of recreational opportunities within the Reserve, including technical rock climbing, that are compatible with other visitor uses, consistent with the purposes of the Reserve. Consequently, there should be an Outstanding Climbing Features Zone that overlays those formations that provide particularly outstanding climbing opportunities. This zone would include the Twin Sisters formation.

Management Zone - California Trail Subzone, Outstanding Features

The draft CMP continues to be highly subjective in the designation of what activities will and will not be allowed in certain zones. For example, the California Trail Subzone is to be managed only for activities “directly related to historic preservation.” Thus, there is to be no technical rock climbing on any of the many rock outcroppings surrounding the Twin Sisters formation, which is considered an outstanding feature. Issues concerning the Twin Sisters Formation are discussed separately in this letter. Yet, the draft CMP proposes to allow for other day uses such as hiking around Twin Sisters. This makes no sense. There is no supporting data to indicate that recreational activities such as climbing are incompatible with other activities associated with historic preservation around Twin Sisters.

One argument put forth by a member of the Planning team during the meeting in Boise, Idaho on Dec. 16, 1993 for restricting climbing was the protection of the viewshed surrounding the Twin Sisters Formation. It was argued that the protection of the vertical viewshed (i.e. rock formations), where climbers would be, was more important than the protection of the horizontal viewshed (i.e. range land) where other recreational users would be. Equal emphasis should be given to both the vertical and horizontal viewsheds. However, people should not be considered as a factor in any viewshed, since they will naturally disperse themselves, minimizing their visual impact. This is but one example of how the draft CMP continues to use “exclusive zoning” to exclude certain activities in an arbitrary fashion. Other areas within the California Trail Subzone have cultural resources such as the inscription rocks that are fully incompatible with any type of climbing. Climbers have supported voluntary prohibitions on climbing there for many years and continue to support a complete ban of all activities on the inscription rocks.

2. Management zoning for the plan and alternatives was based primarily on resources. Climbing is a recreational activity not a resource.

3. The Twin Sisters formation is in the foreground of the California Trail. Under the comprehensive management plan the National Park Service will emphasize preservation and interpretation of the California Trail in the foreground of the trail corridor. Recreational uses not directly associated with access or enjoyment and interpretation of the California Trail will generally be precluded. Among the precluded activities will be siting of recreational facilities, such as campgrounds and picnic areas, and recreation uses, such as bicycling, climbing, or scrambling on the inscription rocks, the Twin Sisters formation, Pinnacle Pass, and other physical cultural resources.

City of Rocks National Reserve was designated as a national historic landmark because of its significance as a major landmark on the California Trail. Significant well-preserved segments of the trail are located within the boundaries of the reserve. The national reserve was established to protect this nationally significant cultural resource as well as its geological resources, which have been recognized by designation as a national natural landmark. The Twin Sisters formation is widely acknowledged to be the symbol of the national historic landmark. For California and Oregon-bound emigrants traveling south along the California Trail, as well as for those who chose to follow the Salt Lake Alternate, the Twin Sisters were a beacon, marking the junction of the two trails and pointing the way to Granite Pass and beyond to California. The importance of Twin Sisters is underscored by numerous entries in emigrant diaries, which describe the unique features of City of Rocks and the Twin Sisters formation in particular. None of these diary references describe climbing on the Twin Sisters by the emigrants.

When a historic property is evaluated for national historic landmark status, the National Register criteria of integrity must be met without compromise. Two of the seven criteria are “association” and “feeling.” City of Rocks National Reserve is considered to be exceptionally significant as a remnant of the California Trail by contemporary historians because of the opportunity it presents to experience passage through the City of Rocks, untrammeled by modern intrusions, much as the 19th century emigrants did. The views of Twin Sisters traveling northwest along the Salt Lake Alternate, moving south along the California Trail, or from standing atop Bath Rock are considered to be essential elements of this experience. The preservation groups and the Idaho State Historic Preservation Office who have worked to preserve and protect this experience have clearly stated that rockclimbing on Twin Sisters is an inappropriate activity that compromises this significant experience.
The draft CMP also exhibits bias against technical climbing in those areas which are designated as public access within the California Trail Subzone. (p. 28, par. 2). Under the draft CMP “Incidental equipment-free scrambling” would be allowed in this zone but technical rock climbing would be prohibited. This demonstrates a blatant and unreasonable bias against technical climbers. Most of the rock formations used by technical climbers can easily be climbed by equipment-free scrambling. Why should one style of ascent be prohibited and another permitted? “Bouldering” and “soloing”, which are essentially equipment-free climbing by technical climber are the same as scrambling. Why should bouldering and scrambling be permitted and climbing with equipment prohibited? 

In a public meeting held in Burley, ID, on December 14, City of Rocks Superintendent Dave Pugh was asked about this discrimination against technical climbers in this zone. Mr. Pugh said something to the effect that, “Of course we wouldn’t ticket Mom and Pop and the kids from Dubuque for climbing on the rocks”. When asked how his staff would distinguish between “technical climbers” and other visitors, Mr. Pugh replied along the lines of, “Well, you know there is a lot of discretionary judgement in law enforcement... a ranger would see a 22-year-old male in lime green lycra pants on the rock. He would be cited”. Mr. Pugh was asked how the City of Rocks staff could be expected to tell teenage technical rock climbers with their parents from a family from Iowa. He again emphasized that “you could tell” just by looking at who the climbers were. This shows the obvious bias of the planning team against climbers. 

The CMP should be concerned with the management of both climbing and scrambling in public use areas. If not properly managed, either may have undesirable impacts. For example, “scramblers” may reach areas on the rocks from which they can not retreat or climb on rock formations that are not stable, thus creating a hazardous situation for themselves and others. There are numerous examples at the City of Rocks each year of technical climbers going to the aid of stranded scramblers. The details of the impacts and management of scrambling and climbing should be reserved for the Climbing Management Plan.

The draft CMP is overly specific when specifying the type of climbing that will be permitted in the “general use/cultural resource impact monitoring” area within the California Trail Subzone (p. 28, par. 2). The definition of “minimum impact climbing”, leaving no permanent hardware, using no loud voice signals, and prohibiting the use of chalk while “encouraging” the use of neutral colored clothing, is ludicrous, shows complete ignorance of climbing, and is inappropriate for a CMP and should not be used. Unfortunately, this definition would preclude almost all existing and new climbing currently available within the that portion of the Reserve. Many of the climbing routes within the reserve make use of permanent anchors for both
COMMENTS

wear neutral colored clothing while other users are not so requested. Thus, one group, the technical climber, is endangered and discriminated against, while other groups are unregulated and free to do as they please. This is another example of the blatant and totally unacceptable bias against technical climbing and the attempt of the planning team to micro-manage climbing in the draft CMP.

Management Zone - Natural Area Subzone, General Nature Area

The draft CMP states that "climbing might occur," in the general nature area of the Natural Area Subzone (p. 29, par. 1). Currently, a limited amount of climbing is occurring in this area; why should it potentially be restricted? Further, the draft CMP states: "users would register before entering the area so that they could ensure the dispersal of activity." (p. 29, par. 1). This language is ambiguous. Would the registration be self-registration or a permit system? What objectives would such a dispersal fulfill? The draft CMP presents no data supporting the need for dispersion of users.

The definition of "minimum impact climbing" referred to above, appears in several other locations within the draft CMP (p. 46, par. 6) and is used in a misleading and confusing manner. This definition and its use is totally unacceptable. It and all references to it must be deleted. All references to climbing should be stated in the general manner that all other recreational uses are described. The CMP should use only the general ideas presented on page 46 of the draft CMP in regards to the draft Interim Climbing Management Plan developed by local climbers in conjunction with the NPS and Idaho Dept. of Parks and Recreation.

Management Zones - Natural Area Subzone, Outstanding Features.

It is our understanding that an area designated as a Research Natural Area (RNA) prohibits all human activities. The draft CMP should clarify the intent of the RNA and follow those guidelines accordingly. In order to properly preserve the RNA, all human intrusions should be prohibited and the area fenced off to prevent domestic stock animals gaining access into the RNA.

The draft CMP fails to mention that some climbing areas outside of the Research Natural Area but within the Outstanding Natural Feature Zone would be closed. E.g. Steinfield's Dome, half of Grey Wall and Road Map Wall. Other activities such as hiking would be permitted. Once again, the draft CMP shows a clear bias against climbing without any objective justification. This restriction should be eliminated in the CMP.

Management Zone - California Trail Subzone, Private Use

The reader of this draft found it very humorous that in one paragraph (p. 28, par. 1) the CMP would permit cattle (but not some human activities) within the historic trail viewshed, even though they were not part of the original viewshed experienced by the emigrants. However, the draft CMP notes that because of the "close association" the cattle had with the emigrants traveling along the California Trail they should be permitted in all but the most sensitive area. The CMP fails to mention that the majority of the California Trail, including several of the most important features, is on private land. The owners of the land depend upon ranching with attendant grazing for income. In addition, the enabling legislation specifically designated that cattle grazing will continue. In spite of the language of the draft CMP, cattle will probably"
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>12.</strong> None of the alternatives recommend &quot;taking private lands.&quot; The enabling legislation does authorize the secretary of the interior to acquire lands and interests to achieve the purposes of the reserve with the owner's consent (also see appendix A and &quot;Major Planning Considerations&quot;, Land Acquisition section).</td>
<td></td>
</tr>
<tr>
<td><strong>13.</strong> See response 3 above.</td>
<td></td>
</tr>
<tr>
<td><strong>14.</strong> The text was changed.</td>
<td></td>
</tr>
</tbody>
</table>
they are particularly sensitive to disturbance during their courtship and nesting cycle" (p. 39, par. 1). The Access Fund fully supports reasonable restrictions to protect nesting raptors. Unfortunately, the planning team has once again tried to micro-manage climbing areas and preempt any Climbing or Wildlife Management Plan with language that is far too restrictive and vague. From some outcrops, all of the City of Rocks can be seen, thus all of the Reserve would have to be closed. The above statement shows a complete lack of understanding on the part of the planning team of both climbing and wildlife issues.

Resource Management - Visitors

Although climbers recognized the importance of maintaining the "Silence of the City," the current proposal to prohibit all noise-generating equipment outside of road corridors is inappropriate, (p. 40, par. 6). As stated this would prohibit any type equipment that might be needed for maintenance of trails, fences, and other "man-made" intrusion in the Reserve on private or public land. In compliance with Cassia County ordinances, climbers have been using power-drills for the installation and replacement of fixed anchors under a permit system since 1991. The Access Puns believes that this system is fair and effective.

Further, this restriction and others like it in the draft CMP are once again inappropriate for a CMP. A statement which recognizes the importance of the silence feature should be included in the CMP but expanded to include all types of noises that may impact a visitor's experience. These noises would include vehicles, (an RV generator can create far more noise than a few short bursts from a power drill), animals, people, aircraft, and power-equipment. How the impacts should be managed should be part of the implementation process and not dictated in the CMP.

General Development - Facilities Inside the Reserve

One area of major concern is the proposed action to remove part of the existing road way along the California trail, (p 48, par. 2). If the purpose of removing the road is to improve the historic viewshed then the road should be completely removed and revegetated to present a natural setting as possible. Leaving the road as a ranch road would totally defeat the idea behind preserving/restoring the area around the California Trail. The road should be re-aligned to the west portion of section 12 with possibly an interpretive wayside. (This project would have to be carried out with the permission of the land owner). The new road would serve several purposes. It would enable visitors to more easily access the Twin Sisters area of the Reserve while allowing private access to the private land which the California Trail crosses. It would eliminate the need to improve, at considerable cost, the road which continues around the south end of the Reserve. It is doubtful that many visitors would visit the Twin Sisters area under the current plan due to the amount of driving required.

General Development - Camping

The draft CMP for managing camping in the Reserve is absolutely unacceptable. Camping has been an area of critical concern for many years in the Reserve. As currently proposed, all camping within the Reserve would be removed until at least 2001, when 7 back-country sites might be developed (p. 56). Before the creation of the Reserve, unregulated campsites were scattered throughout the City of Rocks. After the creation of the Reserve, sites in sensitive areas were eliminated. In 1993, campsites were identified and numbered, and fees were charged...
for the first time. The draft CMP addresses many of the impacts and concerns related to camping, but fails to address several major concerns.

Hundreds of families, social groups, and organized groups camp at the City of Rocks. For many, a Memorial Day or Labor Day camping trip to the City of Rocks is a long standing tradition. The limited camping opportunities provided in the CMP will adversely impact thousands of visitors. Although there is currently not a significant number of RV users currently visiting the Reserve the CMP would provide for the immediate construction of a 100 site full service RV campground outside the Reserve. Unfortunately, the planning team has addressed the possible future needs of potential visitors at the expense and displacement of current campers who seek a semi-primitive camping experience. Further, the draft CMP reasons that a large RV campground would help produce revenue for the State of Idaho to operate the Reserve. We object to the concept of campground fees being used to support activities other than campground maintenance. If operating revenue is needed, then all visitors must share part of the burden, not just campers. Further, many of the current campers would avoid the high fees charged for a fully developed site and seek out new areas to camp outside of the Reserve on public/private land or inside the Reserve on private lands without fees.

The primitive (tent) campground proposed in the draft CMP and shown on maps and diagrams in the southwest corner of the Reserve is a phantom. This campground, with the potential of 50 sites, is admirable, and various sections of the draft CMP concerning camping describe it beautifully. Only a careful reading (p. 56, par. 1) reveals that this campground is NOT scheduled for construction. It appears to be merely a decoy, designed to deflect citizen complaints concerning the total removal of all camping from within the City of Rocks. The group campground shown west of the Breadloaves is also NOT scheduled for construction. Failure to provide a suitable group campground will harm climbers and the many Boy and Girl Scout, Church, and university groups who visit the City of Rocks regularly. The final CMP must fully address the needs of campers who want the quiet of a primitive or semi-primitive camping experience and not just the needs of RVers.

A suitable primitive campsite should be identified within the Reserve and be developed immediately, along with a group campground. (A walk-in campground without any privacy between sites would not be acceptable). A full service RV campground with attendant high fees will not meet the needs of the thousands of climbers as well as other groups and families which visit the City of Rocks each year. We suggest that the maximum number (30) of primitive sites be established using guidelines which minimize environmental impacts and user conflicts. We also insist that new campsites be established before the old sites are obliterated.

Any walk-in sites should be provided with storage lockers, similar to the bear boxes in Yosemite NP, sufficient to protect food from rodents and birds, and allow for the protection of personal belongings while campers are away from the camp site. Also, there should be space for at least two cars per site and not one as indicated on page 87.

<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>18. The text was changed.</td>
<td></td>
</tr>
<tr>
<td>19. Various layouts and capacities for the RV campground, such as suggested by this comment, would be considered during the design phase.</td>
<td></td>
</tr>
</tbody>
</table>
The draft CMP plan for the group camp site on the opposite side of the Reserve from the ampitheater is not adequate, especially since it is not scheduled for construction. The group camp site should be built in proximity to the ampitheater. Building a group camp site next to the ampitheater would allow for easier access for groups to programs being held there and at the same time reduce the potential conflicts that may occur in the heavily used Breadloaves area.

Comments on the draft EIS

Environmental Issues - Visitor Use

Several statements are made within the draft EIS concerning climbing and climbers that are misleading and/or false. For example, there is no supporting data that climbing intrudes on the historic trail scene (p. 65, par. 3) more than a person walking down a trail does. The statement concerning the visual impact of climbers must be removed from the EIS and replace with a more general statement that all types of recreation, including hiking, scrambling, and rock climbing may intrude on the historic trail scene. Again the statement of visual impacts regarding only climbers is another blatant example of the bias against climbers in the draft EIS.

Environmental Issues - Rock Climbing

The language used to describe the current climbing situation is overly suggestive and exaggerated (p. 65, par. 4). Although climbers have installed many fixed anchors within the Reserve, they have not caused the scarring of rock faces suggested in the draft EIS. In fact, to the casual observer and to many climbers fixed anchors are almost invisible. Also, the number of conflicts between climbers and non-climbing visitors is minimal. There is no supporting data in the draft CMP for the implication that conflicts between climbers and other visitors are a major source of concern. In recent years, the number of social trails used by climbers has been reduced through trail work done by climbers and other volunteer groups. It should also be noted that many of the social trails used by climbers were originally paths developed by grazing cattle. (The draft EIS fails to even acknowledge the trails developed by other recreational users using horses and trail bikes).

Affected Environment - Socioeconomic Environment, Visitor Use

The draft EIS includes the results of several visitor studies which are used to suggest some very misleading conclusions. For example, statements regarding the peak visitor usage are misleading. A BLM study from 1987 is quoted (p. 112, par. 2) to suggest that the peak visitation is from April 15 through June 15, but no data was collected to support the statement. Table 5 clearly shows a different trend, as would personal observation during any summer month. By suggesting that the peak visitation is during the spring months when contrary data are presented shows a failure on the part of the CMP planning team to properly examine all of the data available to them.

20. Conflicts between climbers and other visitors were identified as an issue by the public. See the first and third planning newsletter for list of all public issues.
### COMMENTS

| 21 | In another visitor study conducted in September 1991, 42% of the respondents mention that some other visitor activities affected their visit, (p. 113, par. 4). The results of the study are presented in a misleading manner. The results should have been presented individually and in order of greatest impact to reflect the true nature of the results whether the effects were positive, negative or neutral rather than all being lumped together (i.e. gun-fire 3%, crowds 7%, obnoxious campers 9%, and rock climbing 20%). The draft EIS fails to note that some effects, such as watching a person climb may have positive effects, such as enhancing their visit. |

### RESPONSES

| 21 | A method commonly used at NPS units was used to conduct the September 1991 survey. See NPS (1992) for a detailed description and limitations of the survey. |
| 22 | The text was changed. |
| 23 | The text was changed. |
out of line for all alternatives. The description of climbing is in general, very negative and should be re-written to reflect a more accurate view. For example, the word “would” is repeatedly used throughout this section to describe the impacts that COULD happen if climbing were to continue. Once again the planning team has shown their bias against climbers by presenting no supporting data for their claims. Geologists who climb at the Reserve have stated that many of the impacts described in the draft EIS would not be significant.

Many of the techniques described as being used by climbers such as cleaning and chiseling are not required on most of the climbs within the Reserve. Chiseling, as well as, gluing, are illegal activities which are condemned by the climbing community. Route cleaning is typically done only by the first ascent party and only for safety.

In conclusion, much of the current description of climbing and its associated impacts does not give a complete or accurate view and should be re-written by persons knowledgeable about climbing. Since there are no climbers on the planning team, the team will need to be expanded for this task to be done properly.

Environmental Consequences - Impacts on the Socioeconomic Environment, Rock Climbing

Table 10 on page 144 is incomplete as it lacks most of the data concerning climbing in the second column.

The effect of implementing the CMP as it stands would not improve or enhance climbing in the Reserve (p.144-145) only reduce climbing opportunities using inappropriate and unjust reasoning. The CMP fails to meet any legitimate needs of the climbing community, including primitive camping and parking at such areas as Elephant and Parking Lot Rock. Perhaps the building of a parking area for the West Breadloaves is the one improvement for climbers. This parking area will give access not only for climbers but also hikers, backcountry campers, and picnickers. However, it is doubtful that this area would have been developed if its sole purpose was to improve access for climbers, given the bias against climbing the planning team has shown throughout the planning process.

Environmental Consequences - Impacts on the Socioeconomic Environment, Camping

As currently proposed, the establishment of primitive or fully developed camping would not end all user conflicts (p.145-6). Conflicts between car campers and RVers are sure to occur if provisions are not made to adequately separate them. Many campers despise the urban atmosphere that can accompany RVs. This potential conflict has not been adequately addressed within the draft EIS. In addition, the displacement of the current semi-primitive camping into a RV park has not been addressed.

Twin Sisters Formation

The Twin Sisters formation represent some of the highest formations at the City of Rocks, as well as the oldest rock in the Reserve. The Sisters are a prominent landmark and currently offer a unique opportunity for technical climbing found no where else in the Reserve. Various technical climbing routes on the Twin Sisters have been climbed since the early 1960's. Several of the climbing routes on the Twin Sisters are hundreds of feet longer than any other climbs in the Reserve and unlike other climbs in the Reserve they lead to summits with panoramic

24. The EIS does not state that climbing impacts to rock formations would be significant as the comment suggests.

25. The text was changed.
Throughout the draft CMP, the statement is made that the Twin Sisters will be closed to climbing pending the results of a study. This study, initiated in 1993, includes botanical and geologic surveys of the spires, identification of climbing routes, an inventory of climbing hardware, a history of climbing on the Twin Sisters, and the results of a 1993 climber registration program. Unofficial early reports suggest that the Twin Sisters Study will show no botanical or geologic imperative for closing the Twin Sisters to climbing.

The issue of "viewshed" impacts of climbers was, we hope, laid to rest during the summer of 1993 when observers found they could not pick out climbers on the faces of the Twin Sisters from a distance. The few minutes climbers might spend on the summit of the Sisters, where they would be silhouetted against the sky before descending, are not a significant impact on the "viewshed." The issue of violation of the historic ambiance or "the fabric of history" through the presence of climbers on the Twin Sisters is one which may perhaps be best answered by acknowledging that emigrants as well as later visitors climbed many of the formations at the City of Rocks, including nearby mountains, and perhaps the Twin Sisters as well.

The Twin Sisters study represents an important milestone in the City of Rocks planning process. We urge the NPS to use similar studies before closing other areas of City of Rocks or other units of the National Park system to recreational activities such as technical rock climbing.

Conclusion

This concludes the Access Fund's comments on the draft CMP for the City of Rocks National Reserve. Overall the climbing community has been very disappointed in the CMP planning team. In summary, it is the Access Fund's position that first, the draft CMP exhibits a clear and unfounded bias against technical rock climbers and in some cases creates a safety hazard for climbers. Second, the draft CMP fails to adequately provide for non RV camping in the Reserve. Third, the draft CMP uses misleading and incorrect statements including references to studies. Fourth, the draft CMP attempts to micro-manage climbing activities, a task which should be addressed in the Climbing Management Plan.

Because of these deficiencies, and the continued refusal of the planning team to acknowledge the importance of climbing in the Reserve and the concerns of climbers regarding the Reserve's management, the Access Fund recommends that the draft plan be withdrawn until a new planning team can be formed and a new plan prepared.

Sincerely,

[original signature]

Allen R. Sanderson
Access Fund Regional Representative
Mr. Charles H. Odegaard  
Regional Director, National Park Service  
Pacific Northwest Region  
83 South King Street, Suite 212  
Seattle, Washington 98104  

Subject: City of Rocks National Reserve  
Draft Comprehensive Management Plan and Environmental Impact Statement  

Dear Mr. Odegaard:

I have been asked as a board member of the American Alpine Club (AAC) to compile and prepare the AAC's comments to the Draft Comprehensive Management Plan and Environmental Impact Statement for the City of Rocks National Reserve. The American Alpine Club is a not-for-profit foundation started in 1902. The AAC is one of the most prominent national organizations in the United States devoted exclusively to mountaineering and climbing. Our interest in this management plan pertains primarily to how it will impact climbing activities on the unique rock features within the Reserve. These comments have been compiled from information supplied by several club members familiar with the preparation of the management plan, as well as climbers who frequent the City of Rocks for recreational opportunities.

We appreciate the tremendous amount of work that has been put into preparation of this document. We believe that with this opportunity to receive comments from all the affected parties, the Park Service will be able to prepare a final management plan that will address the issues and concerns that are expressed.

The draft plan contains three alternatives for managing the Reserve. We will not support the Alternative 1 - No Action plan because it does not provide the degree of environmental and historical resource protection that is necessary for the Reserve to be preserved for future generations. We also do not support the Alternative 3 - California Trail Emphasis plan as it is overly restrictive towards climbing and other activities that have minimal impact on the historical nature of the California Trail Corridor, while at the same time allowing other activities that have greater impacts on the corridor. The Alternative 2 - Historic Continuum is the proposed management plan and we support many of the recommendations contained within it. There are a number of areas where we believe this alternative should be modified to provide
greater access to climbing activities within the Reserve while still minimizing environmental and historical resource impacts. Our comments are restricted to the proposed Alternative 2 which we support with the recommended changes contained in the following paragraphs.

The first concern expressed by a number of reviewers is that the proposed management plan speaks to climbing activities within the reserve as if it was a relatively new activity. In reality, climbing activities have been recorded within the Reserve since the 1940's and may have occurred as far back as the original pioneers. Many other National Parks such as Yosemite also have a rich tradition of climbing, and when management plans have been prepared for these areas, they reflected the need for the park to preserve this type of traditional use along with other uses that have a historical emphasis. The proposed management plan recommends that some areas be closed to climbing because of the potential visual impact to visitors along the California Trail Corridor. It does not seem appropriate for climbing activities to be restricted in some areas of the Reserve where they may have minimal visual impact on other uses such as vistas along the California Trail Corridor when in fact those same pioneers undoubtedly spent some time scrambling and climbing on the rocks themselves. It would seem reasonable to state that the roads upon which most visitors to the Reserve will travel, as well as certain grazing activities and fence lines, pose a much larger and real visual impact to the historic California Trail Corridor when compared to climbers who will appear quite small when viewed from a distance. A good example of this was in the spring of 1995 when a climbing ranger pointed out rock climbers on the east side of the Twin Sisters to several visitors. The visitors were not able to pick out the climbers who were a half mile away. With this in mind, it is hard to understand the reasoning in the management plan behind the proposed climbing closure for the Twin Sisters which states that climbers in this area will pose an unacceptable visual impact within the California Trail Corridor. When compared to rock climbing, there are much larger visual impacts along the California Trail Corridor from motorists, grazing, and other activities. It appears that the proposed climbing area closures would be discriminatory towards climbing when these other activities, which clearly have a greater visual impact, are still allowed. This portion of the proposed plan is in stark contrast to the work of the National Park Service sponsored Interim Climbing Management Plan team. The proposed Alternative 2 in the management plan should be changed to reflect the preferred alternative in the Interim Climbing Management Plan which recommended climbing closures only on inscription rocks and in archaeological sites, and required a minimum impact ethic in the California Trail Corridor and in the Research Natural Area.

The proposed plan also speaks to irreversible damage to the rock faces caused by chipping and chiseling for the purpose of rock climbing. The climbing community has long promoted a strong ethic that chipping and chiseling of the rock for climbing purposes is not acceptable. At the City of Rocks, only one known incident of chipping or chiseling by climbers has been discovered. In this case, the responsible climber was severely reprimanded by the climbing community, and this
individual a citation. The climbing community has a long history of promoting environmentally sound practices that minimize the impact of rock climbing on the rock. This includes discouraging chipping and chiseling, and promoting "clean climbing", which is the use of rock anchors that do not scar or damage the rock. To imply that rock climbing routinely involves chipping or chiseling is simply not true. This description in the proposed plan presents the reader with rock climbing impacts that are inaccurate and overstated. All references to chipping and chiseling impacts associated with rock climbing should be removed from the management plan and EIS.

The proposed plan also speaks to irreversible damage to the rock caused by drilling. Climbers drill holes 1 to 2 inches long by 3/8 of an inch in diameter in the rock to place expansion bolts for safety anchors. The bolts have hangars attached to them, so that climbers may clip their safety equipment to the bolt as they pass by. The size of the bolt with the hangar is about 1 1/2 square inches. Drilling does no visible damage to the rock since it is a 3/8 of an inch in diameter hole drilled straight into the rock. In reality, bolt hangers do not present a visual impact because they occupy an area of only about 1 1/2 square inches. It is not reasonable to consider a visual impact an item that is not much larger than a 50 cent piece on a cliff that can be several hundred feet high. Once a person is more than several feet away, a bolt hanger is not visible to an untrained observer. In addition, climbers are taking the lead in promoting minimum impact climbing whereby new routes are being equipped with bolt hangars that are painted to match the rock instead of placing the shiny unpainted stainless steel ones. Climbers are also educating each other to minimize or eliminate the use of brightly colored nylon webbing as rappel anchors. All these anchors could easily be replaced with painted metal chains that would not be visible from the ground.

The description in the proposed plan of drilling as irreversible damage to the rock presents the reader with rock climbing impacts that are inaccurate and overstated. All references in the management plan and EIS to drilling impacts associated with rock climbing should be modified to present a more accurate description of the true impacts. We suggest that drilling and bolting be described as follows: "To place anchors for safety when other forms of natural protection such as cracks are not available, climbers may drill holes 1 to 2 inches long by 3/8 of an inch in diameter in the rock to place stainless steel expansion bolts. The bolts have stainless steel hangars attached to them, so that climbers may clip their safety equipment to the bolt as they pass by. The size of the bolt with the hangar is about 1 1/2 square inches. Drilling does no visible damage to the rock since the hole is a 3/8 of an inch in diameter drilled straight into the rock. Bolts with hangers present a minimal visual impact because they occupy an area of only about 1 1/2 square inches, or not much larger than a 50 cent piece. On a cliff that is several hundred feet high, a bolt hanger is not visible to an untrained observer". The proposed management plan should also mention that minimum impact climbing techniques are now being promoted within the climbing community in cooperation with land managers to further minimize any visual impact from safety devices placed on the rock by climbers.

2. The irreversible impacts caused by rock-altering activities pertain to the natural state of rock surfaces and not their visual quality as the comment suggests. Therefore, whether someone can see drill holes in the rock surfaces is not relevant. The impact analysis for rock formations focused on the irreversible and cumulative impacts of thousands of drill holes and other rock damaging activities that alter the natural condition of rock surfaces. Removal of rock material by climbing activities was considered an irreversible impact because the damaged rock surfaces cannot be restored to natural conditions. Because these impacts are irreversible, continuation of rock-altering activities will have an adverse cumulative effect lasting a long period of time. The total amount of natural rock surface damaged over time will increase each time a rock surface is drilled, chipped, or scraped. Describing the impacts of a single drill hole, as the comment suggested, would understate the cumulative impacts of rock-altering activities.

The Park Service agrees that the suggested mitigation would reduce the visual impacts of climbing equipment. The plan does call for the development of a climbing management plan with input from the public.
visual or otherwise, on the rock surfaces over which they climb. The real focus on human impacts to the area should be those that occur on the ground surrounding the cliffs. These include soil erosion from trails, litter, pollution and aesthetic problems related to human waste disposal, and destruction of vegetation from indiscriminate camping and off-road vehicles. Not all of these problems are the result of activities by climbers, but climbers contribute to them. The management plan contains a number of recommendations that will address these types of actual impacts, and we support them.

One of the most significant recommendations in the proposed plan is to close the existing areas that are used for camping and create a primitive camping area instead. We support this recommendation as the existing camping areas are informal and not managed to minimize impacts to vegetation and erodible soils. The management plan should be revised to state that the existing camping areas should be fenced off and restored, but only after the new primitive campsite area is constructed. The management plan should also be more specific concerning the number of primitive campsites that will be developed. Clearly 10 sites will not be enough, given the level of activity and the number of campsites that are used now. We would recommend that the management plan be revised to say that the number of primitive sites to be developed will equal the number of existing informal sites that are closed.

The management plan should also propose using volunteer groups in specific activities that could be carried out to help solve erosion and human waste problems. This includes construction of trails to popular areas that are experiencing soil erosion. This has been done in many other climbing areas with great success such as at Smith Rocks State Park in Oregon. Much of this trail building work has been performed very economically with the use of volunteer labor. Climbing organizations such as the AAC and the Access Fund can be contacted to organize these types of efforts. Construction of outhouses at popular climbing, hiking and viewing areas can help reduce the problems associated with human waste. Climbing groups have already been active with donating funds for outhouses that have been constructed at some popular areas in the Reserve.

The proposed Alternative 2 also recommends that climbing activities in certain areas be managed through the development of a climbing management plan. We recommend that the plan be specific as to how this management plan be organized, who will sit on the committee that drafts the climbing management plan, and who will make the final decision on what is in the final management plan. We recommend that several climbing organizations such as the AAC, the Access Fund, the American Mountain Guides Association, a local mountain rescue organization, and representatives from local climbing clubs, be represented on the committee. The final management plan should be developed by consensus within the committee and with public input.

The management plan should also be revised to give a more accurate description of the impacts associated with developing facilities that will attract new visitors such as.
### COMMENTS

New facilities and the numbers of people they attract will create a larger impact on the Reserve than any of the current activities. Because the Reserve is currently not a well-developed park, it does not experience the large number of visitors that you get at a park with more extensive facilities. Adding campsites, a visitor center, improving roads, and constructing other visitor facilities will attract a much larger number of visitors than what the Reserve experiences today. We recommend that the management plan clearly state the impacts that will result from the proposed development of new visitor facilities.

Our final concern with the proposed plan is the cost. We recommend that the management plan contain a funding section that describes how the 58 million dollar proposed plan will be implemented. This section should outline how the plan will be fully funded. It would seem that a project with a cost of this magnitude will need to be phased over several years. We recommend that the funding section also describe how the plan implementation will be phased. Key environmental resource preservation elements of the proposed plan should be given the highest priority such as construction of the primitive campground followed by closure of the existing camping areas, and trail construction. Construction of new facilities that will attract additional visitors to the Reserve should be given lowest priority.

Thank you for your consideration of these recommendations to the proposed management plan for the City of Rocks. Please keep us informed as to the progress of this planning process. Please forward all correspondence to: The American Alpine Club, 710 Tenth Street - Suite 100, Golden Colorado 80401.

Sincerely,

Steve Swenson

c: Jed Williamson, AAC President
Charles Shimanski, AAC Executive Director
Jeff and Kellie Rhoads
Fred and Anna Witesman

### RESPONSES

6. Funding the plan will require additional legislation (see "Management Authorities and Responsibilities" section). The development phasing schedule under the "General Development" section was changed.
COMMENTS

January 29, 1994

NPS Regional Director
Pacific Northwest Region
83 S. King St., Suite 212
Seattle WA 98104

Dear Sir/Madam:

Please accept these comments on the Comprehensive Management Plan and Draft Environmental Impact Statement for the City of Rocks National Reserve on behalf of the Mountaineering Committee of the Appalachian Mountain Club's Boston Chapter. We appreciate this opportunity to comment on the plan's development. Our members are frequent visitors to the Reserve and we have thoroughly enjoyed our visits. This is our first opportunity to review the Plan and have not seen any previous drafts. While it is certainly important to have a core of reviewers involved from the beginning of such a Comprehensive Plan, it is also very helpful to receive input from a few new sources. These new opinions can sometimes provide a fresh outlook on a planning effort of this scope.

Upon review of these comments, you will note that many of these comments pertain to rock climbing, since that was the general focus of our members' visits. A number of other comments are included which relate to other issues such as interpretation, protection of riparian areas, management of exotic plant species, and wildlife management. We have some professional experience and interest in these issues as well.

This review includes both specific and general comments. Specific comments are detailed below. General comments will follow at the end of the document.

Comments on Comprehensive Management Plan

page xv, first para.: City of Rocks was not a destination, it was one stop along the California Trail. While I see the need for a meaningful declarative statement here, it should be a more accurate one.

page 3, last 2 para.: These two paragraphs establish a pattern which becomes quite clear later in the document. That pattern paints a generally positive view of grazing and a generally negative view of rock climbing. If the NPS is truly committed to resource protection, the regulation of any activity should be solely tied to its impact on the resource. Also, I would be interested to see in what legislative act or agency policy the NPS
### COMMENTS

<table>
<thead>
<tr>
<th>Page</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>7, 2nd para.</td>
<td>Is the rock climbing community represented on the planning team? Are there any local ranching/grazing interests represented on the planning team?</td>
</tr>
<tr>
<td>9, last para.</td>
<td>The &quot;combination of historic and modern uses&quot; which have &quot;resulted in successional shifts toward a dominance of sagebrush...and nonnative plants&quot; and the loss of riparian communities near streams and springs is really grazing isn't it? If the destructive land use of which you speak is grazing then state this. Are you not saying &quot;grazing&quot; because you know you won't get the support to restrict this land use?</td>
</tr>
<tr>
<td>13, 4th bullet</td>
<td>While I support any research into developing ecologically sound grazing practices, there is no need to wait for such research to implement more sustainable grazing practices at the City of Rocks (or any other area). These methods are well understood. It does a disservice to this plan, and the protection of the resource, to delay action on managing grazing until some undefined research project is completed.</td>
</tr>
<tr>
<td>13, 1st bullet under &quot;Natural Resource Management&quot;</td>
<td>What are the &quot;primary&quot; natural resources? These are not defined in the document.</td>
</tr>
<tr>
<td>13, 1st 3 bullets in the second column</td>
<td>All three of these items primarily pertain to grazing but, again, you won't make the simple statement &quot;control/restrict grazing to manage exotic plant species, minimize erosion and preserve wetlands&quot;.</td>
</tr>
<tr>
<td>13, 1st bullet under &quot;General Visitor Use&quot;</td>
<td>This is the role of the NPS, as stated in its mission. Is there a need to state it here or are you building a case to restrict recreational use? The &quot;Natural Resource Management&quot; category did not begin with such a statement. If it did, you would then be compelled to further restrict grazing.</td>
</tr>
<tr>
<td>14, 5th bullet</td>
<td>What is a &quot;special species&quot;? Please define.</td>
</tr>
<tr>
<td>14, &quot;Recreation&quot;</td>
<td>This also includes a thinly veiled negative comment on climbing. Compare this to the statement in the preceding category &quot;Interpret livestock grazing as a traditional use of the region...as an integral component of the sagebrush steppe ecosystem&quot;. Is grazing an integral component of this ecosystem? As you have stated, it has destroyed wetlands and altered the vegetative community to promote the growth of exotic species.</td>
</tr>
<tr>
<td>14, 3rd bullet in &quot;Development&quot;</td>
<td>The term &quot;persons with disabilities is preferred to &quot;handicapped&quot;.</td>
</tr>
</tbody>
</table>

### RESPONSES

<table>
<thead>
<tr>
<th>Page</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Planning team members are listed under the &quot;Preparers, Contributors, and Consultants&quot; section.</td>
</tr>
<tr>
<td>2</td>
<td>The &quot;Affected Environment&quot; section lists the man-induced factors, including grazing, that caused changes in the plant communities in the reserve.</td>
</tr>
<tr>
<td>3</td>
<td>Grazing is currently being managed in the reserve under an interim grazing management plan. Under the new grazing management plan, livestock grazing will be managed using the best available techniques. Management actions will not be delayed because of research as the comment suggests.</td>
</tr>
<tr>
<td>4</td>
<td>The primary resources are listed under the &quot;Management Zoning&quot; section.</td>
</tr>
<tr>
<td>5</td>
<td>The text was changed.</td>
</tr>
<tr>
<td>6</td>
<td>The text was changed.</td>
</tr>
<tr>
<td>7</td>
<td>The text was changed.</td>
</tr>
<tr>
<td>COMMENTS</td>
<td>RESPONSES</td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
</tr>
</tbody>
</table>
| **page 14. "Land Acquisition": Is the NPS not interested in acquiring recreational resources? Only natural, cultural and scenic resources are mentioned. Also, what does the last bulleted item mean?**

8. The text was changed.

9. The land protection plan tiers off the CMP and provides more specific details on how to acquire interests on nonfederal lands to protect resources.

10. Minimum-impact climbing was first defined in the interim climbing management plan that was developed with input from the climbing community.

11. The text was changed.

12. The text was changed.

13. The text was changed.

**page 16, 2nd para.: Why is the Land Protection Plan a separate document. Isn't this an integral part of the Comprehensive Plan?**

**page 27: Does the use of the symbol for climbing on the adjacent map indicate that climbing is recommended only at these sites? Climbing is done all over the Reserve. The use of this symbol may therefore be inaccurate. Also, please consider a different symbol. That is not a person climbing. It is a person rappelling.**

**page 28, 2nd column, 1st para.: It is quite a stretch to indicate that grazing is compatible with the preservation of the historic viewshed because the emigrants had livestock. I am sure the emigrants had unleashed dogs yapping at the heels of their livestock. Shall we include this in our historic viewshed?**

**page 28, last para.: Is it appropriate to eliminate a recreational activity when you haven't conducted the necessary research recommended in the Plan? The impacts of an activity must be known and be harmful before you take the drastic step of eliminating that activity from public lands. Also, where did this concept of "minimum impact climbing" come from? Did you get any input from the climbing community? I doubt it. You state or imply that the smothering of the rock, the noise of climbers and the view of climbers are negative impacts. Do your visitor's consider the noise and view to be a negative impact? It is virtually impossible to hear or see a climber unless the climbing route is immediately adjacent to a roadway, in which case the impacts of the roadway and traffic are far greater than those of the climber.**

**page 29, 3rd para.: Grazing is allowed to continue in an Exceptional Resource Area "because it was considered to have water resources critical to ranching operations". If we are to use this logic then climbing should be allowed to continue in this zone when the resource (rock) is critical to climbing. Once again, climbing is restricted with little understanding of its impacts on the resource or the visitor experience while grazing continues while its negative impacts are well defined.**

**page 29, second column: The text references sections 25, 31 and 36 but the accompanying map does not have sections. The reader cannot identify these areas. Also, what is "nature walking"? Is this the same as "nature viewing" as stated elsewhere?**

**page 29, last para.: How does climber registration disperse activity? Will the NPS limit activity once a predetermined carrying capacity is reached or will climbers decide such issues?**
COMMENTS

page 30: This map might best be included before the text at the start of the section.

14. Congress directed the NPS to "identify those areas or zones within the reserve which would most appropriately be devoted to (1) public use and development; (2) historic and natural preservation; and (3) private use . . . ." The document gives examples of appropriate uses for each zone. The assumption that all other uses are inappropriate is incorrect.

15. The text was changed.

16. The text was changed.

17. Many raptor nest sites were identified during the 1991 raptor survey conducted by the Park Service.

18. The text was changed.

19. The text was changed.

RESPONSES

page 31: The symbol used for the wagon rut remnant should ideally look like a wagon rut itself, it does not. Also, "appropriate activities" are identified in the Development Zone (as in other zones). Is it policy to identify "appropriate activities" rather than "inappropriate activities"? Are we to assume that any activity not listed as "appropriate" is therefore "inappropriate"?

14. The text was changed.

15. The text was changed.

16. The text was changed.

17. Many raptor nest sites were identified during the 1991 raptor survey conducted by the Park Service.

18. The text was changed.

19. The text was changed.

page 34, last para.: Grazing is described as a "dynamic active expression of traditional ranching". Must you continue to attempt to create this inaccurate and romantic view of grazing? Such editorializing is inappropriate in a planning document. Also, the use of "dynamic" and "active" is redundant. You are trying so hard to make grazing sound positive that you are tripping over yourself.

14. The text was changed.

15. The text was changed.

16. The text was changed.

17. Many raptor nest sites were identified during the 1991 raptor survey conducted by the Park Service.

18. The text was changed.

19. The text was changed.

page 37, "Air Quality": The designation of the city of Rocks as a Class I Area with regard to air quality (and a program of air/visual quality monitoring) would be a positive step. The preservation of visual quality may be the most important step we could take to protect the historic viewsheds. This is clearly more important, but more difficult and more long term, than regulating any on-site activity. Let us put our effort to truly meaningful protection measures, not just those which are easy to implement.

14. The text was changed.

15. The text was changed.

16. The text was changed.

17. Many raptor nest sites were identified during the 1991 raptor survey conducted by the Park Service.

18. The text was changed.

19. The text was changed.

page 37, "Geological Resources": Again, why place a moratorium on climbing when the impacts are not known? The impacts of grazing are known (reduction in plant diversity, soil erosion, destruction of wetlands, etc.) yet no such moratorium is proposed.

14. The text was changed.

15. The text was changed.

16. The text was changed.

17. Many raptor nest sites were identified during the 1991 raptor survey conducted by the Park Service.

18. The text was changed.

19. The text was changed.

page 39, 1st para.: If all rock outcrops in site of golden eagle and ferruginous hawk nest sites are to be closed to climbing, is this closure included in the other group of closures recommended due to the impact on the historic viewsheds? This is actually a new, undefined group of closures. Since few of these nest sites are known or identified, we don't know how widespread the closure will be. Since these species nest on high outcrops, won't any "outcrops in site of [these] nest sites" include much of the Reserve? What distance from a nest site should we be concerned with? While we are sensitive to impacts on these species, particularly during breeding, I doubt if there is any need for such a widespread closure, or for any period other than breeding season.

14. The text was changed.

15. The text was changed.

16. The text was changed.

17. Many raptor nest sites were identified during the 1991 raptor survey conducted by the Park Service.

18. The text was changed.

19. The text was changed.

page 38, last para.: The statement "Many rocks...used by rock climbers also provide essential habitat to many species that are sensitive to human activity" seems to be an overstatement. No inventory has been completed yet; how can you state "many rocks...many species..."? I believe the following would be more accurate: "Some rocks...may provide...species". If the inventory indicates that certain rock formations must be closed to climbing during breeding seasons (or indefinitely) to protect rare or
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>endangered species, I am confident that the climbing community will support such a decision. Protection of rare/endangered species should generally take precedent over human use.</td>
<td>20. Significant resource damage and thresholds will be defined in the resource management plan. Also see the Council on Environmental Quality NEPA regulations at 40 CFR 1508.27 for a definition of significant impact.</td>
</tr>
<tr>
<td>page 39, &quot;Domestic Livestock Grazing&quot;: Please define the term &quot;significant resource damage&quot;. Is this the same threshold used in gauging the impacts of other human activities? This threshold seems too high. Exactly what is significant damage?</td>
<td>21. To protect wetland and riparian areas livestock grazing would be excluded from most riparian habitat on public land and livestock access limited in other public portions of the reserve. Mitigation to minimize harm to wetland and riparian areas is described in appendix J.</td>
</tr>
<tr>
<td>page 40, 1st column, bottom: &quot;Grazing would continue in all areas of the reserve except...some damaged fragile areas (including damaged wetlands and riparian areas) on public lands&quot;. Therefore grazing will continue on some damaged fragile areas? There must be a way to get water to livestock without destroying wetlands, particularly if these wetlands are important habitat for rare/endangered species or the &quot;special species&quot; mentioned on page 14. I am sure that wetlands are a limiting factor for many species in the Reserve. Such valuable habitat characteristics must be preserved.</td>
<td>22. Natural quiet was identified by the public as an important quality of the reserve worthy of protection. See the planning newsletter for additional information on public opinion.</td>
</tr>
<tr>
<td>page 40, last para.: Please explain how the &quot;natural silence&quot; of the Reserve became a significant value. How is silence at this Reserve different, or more valued, than at other NPS units? Aren't all natural areas, and much of Idaho for that matter, silent most of the time? I would be interested to know if the visitor experience would be more affected by a power drill or a firearm discharge. If noise is really that important you must seriously consider restricting firearms.</td>
<td>23. Climbing would not be banned in these sections as the comment suggests. These sections are encompassed by the natural and recreational resource areas shown on the alternative 2 zoning map.</td>
</tr>
<tr>
<td>page 43, last para.: The use of the term &quot;awesome&quot; in this context is a bit overstated. While I agree that visiting the Reserve, enjoying the scenery and learning about the history is a uniquely rewarding experience; I think the use of such terms is an over-dramatization.</td>
<td>24. Percentages were not calculated because the total number of climbing routes in the reserve and climbing closures on private land are unknown. The climbing management plan will provide more specific information about available climbing areas.</td>
</tr>
<tr>
<td>page 46, bottom: Again, exactly where are the sections (25,31,36) indicated in the text? The reader cannot assess the impacts of a ban on climbing in these sections without more detail. From the statement &quot;the climbing management plan would decrease the land available from the current 12,913 acres to about 10,721...&quot;(p.v) we can see that grazing will be eliminated from 17% of its present range. Exactly what percentage of climbing routes would be off limits? Grazing interests are given meaningful detail and climbers deserve the same consideration. Also, will the parking areas indicated be determined in the forthcoming Climbing Management Plan?</td>
<td>25. Parking areas will not be determined in the climbing management plan.</td>
</tr>
<tr>
<td>page 46, 2nd column, 2nd para.: Again, is it appropriate to prohibit the use of power drills prior to the completion of any pertinent research or the completion of the Climbing Management Plan? This seems premature. How is the &quot;sense of silence and mystery that pervades the landscape&quot; that unique? This is simply</td>
<td>26. The text was changed.</td>
</tr>
<tr>
<td>COMMENTS</td>
<td>RESPONSES</td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
</tr>
</tbody>
</table>

27. The text was changed.

28. See the Council on Environmental Quality NEPA regulations (40 CFR 1500-1508) for information on NEPA compliance.

29. The text was changed.

30. Livestock was considered part of the historic setting.

a function of the lack of human use due to the extreme climate, rugged terrain and isolation of the Reserve. Much the same condition can be found throughout the badlands and mountainous regions of the West. If climbing is to be severely restricted to protect the valued silence at this site, it could be used to restrict climbing on almost any public land. This Comprehensive Plan recommends the construction of RV facilities. I believe more visitors would be put off by the incessant drone of RV engines and generators than the occasional power drill.

27. page 49, 1st para.: The recommended range of 10-50 campsites is too wide. Please narrow it down and make a specific recommendation. How many primitive sites are now provided in the Reserve? Is this enough in a Reserve of 14,000 acres?

28. page 51, "Roads": Much energy should be directed at the construction of a road which would allow commercial and through traffic to bypass the Reserve. This would be a positive, long term step in preserving the visitor experience.

29. page 63, 2nd para.: Does the landscape still look much the same as it did, considering "The vegetation and habitats evolving today are different from those that existed before human uses occurred"? (p.123)

29. page 64, "Air Quality": The establishment of an air/visual quality monitoring program at the Reserve is crucial to the long-term protection of the historic and scenic viewsheds. This issue deserves much more attention in both the Comprehensive Plan and EIS. As is stated on page 101, "City of Rocks visual quality is probably deteriorating similarly to that at Craters of the Moon. Even slight increased in air pollutants could cause major decreases in visibility."

29. page 64, last para.: The Draft EIS states that the Comprehensive Plan "recommends actions to encourage the use of low-impact climbing techniques...". This statement is clearly inaccurate. The Plan recommends a moratorium on climbing in certain areas and an outright prohibition on certain techniques/equipment. In our view, such a moratorium and prohibition could easily become permanent. The EIS therefore makes the Plan sound more climber-friendly than it is in reality.

30. page 65, 2nd para.: Why is "the continuation of current grazing activities...important for maintaining the historic rural setting"? Because livestock were part of the historic setting or because...
### COMMENTS

other land uses (farming, residential development, etc.) would be less compatible uses?

page 65, 3rd para.: "grazing...may be damaging vegetation beyond the point of recovery...Erosion associated with overgrazing may be affecting the water quality of streams and springs." I appreciate the candid statement on grazing impacts.

page 65, last para.: Please specify exactly how, and to what extent, the cliff faces have been scarred by climbing. I think this is important so that we may compare this impact to other resource impacts. Also, exactly what conflicts have arisen between climbers and non-climbers in the Reserve? Have there been conflicts between other user groups? If so, please include this information in the pertinent sections or remove this item from this section. Otherwise, it appears to the reader that the only conflicts have involved climbers.

page 66, 1st para.: It is not true that no designated camping areas exist within the Reserve. There are several, see page 114).

page 66, 2nd column, 2nd para.: Exactly how would private landowners be adversely impacted by land acquisition?

page 69-70: This information is a bit confusing. Do these zones exist independent of the alternatives? While the concept of zones makes sense, it is unclear how specific prohibitions or regulations can be presented separate from an alternative.

page 69, 4th bullet: This term "equipment-free scrambling on rocks" is new. Is this the "minimum-impact climbing" previously referred to or an even less intensive use? Also, what is it about equipment that is offensive? Is it the noise of power drills, the 'scarring' of rock, or what? Whatever the specific problem is, please regulate that and not the entire activity. Perhaps your intent is simply to reduce public use. If so, just state that.

page 70, 2nd column: Once again we see the term "minimum-impact climbing" next to "grazing continues". How about adopting the phrase "sustainable grazing" or "minimal-impact grazing".

page 71, "Visitor Use": The primary visitor use in the Reserve is rock climbing, not the California Trail (see page 113) yet you don't say this in the first paragraph. Why?

### RESPONSES

31. The extent of impact to rock surfaces in the reserve has not been measured. The document calls for the development of a resource management plan that will include a monitoring and inventory sampling program to determine the extent of climbing impacts on rock formations. See the "Resource Management" section.

32. See the planning newsletters for all public issues raised during scoping.

33. The text was changed.

34. The text was changed.

35. "Equipment-free scrambling" is not the same as "minimum-impact climbing".

36. The text was changed.

37. The climbing management plan will provide more specific information about total area in the reserve available for climbing.
COMMENTS

38. page 77, 2nd para.: Picnicking is to continue at the Twin Sisters but climbing is prohibited. Is climbing inherently less compatible with the historic setting than picnicking?

39. page 77, "Resource Management": There is no mention of grazing until the very last sentence. There is no mention of grazing in the "Management Actions..." section even though the wetland impacts cited are obviously caused by grazing. Once again, you seem timid to point out the negative impacts of grazing.

40. page 113/114: What was the impetus for the County ordinance banning power drills? What involvement was there from the NPS? Are visitors restricted by local ordinances in other NPS units?

41. page 123, 3rd para.: How can you refer to grazing as a "sustainable use" of the land when, in the previous paragraph you state that grazing (among other uses) has "resulted in irretrievable losses of soil and the introduction of highly competitive nonnative plans that are nearly impossible to eliminate. As a result, the original vegetative communities and the distinct assemblage of animals dependent upon them have been permanently lost." While grazing on the Reserve has shown to be profitable for a longer period of time than farming, it is not sustainable.

42. page 124, last para.: Why do you state that the "gradual recovery of the natural productivity of this land might eventually increase its forage value"? I can't see how it wouldn't.

43. page 131, "Natural Quiet": How do you know that the "natural quiet" is so valued by the visitors? Have you surveyed them? Is the quite more valuable here than at other NPS units? Also, I question whether this is a natural or cultural resource. Isn't the quite valued for reasons of preserving the historic setting?

44. page 132, "Rock Formations": Where are the "fragile" rock formations referred to here and elsewhere? Are there outcroppings composed of something other than granite? Also, lichens are very

RESPONSES

38. The text was changed.

39. Grazing management actions are under the "Management of Natural Resources Uses" section.

40. The enabling legislation provides direction for the state and appropriate units of local government having jurisdiction over land use within the reserve to enact ordinances or establish regulations that will protect and preserve the historic and natural features of the area in accordance with the CMP (See appendix A). Other parks may have local ordinances or regulations, such as fishing regulations, that apply to visitor use within the park.

41. The text was changed.

42. The "Resource Management" section does call for the development of a fire management plan with prescription for fire.

43. See response 4.

44. The plan, under the resource management section, calls for a monitoring and inventory sampling program that concentrates on locating fragile rock formations and impacts. Also, an air monitoring program would be developed for the reserve.
susceptible to the impacts of air pollution. Perhaps this issue should be addressed in the EIS.

Page 132, last para.: "Cleaning" of loose material from climbing routes generally happens only once, during the first attempts. Again, chiseling is very rare and is not an accepted practice.

Page 133, "Alternative 2": When recommending climbing closures for purposes of restoration, please define the term "essential". This is too vague and perhaps should be left to the Climbing Management Plan. Would minimal-impact climbing be "encouraged" or required? Also, are you prohibiting the use of power drills to decrease visitation and the associated impacts on the rock, the impacts of climbing on historic viewsheds, or both? Shouldn't the entire discussion of power drills be left up to the Climbing Management Plan?

Page 134, "Alternative 2": Please define the term "phasing out". What timetable do you recommend or anticipate to eliminate grazing from sensitive and highly degraded areas? Also, the discussion of fire management only discusses natural fire. Why not prescribed fires specifically for the purpose of creating diversity. This is a growing and accepted management practice.

Page 135, "Alternative 2": Would you restore the former road bed if it were realigned. If not, the old road bed will remain as a scar on the landscape for many years.

Page 136, 2nd para.: Has the U.S. Air Force cooperating in reducing the impacts of low-level overflights? This statement indicates that perhaps they are resistant.

Page 138, "Alternative 2": Again, why is grazing only being eliminated from "some damaged wetlands and riparian areas on public lands"? Seventy-four percent of wetlands and riparian areas will be subject to unrestricted grazing? Which ones will continue to be damaged and why? Isn't there some way to achieve a higher level of protection while providing water for cattle?

Page 144, table 10: This table is confusing. What do the blank spaces in Alternative 2 mean? The text following this table does not provide the necessary detail or discussion either.

Page 147, "Alternative 2": Again, define "phased out".

Page 147, "Alternative 2, Conclusion": The increased forage value should be factored into the economic benefit analysis. Economic analysis is not simply a short-term view but a long-term one. The economic analysis as a whole is too simplistic. It is a more comprehensive cost-benefit analysis were completed, various non-traditional values would also be factored in. These could include both consumptive and non-consumptive recreation values as well as...
option, bequest and existence values. With this more detailed analysis the value of increased diversity, improved wildlife habitat, restored riparian areas, and other factors, could be assessed.

**SUMMARY**

The Planning Team has obviously put a great deal of effort into the development of the Comprehensive Plan and the Draft Environmental Impact Statement. I hope this planning effort is fruitful in spurring management actions which will protect the myriad of resources that make up the City of Rocks National Reserve.

My general opinion is that the Comprehensive Plan, and to a lesser degree the EIS, is lacking in detail in the following areas:

* The specific impacts of rock climbing on natural and cultural resources and the effect of climbing regulations and closures on visitors.

* The present and long-term impacts of grazing on vegetative diversity, native plant species, wetlands and riparian areas, wildlife habitat and cultural resources.

* The present state of rare/endangered or candidate species or the effects of human use on these species.

* The overall economic impact of the alternatives.

Specifically with regard to non-traditional values.

While I realize the need to complete the Comprehensive Plan now and proceed on research and the development of more specific management plans, it is difficult to assess the information and recommendations presented considering the lack of detail in the above areas. When detail in such areas is lacking, the implementation of certain recommendations must simply wait until the information is available.

The Comprehensive Plan recommends serious restrictions on rock climbing with perhaps a limited understanding of climbing, or its impacts on the resource. The Plan further recommends the implementation of these serious measures prior to the completion of a Climbing Management Plan. Further, the Comprehensive Plan places less serious restrictions on grazing, through and undefined phasing scheme, even though the negative impacts of grazing are better understood and documented (at least in the EIR).

Although the Comprehensive Plan paints a generally positive view of grazing, the Draft Environmental Impact Statement provides some insight into the negative impacts of grazing:
"trail ruts...deteriorating" (p.63)

"archeological sites are subject to damage from...cattle grazing" (p.64)

"grazing...may be damaging vegetation beyond the point of recovery...Erosion associated with overgrazing may be affecting the water quality of streams and springs" (p.65)

"Cattle concentrated in the riparian zones accelerate soil erosion and contribute fecal coliform to reserve streams and springs. Most of the soils in the reserve are highly erodible, and several severely eroded areas contribute sediment to streams during high flows corresponding to storm events and spring snowmelt. High stream sediment and associated turbidity can negatively affect stream organisms both in and outside the reserve far downstream from the source of the particulate matter." (p.103)

"the original vegetative communities and the distinct assemblage of animals dependent upon them have been permanently lost." (p.123)

While I am generally supportive of the preferred alternative, I would respectfully recommend the implementation of the following management actions:

* Take a more firm stance, with a better defined timetable, on controlling the negative impacts of grazing. Implement specific measures to ensure sustainable grazing practices throughout the Reserve.

* Implement a Fire Management Plan which prescribes fires to promote native plant and animal diversity.

* Implement no climbing moratorium until the completion of the Climbing Management Plan. Implement only those regulations necessary to control "significant resource damage" or whatever threshold is used to control grazing impacts.

* Aggressively pursue more land acquisitions to avoid conflicts with private land owners and to decrease impacts of poor grazing practices on these lands.

* Take stronger measures to protect important wildlife habitat; wetlands and rare/endangered species habitat in particular.

* Immediately implement a program to monitor air and visual quality and take steps to protect air/visual quality, which may be the greatest threat to the historic viewsheds.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climbers seek to be treated fairly, as any other major user group. The restrictions on our recreational activity must be based on the actual impacts on the resource and the visitor experience. Restrictions should not be based on local perceptions/attitudes or impacts which are not well defined. I hope these comments have been helpful to you. Members of the Climbing community remain open to working with you, and the local citizens, to protect the public resources of the City of Rocks National Reserve.</td>
<td></td>
</tr>
</tbody>
</table>

Sincerely,

Richard P. Doucette
on behalf of the Mountaineering Committee of the Appalachian Mountain Club's Boston Chapter

R. Doucette
17 Quincy St.
Medway MA 01844
Arizona Mountaineering Club
P.O. BOX 1695 • PHOENIX, ARIZONA 85001

Sub: City of Rocks Proposed Climbing Management Plan

This letter addresses the Arizona Mountaineering Club's (AMC) official position in regards to the proposed draft Comprehensive Management Plan (DCMP) for the City of Rocks Reserve in Idaho.

Az. Mountaineering Club Background:

The AMC is an organization based in Phoenix, Arizona. It is a non-profit corporation which caters to the interests of hikers, mountain bikers, tree ratters, mountaineers and technical rock climbers. The AMC works closely with the Access Fund and other agencies in working with officials and the public with regards to climbing related issues. The club has a long history of trail maintenance work, Grand Canyon clean-ups, Christmas luminaries, and assorted other public-service projects and conservation efforts.

The AMC wishes to emphasize the importance of climbing as an activity in the City of Rocks. Climbers, more than any other group, have donated time and resources for trail projects, toilet facilities, clean-ups and other activities, with a desire to preserve the area for themselves and future generations.

Our Concerns:

☐ Climbers make up 75-90% of the visitors to the City of Rocks. The DCMP is riddled with anti-climber/climbing bias. This is inappropriate and highly unprofessional. Many climbers are professionals; attorneys, engineers, accountants etc. These people expect the same high-quality of professionalism from NPS officials and superintendents that is expected of them in their vocations. Climbers have "voluntarily" restricted climbing in sensitive areas, and continue to be very patient with officials regarding development of the DCMP; yet the DCMP doesn't effectively address climbers issues, it attempts to regulate them (climbers) out of existence.

☐ The cover letter on the DCMP calls for a "partnership" between groups. There is no mention of this in the plan itself, and the initial methods and efforts of the DCMP team prove this out. The initial planning team did not have climber representation and is fully unqualified to assess impacts of climbing and direct climbing management. They sought NO input from the Interim Climbing Management Planning Team which was formed as a public vehicle to address climbing related issues. The public meetings were held in locations which excluded the largest populations of climbers who frequent the City of Rocks.

1. See response 1 to the Access Fund.
The DCMP violates the initial goals put forth by the NPS, relating to the call for local management plans. The DCMP attempts to "micro-manage" climbing and is not based on identifiable impacts. The DCMP also violates the NPS goals to "manage climbing with minimum regulation necessary", while protecting resources.

Climbing is banned in the Research Natural Area, while other visitor activities are still permitted. The "micro-management" documented above is further evidenced by the DCMP's definition of "minimum impact climbing". No fixed anchors, no chalk, no voice signals. If there are DOCUMENTED impacts from these activities they should be addressed by local management in cooperation with local climbers.

The DCMP restricts all camping in the Reserve until a 7-site primitive campground is established between 2001 and 2004. Various other future campsites in the Reserve are proposed but not scheduled. A 100 site RV campground outside of the Reserve is scheduled for construction immediately. This action is another blatantly obvious means to restrict climbers access to the City of Rocks. RV campers make up an extremely small percentage of the users of camping within the reserve. So why build such a facility?

Allowing cattle to remain upon land in the Reserve while banning climbers in the same area is extremely hypocritical.

Allowing "family" scrambling but no technical climbing is another example of evident bias against climbers and extreme "micro-management".

Blatant exaggerations in the Impact Statement which single out climbers as a "negative visual impact" while ignoring other users and impacts such as hikers, horseback riders and cattle. The DCMP further singles out climbers by failing to mention trails developed by cattle, horses and trail bikes.

The list is very long and could go on for several pages, but the primary thrust is that the DCMP is very negatively biased against climbers. It shows strong influence by private landowners and ranching interests. The Impact statements are worded in a very negative way, with much of the actual impact data inadequately presented or even ignored. Climbers are presented in an extremely poor light, with no mention made of their work to benefit the Reserve. The definition of Minimum Impact Climbing in the DCMP is extremely unrealistic.

The text was changed.

Climbing activities typically occur on rock formations and not rangelands where cattle graze. The plan does not "ban" visitors from livestock grazing areas on public land.

The text was changed.

The impact analysis for scenic quality does not state that climbers cause a "negative visual impact." The analysis of impacts caused by rock-altering activities pertain to the natural state of rock surfaces and not their visual quality as the comment suggests. The natural biological diversity impact analysis does evaluate the impacts of the various ground-disturbing activities stated in the comment.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>The DCMP goes outside the Congressional mandate in establishment of &quot;zones&quot; within the reserve. Finally, the DCMP fails to provide for camping within the Reserve, and uses very misleading statements with regards to studies and perceived impacts. The AMC has nearly 400 members. These members often schedule trips to various climbing areas around the country. If this DCMP is accepted, this is one area that will likely be taken off of many peoples list. Since this is federal land, it is placed in the trust of officials and superintendents to care for, to ensure that all US citizens have access and can enjoy its beauty. It is not a vehicle for local landowners and ranchers to exclude others through regulations which keep the general public out.</td>
<td></td>
</tr>
<tr>
<td>6. The plan does provide for camping in the reserve.</td>
<td></td>
</tr>
</tbody>
</table>

Sincerely, Thomas Matthews
The Arizona Mountaineering Club

THOMAS MATTHEWS
CHAIRPERSON, ACCESS COMMITTEE
January 25, 1994

Charles Odegaard  
Regional Director  
National Park Service  
Pacific Northwest Region  
83 South King Street  
Suite 212  
Seattle, WA 98104

Re: City of Rocks National Reserve Draft General Management Plan

Dear Regional Director:

The Climber’s Conservation Alliance is a grass roots environmental organization dedicated to the preservation of the environment and responsible use and management of public and privately held climbing areas in the United States. Although our organization is relatively new, members of its Board of Directors have been involved in the planning process for City of Rocks National Reserve for many years.

We have reviewed with great interest the Draft Comprehensive Management Plan and Environmental Impact Statement for City of Rocks National Reserve and, unfortunately, find the document severely flawed. Apparently, considerable public input and objective data were either ignored or distorted to produce a planning scheme that is neither workable nor realistic. Furthermore, the “Alternative” plans proposed are exemplars of massive government waste.

Similarly, the Environmental Impact Statement fails to meet even cursory standards for a document bearing such title. Little if any research has been conducted. However, the data and research that was gathered directly contradicts the Planning Team’s EIR. In some cases, data is deliberately misrepresented.
Although we find the above and many other matters in the Draft GMP very troubling, in particular, we would draw your attention to the following:

1. **ANTI CLIMBING BIAS** There is an overwhelming bias against climbing activities exhibited throughout the Draft GMP. Unsubstantiated statements are made throughout the Draft GMP concerning impacts of climbing on the rock surfaces. Use of fixed anchors and other climbing practices are most definitely not causing "considerable damage to the rock surfaces" nor has it "marred the scenic qualities of some rock faces" as is asserted. If this and other contentions were not stated in such apparent sincerity, they would be laughable. As such, they are of grave concern to the climbing community.

2. Although a small (and vocal) contingent of individuals have made use of fixed anchors seem a major environmental concern, in actual fact, this is completely false. Even Superintendent David Pugh has acknowledged that the Park Service has a "hard time finding bolts, and [they] know where they are". Environmental studies at Twin Sisters would seem to confirm the minimal impact that fixed anchors have on the environment.

3. Although 1991 Visitor Use data found 58 percent of visitors were climbers, the entire Draft GMP supports a proposition that climbing is somehow not a compatible or perhaps even legitimate activity in much of City of Rocks. The Environmental Consequences section of the Draft GMP makes sweeping (and negative) statements about the effects (and potential effects) of climbing at City of Rocks. Absolutely no data exists to support these statements.

4. The Draft GMP also contends that rock climbers presence on "key landmarks like Twin Sisters...would make it difficult for anyone to imagine a historic scene and could confuse some people's understanding of historic conditions." Recent studies by the NPS have shown this assumptive "fact" to be completely false.

2. **"BUILD IT AND THEY WILL COME."** Equally troubling as the biases against current user groups, are the development proposals made in the Planning team's two "Alternatives". Not only are many of the facilities proposed unnecessary, but command astronomical price tags.

   Although RV visitation is currently minuscule, a proposed 80 to 100 site "RV Campground" will cost well over $7,000,000.00! The RV "campsites" are projected to cost, at a minimum, $56,138.00 each. Toilets and showers for this one campground alone are projected at $546,000.00. Since it is proposed that these facilities be located outside the Park (with which we agree), if there is a need for such facility, then private concerns (KOA, etc) will certainly build them. The wisdom of building such facilities with taxpayer dollars for people who do not visit the Park is lost on us.
Staggering price tags are also attached to even mundane items such as vaulted toilets. A single, two compartment vault toilet is projected to cost $93,600.00. Of this amount, $15,000.00 is allocated to that nebulous bureaucratic black hole: "Advance and Project Planning Cost". A 400 square foot "Comfort Station" (Toilet) commands an equally impressive price tag of $223,080.00, or $558.00 per square foot.

The list could go on. The Pentagon’s $200 hammers can’t hold a candle to the Park Service’s $100,000.00 vaulted toilets.

By offering the public two ill conceived Alternatives, bearing enormous price tags and a "No Change" alternative that is portrayed in a doom and gloom scenario, the GMP Planning Team has clearly wasted it’s time and no doubt considerable amounts of the tax-payer’s dollars. Unfortunately, the planning team’s biases against rock climbing, and their own vision of how they would like to see City of Rocks enjoyed, have not changed one iota during the several years they have been working on the GMP. Their arrogance is monumental.

Given the alternatives, the CCA can only endorse a No Change proposal. We strongly urge that the GMP Planning Team be discharged and in the future a new General Management Plan be devised that addresses the need to balance resource protection with responsible recreational use.

If you have any questions or comments, please do not hesitate to contact me.

Very truly yours,

THE CLIMBER’S CONSERVATION ALLIANCE

By, Randy K. Vogel, President
COMMENTS

OREGON - CALIFORNIA TRAILS ASSOCIATION

OFFICE OF NATIONAL HISTORIC TRAILS PRESERVATION
950 OLD TRACE ROAD • PALO ALTO, CALIFORNIA 94306 • (415) 961-0815

January 18, 1994

Mr. Charles H. Odegaard
Regional Director, National Park Service
Pacific Northwest Region
83 South King Street, Suite 212
Seattle, WA 98104

Dear Mr. Odegaard:

As National Trails Preservation Officer for the Oregon-California Trails Association, I wish to comment on the Comprehensive Management Plan (CMP) and Environmental Impact Statement (EIS) for the City of Rocks National Reserve, Idaho. It is my understanding that our Idaho Chapter will also be commenting directly on the plan.

OCTA generally supports Alternative 2, the preferred alternative, but we do have some continuing concerns which we wish to be placed in the official record. We hope that these concerns will be seriously considered and addressed where necessary before the CMP is finalized.

Our overriding concern has to do with the purpose behind the establishment of the National Reserve and the priorities for development and management which we strongly feel need to take precedence in order to achieve that purpose. From a strictly historic preservation point of view, Alternative 3 could be considered the best of the alternatives, but we fully appreciate that the National Reserve concept allows for other recreational and traditional uses, and it was with this understanding that the consensus leading to the establishment of the Reserve was achieved after so many years of frustration. As a historic trails preservation group we wish to honor that consensus. At the same time, we feel that the primary reason for establishment of the Reserve was the protection and preservation of the historic trails resource. We also feel that this is clearly indicated in the enabling legislation. For this reason OCTA believes that the underlying philosophy for planning, development (or lack of development), and ongoing management of the Reserve must always give priority status to maintaining and enhancing the emigrant trails experience. We are not opposed to those recreational or traditional uses which will not negatively impact upon the trail experience, and we frame our comments on this basis.

Rock climbing has been a continuing concern for our organization. We generally feel that Alternative 2 handles that part of the equation in a sensible and acceptable manner. However, we are most concerned about the possible implications of the rock climbing paragraph on page 76. We are unalterably opposed to any climbing on Twin Sisters or in the immediately vicinity, and we see no reason for a resource study in this regard. The decision should be made now that this historic visual resource—one of the most important and most commented upon

RESPONSES

1. Questions related to climbing use outside the foreground viewshed of the California Trail prism, which includes Twin Sisters, in the California Trail subzone will be addressed in the climbing management plan.
natural features of the California Trail—will not be subject to rock climbing. It is also unclear to us what constitutes the "Impact Monitoring Area." It is indicated that this area is in "the northern end of encampment area" and that "minimum-impact climbing" would be allowed. The paragraph on page 76 also states that a climbing management plan would be developed with input from the local climbing community. OCTA would like to have further clarification as to just what constitutes the "northern encampment area," and we are, in general, opposed to any climbing activities which will have an immediate visual impact from the historic trails corridor. We can accept rock climbing in the Reserve and feel that it is a legitimate recreational use, but its use must not lessen the trails experience which is the fundamental purpose for the establishment of the Reserve. We would like to have historic trails preservation people involved in any formulation of a climbing management plan. We see no reason why rock climbing and historic preservation cannot coexist in the Reserve but not if it comes at the expense of the trail experience.

OCTA believes that the Circle Creek Basin (City of Rocks Basin) must have its visual integrity completely restored and then maintained. This unique and extraordinary viewed is what makes City of Rocks the national historic and natural treasure that it is. Number one priority should be given to willing seller acquisition of the private inholdings in the entire basin, and the management plan should then give priority to the removal of all man-made "improvements" which have been introduced over the years. The station house at the entrance to the basin is of historic value itself and should be incorporated into the management scheme but all other visual intrusions should be removed as quickly as possible. No activities and developments should be allowed within the basin as it is viewed from anywhere along the historic trail. This spectacular viewed and the emigrant's reaction to it is the primary reason why City of Rocks is of such outstanding national significance.

OCTA is still somewhat concerned about camping proposals within the Reserve boundaries. We would very much prefer that campgrounds be established outside of the boundaries because of the limited size of the Reserve. However, the camping proposals in Alternative 2 seem to be reasonable if the concept is accepted that camping must be provided for within the scenic areas of the Reserve. We appreciate that the public likes to have such convenient camping facilities provided for it, but we seriously question whether this desire is best for the purposes of the Reserve. It takes only a matter of minutes for anyone to access any portion of the Reserve, so there would be no hardship involved in establishing campground facilities on private lands outside of the Reserve boundaries or on those portions of the Reserve which lie on the periphery outside of the truly scenic areas. We would urge that further consideration be given to the campground situation. This is the time to make such a decision.

In any long-term development plan concerning City of Rocks, OCTA
would like to urge that priority be given to willing seller acquisition of Granite Pass and to the establishment of a continuous Scenic Byway between City of Rocks and the already established BLM Scenic Byway which extends from just north of Rock Springs to Thousand Springs Ranch. Granite Pass is second only to South Pass in importance as an emigrant trail pass. Tens of thousands of emigrants passed over it, and it must be considered near the top of the list of historic passes in the United States. It is very much still in its original state, and it offers a truly outstanding experience. The establishment of such a scenic historic byway beginning at City of Rocks would provide the nation with a participatory experience which is not just an episodic one within a severely circumscribed area, but an extended living-history drive which would provide the participant with a true appreciation of the emigrant trail experience. It would be an experience of extraordinary national significance.

OCTA appreciates this opportunity to comment on the City of Rocks Comprehensive Management Plan. We have worked many years to see to it that City of Rocks received the recognition and protection that it so richly deserves as one of this nation's most significant historic overland trail experiences. We believe that this Plan is a good start towards protecting and enhancing a magnificent part of our American heritage. We hope that our comments will be considered and incorporated into the Plan. Our concerns have primarily to do with emphasis and the setting of priorities, but we feel that it is essential that any management and development plans which are now to be put in place for City of Rocks are absolutely and unequivocally committed to establishing historic trails protection and preservation as their guiding principle.

Sincerely,

Thomas H. Hunt
National Trails Preservation Officer

CC: John Davis
Larry Jones
Virginia Ricketts
January 28, 1994

Dear Regional Director,

This letter documents our comments of the City of Rocks National Reserve Comprehensive Management Plan and Environmental Impact Statement.

Idaho Chapter of the Oregon/California Trails Association is an organization of approximately 120 individuals and families. Our membership consists primarily of Idaho residents but also includes members from California, Montana, Oregon, and Washington.

IOCTA is a sub-unit of the national Oregon/California Trails Association. IOCTA and IOCTA are not-for-profit organizations dedicated to the identification and preservation of trail-related historical data, the collection of historical data, and the education of the general public on the significance of the trails to our national history. This letter represents the views of the Board of Directors, IOCTA.

IOCTA through IOCTA's role in supporting the proposed bill for the creation of the City of Rocks Reserve, IOCTA was more than convinced that the area deserved national recognition. The reserve concept was especially appealing to us because of the idea that the area would be under the direction of a State/local agency. An earlier federal attempt to bring more comprehensive management to the area failed because of lack of trust in the scope of federal management. We are comfortable that the concept of State/local administration of the reserve will enhance the acceptance of governmental management by the private landowners and the users of the area.

We want to commend the National Park Service for leading this effort to place City of Rocks under more comprehensive management. We recognize that the task was difficult and that this effort represents the beginning of an even bigger task of implementing the plan. We do not wish to add to the task but we still must perform our advocacy task regarding the historical values identified with the City. We advocate on behalf of our organization and the California bound emigrants who wrote of their impressions and experiences while passing through the area in the middle third of the 19th Century.
We are disappointed that the draft Comprehensive Management Plan and Environmental Impact Statement only acknowledged the existence of Public Law 102-328. This amendment to the National Trails System Act should have been co-equal with Title II PL 100-696 in this planning effort.

This newer law we feel gives added historical emphasis in the vicinity of the California Trail in the City of Rocks Reserve. The area is much more than a reserve for the area contains at least one value that is a national value recognized by federal law. NPS needs to incorporate the concept embodied in the Congressional designation of the California Trail as a national historical trail within the comprehensive plan.

As a prelude to commenting on your planning document we reviewed Title II Public Law 100-696.

Section 201 leads off with the requirement "to preserve and protect significant historical and cultural resources".

Section 202(a) requires a comprehensive plan. The section directs the plan to identify "those areas or zones within the reserve which would most appropriately be devoted ... (2) historic and natural preservation; ....".

Section 202(c) provides a level of Congressional guidance which has not been fully appreciated in this planning effort. The language of subsection (c) strongly suggests the primacy of protection and preservation of historic and natural features of the area. We feel that subsection (c) gives historic and natural preservation a higher stature than the two other objectives listed in section 201(a).

257

The contention by NPS that City of Rocks is a unit of the national park system does not square with section 202(d). Such a NPS contention is only valid if NPS has active management jurisdiction over the area. Section 202(c)(1) expresses the intent that NPS transfer management and administration to State/local government. Our contention is bolstered by your national reserve discussion on page eight of the document. City of Rocks Reserve represents a unique intergovernmental land management situation which does not fully fall within the provisions of 39 Stat 535. To plan under the constraint of 39 Stat 535 will force the administering State/local agency to behave as an organizational unit of NPS rather than a cooperating agency. This we feel is a fundamental point given Congressional intent that the area be managed and administered by State/local government. We see no justification for NPS enfolding this reserve within its...
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organic Act strictures because such an action imposes another level of policy and regulation on the State/local government administering agency. IOCTA asks if cooperative management is not to occur, then what separates a national reserve from a national park/monument? This fundamental point is also important to section 202(e) if a NPS determination is made that management is not consistent with the purposes of the Act. Any adverse NPS determination must be measured against the purposes of Title II and not the purposes of Title II as screened through 39 Stat 535.</td>
<td>3. Comment noted.</td>
</tr>
<tr>
<td>The document narrative and maps often gives the impression that private property rights are secondary and subservient to federal plans. The final documentation for the selected plan should make it clear that private property owners control all aspects of property ownership unless Cassia County zoning ordinances dictate otherwise. The final documentation for the selected plan should make it clear that private property is subject to state law and only subject to federal laws which regulates any other private property in Idaho. IOCTA feels these statements are necessary so that private land owners can be reassured that they can manage their lands free of extraordinary federal control. Our general concern is that the review document is the sheer size and narrative complexity. Most citizens and private land owners will find the document intimidating. The discussion of the many constraints in the general sections of the document and particularly the Alternative Plans section may unsettle private landowners.</td>
<td>4. Questions related to climbing within the foreground viewshed of the California Trail prism in the California Trail Subzone are addressed in the &quot;Management Zones&quot; section. Questions related to climbing outside the foreground viewshed will be addressed in the climbing management plan.</td>
</tr>
<tr>
<td>IOCTA generally supports maintaining private landownership in the reserve. IOCTA does, however, feel that significant inscription rocks need to be protected by state fee title ownership or at least protective scenic easements. IOCTA is of the opinion that past and present landowners have taken pretty good care of the California Trail and associated features, given the variation of social attitudes in southern Idaho over the past 150 years. IOCTA wants the private landowners treated as cooperators and not as hindrances to the &quot;proper&quot; management of the reserve.</td>
<td>5. The question of grazing in the foreground viewshed of the California Trail subzone is addressed in the &quot;Management Zones&quot; section. The question of grazing outside the foreground viewshed will be addressed in the climbing management plan.</td>
</tr>
<tr>
<td>IOCTA suggests an intergovernmental plan of action be incorporated in the decision making final version of the comprehensive plan.</td>
<td></td>
</tr>
</tbody>
</table>
COMMENTS

6. Livestock grazing falls within this view. The steep topography of Circle Creek, the sparseness of low growing vegetation along the sides of Circle Creek, and the loose character of the soils along the banks of Circle Creek leave no doubt that livestock grazing in the steeper areas of Circle Creek cannot be justified under any livestock management scheme. (5th para. page 3)

7. The success of any proposed comprehensive management plan on the area is heavily dependent upon Cassia County land use ordinances. The NPS and State Parks need to make provision in the plan to provide the necessary support to the County Commissioners in crafting the appropriate ordinance language. Both agencies need to have active commitment to aid the commissioners in gaining the political support for adoption of acceptable ordinances.

8. Of all the rock formations in the reserve, IOCTA feels that rock climbing on Twin Sisters should be prohibited. Twin Sisters is the outstanding feature of the California Trail in Idaho. PL 102-328 gives added emphasis to preserving Twin Sisters for its historical significance. The NPS should not view the Twin Sisters as a multiple use resource.

ALTERNATIVE 2

California Trail Subzone - the proposed plan speaks of respecting property rights, a 0.5 mile corridor, and enclosure. Since most of the historic trail is on private lands, it does not appear that any new forms of protection will be accomplished in the foreseeable future.

The proposed plan falls in comprehensiveness in that it defers decision making regarding rock climbing on Twin Sisters to an unspecified point of time in the future. Rock climbing within the City of Rocks was known by NPS and State Parks to be a critical resource management issue in the early stages of the planning effort. Yet the issue was not given appropriate weight early enough in the planning effort. Now NPS planning team seeks to belatedly address this issue with a data collection effort. It appears that this basic resource conflict will not be resolved until after the public response deadline has passed. IOCTA reminds NPS planners and decisionmakers of Twin Sisters significance to California Trail history. Though Names Rock is probably more prized by late 20th Century visitors, one must realize that the emigrants and passing time created that historical site. IOCTA holds the position that rock climbing on Twin Sister should be permanently prohibited. This prohibition should be incorporated in the final management plan decision.

RESPONSES

6. Comment is addressed in the "Management Zoning, Land Protection" section.

7. The issue of climbing outside the foreground viewshed of California Trail, which includes Twin Sisters, will be addressed in the climbing management plan.

8. The issue is addressed in the "Management Zones" section.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
</table>

| inscription rocks should be a part of the final plan configuration. This plan would identify the inscription rocks which are worthy of protective easements in the immediate future. The action plan should also set a periodic review schedule for reassessing the need for fee title public ownership of these rock formations. |

Enclosure 1

John Davis  
President, IOCTA
**COMMENTS**

**SUMMARY**

Page iii - Paragraph 202(a) of Title II requires identification of "areas or zones within the reserve which would most appropriately be devoted to... (3) private use subject to appropriate local ordinances designed to protect the historic rural setting." To write that "some private use would continue within the reserve" serves to suggest the public values inherent in these private lands exceed the private values of the privately owned lands. Zoning in the context of Title II 202(a) is a mapping exercise as opposed to the zoning accomplished by city/county commissions. NPS fails to clearly make the distinction that their "zoning" has no legal basis and is intended to orient the comprehensive planning effort to balance the three listed uses of the lands within the reserve. Plan reviewers should insert the term "area" in place of "zones" in reading the document as the former term has equal legitimacy as it is also a term used in Title II 202(a).

**PURPOSE AND NEED FOR PLAN**

Page 3 3rd para. - IOCTA agrees that the overriding issue is one of balancing the various demands upon the area. We do however feel that balancing of these demands be tempered by the recognition of the values that are irreplaceable, of the demands that can be met in other locations elsewhere in the reserve, and of demands that can be met in other locations in Cassia County or in Idaho or northern Utah.

**MAJOR PLANNING CONCERNS**

Page 8 2nd para. - Following transfer of NPS jurisdiction to State/local government the reserve appears to lose its status as a national park system unit.

Page 8 4th para. - This paragraph appears to give greater weight to "preserve, protect and interpret" as five components are listed while "manage recreation ..." stands alone. We hope plan decisionmaking will give preserve, protect and interpret the weighting implied by the five component listing.

Page 8 5th para. - The 1964 national historic landmark designation we are sure establishes a prior precedent of longstanding historic value relative to the rockclimbers claim of early and regular ascents on Twin Sisters.

Page 12 Air Quality - This management objective appears to be excessively ambitious and poses a threat to private land use and uses on surrounding federal lands under other agency jurisdictions. The airshed relevant to the 15,000 acre City of Rocks Reserve must

---

**RESPONSES**

9. Comment noted.

10. The reserve will remain a unit of the national park system. Please see the "Management Authorities and Responsibilities" section for further information.

11. That is the intent of the plan. This is in keeping with the Organic Act establishing the National Park Service.

12. Comment noted.
**COMMENTS**

<table>
<thead>
<tr>
<th>Page</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>It is our understanding that the reserve will remain a national park system unit.</td>
</tr>
<tr>
<td>14</td>
<td>The issue will be covered in the implementation plan for the comprehensive management plan.</td>
</tr>
<tr>
<td>15</td>
<td>The text has been changed to reflect that development of these facilities is not a condition of transfer.</td>
</tr>
</tbody>
</table>

**MANAGEMENT AUTHORITIES**

<table>
<thead>
<tr>
<th>Page</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>We do not understand the need for a cooperative agreement with BLM as a condition for transferring jurisdiction to State Parks. Again we mention that Congress did not specifically view the reserve as a unit of the national park system. In reading Title II we feel Congress saw the reserve concept as a different, and of lesser status, action than national park/monument creation.</td>
</tr>
<tr>
<td>14</td>
<td>It is unclear whether NPS or State Parks will develop the various resource management plans. IOCTA feels that the administering agency should prepare these plans. The evaluation standards should also be the product of a joint effort of NPS, State Parks, Cassia County, and local residents.</td>
</tr>
<tr>
<td>15</td>
<td>This paragraph applies a condition of transfer not mentioned in the 2nd paragraph of page 15. Such a condition would be reasonable if NPS funds the construction of the principal visitor and administrative facilities. This condition should be deleted or moved to page 15.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>ICTA applauds NPS’s commitment to supply technical services to benefit the reserve.</td>
</tr>
<tr>
<td></td>
<td>This paragraph addresses the criterion for reversion of administrative jurisdiction. This criterion is based</td>
</tr>
</tbody>
</table>
upon the comprehensive management plan. PL 100-696 Title II Sec202(e) makes reference to "the purposes of this title". Any evaluation of State Parks's performance in reserve administration must be judged upon section 201(a). This comprehensive plan is the detailed implementation of the guidance of Title II.

**Page 18 3rd para.** - IOCTA takes the position that Cassia County's acceptance of the NPS comprehensive management plan must never be made a condition for transferring jurisdiction to State Parks. Cassia County's comprehensive land use planning process is a different process than NPS planning. The county's land use planning process must always be allowed to proceed unfettered by NPS systems.

**Page 20 2nd para.** - The enabling law does not contain the language "conserve the scenery". This phrase should not be portrayed as a phrase within the language of Title II.

**Page 56 1st para.** - The paragraph states "Participants responsible for these actions are included under each action." In most of the actions no funding participant(s) are listed.

**Page 59** - The staffing chart should be developed based upon State Parks park management staffing philosophy. The proposed staffing seems excessive given State Parks staffing in other major state parks. It would be nice to have State Parks employee titles and pay scales listed instead of NPS titles and pay scales.

**Page 103 Water Rights** - The final word in the last sentence should be "acquired" in order to make the sentence meaningful.

**Page 113 Interpretive/Educational Opportunities** - The yellow T-shaped markers were installed by Trail West, Inc. rather than OCTA/IOCTA. IOCTA maintains these markers.

**ENVIRONMENTAL CONSEQUENCES**

**Page 127 3rd para.** - A very positive statement is made regarding specific county zoning actions. Such county actions are speculative at this time.

**Page 144 Table 10** - Rock climbing regarding Alternative 2 and Twin Sisters has an entry "note available". Is this an error that in fact should read "not available"?

**Page 146 Hunting Alt. 2** - IOCTA supports the prohibition against discharging firearms in to towards the California Trail subzone.

**APPENDIX 3**

We feel that cost estimates are excessively high but realize that they will become more realistic as the various facilities are advocated in federal and state appropriation processes.

16. We believe that section 202(c)(1) does make a condition for transfer.

17. The text was changed.

18. If participants are not listed, it is because they have not been determined.

20. The text was changed.

21. The text was changed.

22. Yes. At the time the draft document was released, climbing was not allowed on Twin Sisters pending the outcome of an impact study. After completion of the impact study and review of the draft plan by the State Historic Preservation Officer, it was decided that, because of the exceptional cultural resource values of Twin Sisters, active recreation including picnicking, camping, and climbing would not be allowed there. This decision is reflected in the final plan.
January 27, 1994

Mr. Charles Odegaard
Regional Director, Pacific Northwest Region
National Park Service
909 First Ave.
Seattle, WA 98104-1060

Dear Mr. Odegaard,

The comments of National Parks and Conservation Association regarding City of Rocks National Reserve Comprehensive Management Plan, Development Concept Plan and Draft Environmental Impact Statement are as follows.

Alternative 2 appears to be the best alternative and we endorse the National Park Service recommendation, with minor changes. We are pleased to see the plan calls for balanced use of the Reserve and for some restrictions on climbing. Our concern is that any use of the Reserve be managed in such a way as to protect the resources. Climbing activities on rocks of historic significance is not compatible with resource protection. Any climbing procedures that diminishes or degrades park values should be prohibited.

Recreation use of the Reserve will increase significantly particularly after construction of camping areas. It is reasonable to expect the combination of climbing use and visitors attracted by the historic and natural values of the Reserve will, in a relatively short time, overwhelm the ability of the land to absorb the punishment of such use and will diminish the value of the experience to the visitor. Because of this, it is imperative a Visitor Impact Management Plan be prepared as soon as possible. Such a plan should establish carrying capacities for the various uses of the reserve and carefully consider separation of incompatible activities.

The management authorities chapter sets forth actions that must occur before management of the Reserve would be transferred to State or local governments. One of these requirements is enactment of county ordinances to protect Reserve values. Since management of the Reserve will likely be vested with Idaho State Parks, a further
requirement should be added to assure the State has appropriate rules and regulations in place to protect Reserve values.

We suggest further study of magnitude of the development plan. Locating most development outside Resource boundaries is highly desirable. However, a 100 unit recreational vehicle campground commits an excessive amount of appropriations in a relatively inflexible development. We suggest funds would be better spent in providing more campsites that could be used by both tent and recreational vehicle campers.

Thank you for the opportunity to comment.

Sincerely,

Dale A. Crane
Northwest Regional Director
THE WILDERNESS SOCIETY
IDAHO OFFICE

January 28, 1994

Regional Director, National Park Service
Pacific Northwest Region
83 South King Street, Suite 212
Seattle, WA 98014


Dear Sir,

Thank you for this opportunity to comment on the draft Comprehensive Management Plan (CMP) and Environmental Impact Statement (EIS) for the City of Rocks National Reserve (CORNR). The Wilderness Society (TWS) continues to be concerned over the long-term management of the City of Rocks Reserve.

There are many good points developed in the CMP which provide much-needed management direction for the CORNR. Nevertheless, several points within the CMP need to be better defined. TWS understands the general nature of a CMP but given how long it's taken to produce this document and the fact that no climbing management plan has yet been developed, the CMP will likely be the only management document addressing the CORNR for the foreseeable future. Therefore more detail and management direction must be developed and included in this document.

VEGETATION: The CMP must better define the actions and the implementing steps needed to restore native vegetation to the CORNR. The statement "nonnative plant species would be eradicated or controlled only if they threatened to spread or compete with reserve resources and if control was feasible (pg. 38)" is inadequate. Nonnative plant species will threaten and will spread in the CORNR. A plan for control must be developed and implemented now. Different strategies must be developed depending upon the species identified. In determining feasibility the CORNR managers must consider long-term benefits and not simply short-term costs of control programs, which can often be quite expensive. Rehabilitation for decades of livestock overgrazing won't be accomplished overnight, but the task must begin soon.

1. Specific actions to restore native plant communities will be included in the resources management plan, the grazing management plan, and the coordinated fire management plan.
The CMP should make a firmer commitment to implement a fire management program which returns fire to its natural role in the ecosystem of the CORNR. The Park Service should do more than promise a plan which will "probably" include provisions for prescribed natural fire and prescribed burning (pg. 38). A fire plan should positively include these provisions. The fire plan should go beyond allowing natural fires to burn (pg. 134) and include a plan for prescribed burning to hasten reintroduction of fire back into the CORNR.

Given past experiences throughout the West, it is certain that as the number of recreationists visiting the CORNR increase, conflicts with livestock grazing will also increase. Despite the statements throughout the CMP explaining that livestock are part of the history of the area (after awhile the CMP begins to read like a promotional piece for the Idaho Cattle Association) recreationists simply don't like to see cows and the damage that is inevitable to riparian areas from grazing. The CMP should recognize and accept the inevitable conflicts and at least set the stage now for livestock reductions. The CMP should state that allotments that become vacant will be closed, not reallotted. The CMP should also consider phasing out existing allotments over some given time period. There is a growing dissatisfaction with public lands grazing throughout the West, and the Park Service needs to recognize the changing values of society and plan for reduction and eventual removal of livestock from the CORNR. Such a step, along with the reintroduction of fire, constitute two of the most significant actions the Park Service could take to begin a restoration program of the vegetation within the CORNR.

Prohibiting grazing in the natural subzone area is a good start, but the CMP should also take the step now of eliminating grazing in the backcountry area recreation zone. Riparian areas and wetland areas offer some of the highest diversity within the CORNR and these areas should also be identified immediately for a systematic removal of livestock grazing. The 26 percent of riparian and wetland areas scheduled for recovery are inadequate.

Finally, the Summary of Impacts states that "most rare or sensitive plants in the reserve would be protected" (pg. 154). The CMP should be revised to protect all rare and sensitive plants.

**RECREATION** The lack of a climbing management plan for the CORNR remains the single greatest deficiency in the entire management regime for the area. Until the Park Service takes on this issue in a meaningful way, resources at the CORNR will continue to suffer.

Why does the CMP propose to protect only 25 percent of the significant rock formations within the CORNR from climbing activity impacts (pg. 133)? Why not protect all of the significant rock features?

Apparently no actions on restricting the use of hand drills and bolts will taken unless these activities were having a "significant" effect on the formations (pg. 133). "Significant"
is not defined in the CMP. Will "significance" vary with each manager that comes along for the CORNR? "Encouraging" minimal impact climbing techniques and temporary closures of areas "when necessary" are both so open-ended and undefined as to be generally meaningless.

TWS encourages the Park Service to step forward and recognize that the CORNR is not a climbing gymnasium and ban the use of hand drills and the placement of any new bolts. It's hard to understand why the Park Service continues to believe that allowing the continuation of drilling and bolting contributes anything toward maintaining the long-term ecologic integrity of the CORNR.

TWS questions the need to build a 100-site RV campground immediately adjacent to the CORNR. We agree with the direction which encourages camping outside the reserve, but believe that the proposed campground should be built somewhere closer to the nearby communities. Additionally, TWS believes that housing for permanent and seasonal employees should be built in the surrounding communities. Placing the campgrounds and administrative facilities closer to the communities presents those communities with an opportunity to diversify their economies. Relying on any single enterprise like agriculture for the base of the local economy is short-sighted and means the likely eventual death of any community.

The Park Service should aggressively pursue an agreement with the U.S. Air Force to eliminate low-level overflights over the CORNR. The reserve is so small compared to the surrounding landscape that the Air Force could easily re-route their training flights away from the area.

SUMMARY: The CORNR CMP should be revised to include more detailed management direction and implementation steps designed to carry out the goals for protection of the CORNR. This document will likely be the only one produced for the CORNR for some time, and so should be far more site-specific that the draft. Provisions for better protecting the resources within the CORNR should be developed and included in the final CMP.

Please keep TWS informed of further developments.

Sincerely,

Craig J. Gehrke
State Director
January 27, 1994

RE: CITY OF ROCKS DRAFT CMP

Regional Director
NATIONAL PARK SERVICE
Pacific Northwest Region
63 S. King Street, Suite 212
Seattle, WA 98104

Gentlemen:

I sent a detailed response to the CITY OF ROCKS WORKSHEET on September 30, 1991 to the Denver Planning Office, and expected to receive a draft CMP when it became available. For whatever reason, I never received one.

Today I talked with Mary Magee who is sending me one by overnight mail so that I may have a chance to make your February 1 deadline for comments. Hopefully I will receive the documents by Monday, and my comments should be mailed to you next week.

In case you can't wait and must close your comment record on February 1st, the following comments, based upon my 1991 input should be considered as my formal response to the draft CMP and included in the record. They are written in general terms rather than as an item by item response.

I am past President of the Mazamas, the oldest and largest climbing club in the United States which has a climbing requirement for membership. I am past President of the Wy'East Climbers, virtually the smallest climbing club in Oregon. I am a past two term Board Member of The American Alpine Club. I am past Rescue Chair for the Mountain Rescue and Safety Council of Oregon (MORESCO). I am presently on the Board of Directors The Access Fund. I was a leader of Sierra Club highline trips for a number of years, and consider myself a conservationist. I am President of CORPLAN, INC., a one man consulting and design company for recreational trails on public and private lands. Much of my work is mitigation of damage occurring in climbing areas. I recently conducted a working seminar on trail design and construction at City of Rocks attended by staff, NFS staff, and Forest Service Personnel. I believe that David Pugh was happy with the work. I am quite familiar with City of Rocks, and hope that you will view my comments as constructive.

Thank you.
COMMENTS

comments of Jim Angell for the Draft CMP

CITY OF ROCKS MANAGEMENT PLAN

GENERAL MANAGEMENT OBJECTIVES

Some of the best examples of the exceptional cultural areas should be preserved while allowing most of the existing and recreational uses, including rock climbing, to continue.

The natural resource areas are not so unique as to require special management within the preserve. If the plan tries to manage for these values as paramount, it will severely restrict other uses which are of greater value to the public and the local population.

One problem with some natural scientists became apparent at the recent Boulder meeting which addressed climbing management in national parks. A scientist who had been working for Joshua Tree remarked that "the wildlife seems to be adapting to the climbers, and this is not good." I asked whether it would also have been "not good" if they had not adapted and he said yes. Catch 22. I guess I have some problems with "research areas" as an arena for public management.

The California Trail epoch was the time most often referred to in the planning workbook and I am assuming this is also the case in the draft CHP. We should remember that in 1852, 52,000 people passed through here in a few months time, leaving their graffitti, doing their wash, making campfires, and watching their children climb the rocks. So why shouldn't contemporary climbers also climb the rocks?

The entire preserve never was a vast primitive setting. It always had a population of sorts. To preserve the setting in a vacuum would be a false, "Disneyland" version of history.

Planners should avoid foisting upon us the words "mystery" and "silence of the landscape." It didn't and doesn't exist.

THE RESERVE AS AN EDUCATIONAL EXPERIENCE.

People should learn about the entire history of the City of Rocks area, from prehistoric Indian camps to modern ranching AND ROCK CLIMBING.

THE ROLE OF CLIMBING IN THE MANAGEMENT PLAN.

Climbing should be allowed throughout the Reserve with the least restrictions necessary to preserve genuinely historic and archeological artifacts. I am even willing to seek preservation of 100 year old or greater graffitti.

Areas suitable for rock climbing exist only in nature and must be climbed where they are found. The City of Rocks is a premier climbing area and such use should be expanded. The advantage to climbers is continued responsible use of public lands by an important segment of the public. The advantage to the local economy is obvious.

2
It may be argued that climbing is a use which is not compatible with the "historical" theme of the City of Rocks. I would suggest that this is pure speculation.

Climbing is an activity which is instinctive. Just watch very young children. As soon as they learn to walk, they start to climb. School systems, having recognized that climbing is a human instinct, spend millions on playground equipment, much of which relates to climbing.

How, then, can we now say that the pioneers, and their children passively viewed the rocks "for their mystery?" It is more likely that they climbed them.

It may be argued that climbers wear wild, decorative clothing and leave bright colored slings and shiny bolt anchors on the rock and that these are incompatible. The way to mitigate this is to regulate costume and colors in special historic areas. The wrong way is to ban the sport.

HOW ABOUT GRAZING?

There may be some slight benefit to the local economy. Grazing may also show some of the recent historical use of the land. However, if head-count is what you are after, there are many more climbers than there are owners of cattle in the Reserve.

Grazing is certainly not unique to this area. When you have seen one cow, you have seen a hundred.

If grazing were allowed in some areas of the preserve and not in others, there would be the requirement for extensive fencing. This would not help with the free movement of people.

Grazing does not improve the purity of the water system.

CAMPING

Thus far, the expected rush of visitors to the City of Rocks has mainly been climbers. To reduce the number of campsites is counterproductive. They should be improved along the lines of the Climbing Management Plan.

There should also be a variety of accommodations available. Most of these should be built by private enterprise on private lands near the park. These would include motels and RV parks. It is not likely that an entrepreneur would build a tent campground. Hence, such use should be permitted within the reserve.

Regulated camping will require sanitation facilities, clean water, and probably some policing.
COMMENTS

comments of Jim Angel for the Draft CMP

LOCATION OF THE VISITOR CENTER

If properly situated with a meeting area which looks out over the Circle Creek Basin, the center would become a more organic part of the reserve. It would also be more convenient for interpretive tours, etc.

HISTORIC VIEW PROTECTION

The reserve should cooperate with other landowners to protect exceptional historic views and more of the crescent of rock that provides habitat for species of special concern.

Cooperation with other landowners in the interest of protecting exceptional resource values is always important. What these values may be needs careful examination.

Exceptional historic views, including the crescent of rock, is a valid resource value. Climbers, within that view, should not be excluded. I can think of no reason to exclude climbers while including cows.

Habitat for species of special concern needs very careful examination. The question what species? - how "special" is the concern? - and who are the concerned? It is easy to leap to the conclusion that wildlife can't get along with man. 500 deer are killed each year by autos within the city limits of Boulder, Colorado.

My greatest concern is usually that, once agreement is reached on the need to protect something, the simplest means for protection is often chosen - and this means banning any activity which might become a problem.

I believe that when agreement is reached, that only needed mitigating measures should be taken and that these should be the least restrictive of public use.

EXISTING ROADS

I can see no benefit in removing the north-south road from the viewshed of the trail only to add a new through route south of the reserve. The money can be spent on more important things than roads.

OTHER THOUGHTS

The alternatives present a variety of management options. The balance between different approaches could be weighted more heavily toward active visitor use without compromising the values of preservation.

I believe, for example, that Cassia County History Tour AND California Trail Tour are compatible, both with each other and with a Historic Continuum with increased recreation, which is the alternative I favor.
ENVIRONMENTAL IMPACTS

When discussing impacts, our first concern should be that we deal in FACTS. We should not be talking about "mystical qualities" and then be evaluating impacts upon these undefined environmental qualities.

Environmental impacts should be evaluated with regard to their permanence as well as their immediate effect.

For example: it once was proposed that "To help preserve the sense of quiet and awe that is a significant value associated with the City of Rocks, no noise-generating equipment, including generators, radios, or power tools would be allowed away from the road corridors." What sense of quiet and awe? Where did this environmental value come from? Who has already decided that it needs protection?

If sound becomes pervasive and constant, it may be considered as having a permanent impact. If it is not, why ban it? Should power equipment be banned in the construction of trails and roads solely because of the noise? The Forest Service does this in Wilderness areas and the public pays a terrible price in higher costs, trail work that doesn't get done, and an eroding environment and I know something about the costs of trail construction.

A noise is a passing thing with no permanent impact. Please evaluate restrictions on sound with some judgment. Don't just assume that a noise is bad. Likewise, is a climber's power rock drill an impact if only climbers hear it? Why not zone the climbing area to keep out those who don't like the sound of rock drills — or at least warn them. I'm serious. Where public uses appear to be in conflict, the one with the fewest alternative locations should prevail. There are many more places to experience silence than there are in which to climb.

In fairness, means should be sought to make apparently divergent interests compatible, but we should not assume that silence is good and noise is bad.

Thank you for the opportunity to comment.

JIM ANGELL
Bend, Oregon
Dear Mr. Odegaard:

As the designated agent for Exum Mountain Guides to the Idaho Guides and Outfitters Licensing Board, and as a longtime City of Rocks climber myself, I am writing to comment on the City of Rocks Draft Comprehensive Management Plan, Development Concept Plan, and Environmental Impact Statement. Although this document evidently required a lot of time to prepare, I would submit that it is woefully inadequate either as a description of current usage and problems at the City, or as a presentation of reasonable alternatives.

The Proposed Alternative includes a degree of development that is totally inappropriate for this area. A new visitor center, road realignment, a 100-site RV campground and the proposed changes in tent camping facilities would have far greater impact on the area than the EIS implies. As an example, the EIS states (p. 47) "heavily disturbed areas would be revegetated as if that were a simple matter. The fact is, in the desert environment that prevails at the City, it takes decades, even with the best intentions, to reestablish native plant species. Any relocation of roads, campsites, or other usage will simply create a greater area of disturbance. As much as possible, those areas already disturbed should continue to be utilized. There is currently an array of numbered and well-spaced campsites that are adequate for all but the busiest times; the work that has been done in inventorying, marking, and delimiting these, as well as the picnic tables and outhouses that have been provided, has already gone a long way towards eliminating the further degradation of these sites and preventing the random spread of vehicular disturbance."

The Proposed Alternative demonstrates a disturbing ignorance of the actual impacts or needs of climbers, and appears to have been written by someone with no knowledge of what constitutes safe or responsible climbing practices. For example, the phrase "minimum-impact climbing" is defined as "using no loud voice signals or chalk". This would be an extremely unsafe practice, as well as a ridiculous thing to try to enforce. How is a cry of "Off belay!" to be distinguished from the shouts of the school groups that regularly frequent the area? For that matter, is this an appropriate thing for a Management Plan to address?

There is also a reference to certain areas where technical climbing might be prohibited, but where "incidental equipment-free scrambling" might be suitable. Is this a thinly veiled attempt to gain additional funding for the Cassia County School of Mountaineering, Incorporated?
Search and Rescue group? To attempt to make this sort of distinction in a planning document is totally irresponsible; "incidental equipment-free scrambling" is responsible for most of the deaths mistakenly attributed to climbers in this country each year.

There is a mistaken assumption throughout the DCMP that climbing usage at the City, and climbing impacts, are still increasing. In fact, new route development at this area peaked nearly ten years ago, and the heyday of its popularity as a climbing area is now several years in the past. Under the aegis of The Access Fund and the Friends of the City of Rocks, climbers have been regulating their own impacts at the City and cooperating with the NPS on resource protection there. All of this is ignored by (or unknown to) the drafters of this DCMP.

As it is currently written, we can only hope that lack of funding will prevent the implementation of the extremely expensive, overdeveloped, and overmanaged Proposed Alternative. With minor modifications and minimal additional funding, the No Action alternative could become a true Management Plan, preserving the ambiance of this unique area without excessive development or promotion.

I hope you will consider this. Thanks for your time.

Sincerely,

Ron Matous, Designated Agent
Exum Mountain Guides
Idaho Outfitter's License #5101
Idaho HeartCare Center

January 28, 1994

Attention: Keith Dunbar
Mt. Charlema Odegard
Regional Director
National Park Service
Pacific Northwest Region
4th First Avenue
Seattle, WA 98104-1960

Dear Mr. Odegard:

I am deeply concerned about the future of the City of Rocks and have previously written letters to Governor Cecil Andrus of Idaho and retired Senator Steve Symms regarding the comprehensive management plan for the City of Rocks.

The City of Rocks is currently a very remote, desolate and undeveloped place where hiking, climbing and camping have taken on a special meaning for many years with my family. There has been deterioration in the environment due to a large amount of usage of climbers, hikers, campers and sightseers, but it appears that rock climbing has become a major target for the National Park Service to severely regulate. While it is true that climbers by sheer numbers have contributed significantly to some of the deterioration of the environment within the City of Rocks they are not the only group that has had an impact. Grazing and hunting are activities that will be continued, according to the City of Rocks Draft Comprehensive Management Plan, even when these activities are outlined in similar such reserves. I am opposed to all three alternatives of the Draft Comprehensive Management Plans and would favor a combination of the best features of Alternatives 1, 2 and 3.

I do not want to see the City of Rocks developed as a tourist attraction similar to Yosemite. I would favor allowing the area to return to its previous natural state by banning car traffic and only allowing entry into the Park on foot. This would severely limit the impact by climbers who would, for the most part, be unwilling to hike into the City of Rocks to climb the rocks. Additionally, I would favor closing the area to off-road vehicles, restrict grazing on public land within the Reserve and restrict hunting the Reserve. Climbing could continue but would obviously be markedly decreased if access were more difficult. The same would go for camping sites and sightseeing. What I am vehemently opposed to are visitor centers, RV camping sites, interpretive signs, paved trails and other signs of development which would be a major intrusion into the quiet and solitude which has become the City of Rocks.

Sincerely,

Mark G. Parent, M.D.

901 N. Curtis Road • Suite 304 • Boise, Idaho 83706 • (208) 322-1680
Dear Sirs:

As a rock climber, I would like to express my reservations about the suggested Management Plan for City of Rocks. It appears that the proposed Management Plan would severely curtail the climbing activities of thousands of climbers, and these citizens are some of the environmentally aware, pro-protection people who you want on your side. I feel the exclusion of climbers while actively promoting the increased use of the area by other, less fair-climbers, have as much right to reduce availability as any other group. There is also the matter of historical use of the area—climbers have been there a long time, climbing at City of Rocks is not new. Most visitors would find climbing activity of interest, just as they do in hundreds of park jurisdictions around the country, especially Butterfly, Eldorado Canyon, etc. If you must bring in Tar Buses, please don't do it at the expense of climbers. I shall be writing to Congressional and Senatorial representatives in this matter and want to continue to support your efforts toward effective, balanced management—don't exclude us from City of Rocks.

Yours truly,

Rick Bregger, climber
January 20, 1994

Dave Peugh
Superintendent of City of Rocks
National Park Service
965 Blue Lakes Blvd, Suite 1
Twin Lakes, ID 83301-6601

Dear Sir:

We have become aware of the Draft Comprehensive Management Plan for City of Rocks National Reserve. We have become concerned that there is no written plan for wilderness camping at the City of Rocks.

We teach Search and Rescue at Ricks College in Rexburg, Idaho. We use the City of Rocks as an area to teach climbing and raising or lowering patients over the edge of cliffs.

We have a group of about 36 students that need to be trained yearly. We need to put them in a wilderness camping situation as part of their training. They should not be in an RV campground.

We would appreciate your support in suggesting to those who are involved in establishing guidelines for the City of Rocks that a consideration for such groups as ours be provided in the written provisions, which should be listed in the development charts.

We would appreciate accessible wilderness camping areas that would allow our group that experience.

In addition, we understand that no loud voice signals will be allowed as part of "minimum impact climbing." This is an extremely dangerous situation and we request that this restriction not be placed.

We do not understand the ban on much of the technical climbing. It would seem that perhaps there is some prejudice in this area that we do not understand. Technical climbers, we have found, are generally more careful of terrain than others and generally safer than those who just scramble.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
</table>
| Dave Peugh  
January 20, 1994 | Page 2 |

We request that you reconsider the closing of wilderness camp grounds and that technical climbing be allowed with logical restrictions.

Thank you for your time and consideration.

Respectfully,

Janice J. Harrop  
Paramedic Program Director

pw
January 27, 1994

The Honorable Roger Kennedy
National Park Service
P.O. Box 37127
Washington, D.C. 20013-7127

Dear Director Kennedy,

I am writing to urge you to intercede on behalf of climbers rights at The City of Rocks.

I am opposed to the draft CMP for the City of Rocks National Reserve in Cassia County, Idaho as proposed by the U.S. Department of the Interior, National Park Service preferred alternative. The preferred alternative exceeds the Congressional mandate of the Reserve's Organic act (Pub L 100-696) and unnecessarily attempts to restrict technical climbing and camping in the Reserve. I have enclosed a summary of the problems with the Draft Comprehensive Management Plan. This summary was produced by the Idaho Falls Alpine Club.

I do support the needed improvements that have been made in the past two years and I would support more the of the same.

Please get involved and prevent the gross miscarriage of regulation that the preferred alternative represents.

Sincerely,

Gregory S. Young
COMMENTS

CITY OF ROCKS
DRAFT COMPREHENSIVE MANAGEMENT PLAN

SUMMARY OF SIGNIFICANT ISSUES

Comments must be received by the National Park Service by 1 February.
Alternative #2, the preferred alternative, is what will be implemented. The
other two alternatives are included only to show most restrictive and least
restrictive options for competitive purposes. Comment on #2.

The Cover Letter to the CMP calls for a partnership between
government, landowners and citizens. No mechanism for this is provided in the CMP.
The public meetings held in December were held in locations which excluded
the largest populations of climbers who frequent the City. The large majority of
visits to the City of Rocks are climbing related.
The level of detail regarding climbing is inappropriate for a CMP. These
details should be in a Climbing Management Plan which is created COOPERATIVELY
by local management and climbers and is based on identified impacts. The CMP
violates NPS goals to manage with minimum regulation necessary to protect
resources.
The Planning Team did not have climber representation and is totally
unqualified to direct the management of climbing. They sought no direct input
from or consultation with the Interim Climbing Management Planning Team which
was formed by local NPS management to address climbing issues. The ICMP was
a formal vehicle for public involvement, but was ignored by the CMP planners.
The ICMP Team is not currently active and is NOT working on a Climbing
Management Plan, only a Draft Interim Plan was created (1992) and the
planning process stopped. An NPS official has been given the assignment to
make the interim plan match the CMP with no climber input.
The CMP is riddled with anti-climber/climbing bias. It is inappropriate and
unprofessional. The fact is that the climbing community has donated thousands
of dollars and countless hours to improve and protect resources at the City in
addition to voluntarily restricting activities that negatively impact
significant historical resources.
Climbing is banned from the entire corridor adjacent to the California Trail.
This could also include Twin Sisters because “climbers negatively impact the
vertical landscape.” Climbers currently, voluntarily, refrain from climbing on
incorporation in.

<table>
<thead>
<tr>
<th></th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>The text was changed.</td>
</tr>
<tr>
<td>2.</td>
<td>The text was changed.</td>
</tr>
<tr>
<td>3.</td>
<td>The text was changed.</td>
</tr>
</tbody>
</table>

1. Climbing is banned in the Reserve Natural Area, which includes Steep Face Dome, part of Roadmap Wall and half of Grey Wall. It is currently only allowed on 10-50 site primitive campground. The majority of the rest of the Reserve, excluding the current centers of most climbing activity, would be restricted to “minimum impact climbing” – no fixed anchors, no Chalk, no loud voice signals. These restrictions are unwarranted and inappropriate for a CMP. If there are documented impacts, they should be addressed by local management in cooperation with local climbers. Banning voice signals creates an unenforceable hazard.

2. The CMP restricts all camping at the Reserve until after 2001. A proposed 10-50 site campground would be constructed outside the Reserve immediately. A proposed 10-50 site campground at the Reserve is not scheduled for construction although it is mentioned in the CMP. A group campground is mentioned in the CMP and is also not scheduled for construction. Current camping opportunities must not be removed until full and suitable replacements are available.

3. The text was changed.
Dear:  

Please make any decisions about Climbing Management Plans only after careful research and education about climbing and impacts such as what was and is being done in Joshua Tree. Climbing is a "unique or important backcountry recreational opportunity" that the Natural Resources Management Guidelines (NPS 1988) and US Dept. of Interior Management Policies (Chapter 8, pg.6, 3/88) state must be "protected" and "encouraged". Also public safety must be ensured, including recreational participants, and the resources protected.

Safety is the reason for the use of expansion bolts in rock for climbing. They are used as "protection" while leading from the ground up or as "fixed anchors" at the top of a climb or "pitch", used as a belay or "top -rope" for the second and/or for the lead of the next pitch, or as a rappel anchor for getting down. Understanding of these different uses is very important before deciding on regulating any one that might be causing it's own unique problem without blanketing them all into "fixed bolts" and jeopardizing climbing safety. Most Search and Rescue incidents and accidents involve "scramblers", non-technical or unroped climbers. In the Garden of the Gods, CO. scrambling is prohibited but technical climbing encouraged. Even in 'top-roping' a 3/8 - .5 inch diameter bolt with the thicker, camouflage minimally hangers (creating effectively an eye-bolt) is preferable and 2-3 are recommended (reference John Long's Climbing Anchors). I would like to see galvanized chains on all these "fixed anchors" to prevent the build-up of unsightly, multi-colored "slings" or nylon webbing. Upon reaching the top of the climb the climber must either scramble down or rappel down the doubled rope after it's been passed through the fixed anchor which can be bolts, a piton, a slung rock or tree the latter not always available. If you double a rope around a tree the rope can be pulled down leaving nothing behind, but a rock must be slung with webbing or you may be leaving the whole rope behind if it gets stuck. Bolts and pitons are slung with a loop of webbing and/or an aluminum ring. These get left behind and without the ring are burnt by the rope friction. The next party will add-on until there are 4-5. The nylon is also susceptible to UV radiation. Chains are not and the rope can be pulled through the links successfully. This type of fixed anchor is also use for belaying and top-roping and is essential to climbing safety. In Europe they spray paint on the rock where the piton placed in 1930 is for your safety also sometimes the whole route's line. Obviously this type of environmentally insensitive and damaging practices should be outlawed but not the basic safety or the recreational activity itself. The bolts placed on routes for protection particularly on face climbs are generally what people are talking about when they speak of "bolting". These bolts should be placed only where no cracks in the rocks allow for traditional clean climbing protection such as nuts and cams. Issues have been overbolting by putting the bolts on one line of a climb to close together say less than 8-10 feet, or by putting to many lines to close together on one face. If the bolt spacing is ten feet the distance of fall is 20 feet plus another 5 feet due to rope stretch. Climbers do not want to fall to far. The
bolts are still not visible, sometimes the hangers are although the third or fourth one usually requires binoculars or careful study. These hangers can be painted to match the rock and not glint in the sun. They should only be allowed to be put in by experienced, certifiably capable people who have obtained a permit. The people who bolted Joshua Tree, which I recently visited, did it in an environmentally conscious manner using their own resources and can not be accused of over bolting. Some areas such as Echo Rock had all the climbs that should be fit, but I'm sure there other areas further out that could use belay anchors at the top of cracks or even some faces that could be conscientiously bolted by responsible people like some of the Friends of Joshua Tree members or The Access Fund of the American Alpine Club who recently voluntarily installed outhouses and improved trails at their own expense. Lastly, fixed anchors such as pitons are usually a life and death situation in alpine climbing or mountaineering and any regulations on fixed anchors or webbing left behind would greatly affect the inherent risk of this sport which is far greater already than rock climbing.

Of course the resources should be protected including the rock, wildlife and plants. Some people have climbed to close to nesting sites or archeological sites and this should be restricted and was probably inadvertant. Climbers are not the ones painting graffiti on these rocks or these types of blatant acts of disregard. In Joshua Tree the biggest problems of all users was "boomboxes", dogs in backcountry (as coyote bait and not using the outhouses), and #1 was smoking. Smokers light up, drop the match on the ground, hopefully put the cigarette out on the ground where it usually stays. Why do so many throw the butts out the window when they have an ashtray in the car/winniebago - because the world is their ashtray. Restricting smoking is far more important than bolts. Litter is outlawed but there is no one around to enforce it, except up on the rocks the climbers see what's going on. Enforcing the existing regulations such as 36CFR would do more for the resources than further regulating the climbers and this activity must be protected and provided safely per existing statutes. Please help ensure this.

Sincerely,
Glen Anders
Graduate of Yosemite Mountaineering, 1978
Taxpayer
Golden Eagle Pass holder
USFS Campground Fee Payer
Dear Mr. Odegard,

I have three major concerns about the Draft Comprehensive Management Plan for the City of Rocks National Reserve in Cassia County, Idaho, that I would like to express to you. All of these concerns pertain to the preferred alternative (Alternative Plan 2) in the Management Plan.

First, I would like to express my dismay at the possible closure of the Twin Sisters area to rock climbing. On page 28 of the Management Plan it is stated that there is a planned moratorium for climbing at the Twin Sisters for research to be completed. I was specifically wondering how long this planned moratorium is and exactly what kinds of research data would support the complete closure of the Sisters to the climbing community. I support closing the eastern part of the California Trail to climbing activities as this is where the majority of historical aspects related to Trail are found.

Also on page 28, minimum-impact climbing that is designated to occur in impact monitoring areas includes in its definition "using no loud voice signals". Climbers communicate with each other verbally to diminish the chances of a serious accident occurring. To limit such communication will needlessly endanger the lives of people. I believe your definition of minimum-impact climbing should be revised, or at least clarified. After all, who will control the boisterous boyscouts?

Finally, I am concerned about the lack of including the proposed in-reserve campsite development (pages 49-50) in the tentative development phasing schedule (p. 56). Premature closing of in-reserve campsites before completing the proposed campsite development would bottleneck access to the reserve. Already it is very difficult to find a designated campsite on an average weekend. I believe this oversight in plan development needs to be addressed.

Overall, I do support the needed improvements that have been made to the reserve in the past two years, including fee collection. I also support many of the proposed changes that the Management Plan outlines. However, I feel that primitive camping for tents and small RV's should be permitted and accommodated within the reserve boundaries.

Thank you very much for your time and consideration. I realize it is a tough position that you are in to try to satisfy so many peoples' demands, but you're doing a good job.

Sincerely,

Wayne Aprill
Dear Mr. Odegard,

Much has been written in recent weeks about Park Service closing City of Rocks, Idaho to all hikers, campers, mountain bikers, and climbers. In addition to being a hiker and climber, I am also interested in its historical value as members of my family came west on the Oregon Trail in 1853 and also provided information to Ezra Meeker who mapped and marked the Oregon Trail. I was born and raised in Owyhee County Idaho and have visited City of Rocks for many years.

I have been appalled at spray paint on walls, cans and wrappers on the Inner City trails, and extensive bolting during the past three years. Something has to be done to protect this unique geographical and historical site.

I am afraid, however, closing it would be counter-productive. It has been advertised widely, I have climbed alongside people from all over the world. I am afraid they would continue to use it. This would entail strict policing with no return from the investment.

I suggest it be changed to a "pay" campground. Overnight camping and day use could then be limited to the number of visitors it could handle. This park, because it is such an excellent climbing area, is an asset to the Park Service, it could be made self-sustaining with proper management and control. Campers should be handled on a "first come, first serve" basis. Reservations should not be accepted except for educational groups such as Scouts or Geological study classes. Possibly a telephone answering service could apprise potential campers of its vacancy status on any given day.

As far as I am concerned, bolts should never have been allowed in the first place. Bolting is encouraged by guides, instructors, and merchandisers to increase their profit. There are so many established climbs, and potential climbs without bolting it is ridiculous to increase congestion to further their interests. Bolting should be prohibited and where possible without further damaging the environment, present bolts should be removed.

The historical value of the writings on Register Rock must be protected. Anyone vandalizing this area should be ticketed, fined, or jailed.

I am a rancher's daughter so I am adamant that anything done in the "Sisters" area should be in keeping with the land-owners' desires. Maybe they would like to get involved in cooperatively selling permits to climbers and profit by it also.

I appreciate your concern, the City of Rocks is my favorite place to visit whether for climbing, hiking fifty-million years into the past in the inner city, or just sitting by a camp fire and listening for the whip-poor-will's sad song. I have often thought, when I retire I would like to go there as a volunteer custodian to protect this, my beautiful desert hide-away. Unfortunately retirement is still at least six years in the future. Thank you for allowing me to voice my concerns.

Mary Jess Baker
Mr. Charles Odegard,
National Park Service,
Suite 212, 83 S. King St.
Seattle WA 98104

Dear Mr. Charles Odegard,

As a foreigner my only reason to come to the States and stay for long periods is for the incredible access that rock climbing has had since the beginning of this activity in the country. It is really shocking to understand that one of the most incredible areas for rock climbing in all the Americas, such as City of Rocks, Idaho, is going to be severely banned for rock climbers in particular.

Since rock climbers are the first visitors concerned for the environment, it's a must that you consider their participation in the preparation of any management plan. The opposite will be an ironic demonstration of democracy.

Truly yours, Abé Brand
Re: Comments concerning City of Rocks National Reserve

January 26, 1994

Regional Director
National Park Service
Pacific Northwest Region
83 South King Street, Suite 212
Seattle, WA 98104

Dear Regional Director:

The Nicholson family, as owners of the Circle Ranch located within the City of Rocks National Reserve, has retained my office to assist them in resolving several difficulties concerning the draft comprehensive management plan the National Park Service has proposed for the City of Rocks.

Alternative 2 (The Plan) and alternative 3 (California Trial Emphasis) are the most troublesome to the Nicholsons. I have enclosed copies of three different documents that illustrate that many of the Nicholson's concerns have been repeatedly voiced and are also concerns of many other people. These documents include (1) a letter dated September 23, 1991, addressed to the City of Rocks Planning Team signed by State Senators Denton Darrington and Dean Cameron, as well as State Representatives Jim Kempton and Bruce Newcomb; (2) a Petition dated September 29, 1991, consisting of fourteen pages; and (3) a letter dated September 14, 1991, addressed to the Planning Team signed by Michael Von (Mick) Nicholson. We desire that each of these documents be once again reviewed and considered before a final plan is developed.

Public Law 100-696, Title II basic intentions are clear. A National Reserve is to be created in cooperation with governmental agencies and LOCAL RESIDENTS, see Section 202(a). Additionally, private ownership of land is not to be violated, see Section 202 (d)(1). The Nicholsons are local residents and wish to remain private owners of their land. Some of the major concerns that the Nicholsons have regarding alternatives 2 and 3 are the restrictions pertaining to hunting, air quality, ability to continue their farm and ranching operations, wetland restrictions, protection of certain animal and plant life, reconstruction of buildings and

1. These documents were reviewed and considered.

2. The plan directs reserve managers to work cooperatively with willing private landowners to manage livestock and natural resources. The plan does not restrict uses compatible with the purposes of the reserve such as hunting, ranching and farm operations, access, and firewood gathering on private lands. The state and/or the county has jurisdiction over land or water uses on private parcels. "Reconstruction of buildings and other structures" would be subject to local ordinances. There are no known federally listed threatened or endangered species within the reserve that would require additional mitigation on private land for the "protection of certain animal and plant life".
3. Air pollution from activities on private land and other public concerns would be considered during the process of redesignating the reserve as a Class I airshed. The state is responsible for redesignating areas as a Class I airshed.

4. The plan does not specifically restrict the use of wetlands on private parcels. However, the Clean Water Act, and state and local laws may apply to certain activities on private wetlands.

5. The enabling legislation (appendix A) and plan recognizes existing water rights (see Environmental Issues, Water Resources and Water Rights section). In addition, the plan does not restrict private water rights.

6. Commercial development on private land is subject to county ordinances. Alternative I does not preclude the county from considering commercial development on private land in the reserve.

"Commercial Development/Residential Construction:

Alternative 2, page 22, prohibits rock climbing on the faces of the Twin Sisters "...visible from the trail..." This would indicate that rock climbing is permissible if the climber is out of sight as the rocks are viewed from the trail. The same type of consideration could be given to residential and commercial development on private land. If it's out of sight of the trail, authorization for limited development or controlled residential construction, not to include subdivision, could be included in all management alternatives.
Additionally, any building or structures known to exist in the past could be reconstructed on private ground for private use of the owner. This position satisfies the letter and intent of the law by addressing the needs of the Public as well as the local residents.

Please review carefully these concerns of the Nicholsons. This land has been with their family for many years and is truly a part of who they are.

If we can provide any additional information or comments, please get in touch with me.

Sincerely,

BYINGTON, HOLLOWAY, WHIPPLE & JONES, Chartered

[Signature]

Enclosures

PC: Michael Von (Mick) Nicholson
Jean Elwell
Cassia County Commissioners
Charles Odegaard  
Regional Director, NPS  
Pacific Northwest Region  
83 S. King St., Ste. 212  
Seattle, WA 98104  
25 January 1994  

Dear Mr. Odegaard,

We write to give our input to the City of Rocks Management Planning process now under way. We have looked through the published management options, and are very concerned by both the preferred plan, Option 2, and the most restrictive plan, Option 3. Given the alternatives, we support Option 1, though it is not ideal either.

As citizens and outdoorspeople, we are very aware of the burgeoning numbers of users on U.S. public lands, and agree that management plans and some restrictions on use, "multiple" or otherwise, are becoming increasingly necessary to protect these incomparable places. However, we do not feel that in the case of the City of Rocks Reserve, the process or the outcome has been balanced or appropriate. We are also rock climbers, and feel that both Options 2 and 3 place unnecessary and unreasonable restrictions on climbers, as well as undoing many recent and needed improvements to the City. Climbers are without a doubt the number one use group of the area by sheer numbers alone, yet not a single representative from the climbing community was included in drafting the options. Access is already a problem due to the numerous private inholdings within the City. Other than restricting climbing on sites of historical interest (which I must point out was simply defacement and graffiti when it occurred during the migration west, but is now being prized as of great historical interest), closing 25-50% of the current climbing areas is sheer folly with little to be gained. It is truly unrealistic to think you can develop the City as a great RV-tourist stopping point on the already overcrowded "Western National Parks Tour", as the 100-site RV camp planned near Almo seems to indicate. We fully support interpretive efforts to provide information about the Oregon Trail and Western migration, but there does not seem to be any justification in spending tens of millions of dollars of our hard-earned taxpayer money to develop a market that most likely doesn't exist.

The main use group at the City is and will remain climbers, and for good reason: with routes in all ranges of difficulty and lengths, both sport and traditional, and on incredibly fine granite, this is one of the most concentrated and outstanding climbing areas in N. America. Instead of fighting this reality and attempting to discourage climbers, you should recognize their importance as the only numerically significant user group of the City, and work with, rather than against, them. As the primary use group, there are certainly many improvements to be (over)
made to lessen impact, such as well established, maintained and marked trails, restricted camping, and better toilet facilities. The climbing community has already volunteered much time, money and effort toward these things, and credit should be given to them for recognizing problems and seeking to ameliorate them. It is utterly senseless to move all camping out of the Reserve, especially since the facilities were just upgraded last year, and great improvements have already been seen. The fee system is also in place and must be generating a significant revenue to the Reserve, again, mostly from climbers.

Options 2 and 3 include unreasonable and clearly unfair restrictions on climbers, while other use groups doing the same things would not be penalized (scrambling vs. bouldering, voice commands versus simple shouting, etc.) It is very clear the the committee is targeting climbers unfairly, without any real grasp of their methods or the safety issues involved with voice commands and permanent anchors.

Though there are certainly some ill-mannered, poorly informed climbers out there, the great majority of us are thoughtful, concerned and aware folks, who want to maintain access, increase climber education, and minimize impact. From the earliest days of mountaineering and climbing, the community has been involved in protecting and preserving for the environment. However, we must confess that the only other people besides climbers we have ever met at the City have been hunters, so we are a little confused about who the planners think will flock to the City of Rocks once those annoying climbers have been restricted. The great American RV tourists certainly prefer sheer spectacle of scenery (Yosemite, Zion, the Grand Canyon), coupled with tacky restaurants, souvenir shops, and smoothly paved roads, none of which currently exist, nor, heaven forbid, ever should.

We urge you to abandon your preferred plan, Option 2, and for lack of better alternative, adopt option 1.

Sincerely,

Jennifer Colby & Rich Wilcox

Rich Wilcox
PO Box 840
Alta, UT 84002
Mr. Charles Odegaard, Regional Director  
Pacific Northwest Region  
National Park Service  
909 First Street  
Seattle, WA 98104-1060

Topic: City of the Rocks Draft Comprehensive Management Plan

Dear Sir;

I have been wondering just who the patrons of the City of the Rocks Preserve are. It would appear from the summary of your Management Plan that they are mostly technical climbers and "local" residents. Who, of those patrons, would be likely to use a RV Park with a hundred sites?

The climbers are mostly environmentally aware. They travel light and are willing to forego hot showers and electrical hookups for the day or two they are in the area. They do prefer campsites and toilet facilities reasonably close to where they are climbing.

Boy Scout groups do best with the same kind of facilities. The historic values of the Preserve as part of the California Trail make it of some interest to scouting groups for day hikes and perhaps for overnight camps.

Family parties here in the west generally are comfortable with modest camping facilities. Some of us like a full RV Park, but it needs to be located near fishing, boating, or scenic values like Yellowstone or the Tetons--someplace we would like to go to stay for several days where the children would not be bored to tears. The City of the Rocks doesn't qualify.

Its location far from a freeway or a major highway and the generally uninviting weather of the high, cold deserts make it an unlikely stopoff for RV travelers going from somewhere to anywhere else. The summers are short, hot, and dry; winters very cold. Spring weather is uncertain; only autumn offers enticing weeks of pleasant weather for any but technical climbers.

Who, then, is likely to make enough use of the RV Park to justify spending more than seven million dollars to construct it? I would suggest that the priority be given to providing reasonable facilities for the use of the identified patrons--technical climbers and local groups. It would be good if there were a designated campground. That is not much more than is currently in use.

Another consideration is that there is seldom serious vandalism of minimal campgrounds. However, unused major facilities
are often the target of vandalism, particularly if they are isolated. This is not a specifically Western phenomenon, but it does happen in the West. An R V Park would be a more likely target than a simple campground.

I ask you to seriously consider the real needs of the patrons of the Reserve and the necessity of cutting government expenditures wherever reasonable. Please don't build an R V Park at City of the Rocks.

Sincerely,

[Signature]

Jerelyn S. Decker
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gordon D. (66)</td>
<td></td>
</tr>
</tbody>
</table>

To whom it may concern,

I am writing this letter in response to the proposed management plan for the City of Rock, Idaho. In reading over the document, it appears that climbers are singled out as a high impact user of the resource. The City of Rock has been a climbing destination for climbers from all over the world for many years. I have been climbing there for well over 15 years. While it is true the climbers have been a large majority of the users of the city, in terms of impact on the resource, they have had a relatively minor impact. It seems that off-road vehicles, grazing, and hunting have a much larger impact on the resource than climbing ever has had. You talk about the pristine, scenic value of the reserve...
and that climbers impact these qualities, while ignoring the much larger impact of grooming (visual + ecological) + shouting (auditory + dangerous). While it is true that boating impact the resource, that impact is so negligible as compared to to other more traditional uses, it is very un intrusive.

I highly disagree with any of the proposed management schemes dealing with climbing. I encourage review and change of the plan.

Regards
Gordon Douglass
January 31, 1994

From:
Inez Drixellus

To:
Regional Director
National Park Service
Pacific Northwest Region
909 First Avenue
Seattle, WA 98104-1060

To Charles Odgaard, Regional Director and Interested Persons:

This letter represents the Friends of the City's (of the Rocks) position on the Draft Comprehensive Management Plan, Development Concept Plan, and Environmental Impact Statement for the City of Rocks National Reserve (hereafter referred to as Draft CMP or DCMP). The Friend of the City of the Rocks is a national organization representing the interests of rock climbers, campers, mountain bikers and any other recreational user of the City of the Rocks National Reserve throughout the international recreational community. The Access Fund has been involved with the National Park Service (NPS) for over four years in resolving resource problems at the City of Rocks, donating considerable time and money to the NPS and Idaho Department of Parks and Recreation management efforts. Many of the climbers that regularly visit to City of Rocks are contributing members of the Friends of the City.

Climbers are an important part of the history of the City of Rocks. They began visiting regularly in 1962. Over the last two decades climbers have organized the first citizens clean-ups of the City, in the 70's and 80's. They have donated labor to build trails to control erosion and allow to easier access for all visitors. Through the Friends of the City, climbers have donated thousands of dollars for the purchase of toilet facilities which are being used by all visitors. With a desire to preserve the area for future generations,

I remain respectfully yours,

Inez Drixellus
Member of Rock Rendezvous
a San Francisco, California climbing organization
Regional Director
National Park Service
Pacific Northwest region
83 S. King st., Suite 212
Seattle, Washington

Dear Sir,

We would like to comment on the plan for the City of Rocks National Reserve as presented at the Almo meeting held on December 14, 1993. The proposed campground and facilities appear to be well planned and would make a lovely place to visit. Our family enjoys traveling and we have camped at many State and National Parks, and if we found a facility like the one proposed, we would be pleased.

However, our perspective changes when the proposed facility is in our community and its promotion would greatly affect the lives of the people who live here. In your Comprehensive Management Plan-Development Concept Plan-Environmental Impact Statement-City of Rocks National Reserve, Summary, page v, paragraphs three and four state:

The local economy could then be somewhat adversely affected by a reduction in agricultural-related employment and local expenditures, but this would be offset by increased employment and local expenditures related to tourism.

The character of the surrounding communities would continue to be altered through car, bus and mountain bike use. Bus and tour traffic would increase during the week, and car traffic would be more prominent on the weekends. Potential private development in Almo and Oakley could also alter the character of the communities. Economic benefits to the communities from reserve visitor expenditures would likely remain the same as now.

If the above statements were applied to one of the "rare or sensitive species" living in the area, this plan would probably be determined to be unacceptable. Our point is that people seem to have little value. Those of us living in Almo chose this lifestyle and are not anxious to see it change so dramatically. Very few in this community are interested in changing the focus of their occupation from ranching to tourism. This means that if we have business opportunities in tourism, we will probably have people moving into the area to establish those businesses which could lead to a community similar in nature to Jackson Hole or West Yellowstone. These are communities that we avoid on our trips because of their commercialism and overcrowding. We simply do not want to live in that type of environment.

When the plan for the reserve was initially discussed, residents of the area stressed the need for little or no development in the City of Rocks and preservation of property rights and grazing permits. We felt that the Park Service would be contained within the area of the Reserve and that by limiting development there, we would be able to control the changes to our community. This plan makes it clear that while there will be little development and no loss of grazing or property rights within the Reserve, the development which will cause the loss of grazing and property rights and greatly impact the nature of the community will take place outside the boundaries of the park.

This "plan" does not address problems created for the ranchers and residents of the area who graze cattle or own property within the areas of proposed development. This plan...
COMMENTS

makes it clear that reserve boundaries do not limit or restrict the Park Service from adding facilities wherever they can. So while grazing rights and property rights are protected within the reserve, those outside the reserve will be open to whatever restrictions, limits and changes that occur from the increased tourism. We feel that this plan could have a significant effect on property within a fifty mile radius. Already we see plans for developing National Forest land from Almo through Albion, and proposals for zoning and scenic highways from Declo to Oakley via the City of Rocks. Such proposals will radically affect our way of life.

Another aspect of the plan is the elimination of the road from the Y to the Twin Sisters. This will eliminate the only direct route many ranchers have between Almo and the Junction Valley where they pasture their cattle much of the year. The elimination of this road will increase their travel from ten or twelve miles one way to twenty to twenty-five miles one way.

With the addition of such modern facilities, there will be increased promotion of the area, bringing in much more traffic and many more people. As the needs of the tourists conflict with the needs of the area residents, it seems that the tourists win every time. Roadsides must be made more beautiful so that tourists won’t be offended by haystacks or unsightly clutter. Cattle must be moved from streams and campgrounds. Tourist oriented businesses will be encouraged in the area. Almo will no more be the peaceful and isolated community that we enjoy now as home.

We have appreciated the care that the City of Rocks has received under its present management. The addition of restrooms and the camping sites and the management of garbage and off road travel has greatly improved the condition of the area. We also recognize that many local people have been employed by the Reserve. We would like to see this type of management and development continue. It is the addition of large campgrounds and the resulting promotion of the area as a resort that will lead to undesirable changes to our valley and that we oppose.

Sincerely,

Kent R. Durfee

Janis Durfee

Kent R. Durfee

Janis Durfee

RESPONSES

I. The road will not be eliminated and will be available for local rancher use.
Dear Mr. Odegaard:

I am writing in regards to the Draft Comprehensive Management Plan for the City of Rocks National Reserve. I and my family have spent many weekends camping, hiking, and climbing at the City of Rocks. We have been visiting the area for about four years and have seen the "City" change, mostly for the better. The worst change we have seen is the blasting of a small boulder adjacent to the road, which created a scar that will last for centuries. Unfortunately, if some of the changes mentioned in the Draft Comprehensive Management Plan are enacted, we will have little reason to visit the City of Rocks.

The elimination of camping within the City (specifically by the rim), along with the creation of a RV camp, is very distressing. One of the City's main attractions to my family and many of our friends would be lost; beautiful camping away from the maddening crowds. The idea of RV's cruising through or around the City, along with the noise, traffic, pollution and people they would bring, is very saddening to me. Without camping in the City, very few people would enjoy the beauty of the area when it is at its best, sunrise and sunset.

The Draft Comprehensive Management Plan also has in it many possible actions which will adversely affect climbing in the City of Rocks. Climbing is the other reason my family and I visit the City. It is a wonderful place for both beginners and experts, and is known around the world for its climbing. The elimination of climbing from the Inner City and other, more historical rocks is an unnecessary and harsh move. Climbers have shown at other rock climbing areas (Yosemite CA, Devil's Tower...
WY, and Hueco Tanks TX) that they can stay away from those areas that have ecological or historical significance. Climbs hundreds of feet away from historical inscriptions can do no damage to those inscriptions. Climbers are also willing to use rock colored webbing and camouflaged bolts for belay stations and rappel anchors.

It is very unfortunate, that an area, which according to the survey reported in the Draft, is being used primarily by campers and climbers (~91% each), is going to be restructured so that both of these activities are severely restricted. I support the no action alternative to the Draft. I must add, that I do agree that historical inscriptions, portions of the Oregon Trail, and threatened species should be preserved. I also agree that uncontrolled camping and the formation of "social" trails is damaging to the area and should be stopped. What I don't agree with, is that severe limitations on climbing and camping must be enacted to accomplish these goals. It is also grossly unfair to restrict the activities of several groups who currently visit and enjoy the City, to advance the activity of one group; namely, sightseers.

Please put my name and address on the list to receive any further information concerning the City of Rocks National Reserve. Thank you for your time.

Sincerely,

John G. Evans

In order to avoid sending essentially a duplicate of this letter, I am signing this one; indicating my agreement and support of the views expressed by Mr. Evans.

Sincerely,

Michele Price

(same address as Mr. Evans)
Dear Mr. Odegaard,

I am writing to you in response to the NPS' proposed Climbing Management Plan (CMP) for the City of Rocks National Reserve. As a climber, backpacker, and wilderness traveler, I am deeply concerned at the restrictions the proposed plan would place on climbing. The sport of climbing has long been a tradition on public lands, and restricting it, while promoting more overall development would be detrimental. Climbers create little environmental impact compared with roads, cars, motor homes, and mass groups of people. Climbers are also known as a whole for taking great strides to protect our fragile environment. Please do not take away the privilege of climbing at City of Rocks, a world class climbing area.

Secondly, I would also urge you not to consider a ban on fixed hardware. Fixed hardware is vital to the safety of climbers. I agree that its use should be discretionary, but it should not be banned. Current routes that contain fixed hardware will need their hardware replaced and upgraded over time. If this is not allowed, the possibility of hardware failure, and a subsequent death or serious injury is high.

Thank you for taking the time to hear my views. Lastly, I would urge you to look with an open mind at the current Interim Climbing Management Plan, which was written by climbers, land managers, residents, and environmentalists. This plan more closely represents interests of all the parties involved. I hope that climbing at City of Rocks can be preserved for future generations. Thanks again.

Sincerely,

John W. Hake
Charles Odegaard  
Regional Director  
Pacific Northwest Region  
National Park Service  
909 First Ave.  
Seattle, WA 98104-1060

Re: City of Rocks Draft Comprehensive Management Plan

To whom it may concern:

In general, I support the proposal in the Draft Plan to preserve the remnants of the California Trail, the major landmarks, the inscription rocks and the rural setting of the Reserve. I very much support the concept of encouraging low impact climbing in all areas.

I agree that climbing must be restricted to protect sensitive cliff dwelling species.

I disagree with the removal of all of the climbing routes in the view areas of the California Trail. Rock climbing is in general a minimal modern intrusion and should not be restricted except in unusual circumstances.

I support prohibiting climbing close to historic inscriptions on the rocks. But the restricted area should extend no more than 30 feet from the inscriptions in each direction. In addition, fencing off the inscriptions dramatically alters the atmosphere. It destroys the rural feel and setting of the area. An esthetically designed barrier and appropriate signs, which make it clear that no one should go beyond the barrier, are best.

Sincerely,

Daniel J. Harrison

Daniel J. Harrison
February 9, 1994
Regional Director, National Park Service
Pacific Northwest Division
83 South King St., Suite 212
Seattle, Wa. 98104

I have recently been informed that you are taking steps to ban all bolting and repairing of climbing anchors at City of Rocks National Reserve. I believe you must consider other alternatives for the following reasons.

1. National Parks and recreational areas should be utilized for the enjoyment of everyone, not just people who like to drive thru in their RV's and buy souvenirs. The group of people who hike, climb, canoe, ski, hangglide and bicycle are impacting the environment far less than someone on a motorized vehicle.

2. Please consider the climber's viewpoint. For the most part climbers will help ensure that the area stays clean of litter and other debris, since they are the majority users of the area they will generally pickup after others.

3. The repairing and replacing old bolts and anchors is causing very minimal environmental impact especially when considering the trees that have been cut to build roads and facilities in the area, and the air pollution caused by motor vehicles driven into and around the park.

4. Replacing old anchors helps to ensure safety and prevent serious accidents from happening. Being a husband and father to three month old twin boys it is important to me and my family that I return home safely from a climbing trip. Replacing old bolts and anchors will help to ensure a safe and enjoyable vacation.

For the reasons stated above I urge you to consider other alternatives to a ban on bolting.

Sincerely,
Edward J. Kowalski

Edward J. Kowalski
Dear Keith,

As a taxpayer, camper, and climber at the City of the Rocks I feel compelled to comment on the DCMP plan #2 which is being considered for the reserve.

The meetings which were scheduled for input were held at a poor time of year (right before Christmas) and in a location not close to where the majority of the climbers who use the reserve come from.

My primary concern about plan #2 involves taking out existing campsites in the City, not replacing them with comparable sites before construction begins on the new day use areas, and directing all campers to stay in an R.V. park located outside the City. This is not an acceptable alternative for me.

When I go to the City to camp and climb with my family, a major part of our enjoyment comes from being stay among the formations and enjoy their beauty after we sit down to cook dinner and watch the sunset.

Climbers now represent the largest majority of the reserve's users. Most climbers are tent campers, they don't own R.V.s and they do not want to camp in an R.V. park located outside the City.

The Interim Climbing Management Team should be involved in the decisions about which areas should closed to climbing. Temporary closures necessary for nesting birds or habitat restoration may be necessary from time to time and climbers are aware of these considerations. To close the areas because of a view corridor for the Californias Trail seems unwarranted to me. Climbers on the formations are hardly visible, if at all, to people on the trail. Their views will be affected more by their fellow hikers than the climbers. Many people are fascinated by the feats of the climbers and enjoy watching them.

To me, this whole project sounds like an expensive effort to keep the people who use the City out of it and replace them with sightseers who may very well just come in, drive the loop tour and then leave. The multi-day users are the climbers.

The projected cost of the DCMP at $58,462,118 is staggering when appropriate changes such as stabilizing parking lots, designating campsites, installing port-a-potties, placing garbage receptacles, marking existing trails and encouraging people to stay on existing trails, temporary closures of certain areas to accommodate nesting birds, making information available for self-guided tours, and fee collections can be accomplished for a fraction of this sum.

Sincerely,

[Signature]

[Handwritten Name]
Mr. Charles Odegaard  
Regional Director  
National Park Service  
Pacific Northwest Region  
t3 S. King Street Suite 212  
Seattle WA 98104

Dear Mr. Odegaard:

I am writing to offer my perspective on management of the City Of Rocks National Reserve. I am an avid outdoorsman, a hiker and sightseer as well as a climber. I understand the need to balance activities in the interests of preservation and to enable a fulfilling experience for all visitors.

The City of Rocks is an area of ethereal views and historical significance as well as stellar rock climbing. In my experience, climbers appreciate these attributes more than most other visitors. Climbers also accept the lack of superficial amenities that would ruin the wilderness flavor of the area. The ideal plan for the area would prevent abuse without overrestricting activities or "improving" the area simply to make life easier for the casual tourist.

Here are my suggestions:

<table>
<thead>
<tr>
<th>Services</th>
<th>Roads &amp; Trails</th>
<th>Camping</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Provide a small visitor center that provides historical info, camping regulations and climbing closures and regulations.</td>
<td>1. Maintain but do not significantly improve existing roads. Do not build any new roads.</td>
<td>1. Don't eliminate camping within the reserve. Instead, formalize parking locations at the current camping area to prevent overcrowding and destruction of vegetation.</td>
</tr>
<tr>
<td>2. Do not build restaurants, concession stands, hotels or the like anywhere near the reserve.</td>
<td>2. Maintain and mark the existing trails to limit erosion.</td>
<td>2. Provide overflow and RV camping outside the reserve.</td>
</tr>
<tr>
<td>3. Don't eliminate camping within the reserve. Instead, formalize parking locations at the current camping area to prevent overcrowding and destruction of vegetation.</td>
<td></td>
<td>3. Allow backcountry camping in established sites by permit only.</td>
</tr>
<tr>
<td>COMMENTS</td>
<td>RESPONSES</td>
<td></td>
</tr>
<tr>
<td>----------</td>
<td>-----------</td>
<td></td>
</tr>
<tr>
<td><strong>Climbing</strong></td>
<td>1. Formalize the voluntary rules that already exist: the power drill ban, seasonal closure of nesting sites and no climbing over historical inscriptions.</td>
<td></td>
</tr>
<tr>
<td>2. Allow anchor replacement on existing climbs, but close densely developed or sensitive areas to <em>new</em> route development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Instead of complete bans on climbing historical formations (Twin Sisters, etc), consider temporary closures during high season weekends.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I wish you success in your endeavor and hope you find my input valuable. If I can be of further assistance, please don’t hesitate to contact me.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sincerely,

Joe Machara
January 24, 1994

Charles Odegaard, Regional Director
National Park Service, Pacific Northwest Region
83 South King Street, Suite 212
Seattle, WA 98104

Dear Mr. Odegaard:

I have read the Draft Management Plan for City of the Rocks National Reserve, Idaho. I do not feel that a full range of Alternatives were identified. The plan was formulated by a small group that did not include the other user communities. The non-Park service members were all from the local community, it is evident that their input has favored their interests over all others.

I agree that a management plan is sorely needed at the Reserve. The cumulative impacts of increased camping, hiking, and grazing are degrading the land values. It should be pointed out that grazing itself has had a major effect on riparian areas in particular, as it has had throughout the west.

The preferred alternative strives to protect the grazing rights of the local community while stating as a goal to preserve and restore the primary natural resources. The intensive grazing that this area has suffered is allowed to continue in Alternative 2 in direct contradiction to protecting the areas pristine vistas, scenic quality, and impressive silence. The smell, sight and sounds of cattle are in conflict with the stated goals. It is clear that the cattle related activities such as round ups are being cloaked as an integral part of the California Trail history, yet grazing and dry land farming did not begin until long after the railroad had ended the usefulness of the trail. I would think that if historical accuracy was the intent, the area would be managed to resemble what it appeared like in the 1850’s, not 1890’s. This emphasis on maintaining grazing also flaws Alternative 1.

The full historical continuum of ranching and grazing can be seen as it is practiced today in many other parts of Idaho. There are many round ups and rodeos and state fairs to provide visitors with the experience they desire. I would prefer to have them experience these in another setting so that the city will not be degraded further.

Alternative 3 emphasizes the California Trail and rock outcrops. This area is remote and out of the way. The investment in facilities to enhance this aspect of the area does not appear cost effective based on current historical interest. It is also a relative small area. The proposed RV camp and encouraging additional visitation will destroy precisely what you are intending to protect. The added noise and activity will effectively eliminate the solitude and quiet that is the object of the management action.

I do feel that primitive camp sites, climbers social trails
and other ways need to be managed. Riparian areas need protection as well as wildlife. Current climbing routes should be assessed as to scenic and environmental impacts. There are many routes, some better than others, some more popular than others. Some are rarely climbed at all. Perhaps the climbing community should be represented on your committee to provide input. Some routes could be closed, new routes could be permitted based on impact studies. Some routes can be open or closed based on the time of year to avoid interfering with vegetation or wildlife cycles. Bolts are essentially invisible from more than 100 feet distance. Sling materials now come in colors that are more harmonious with the background. These can be used to lessen the visual impacts.

The use of the Reserve is changing. The management plan should reflect the impacts of the new uses and reconsider the maintaining of uses that no longer reflect a majority of users. Perhaps user fees will aid in reversing the decline of the area. I would prefer to pay a user fee, and remove grazing, than to not pay the fee and continue grazing.

The use issues are complex as they are throughout the new West. I think you erred in not obtaining appropriate input on your draft and have not offered Alternatives that reflect the true usage of the Reserve.

Good luck in working out an acceptable compromise, but please get all sides of the issue first.

The preferred plan does not address the need of the major users: campers, rock climbers and sightseers. It favors the past users in spite of their poor stewardship of the area.

Regards;

W.T. McCarville
Charles H. Odegard, Regional Director
Pacific Northwest Region
83 South King Street
Suite 212
Seattle, Washington, 98104

Dear Sir,

I realize you are under serious pressure from different directions to formulate a plan for the City of Rocks National Reserve that will satisfy everyone. Unfortunately, you and your team have completely missed the mark with your current plan.

In reality, all the future issues at the City of Rocks National Reserve will revolve around climbing.

You may not want to believe it, but the other concerns addressed in the plan (such as preservation of historic sites, air quality, grazing issues, etc.) will pale in comparison to the problems associated with climbing. I believe that climbers will not allow the government to simply regulate them away from public land. In other words, the implementation of any plan will not be accomplished without the support of the climbing community. The proposed plan does very little to address the minimization of impact from climbers. A truly successful plan will be one that simply minimizes the impact from climbing, just like other national parks.

A realistic, gutsy, hard-line plan for the City of Rocks would look something like this:

1) Buy all the private land now within the Reserve boundary. This will effectively remove any conflict between current land users.

2) Establish a campground well away from the rocks or historic sites. Pick an area that can reasonably be sacrificed to protect the rest of the City. Development does not have to be expensive (make 'em suffer, they'll love it), but the campground must have a lot of room for future expansion.

3) Establish a series of trails throughout the Reserve to efficiently move people to and from the rocks. Eventually, all the roads in the area should be paved.

4) Ban all motorized equipment in the Reserve away from roads. I doubt that climbers will ever get away from the need to protect climbs with bolts, but the sheer effort of hand-drilling holes in the plutonic granite will be enough of a deterrent to prevent rampant senseless bolting.

5) Impose seasonal or sectional bans on climbing in certain areas to protect wildlife or habitat. These bans should not be permanent to exclude activity forever, but must be able to be harshly and swiftly enforced.

Sincerely,

Martin Neugent
The public's review of the draft (Comprehensive Management Plan/ City of Rocks National Reserve) is one of the most important steps in producing the final and approved plan. Anyone with interests or concerns should take the time and effort to let us know what they are. The review period for this document ends, February 1, 1994. Please address your comments to:

Regional Director
National Park Service
Pacific Northwest region
83 S. King St., Suite 212
Seattle, WA 98104

In reviewing the Comprehensive Management Plan, Development Concept Plan, and Environmental Impact Statement for the City of Rocks National Reserve it appears Alternative 3 best reflects the primary purpose of Congress when the Reserve was authorized: the preservation of the historic California Trail and its viewshed, a national treasure, so future generations have the opportunity to understand and appreciate the emigrant experience.

However, Alternative 2 will be acceptable if preservation and protections of the California Trail and its viewshed is not violated. Rock climbing must be banned within the historic preservation zone (trail and viewshed) and especially on the Twin Sisters - there are plenty of climbing and recreation areas available outside this zone. Modern improvements, campgrounds, etc., do not belong in this zone. After all no emigrant diary tells of seeing rock climbers on any rocks or brightly colored chemical toilets anywhere in the City of Rocks.

Future land acquisitions should include the stage station and trail segments in Junction Valley and west over Granite Pass. This will be an important enhancement to the trail experience and a valuable addition to the Reserve.

VIRGINIA ROCKETT
Dear Charles Odgerswal,

As a long-time climber and recent visitor of the City of Pecos, I must
say that I am very concerned with the
future of the park, not only from a climbing
standpoint but for the future of the
reserves resources as well.

I would like to address the issue from
a climber's point of view, briefly, and then
finish by addressing my concerns for
the future of the pristine national
Recreation itself.

I suppose that it is futile to try and
explain the passion that climbers have
for their lifestyle as well as for the areas
they climb in — we, as a whole, respect
the areas we climb in as much as we do
each other. Our concerns for our climbing
areas are evident through our creation
of the Access Fund, organized
cleanups, and never ending debates
between climbers over the ethics of
bolting, or altering the rock in any
way — we really do try to exercise
minimum impact to accessible areas.

As I understand it, the City of Pecos
has actually seen much improvement.
over the years, as climbers continued to
discover the Reserve, any time
traffic increases - one can argue that
more damage is done - however, climbers
tend to stay on existing trails, and
carry out their trash as well as other
trash in the area. I also understand
that the existing restrooms were
paid for by the Access Fund - campers
are clean and every climber I have
ever met at "The City" has an immense
respect for the Rock and the area.

Admittedly, belting and chalk, among
other issues, can be debated as to their
impact on "The City", but my concern
is with the possible increase in traffic
from non-climbers or even campers. I
have seen it time and time again, when
tour bus visitors and non-outdoor enthusiasts visit such areas -
they have little or no respect for
the fragile nature of the environment.
Crashing through brush and scrambling
unroped on rock faces invites many
problems.

I feel that the climbing community
will be extremely helpful and willing to work with existing plans as well as problems - as long as they are consulted and given a fair chance to respond to work with reasonable objectives. I know that the city is an international destination for climbers as well as for local residents of the west - I would even venture a guess that the majority of traffic passing through is climbers. Please do not shut the door on our community, on a climbing craze that is considered world class to so many wonderful people. I can't speak for all climbers - and I hope most of the letters you will soon receive from them will be polite, but I would just like to personally extend my concern that we may continue with existing plans - not new, non-climber-blessed ones - so that we may continue to enjoy such a wonderful, impressive climbing paradise. Please take our concerns seriously, we need to be considered and need to be part of the decision-making process in the future.

Thank you for your time.

[Signature]
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>I would also like to be put on the mailing list. Thank you.</td>
<td>Robert Reed</td>
</tr>
</tbody>
</table>
Jacob Sack

Regional Director
National Park Service
Pacific Northwest Region

RE: City of Parks Draft Comprehensive Management Plan (DCMP)

Dear Sir's and/or Miss's,

I respect your desire to protect the City of Parks' unique geologic and historic landmarks. I wholeheartedly approve of the conservation of the natural resources and heritage. As I understand it, the Comprehensive Management Plan of preference is Alternative #2. There are certain aspects of this plan that could be improved to allow the protection of this area while providing enjoyment as well.

The plan proposes a 100 site RV campground to be built outside the park. Though the DCMP shows primitive and group campsites, they seemingly have a lesser priority. Due to the large number of visitors to the area during peak times, existing campgrounds should not be removed until such time as viable alternatives are available for those without RV's or the desire to camp near the Park.

According to a copy of your letter [LRB (PAR-RE)] I received, the plan seeks to further "a partnership between all levels of government, area landowners and citizens to ensure that the valuable resources of the City of Parks are preserved for future generations." There is no mechanism to accomplish this goal in the DCMP.
The planning team had no intention of dismantling or rationalizing.

Despite the fact that the majority of the implementation team had not used the 100% formula or in consultation with the ICARU Team,
the planning team was swung by local support.

It would seem that it is one of the chief drivers of the situation, as the American team, under the California Team of the project, is currently

However, we have not yet been able to determine if the majority of the project has not been addressed by the ICARU team and further officials.

It is my hope that these problems will be clarified and rationalized further. I thank you for your time and consideration.

Sincerely,
[Signature]

[Date]
Dear Mr. Odegard,

I am writing you in regard to my concerns about the Management plan for the City of Rocks. While I realize that the process is quite extensive and there are many different factions to be taken into consideration, I truly think that plan 2 is not in the best interest of the City nor the people that have been visiting this incredible place for many years. This is not the place to address the main problem that there are too many people on the planet trying to escape the pressures of our lives, and the place we do that is in recreation and places like the City.

My main concern in the plan is that there has not been the cooperation and input of the climbing community, which at the present time is one of the major groups that come to this area. Language stating what to wear is totally contradictory to NPS goals of minimum regulation. Limits need to be set but signing in is more regulation. Throughout the plan there is mention of the great aspects of this region for its historical value. I think this is way over blown and that taxpayers should not be using monies to build more roads and developed campsites for R.V. I want to get closer to the Earth and hanging on rocks and touching them is my way of doing it. I do not need interpretative signs, flush toilets. When I go to the City of Rocks I stay for one week and use the time to reflect, exercise, and be outside and enjoy the beauty. No more do I think that I can find solitude and quiet due to influx of people. The plan needs more work and spending of less money. Do not turn it into another Yosemite.

Thank you for taking my views into consideration.

Sincerely,

Deborah Sussman
January 27, 1994

Regional Director
National Park Service
Pacific Northwest Region
83 S. King St., Suite 212
Seattle, WA 98104

Subject: Comments on the Draft Comprehensive Management Plan,
Development Concept Plan, and Environmental Impact
Statement of the City Of Rocks National Reserve, Idaho

General Comments:

As a major land owner in the Reserve and an interested citizen I
wish to submit my comments concerning the report and proposed
plan. I have participated in the process that began in the mid-
1970's and eventually resulted in the act that established the
Reserve and culminated in the above referenced report. My
general comments will be followed by specific comments.

As the planning process initiated by the National Park Service
began, several concepts being stressed by the Park Service were
most disconcerting. The emphasis seemed to be directed primarily
at the westward migration with little or no recognition given to
the historical rural setting, the continued use of the range land
for livestock production that is consistent with the historical
rural setting, and the rights of private property owners.

The Park Service is to be commended for hearing Almo residents
and public comments from other communities in the immediate
proximity of the Reserve. The Park Service took off the
traditional blinders and expanded the concept by including the
historical rural setting and continued grazing activity in the
planning process. The private property rights are acknowledged
and the willing seller/willing buyer concept is referred to
several times which does add comfort to those who own land in the
Reserve.

I have read, and have been warned, that the Federal Government
has in the past and may in the future use heavy handed tactics in
acquiring property they want. I am hopeful that this will not be
the case in the development and protection of the Reserve.

The organization of the report made it difficult to read and was
confusing. Considerable time and effort was expended in studying
the outline in an effort to find the continuity of the report.
At times the report seemed redundant.

The summary was short and to the point. That was good. From
there you dive right into Part One which is followed by Part Two
of the report. There is need for an introduction that briefly
COMMENTS

tells what is to follow, why there are two parts and what the reader should be looking for in each part (significant sections). This may improve the readability of the report and eliminate the appearance of redundancy.

I am not completely satisfied with the proposed plan. By law, the planning agency is required to submit a "no action plan" or in this case alternative 1. If alternative 1 (no-action plan) would adequately protect the cultural and natural resources, I would prefer this alternative.

It is my view that alternative 1 does not provide the protection required. However, I feel the National Park Service has been remiss in not providing an alternative scenario that is less constraining than alternative 2 (proposed plan) but which would provide the desired protection of cultural and natural resources and decrease the rather extensive development proposed for the Reserve.

The regional loop concept proposed for consideration is a desirable addition. The relative isolation of the City of Rocks National Reserve from major population centers and its diminutive size suggest a need to include in a one to three day trip a visit to the Reserve along with other historical and unique sites in the area. The Golden Spike Monument at Promontory Point on the north end of the Great Salt Lake as well as Kelton, a railhead for southern Idaho, could logically be included in the extended excursion loop. Other sites of interest would include Massacre Rocks, Craters of the Moon, and the Hagerman Fossil Beds National Monument to mention a few.

I am in favor of eliminating any rock climbing in the vicinity of or on the Twin Sisters, and other major rock formations that have historical significance. There is a need to strictly enforce rock climbing rules where rock climbing is permitted. Recreational rock scrambling should not be curtailed except in sensitive areas.

There are several biases in the report that are evident to the reader. Two of the most obvious biases relate to the grazing activity and residential development in the Reserve. I will address these in detail in my specific comments.

Specific Comments:

Page 14 - Land Acquisition - The willing buyer/willing seller is mentioned in several places, but nowhere does it say that the federal government must be a willing buyer for all private property in the Reserve. Rather it is suggested that the federal government will be a willing buyer if it suits their need. In the second paragraph of the Land Acquisition heading, it states the federal government will, "Give prompt and careful
consideration to any property owner ... who notifies the secretary of the interior... in undue hardship. The federal government should be required to buy private property in the Reserve if approached by a willing seller, not just give prompt and careful consideration to the issue.

Page 18 - Management Zoning - The Cassia County zoning is summarized and that summary precludes commercial and industrial development but allows for limited residential development within the Reserve on lots of record at the time the enabling legislation was enacted. The county would develop design guidelines to minimize the effects of such development. The county zoning is again mentioned on page 76 under the discussion of alternative 2. I feel that this approach is appropriate, fair and equitable to existing private property owners.

What I find interesting is the contradiction that appears elsewhere in the report on this issue. For example, in the introduction of alternatives on page 69-70 and in the detailed description of each alternative, it states that there is to be no residential development in any of the zones including private land in the historic rural setting subzone. There is a rather inobtrusive note at the end of the introduction on page 70 and at the end of each alternative that states, "Private land overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis."

The Park Service needs to correct this inconsistency and recognize in the introduction of alternatives and the detailed discussion of all alternatives that residential development, with restrictions per the county zoning, will be permitted on private land.

Page 44 - Regional Loop Tour - The loop tour is a great concept, but who will pay for building such a road? The county is currently not financially capable of making the immediate capital outlay or meet the annual maintenance requirements. Financial arrangement from a source other than the county is needed before this feature can be implemented.

Page 50 - Facilities Outside the Reserve - The camp sites and visitor center will be located on land that is currently used for livestock and wildlife grazing. No analysis has been made on the socio-economic impact that this will have on local and extended communities.

Page 115 - Local Communities - It is mentioned that a small climbing/hiking outfitter business is located in Almo. The business lasted just one summer season. It is no longer operating.

3. The county has zoning jurisdiction on private lands in all zones identified in the plan. Appropriate uses for each zone were identified in the plan as required by the enabling legislation.

4. The text was changed.

5. The text was changed.
Page 112 - Visitor Use - Table 5 is titled “1990-1991 Visitation” and then shows visitations for 1982 and the January-March visitations for 1983. The snow conditions during the winter of 1982-1983 resulted in road closures in the Reserve from late November through March. Snow mobiling or other activity in the Reserve was virtually eliminated. Yet there were 9,413 visitations shown for the Jan-Mar, 1993 period. I'm not sure why this was done but it is an obvious error and should be corrected.

Pages 39 and 123 - Domestic Livestock Grazing and Overview of Major Impacts - On page 39 you state, “Grazing over the years has caused an increase in the density of woody plants and their expansion into new areas of the reserve. Increasing woody plant cover, especially sagebrush, has served to confine grazing to less and less area over time, resulting in a reduced range condition, a loss of native perennial herbaceous species, and an increase in nonnative plant species that are more resistant to livestock grazing.”

On page 123 you further state, “the natural productivity of this land would continue to be decreased by loss of soils and invasions of woody species and nonnative plants.” Later, on page 124, you state, “Domestic livestock grazing and suppression of natural fire could continue to degrade and reduce the natural productivity of plant and animal communities .... The diminished productivity ... and severely eroded areas would be difficult to reverse and would continue indefinitely. ... Also, continued livestock grazing would presumably continue to introduce additional nonnative species into the reserve in future years.”

I'm not sure what you mean by natural productivity.

This description of the adverse impact of livestock grazing on the land is grossly misrepresented. It is true that much of the native species, particularly in the open bottom lands, have been replaced by nonnative species. This has been done to provide forage for livestock and wildlife, control erosion, and maintain a high level of forage for livestock and wildlife use over the long term. The management practices have been effective in assuring a viable long term productive ecosystem.

Since the 1930's the range land in this and other areas of the western states has been on the improve. Yes, the range managers (ranchers) have introduced nonnative species and these species have been more resistant to drought and have increased the available forage for livestock and wildlife. This improvement is hard for environmental purists to accept as desirable. They seem to view the original or native species as superior to species that may be introduced, a view point which seems to ignore the law of natural selection. How a species is introduced to an area is irrelevant, if the species thrives and provides desirable forage for livestock and wildlife, then nature is enhanced.

6. The text was changed.

7. Natural productivity is the total elaboration of biomass over time without human enhancements, such as dry land irrigation, fertilizer application, and exotic vegetation planting.
You state that the livestock and fire suppression has resulted in increased woody species such as the sagebrush and juniper trees. Those who are truly knowledgeable about range management know that woody species will gradually take over a range even if livestock grazing is excluded as long as fire is suppressed and not used as a management tool. What then is the true culprit? The ranchers would gladly use fire as a range management tool. However, the threat and reality of legal action by federal agencies, when fire methods are used, generally makes it an unacceptable tool at present. The Forest Service and Bureau of Land Management have long been fire suppression agencies and only give lip service to fire as a management tool at the present time.

I am aware that the Park Service contracted with Dr. Ken Sanders, a range conservationist with the University of Idaho, to study the range use and management practices being implemented as well as make recommendations on future practices. I see where the statistical information on AUM’s, acres, etc. was taken from his work. It is apparent that you chose to ignore Dr. Sander’s views and analysis of range conditions and future impacts. I assume you ignored Dr. Sander’s report since it did not agree with your perception. More attention should have been given to his analysis as statements on grazing impacts were incorporated into this report.

Pages 124, 125, 147, and 149 - Environmental Consequences - All reference made to reduced future active AUM’s acknowledge that “employment and local expenditures related to livestock grazing would be decreased because of reduction in grazing in the reserve.” However, you have failed to quantify the reduction that will occur. You need to quantify this socio-economic impact. The public will be amazed when the primary economic loss (direct expenditures, employment and net gain at the ranch level) and secondary economic loss (employment and income generated by support industries) are properly accounted for.

Thank you for the opportunity to comment on this report.

H. Olen Ward

8. The U.S. Forest Service and Bureau of Land Management provided the grazing allotment and AUM data that was used in the EIS.

9. A detailed economic analysis would require financial data from local landowners, permittees, and businesses. Such data is unavailable. The alternatives would not cause a reasonably foreseeable significant adverse effect on the local economy, therefore a more detailed economic analysis is not required.
REGIONAL DIRECTOR, NATIONAL PARK SERVICE
PACIFIC NORTHWEST REGION:

RE: City Of Rocks National Reserve Idaho

Over the past ten years we have climbed, hiked and hunted within the City Of Rocks Reserve. Over this time period many changes have no doubt occurred. Although we have been involved in the planning and management process before, now as the final management plan takes shape we strongly feel the following comments should be considered.

Technically the reason that the City Of Rocks exists as a National Reserve is because of its historical significance although many other reasons are present for people visiting and enjoying the City Of Rocks. In fact, after conversing with people visiting the Reserve on a near weekly basis we have yet to encounter anyone who came to experience only the Reserve's contribution to antiquity. Most people say they are interested in climbing, hiking, sightseeing, camping or biking. Although the Park Service may be bound by law to preserve the significant historical assets within the
COMMENTS

Reserve they are not required to recreate a historical setting within the Reserve (Proposal Alt. #2) at the expense of other activities that were taking place when the Reserve was formed. Namely under the plan, ("The Proposal" Alt. #2) rock climbing would be prohibited along the "California Trail Corridor" thus eliminating a major asset of the Reserve to climbing opportunities. Therefore we feel that the proposal is an unacceptable alternative. Instead we believe that the Reserve should be managed to encourage recreational opportunities while at the same time protecting historical and natural interests. An alternative which restricts rock climbing and other activities near or on historical sites (eg. inscriptions, archeology, wagon ruts, wildlife, etc.) without trying to recreate a historical setting needs to be considered. In relation to this we strongly feel the following would be beneficial to the Reserve: visitor center, new road alignment and paving, fee camping within designated campsites, interpretative hiking trails, mountain biking opportunities, toilet facilities, picnic areas, scenic overlooks and other visitor helps.

We have also included miscellaneous concerns we have about other Reserve management issues. These are as follows: Fixed anchors (bolts) should continue to be allowed (The impact of fixed anchors is minimal compared to road construction and campground facilities.). Although power drills should be prohibited and the Reserve should not be "over-bolted", monitoring should be extensive and some areas
will no doubt need to be closed to new bolting. Another issue that needs immediate attention is the leash law for pets. After witnessing multiple dog fights and human/dog encounters, we strongly feel pets should only be allowed on a leash in certain areas (e.g., picnic/campground) all other areas should be closed to pets. Also shooting and hunting should be highly restricted within the Reserve for public safety.

Good luck in the final planning stages! We appreciate your time and effort.

Sincerely,

Mark & Tracey Weber
Dear Regional Director:

My name is Joel Wegener and I live in Oakley, Idaho. Five years ago my family and I decided to move from California. We did not know where we wanted to live, so we thought if we traveled around a little and did some rock climbing (I'm a climber) we could find a place to call home. I had heard great reviews about the City of Rocks from other climbers, there for it became a destination of ours. We very quickly fell in love with the City of Rocks and its surrounding communities. The rustic, rugged, individualistic nature of these communities agreed with my wife and I, and that is why we made our home in Oakley, California, with its overcrowding problems and all of the negative aspects associated with it, was lacking what we found in Oakley.

I have a draft of your Comprehensive Management Plan, Development Plan, and Environmental Impact Plan. I have read it, and I can say without a doubt in my mind that Alternative #1 (leaving it the way it is now), will be the best course of action. Over the last five years I have observed the usage of the City of Rocks. The rock climbers make the majority of visitors, followed by a small amount of over nighters and day users. Very few RV's pass through. RV users tend to not travel very far from their vehicles and go exploring.

I do not agree with Alternatives #2 and #3. There will not be enough people to support the plans of those alternatives. And if you were somehow able to attract that many visitors, I don't think it would be congruent with the rustic, primitive, self-discovery nature that the City of Rocks has.

The environmental impact of Alternatives #2 and #3 will be far more than #1. The City of Rocks does not need any more development or trampling feet. The development that has taken place already has been tactfully and thoughtfully done and now meets the visitors needs.

In closing, I would ask that you carefully consider what I have said. Not only is this my opinion, but others in this community as well. Let us give people the opportunity to discover the City of Rocks in much the same way as the pioneers did, without the clutter.

Sincerely,
Joel Wegener
Dear Sir:

I do not want millions spent on the City of Rocks near Oakley, Idaho. We used to be able to take our young children there for a picnic and select any number of sites to relax and play. Now it is so crowded that there's no place to go and the rock climbers are often rude and think they own the place. I feel they are also doing damage to the rocks and grounds there. I wish they had never heard of the City of Rocks. I also feel that it promotes more crime to the area by having so many people here. Surely the Government has better ways of spending our money.

Thank You,

Jane Whiteley
January 1, 1994

Charles H. Odegaard
Regional Director
Pacific Northwest Region
National Park Service
83 South King Street, Suite 212
Seattle, WA 98104

Dear Sir:

I have read the Proposed Comprehensive Management Plan. I am pleased that Alternative 2 has been selected as the proposed alternative as it balances recreation with preservation and interpretation.

The preservation of the Resource Natural Area, realignment and removal of existing roads and casual trails are examples of positive action. Contiguous private lands should be acquired as they become available.

I was a member of the defunct City of Rocks Interim Climbing Management Team. I continue to support minimum impact climbing, as defined in the proposed plan, with one important modification. I would strongly recommend the definition of minimum impact climbing exclude the use of any tools (wire brushes, hammers, screwdrivers, chisels, adhesives, etc.) for the cleaning or alteration of the climbing route.

I strongly oppose the continued installation of fixed hardware in the Front Country recreational corridor. On page 13 of the plan, under General Visitor Use, the plan recommends precedence be given to "resource preservation" and that "resources are not unacceptably degraded."

On page 64, under Geological Resources, the plan acknowledges that due to increased numbers of climbers, new styles and new technical equipment there has been a "substantial increase" in the "amount of permanent climbing hardware attached to rock faces. The increasing use of chalk has also made visible chalk trails on rock faces. Natural rock faces have been cleaned of dirt and small plants and lichen have been removed with wire brushes."
On page 37 of the plan, under Geological Resources the plan recommends a monitoring process to "determine if impacts over time are significantly altering the natural state of the rock surfaces or accelerating erosion." (Emphasis added)

I would suggest that at CIRO, the 3,500 plus fixed anchors, the uncounted lengths of 3/8" chain installed, the aforementioned "chalk trails" and the extensive alteration of routes with every manner of tool and adhesive, demonstrate too well the degradation possibilities available to climbers while the NPS has had managerial responsibility.

The Planning Team fails to mention the maintenance of the 3,500 plus bolts in their $58,462,118 construction budget or in their annual $900,000 operating budget. Is it the intention of the NPS to maintain these myriad pieces of fixed hardware for free? Do they expect unnamed volunteers to maintain the hardware during its questionable lifetime? Or will the NPS simply close areas in the historically near future to climbing as the unmaintained anchors begin to fail? There is no question that this hardware will fail, the only question is, when? Will the ill thought out excesses of this generation deny future generations the pleasure of climbing at CIRO?

We now replace 1/4" bolts with 3/8" or 1/2" bolts. In the future, in the interest of safety, will we switch to 1" bolts? Are we being just a little short sighted?

To allow the status quo to continue under the guise of "monitoring" is to allow the sport climbing community to finish (albeit at a slower pace) the transformation of this area into a sport climbing gymnasium. We will deny any sense of adventure for those who follow: wire brushed rock, chalk trails leading to bolts placed 6 feet apart, marking the way for generations to come.

As late as this year climbers still are using power drills and "cleaning" tools to replace and install new permanent hardware. Prominent members of climbers' advocacy groups continue to brag of such accomplishments.

The Comprehensive Management Planning Team should only allow "minimum impact climbing" at CIRO and the Climbing Management Plan must reflect that direction. There are already too many pieces of fixed hardware and the accompanying rock alterations.
On page 133 of the Plan, the fifth paragraph admits, "The net effect of all actions under this alternative would be an increase in impacts on rock formations, although the effect would not be as great as it otherwise would if not mitigated by the climbing management program and the closure of some formations to climbing." (emphasis added)

The conclusion that total impact will be lessened by closing some areas and trusting in monitoring to trigger mitigation in other areas encourages the status quo, without the power drill. This approach only forestalls that inevitable time when every rock surface within the Front Country, with the remotest possibility of a climbing route, will have fixed anchors in proliferation.

I appreciate the Park Service’s perceived conundrum of allowing recreation while "preserving for future generations." However, any argument that a ban on permanent hardware and rock alteration will end climbing or that it will substantially increase the hazard is specious. Rock climbing existed before "sport climbing," most bolted climbs at CIR0 can be climbed with a top rope and a top rope is far safer than a bolted face climb. Future generations will be much better served by instituting minimum impact climbing.

That a challenging rock face exists within a unit of the NPS should no longer provide a territorial imperative justifying its conquer regardless of the means necessary.

The Comprehensive Management Plan should not trade increased resource degradation for the pleasure of those who have no sense of the past and little regard for the future.

Sincerely,

Steven L. Wolper
APPENDIX A: LEGISLATION

PUBLIC LAW 100-696 [S. 2840]; November 18, 1988

ARIZONA-IDAHO CONSERVATION ACT OF 1988

An Act to provide for the designation and conservation of certain lands in the States of Arizona and Idaho, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act be cited as the "Arizona-Idaho Conservation Act of 1988"

TITLE I—SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA

ESTABLISHMENT OF SAN PEDRO RIPARIAN NATIONAL CONSERVATION AREA

Sec. 101. (a) Establishment.—In order to protect the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands surrounding the San Pedro River in Cochise County, Arizona, there is hereby established the San Pedro Riparian National Conservation Area (hereafter in this title referred to as the "conservation area").

(b) Area Included.—The conservation area shall consist of public lands as generally depicted on a map entitled "San Pedro Riparian National Conservation Area—Proposed" numbered AZ-040-0Z, dated January 1988, and consisting of approximately 56,431 acres.

(c) Map.—As soon as is practicable after enactment of this title, a map and legal description of the conservation area shall be filed by the Secretary of the Interior (hereafter in this title referred to as the "Secretary") with the Committee on Interior and Insular Affairs of the House of Representatives and the Committee on Energy and Natural Resources of the United States Senate. Each such map shall have the same force and effect as if included in this title. Such map shall be on file and available for public inspection in the Office of the Director of the Bureau of Land Management, Department of the Interior, and in the Bureau of Land Management offices of the State Director for Arizona, and the district office responsible for the management of the conservation area.

MANAGEMENT OF CONSERVATION AREA

Sec. 102. (a) General Authorities.—The Secretary shall manage the conservation area in a manner that conserves, protects, and enhances the riparian area and the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the conservation area. Such management shall be guided by this title and, where not inconsistent with this title, by the provisions of the Federal Land Policy and Management Act of 1976 (hereinafter in this title referred to as "FLPMA").

(b) Uses.—The Secretary shall only allow such uses of the conservation area as he finds will further the primary purposes for
preparation and implementation of the comprehensive, long-range plan required pursuant to section 103 of this title.

(b) REPRESENTATION.—There shall be 7 members of the Committee, who shall be appointed by the Secretary. Members of the Committee shall be appointed for terms of three years, except that of the members first appointed 1 shall be appointed for terms of 1 year and 3 shall be appointed for terms of 2 years. The Secretary shall appoint one member from nominations supplied by the Governor of the State of Arizona, and one member from nominations supplied by the Supervisors of Cochise County, Arizona. The other members shall be persons with recognized backgrounds in wildlife conservation, riparian ecology, archeology, paleontology, or other disciplines directly related to the primary purposes for which the conservation area was created.

LAND ACQUISITION

Sec. 105. The Secretary may acquire lands or interests in lands within the boundaries of the conservation area by exchange, purchase, or donation, except that any lands or interests therein owned by the State or local government may be acquired by donation or exchange only. Any purchase or exchange of lands to be added to the conservation area shall require the consent of the owner of those lands or rights.

REPORT TO CONGRESS

Sec. 106. No later than five years after the enactment of this title, and every ten years thereafter, the Secretary shall report to the Committee on Interior and Insular Affairs of the House of Representatives and the Committee on Energy and Natural Resources of the United States Senate, on the implementation of this title. Such report shall include a detailed statement on the condition of the resources within the conservation area and of the progress of the Bureau of Land Management in achieving the purposes of this title.

AUTHORIZATION

Sec. 107. There are hereby authorized to be appropriated such sums as may be necessary to carry out the provisions of this title.

TITLE II—CITY OF ROCKS NATIONAL RESERVE

ESTABLISHMENT OF CITY OF ROCKS NATIONAL RESERVE

Sec. 201. (a) There is hereby established the City of Rocks National Reserve (hereinafter referred to as the "reserve"), in order 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.

(b) The reserve shall include approximately fourteen thousand three hundred and twenty acres as depicted on the map entitled "Boundary Map, City of Rocks National Reserve, Idaho" numbered P30-80,005 and dated October 1987. The map shall be on file in the offices of the National Park Service, Department of the Interior and the Offices of the Governor, State of Idaho.

(c) Within six months after the enactment of this title, the Secretary of the Interior (hereinafter in this title referred to as the...
"Secretary") shall file a legal description of the reserve designated under this section with the Committee on Interior and Insular Affairs of the United States House of Representatives and with the Committee on Energy and Natural Resources of the United States Senate. Such legal description shall have the same force and effect as if included in this title, except that the Secretary may correct clerical and typographical errors in such legal description and in the map referred to in subsection (b). The legal description shall be on file and available for public inspection in the offices of the National Park Service, Department of the Interior and the offices of the Governor of the State of Idaho.

PLAN AND MANAGEMENT OF RESERVE

Sec. 202. (a) To achieve the purpose of this title, the Secretary, acting through the National Park Service, in cooperation with appropriate State and Federal agencies, local units of government and local residents shall formulate a comprehensive plan for the protection, preservation, and interpretation of the reserve. The plan shall identify those areas or zones within the reserve which would most appropriately be devoted to—

(1) public use and development;
(2) historic and natural preservation; and
(3) private use subject to appropriate local ordinances designed to protect the historic rural setting.

(b) Within eighteen months following the date of enactment of this section, the Secretary shall transmit the plan to the President of the Senate and the Speaker of the House of Representatives and to the Governor of the State of Idaho.

(c) At such time as the State or appropriate units of local government having jurisdiction over land use within the reserve have enacted ordinances or established regulations which in the judgment of the Secretary will protect and preserve the historic and natural features of the area in accordance with the comprehensive plan, the Secretary shall, pursuant to cooperative agreement—

(1) transfer management and administration over all or any part of the property acquired under subsection (d) of this section to the State or appropriate units of local government;
(2) provide technical assistance to such State or units of local government in the management, protection, and interpretation of the reserve; and
(3) make periodic grants, which shall be supplemental to any other funds to which the grantee may be entitled under any other provision of law, to such State or local unit of government to carry out the purposes of this title.

(d)(1) The Secretary is authorized to acquire such lands and interests as he determines are necessary to accomplish the purposes of this title by donation, purchase with donated funds, or appropriated funds, or exchange, except that the Secretary may not acquire the fee simple title to any land without the consent of the owner. The Secretary shall, in addition, give prompt and careful consideration to any offer made by an individual owning property within the reserve to sell such property, if such individual notifies the Secretary that the continued ownership of such property is causing, or would result in, undue hardship.

(2) Lands and waters, and interests therein, within the boundaries of the reserve which were administered by the Forest Service.
United States Department of Agriculture or the Bureau of Land Management, Department of the Interior prior to the date of enactment of this title are hereby transferred to the administrative jurisdiction of the Secretary to be administered by the National Park Service in accordance with this title.

(3) Lands and interest therein so acquired shall, so long as responsibility for management and administration remains with the United States, be administered by the Secretary subject to the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended and supplemented, and in a manner consistent with the purpose of this title.

(e) If, after the transfer of management and administration of any lands pursuant to subsection (c) of this section, the Secretary determines that the reserve is not being managed in a manner consistent with the purposes of this title, he shall so notify the appropriate officers of the State or local unit of government to which such transfer was made and provide for a one hundred and eighty-day period in which the transferee may make such modifications in applicable laws, ordinances, rules, and procedures as will be consistent with such purposes. If, upon the expiration of such one hundred and eighty-day period, the Secretary determines that such modifications have not been made or are inadequate, he shall withdraw the management and administration from the transferee and he shall manage such lands in accordance with the provisions of this title.

(f) Congress finds that there are unique circumstances with respect to the water and water related resources within the Reserve designated by this title. The Congress recognizes that the management of this area may be transferred to the State of Idaho, that the State has committed to providing the water necessary to fulfill the purposes of this title, and that there is little or no water or water-related resources that require the protection of a Federal reserved water right. Nothing in this title, nor any action taken pursuant thereto, shall constitute either an express or implied reservation of water or water right for any purpose: Provided, That the United States shall retain that reserved water right which is associated with the initial establishment and withdrawal of the national forest lands which will be transferred to the Reserve under this title.

(g) Subject to valid existing rights, Federal lands and interests therein, within the reserve, are hereby withdrawn from disposition under the public land laws and from entry or appropriation under the mining laws of the United States, from the operation of the mineral leasing laws of the United States, and from operation of the Geothermal Steam Act of 1970, as amended.

(h) There is hereby authorized to be appropriated not to exceed $2,000,000 to carry out the provisions of this title.

TITLE III—HAGERMAN FOSSIL BEDS NATIONAL MONUMENT

ESTABLISHMENT OF HAGERMAN FOSSIL BEDS NATIONAL MONUMENT

Sec. 301. (a) In order to preserve for the benefit and enjoyment of present and future generations the outstanding paleontological sites known as the Hagerman Valley fossil sites, to provide a center for continuing paleontological research, and to provide for the display and interpretation of the scientific specimens uncovered at such sites, there is hereby established the Hagerman Fossil Beds...
Appropriations for the National Park Service shall be available for the purchase of not to exceed 1 new rotary-wing aircraft for replacement only and 468 passenger motor vehicles, of which 324 shall be for replacement only, including not to exceed 355 for police-type use, 12 buses, and 7 ambulances; to provide, notwithstanding any other provision of law, at a cost not exceeding $100,000, transportation for children in nearby communities to and from any unit of the National Park System used in connection with organized recreation and interpretive programs of the National Park Service; options for the purchase of land at not to exceed $1 for each option; and for the procurement and delivery of medical services within the jurisdiction of units of the National Park System: Provided, That any funds available to the National Park Service may be used, with the approval of the Secretary, to maintain law and order in emergency and other unforeseen law enforcement situations and conduct emergency search and rescue operations in the National Park System: Provided further, That none of the funds appropriated to the National Park Service may be used to process any grant or contract documents which do not include the text of 18 U.S.C. 1913: Provided further, That the National Park Service may use helicopters and motorized equipment at Death Valley National Monument for removal of feral burros and horses: Provided further, That notwithstanding any other provision of law, the National Park Service may recover all costs of providing necessary services associated with special use permits, such reimbursements to be credited to the appropriation current at that time: Provided further, That none of the funds appropriated to the National Park Service may be used to implement an agreement for the redevelopment of the southern end of Ellis Island until such agreement has been submitted to the Congress and shall not be implemented prior to the expiration of 30 calendar days (not including any day in which either House of Congress is not in session because of adjournment of more than three calendar days to a day certain) from the receipt by the Speaker of the House of Representatives and the President of the Senate of a full and comprehensive report on the development of the southern end of Ellis Island, including the facts and circumstances relied upon in support of the proposed project: Provided further, That hereafter the Cedar Pass Visitor Center at Badlands National Park, South Dakota, shall be known as the Ben Reifel Visitor Center: Provided further, That Federal funds available to the National Park Service may be used for improvements to the National Park Service rail excursion line between Milepost 132.7 and 100.5 located in Northeastern, Pennsylvania: Provided further, That with respect to lands and waters under the jurisdiction of the Secretary of the Interior within the City of Rocks National Reserve established by title II of Public Law 100–696, the Secretary shall hereafter permit hunting and fishing as well as maintenance of structures necessary to undertake such activities, including but not limited to duck and goose blinds on those lands within an area fifty feet in elevation above the high water level of the Snake River in accordance with otherwise applicable laws of the United States and the State of Idaho.
APPENDIX B: CONSULTATION WITH THE U.S. FISH AND WILDLIFE SERVICE

United States Department of the Interior

FISH AND WILDLIFE SERVICE

BOISE FIELD OFFICE
4696 Overland Road, Room 576
Boise, Idaho 83705

April 3, 1990

Steven R. Culver
Natural Resource Specialist
National Park Service
P.O. Box 25287
Denver, Colorado 80225-0287

Re: FWS 1-4-90-SP-192 (City of Rocks National Reserve)
(SE File: 6003.1040)
(ES File: 1035.0401)

Dear Mr. Culver:

As requested by your letter dated March 14, and received by this office on March 19, we have attached a list (Attachment A) of endangered and threatened, proposed, and/or candidate species that may be present in the proposed project area in Cassia County, Idaho. The list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under Section 7(c) of the Endangered Species Act of 1973, as amended (the Act). The requirements for Federal agency compliance under the Act are outlined in Attachment B. Please reference the species list number on Attachment A in all subsequent correspondence, reports, environmental assessments, environmental impact statements, biological assessments (evaluations), Coordination Act reports, etc. If a construction project is not commenced within 180 days of this response, a subsequent species list request is required by regulations.

If a listed species appears on Attachment A, a biological assessment (evaluation) is required. Should your biological assessment (evaluation) determine that a listed species is likely to be affected adversely by the project, the National Park Service should request formal Section 7 consultation through this office. If a proposed species is likely to be jeopardized by a Federal action, regulations require a conference between the Federal agency and the Service.

Candidate species that appear on Attachment A have no protection under the Act, but are included for early planning consideration. Proposed species could be formally listed and candidate species could be formally proposed and listed during project planning, thereby falling within the scope of Section 7 of the Endangered Species Act. Therefore, if they appear on Attachment A, we recommend that additional surveys be made for proposed and/or candidate species that are likely to be in your project area. If the project is likely to adversely impact a candidate species, informal consultation with this office is recommended.
If you have any questions regarding Federal consultation responsibilities under the Act, please contact Jeri Williams of this office at FTS 554-1931 or 208-334-1931.

Thank you for your continued interest in the Endangered Species Program.

Sincerely,

Charles H. Lobdell
Field Supervisor

Enclosures

cc: IDFG, Hqtrs., Boise
    IDFG, Region 4, Jerome
### APPENDIXES

**AS REQUESTED**
**LISTED AND PROPOSED ENDANGERED AND THREATENED SPECIES, AND CANDIDATE SPECIES, THAT OCCUR WITHIN THE CITY OF ROCKS NATIONAL RESERVE**

<table>
<thead>
<tr>
<th>LISTED SPECIES</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PROPOSED SPECIES</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CANDIDATE SPECIES</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ferruginous Hawk (C2) <em>(Buteo regalis)</em></td>
<td>Nesting Area</td>
</tr>
<tr>
<td>Townsend’s Big-eared Bat (C2) <em>(Plecotus townsendii)</em></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OTHER SPECIES</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Narrow-leaved Indian Paintbrush <em>(Castilleja angustifolia var. flavescens)</em></td>
<td>INPS Category 2</td>
</tr>
<tr>
<td>Simpson’s Hedgehog Cactus <em>(Pediocactus simpsonii var. robustior)</em></td>
<td>BLM Sensitive Species</td>
</tr>
<tr>
<td>Cliff Chipmunk <em>(Tamias dorsalis)</em></td>
<td>Protected Nongame Wildlife</td>
</tr>
<tr>
<td>Pallid Bat <em>(Antrozous pallidus)</em></td>
<td>Presently No Status</td>
</tr>
<tr>
<td>Pinon Mouse <em>(Peromyscus truei)</em></td>
<td>Presently No Status</td>
</tr>
</tbody>
</table>
## APPENDIX C: RARE OR SENSITIVE SPECIES IN OR NEAR CITY OF ROCKS NATIONAL RESERVE

<table>
<thead>
<tr>
<th>Species</th>
<th>Status</th>
<th>Habitat/Probable Location</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Animals</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ferruginous Hawk <em>Buteo regalis</em></td>
<td>Category 2</td>
<td>Observed in the reserve and known to nest within a few miles of the reserve. Very adaptable when selecting nest sites. Potential nesting habitat provided in most of the reserve.</td>
</tr>
<tr>
<td>Townsend's big-eared bat <em>Plecotus townsendii townsendii</em></td>
<td>Category 2</td>
<td>Known to occur in the area. Roosts in caves, large crevices, and abandoned mines. Status of roosting habitat in the reserve unknown.</td>
</tr>
<tr>
<td>Cliff chipmunk <em>Tamias dorsalis</em></td>
<td>Species of Special Concern</td>
<td>Found in rock outcrop areas and pion-juniper habitat.</td>
</tr>
<tr>
<td><strong>Plants</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Narrow-leaved Indian paintbrush <em>Castilleja angustifolia var. flavaescens</em></td>
<td>Species of Special Concern</td>
<td>Occurs in rocky shallow soils along the ridge west of Indian Grove to Finger Rock.</td>
</tr>
<tr>
<td>Simpson's hedgehog cactus <em>Pediocactus simpsonii var. robustior</em></td>
<td>Species of Special Concern</td>
<td>Occurs in rocky or sandy soils among low sage along the Graham Peak ridgeline. May also occur on other wind-swept slopes.</td>
</tr>
<tr>
<td>Kruckeberg's swordfern <em>Polystichum kruckebergii</em></td>
<td>Category 3c</td>
<td>Occurs in the cool moist micro-habitats in crevices of the rock formations.</td>
</tr>
</tbody>
</table>

### Explanation of status codes used in table

**U.S. Fish and Wildlife Service (USFWS)**

**Category 2.** Category 2 candidate species. Listing as endangered or threatened is possibly appropriate, but USFWS lacks sufficient data to support such action.

**Category 3c.** Former candidate taxa. Taxon is more widespread or abundant than previously believed or is not subject to identifiable threats.

**Idaho Department of Fish and Game**

**Species of Special Concern.** A species listed by the Idaho Department of Fish and Game as meriting attention because of its present or potential future status. This classification alerts professionals and the general public to the vulnerability of these species.

**Heritage Program.** Codes indicating classifications used by the Idaho Fish and Game Natural Heritage Program are as follows.

G = Global rank indicator. Denotes rank based on rangewide status.

T = Trinomial rank indicator. Denotes rangewide status of subspecific taxa.

S = State rank indicator. Denotes rank based on status in Idaho.

Numbers, letters, or other symbols following G, T, S indicate the following:

1. Critically imperiled because of extreme rarity or because some factor of its biology makes it especially vulnerable to extinction.
2. Imperiled because of rarity or because of other factors making it vulnerable to extinction.
3. Either very rare and local throughout its range or found locally in a restricted range, or made vulnerable to extinction by other factors.
4. Apparently secure, though it may be rare in parts of its range, especially at the periphery.
5. Demonstrably secure, though it may be quite rare in parts of its range, especially at the periphery.

U. Unknown

?. Indicates reservations about assigned rank.

**Idaho Native Plant Society**

**State Priority 1.** A taxon in danger of becoming extinct or extirpated from Idaho in the foreseeable future if identifiable factors contributing to its decline continue to operate; these are taxa whose populations are present only at critically low levels or whose habitats have been degraded or depleted to a significant degree.

**State Priority 2.** A taxon likely to be classified as Priority 1 within the foreseeable future in Idaho, if factors contributing to its population decline of habitat degradation or loss continue.

**Sensitive.** A taxon with small populations or localized distributions within Idaho that presently does not meet the criteria for classification as Priority 1 or 2, but whose populations and habitats may be jeopardized if current land use practices continue.
APPENDIX D: SITE DESIGN CONSIDERATIONS

New development in the reserve would include roads, trails, backcountry and front country camping sites, and parking areas. Other facilities such as restrooms, entrance stations, kiosks, trash receptacles, and bulletin/information/backcountry registration boards would also be installed.

The character of existing structures, details, and spatial relationships has reflected ranching influences. Although much of the function of new construction would be to support recreational uses, every attempt should be made to use design that is as uncomplicated and as unassuming as the present character. Specific design guidelines will need to be defined prior to or as a part of the design development process. The architectural theme for City of Rocks would adhere to a style expressed by the southern Idaho/northern Utah nomenclature, making liberal use of unmilled lumber, rough-cut rock, dirt, and gravel surfaces (with the associated dust) in open, uncluttered landscapes.

ROADS AND TRAILS

The relocation of the main east-west route would be necessary to protect the inscription rocks area from further bisection and damage. The relocation of the road away from the Silent City rim would be desirable for most visitors because they would be able to enjoy the silence and mystery of the rim without intrusions from traffic noise and congestion from competing uses. Besides enhancing the visitor experience, realignment of the road would eliminate the erosion problems on the east side of Breadloaves and the channeling of springs on the west side of Emery Pass.

Beginning at the Nicholson ranch to the present T junction, the new alignment needs to be moved south, across the drainageway, and placed low enough on the opposite hillside to avoid breaking over the rise into Twin Sisters basin. Traffic should not be visible from the Pinnacle Pass viewpoint looking north. The proposed alignment would meet grade at the south side of Bath Rock after traveling behind Elephant Rock and between the present road and low-lying horizontal formation 1/4 mile to the west of the road. The alignment would meander purposefully to capture the excellent views of the Silent City from southwest angles and to maintain a slow and enjoyable drive. From the T intersection to Elephant Rock, the alignment would stay to the south of the drainage that runs parallel to the existing road in this location and remain below the crest of the ridge that breaks into Twin Sisters plain. Traffic would not be visible from Twin Sisters plain. From the top of Emery Canyon, the proposed alignment would parallel the west face of Breadloaves above, up on the ridge between Go West Rock and Breadloaves and find a saddle to the southwest that allows the alignment to continue to the west and traverse down to the west boundary, avoiding prevalent wet meadows and springs.

Once the road is relocated, the rim would become a pedestrian scene that would reduce car and visitor conflicts and would allow the visitor on foot to find privacy, solitude, and opportunities to capture the magnificence of the scenery without the noise and congestion of the parking areas and campsites. The proposed rim trail, connecting Parking Lot Rocks to Turtle Rock, would be a hardened surface that would allow for visitors that are mobility impaired. The trail would follow the rim, varying in vertical aspect to take advantage of overlook possibilities. Because the rim at Silent City is a combination of rugged, descending topography and steep drops from large boulder ridges, overlooks worked into openings along this edge would vary in vertical aspect according to site opportunities. Perched at various elevations, visitors would have excellent chances of experiencing the full mood and scenic quality of the city. Trail markers that indicate those overlooks would be used to guide foot traffic. The remainder of the loop trail in and around the city would not be a hardened surface.

To maintain the rural character of the reserve, roads would be sealed and hardened to reduce dust but remain unpaved. NPS park road standards and Idaho state park standards would support a 25 mph speed limit. A sinuous alignment and top narrowed surface would discourage speeds greater than this. A slower speed is particularly significant at City of Rocks because of the need to control dust and the additional use of unfenced right-of-ways for trailing cattle.

The primary visitor experience along the east-west route would be a leisurely tour route with seven to eight waysides within the 4-mile crossing. The road would remain gravel and would have a sinuous alignment and narrow top surface to discourage speeds greater than 25 mph. NPS park road standards...
Campsites

The road into Twin Sisters from Junction Valley road would also have a 25 mph speed limit. This would keep the existing route from overlapping the California Trail and remove it as a visual intrusion on the historic scene. The proposed route would be feathered into the juniper edge of the hillside starting at the boundary and proceeding east approximately 1 mile, where it would turn north, still in coniferous cover, and join the existing alignment at the edge of sections 13 and 24.

Secondary roads would use existing alignments, and speed limits would not exceed 10 mph. The road into the tent campsites in section 36 would not be designed to handle RVs.

Backcountry camping, staged from Breadloaves, would require a 2-mile walk in, suggesting a slight inconvenience. The beginning of the zone, which includes Indian Grove and the surrounding forested hillsides, would begin approximately 1 mile from the parking lot. The experience would be more of a car camping, carry-in one, where users can arrive late in the day and make camp within an hour. Sites located in Indian Grove have the difficulty of being around an open meadow, a natural gathering space for groups. Selecting locations for campsites must anticipate social trailing between sites and should adjust locations to discourage this. A second route into the backcountry camping area would be from the parking area along the Almo Park Road to the northwest of Indian Grove. This would require about a 1-mile hike.

Access from Nicholson’s ranch would be more traditional. Two or more miles need to be traversed before entering the camping area, which would require more typical backpacking gear. Locations of sites serving these accesses can be more remote and individual.

The concept of a primitive tent campground experience would be unique to City of Rocks. The campground would contain all the features of a developed campsite, but access to sites would be by foot. This concept is an attempt to preserve as much of the overstory vegetation as possible for campsite uses while not losing rare, shaded land to road loops. Also, the small scale and tight topography suggest carefully placed sites where larger road and spur clearing would be too destructive.

The proposed location is in the southwest corner of section 36 where dense aspen provide shade and spatial separation. The campground would serve as a hub for climbing activities on the rim to the northeast. In addition, nearby rock areas like Nematode, Elephant, Private Idaho, and Twin Sisters ridge would attract uses from the campground that would cause radiating trails. Existing roads and clearly marked trails would assist campers in getting to their day-use destinations.

Amenities at the campsites would include tent pads, picnic tables, and fire rings. Sites would be located along a pedestrian spine — a widened trail that facilitates movement of people and gear from perimeter parking lots to their sites. Trash collection would be centralized at the parking lot.

Site design would

- avoid impacts and discourage visitors from adversely affecting wetlands
- minimize the loss of overstory within the sites
- provide a natural, yet accessible circulation system within the campground
- provide for logical paths to outlying rocks and destinations
- place parking nodes/lots as inconspicuously as possible, keeping them out of view of the main east-west route
- determine restroom locations
- coordinate two trailhead locations
- allow for functional trash collection and firewood pick-up
- define a location for information to be posted that is neither unsightly, nor too remote

Developed camping patterned after that provided in Idaho state parks would be available outside the reserve in an area of mature juniper and pine woods. This campground would accommodate RV use and additional tents in the traditional style of vehicle spur camping off a main loop road. The site would be near the administrative site, community services in Almo, and it would have the capacity to handle intense camping use.
Site design would
minimize the loss of trees
maximize privacy in a separate loop tent area
and livability in the RV loop area
separate tent and RV uses and respond to
different criteria for site configuration
locate an information board
connect to a functional, aesthetic amphitheater

PARKING AREAS

Four types of parking areas would be designed.
Type A: a quick entrance orientation; Type B: a
minor interpretive stop; Type C: destination
multipurpose that accommodates horses; Type D:
destination multipurpose without horses. The
following areas would fit under the described
categories.

Type A
Moulton Entrance
Emery Canyon

Type B
Inscriptions Rocks
Twin Sisters rise
Trails Junction
Nicholson corrals
Granite Pass overlook

Type C
Pinnacle Pass
Breadloaves
Indian Grove

Type D
Turtle Rock
Bath Rock
Parking Lot Rocks

Specialized parking design would accompany the
visitor center site design and the primitive camping
area within the reserve.

Location and construction of parking areas would
use the approach that would cause the least damage
to the landscape and minimize visual intrusion. Each
lot would be designed to fit the landscape character
of the site. Along the rim in the north part of the
reserve, numerous rock edges and groupings would
allow for easier use of vertical elements to define
areas. On the rolling sagebrush plain, designing
unobtrusive parking would be more challenging.
Most camping areas would combine an interpretive
opportunity with recreational facilities, but structures
and signs would not dominate the sites. Messages,

restrooms, and parking would be placed so that the
scenery would remain the experience, not the
modern artifacts.

Along the rim, parking areas at Turtle Rock and
Parking Lot Rocks would use existing disturbed
areas. At Turtle Rock, parking would have to be
brought back from the slot to the overlook and
placed in the open sage disturbed area. Care should
be taken to take advantage of rock and pine edges
to hide the parking from the main east-west road
and to design an experience that does not have a
parking lot image. At Parking Lot Rocks, the existing
disturbance is a steep, descending cul-de-sac with
room for approximately six vehicles. This is one of
the main access points for climbers to descend and
hike into the Inner City. In addition, climbing is
popular on the high faces encircling the cul-de-sac.
New design should pull parking back from this
lower overlook area to keep it out of the way of
climbing staging areas and trail uses. The Bath Rock
area would be relocated to the north side of the
rock, outside of the viewing angle from the top of
the rock. This area may recess into the hillside and
require retaining walls. Present sanitation facilities
would be relocated to this lot. The current lot
would be obliterated and reclaimed, except for a
spur trail connection from the parking area to the
rim trail and overlook. This action would result in
creating an entire rim experience that is not
intruded upon by cars, and that keeps all the
significant viewpoints natural. This action would also
enhance the safety of climbing on the sheer east
face of Bath, where activity on the road currently
interferes with climbs on the rock.

Organized design of a group camping area at
Breadloaves should use the existing disturbed site on
the west side of the rocks. This site has access to
the well, is pleasantly separated from other users,
and allows good trail access to day use areas. The
site is at the top of Emery Canyon, rather exposed
and wind-swept. Care should be given to separating
the camping use from the west rock faces to keep
high demand climbing routes accessible and
unimpeded.

Other parking areas would be determined by
interpretive focus and would need to respond to the
message at the site. Each site would be located to
allow visitors meaningful access to portions of the
trail where key interpretive themes can be shared,
like the junction of two trails, the first view of the
Twin Sisters landmark, and at Pinnacle Pass. These
pulloffs need to be sited out of the eight significant
viewsheds. The inscription rocks location should be to the north of the realigned east-west road with easy access to Register Rock. The pulloff approaching the Twin Sisters basin should lie below the crest of the rise, and allow only pedestrian access over into the plain. The pulloff to the current ranching interpretation should be located to take advantage of an existing corral site. Traffic and parking should not cross the drainage to the north, should be out of view of the campground, and below the crest of the Twin Sisters basin. The pulloff at the trails junction should be downhill (towards the trails) along the newly aligned deadend road into Twin Sisters. Effort should be made to keep the wayside within the pine/juniper cover to minimize its impact on the trail viewshed and to visitors walking on this section. The Pinnacle Pass trailhead settles to the southwest side of Twin Sisters at the foot of the ridge. This site is unsheltered, exposed to harsh summer sun and wind. This parking area needs to be designed to lay easily into the sagebrush basin, well away from activity facing the lot. It includes trailheads north to the campground, east to the pass, and south to the stage stop. In addition, restrooms would be provided because this is a stop where visitors may spend a considerable time.

**STRUCTURES**

The few buildings inside the reserve are historic wood and stone structures. The log buildings have a low-slung appearance and are wider than they are tall.

New restrooms and entrance stations need to reflect the individually handcrafted look of the older existing style, as much as possible. Scale, form, line, color, texture, and materials need to blend with the character of the site, whether it is the muted wash of sagebrush landscape or the vivid contrast of Silent City rock and pine. Structures would follow the horizontal nature of the open sage basins and recede where strong vertical rock character dominates. All buildings would be hidden from the eight major viewpoints and from the California Trail and road corridors. They would take advantage of passive solar site amenities and be accessible but remain as obscure as possible without intruding on open basins.

Planting to revegetate disturbed areas and to cover construction disturbance would include only indigenous materials. Erosion caused from new construction would be alleviated by controlling runoff and catching sediments.

Structures for administration, visitor orientation, interpretation, staff housing, and maintenance facilities outside the reserve would be located in and around Almo. The administration and visitor orientation/interpretation facilities would be located on a flat, sagebrush flank approaching the east entrance at a crossroads. Two routes converge here, facilitating 85 percent of the arrival traffic. This site is extremely open and exposed. Structures would not be hidden, but they would respond to the long, horizontal sense of the site and maintain a low profile. Adjacent uses would be a mix of BLM grazing allotments and ranchsteads. Design would draw on the spacious, agricultural image to determine appropriate architectural and landscape architectural treatments.

Housing for 12 permanent and/or 12 seasonal employees would be constructed on a location south of the existing town. Design for both permanent and seasonal structures at Almo Junction would be recommended to fit into the brick and wood textures of the Almo area. Units need to be placed in the landscape to capture as much passive solar benefit as possible, have snow-free entrances and drives, create privacy between residences, and take advantage of views into the reserve where possible.

Restrooms vary in need from backcountry group facilities, to heavily used front country day use sites. Opportunities to use composting toilets should be maximized, particularly in the backcountry. Where this is not feasible, vault systems would suffice. All front country systems and campground facilities would be handicap accessible.

Placement of interpretive signs would not intrude on approach and arrival views. They would be located so that the visitor looks up from reading and sees the message.

Existing signs in and around the reserve are

**SIGNS**

- **type I** – 1960s metal-style BLM trapezoid markers with standard brown background, white lettering, and the agency logo in the upper left corner

- **type II** – wooden signs, brown with white lettering, some Manning (roofed) types ornamental/handcrafted wooden signs
type III – prison-industry standard metal signs

type IV – specialty-interpretive-florescent iron I-beams.

The reserve would use a uniform sign plan to reduce visual clutter; create a positive, singular image for the reserve; and to curb unnecessary signs. This would be achieved through reducing the number of signs by consolidating and combining messages; using international graphic symbols instead of text; using designed logos to indicate public versus private lands; and using one construction technique to unify all the images.

Exact locations, messages, sizes, and style have not been determined, but signs need to acknowledge the joint partnership of the reserve and give the visitor an immediate sense of the resource value for which the area is named or set aside. This is particularly important in a custom-designed entrance located at the Almo visitor center site. Even simple messages, such as location information, should be tailored to a format and construction technique that suggests the unique handcrafted and cared-for rural sense of the reserve.

Fencing would be the single, most dominant visual impression carried away in the visitor’s mind. The design would blend with informal, unpretentious, existing examples.

Existing fencing within the reserve marks many miles of property lines, grazing allotment boundaries, and previously farmed fields. A complete inventory would be made to establish the historic significance of these lines. Many occur on original properties noted on 1920 plats and are made of materials that are 50 or more years old.

The existing fencing is also informal and at ease. Posts lean unintentionally, are not of consistent diameters or heights, and are weathered, unpeeled, locally gathered juniper. The barbed wire strands vary in the number used and type. Together the wire and posts create a light, transparent image.

Proposed fencing would total approximately 26 miles and be most visible around the trail preservation zones. The functions of proposed fencing would be to separate grazing cattle and pedestrians and to separate cattle and historic resources. No fencing is needed between trailing areas and the roads. Decorative fencing for edge control and circulation direction would be removed. Other systems of establishing boundaries between use areas would be explored, reducing as much as possible the negative message of "Keep Out" that fencing creates. Where pertinent, new lines would run parallel to viewing angles and avoid crossing significant views close to the visitor. Cattle guards may be appropriate as a substitute for fencing in smaller areas requiring enclosures. At-grade guards would significantly lessen the visual impacts of fencing.
APPENDIX E: PROPOSED DEVELOPMENT AND ESTIMATED OPERATING COSTS

These costs are based on FY 1993 dollars and will need to be adjusted for inflation to the time the project is implemented.

### Estimated Development Costs
**Alternative I: No Action**

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INSIDE RESERVE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Circle Creek Basin: Define parking at Nicholson ranch</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rim/Silent City</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Replace 4 miles of fencing around section 36</td>
<td>$334,773</td>
<td>$63,888</td>
<td>$398,661</td>
</tr>
<tr>
<td>Construct 1 two-compartment vault toilet</td>
<td>76,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>Obliterate/revegetate 1.5 miles of 4WD road</td>
<td>559,043</td>
<td>106,668</td>
<td>665,730</td>
</tr>
<tr>
<td><strong>Twin Sisters Basin Overlook</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct parking for 5 cars</td>
<td>37,204</td>
<td>7,100</td>
<td>44,304</td>
</tr>
<tr>
<td>Construct interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td><strong>OUTSIDE RESERVE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct fully accessible 400 sq. ft. comfort station</td>
<td>187,330</td>
<td>35,750</td>
<td>223,080</td>
</tr>
<tr>
<td>Construct 20-car ongoing parking facility, 3 RVs/buses, 7 service spaces</td>
<td>235,132</td>
<td>44,872</td>
<td>280,004</td>
</tr>
<tr>
<td>Maintenance: construct 1-bay, 100 sq. ft. covered maintenance warehouse</td>
<td>165,715</td>
<td>31,625</td>
<td>197,340</td>
</tr>
<tr>
<td>Housing: 2 permanent quarters, including attached garage</td>
<td>464,002</td>
<td>88,550</td>
<td>552,552</td>
</tr>
<tr>
<td>4 seasonal houses (800 sq. ft.)</td>
<td>345,840</td>
<td>66,000</td>
<td>411,840</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$2,410,683</strong></td>
<td><strong>$460,416</strong></td>
<td><strong>$2,873,118</strong></td>
</tr>
</tbody>
</table>
## Estimated Development Costs
### Alternative 2: Historic Continuum (Proposal)

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INSIDE RESERVE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>CIRCLE CREEK</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Circle Creek Basin Overlook</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct 1 mile of 20-foot gravel road from east-west road to overlook</td>
<td>$812,098</td>
<td>$154,981</td>
<td>$967,079</td>
</tr>
<tr>
<td>Construct gravel day-use parking area for 20 cars</td>
<td>148,800</td>
<td>28,397</td>
<td>177,197</td>
</tr>
<tr>
<td>Construct 1/4-mile accessible hardened trail to overlook</td>
<td>46,218</td>
<td>8,820</td>
<td>55,038</td>
</tr>
<tr>
<td>Construct 1.4-mile foot trail w/trailhead</td>
<td>97,000</td>
<td>18,500</td>
<td>115,500</td>
</tr>
<tr>
<td>Construct 3.5-mile gravel trail north around RNA to Indian Grove</td>
<td>160,475</td>
<td>30,625</td>
<td>191,000</td>
</tr>
<tr>
<td>Construct 1 interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Construct 5.0 miles of gravel trail from overlook to Pinnacle Pass (not hardened)</td>
<td>230,000</td>
<td>44,000</td>
<td>274,000</td>
</tr>
<tr>
<td>Garbage receptacle (preconstructed)</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Circle Creek Basin</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Obliterate/revegetate 3.5 miles of 20’ gravel road from Nicholson Ranch to reserve boundary</td>
<td>1,121,819</td>
<td>214,088</td>
<td>1,335,907</td>
</tr>
<tr>
<td>Rip back 1.5 miles 10’ hardened 4WD road across Circle Creek basin to a 3’ natural surface trail corridor</td>
<td>508,385</td>
<td>97,020</td>
<td>605,405</td>
</tr>
<tr>
<td>Revegetate remaining 7 foot width</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct 4 miles of 20’ gravel road from the Nicholson house across reserve to west boundary</td>
<td>878,457</td>
<td>167,644</td>
<td>1,046,101</td>
</tr>
<tr>
<td><strong>Nicholson Ranch</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct day-use parking area for 10 vehicles, 2 RV spaces, 2 horse spaces</td>
<td>129,258</td>
<td>24,667</td>
<td>153,925</td>
</tr>
<tr>
<td>1 two-compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>1 orientation/interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>1 orientation/backcountry sign</td>
<td>432</td>
<td>83</td>
<td>515</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Inscription Rocks</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking for 10 vehicles</td>
<td>74,408</td>
<td>14,200</td>
<td>88,608</td>
</tr>
<tr>
<td>2 interpretive signs (Type IV)</td>
<td>10,087</td>
<td>1,925</td>
<td>12,012</td>
</tr>
<tr>
<td>Construct 4.8 miles of gravel trail from just south of Treasure Rock, past Bath Rock and Emery Canyon Spring, west of the private parcel to Finger Rock, east past Taylor Spring and north to Indian Grove</td>
<td>220,000</td>
<td>42,000</td>
<td>262,000</td>
</tr>
<tr>
<td><strong>Twin Sisters Rise (fully accessible, interpretive wayside, overlook)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interpretive wayside, parking for 10 cars</td>
<td>74,408</td>
<td>14,200</td>
<td>88,608</td>
</tr>
<tr>
<td>3-5 picnic sites/tables</td>
<td>13,100</td>
<td>2,500</td>
<td>15,600</td>
</tr>
<tr>
<td>1 2-compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>1 interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td><strong>Corrals/Historic Rural Setting (fully accessible, interpretive wayside)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct parking for 10 vehicles, 2 horse trailers</td>
<td>104,171</td>
<td>19,880</td>
<td>124,051</td>
</tr>
<tr>
<td>Construct unloading chute for horses/cattle</td>
<td>12,288</td>
<td>2,345</td>
<td>14,633</td>
</tr>
<tr>
<td>Corrals for horses/cattle</td>
<td>51,325</td>
<td>9,795</td>
<td>61,120</td>
</tr>
<tr>
<td>1 interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Seating for activity area</td>
<td>16,391</td>
<td>3,128</td>
<td>19,519</td>
</tr>
</tbody>
</table>

348
## Appendix E: Proposed Development and Estimated Operating Costs

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Rim/Silent City</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Obliterate and revegetate 3 miles of social trails 6' wide (2.2A)</td>
<td>$653,166</td>
<td>$124,650</td>
<td>$777,816</td>
</tr>
<tr>
<td>Obliterate and revegetate 5 miles of social roads 16' wide along rim (9.7A)</td>
<td>2,813,880</td>
<td>537,000</td>
<td>3,350,880</td>
</tr>
<tr>
<td>Restore and revegetate 15 areas (16,000 sq. ft.) of random parking along the rim</td>
<td>1,635,000</td>
<td>312,000</td>
<td>1,947,000</td>
</tr>
<tr>
<td>Improve 2.5 miles of existing hiking trails within Silent City</td>
<td>73,491</td>
<td>14,025</td>
<td>87,516</td>
</tr>
<tr>
<td>Construct 1 mile fully accessible trail from Turtle Rock to Parking lot Rocks</td>
<td>319,214</td>
<td>60,919</td>
<td>380,133</td>
</tr>
<tr>
<td>Construct 1.6 miles of gravel trail from Circle Creek Basin, along Center Creek to just south of the Emery Canyon Road</td>
<td>73,400</td>
<td>14,000</td>
<td>87,400</td>
</tr>
<tr>
<td><strong>Turtle Rock</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct fully accessible parking for 20 cars and 2 service vehicles</td>
<td>157,200</td>
<td>30,000</td>
<td>187,200</td>
</tr>
<tr>
<td>Construct 3-5 picnic sites/tables</td>
<td>5,764</td>
<td>1,100</td>
<td>6,864</td>
</tr>
<tr>
<td>Construct 1-2 compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>Interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Bath Rock</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct fully accessible parking for 25 cars and 2 service vehicles</td>
<td>137,943</td>
<td>26,325</td>
<td>164,268</td>
</tr>
<tr>
<td>5-8 picnic sites/tables</td>
<td>9,222</td>
<td>1,760</td>
<td>10,982</td>
</tr>
<tr>
<td>Interpretive sign (Type III)</td>
<td>2,162</td>
<td>413</td>
<td>2,575</td>
</tr>
<tr>
<td>1-2 compartment vault toilet relocated from existing lot</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>Interpretive sign</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Parking Lot Rocks</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct day-use area parking for 10 vehicles and 3 service vehicles</td>
<td>89,304</td>
<td>17,043</td>
<td>106,347</td>
</tr>
<tr>
<td>3-5 picnic sites/tables</td>
<td>5,764</td>
<td>1,100</td>
<td>6,864</td>
</tr>
<tr>
<td>1-2 compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>3 orientation signs for climbing, rim trail access, Silent City</td>
<td>1,297</td>
<td>248</td>
<td>1,545</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Breadloaves</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Day-use parking for 20 cars, service vehicles, and horse trailers</td>
<td>171,244</td>
<td>32,680</td>
<td>203,924</td>
</tr>
<tr>
<td>Parking for 3 group camping 3 car/site</td>
<td>66,967</td>
<td>12,780</td>
<td>79,747</td>
</tr>
<tr>
<td>3 group camping sites w/tables</td>
<td>38,907</td>
<td>7,425</td>
<td>46,332</td>
</tr>
<tr>
<td>2 two-compartment vault toilets</td>
<td>149,200</td>
<td>28,473</td>
<td>177,673</td>
</tr>
<tr>
<td>Interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Primitive campground/trailhead</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct 0.5 mile of 18' gravel access road</td>
<td>155,890</td>
<td>29,750</td>
<td>185,640</td>
</tr>
<tr>
<td>Construct 5.6 miles of hiking trail (1 segment to high point, 1 segment to Twin Sisters)</td>
<td>333,000</td>
<td>63,550</td>
<td>396,550</td>
</tr>
<tr>
<td>Construct 2.2 miles of gravel trail from primitive campground along Trail Creek to reserve boundary</td>
<td>101,000</td>
<td>25,250</td>
<td>126,250</td>
</tr>
</tbody>
</table>
### APPENDIXES

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct 50 walk-in sites w/tables, tent pads, and fire rings</td>
<td>$209,600</td>
<td>$40,000</td>
<td>$249,600</td>
</tr>
<tr>
<td>Construct 2 miles (25 x 420) 6' hardened walking surface from parking area to sites (edged aggregate base (4&quot;))</td>
<td>61,622</td>
<td>11,760</td>
<td>73,382</td>
</tr>
<tr>
<td>Construct 2 two-compartment vault toilets</td>
<td>149,622</td>
<td>28,473</td>
<td>177,672</td>
</tr>
<tr>
<td>Construct centralized parking for 50 vehicles</td>
<td>253,649</td>
<td>48,406</td>
<td>302,055</td>
</tr>
<tr>
<td>Construct 1 mile of trail to rim climbing area</td>
<td>60,260</td>
<td>11,500</td>
<td>71,760</td>
</tr>
<tr>
<td>Garbage receptacle — one large centralized facility</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Place interpretive sign (Type IV) (standard anodized)</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Indian Grove**
- Designate up to 7 unimproved backcountry campsites | 29,344 | 5,600 | 34,944 |
- Construct 3 backcountry composting type toilets | 78,600 | 15,000 | 93,600 |
- Construct 3 car parking and overlook | 53,000 | 10,000 | 63,000 |
- Interpretive sign (Type III) | 2,162 | 413 | 2,575 |
- Garbage | 0 | 0 | 0 |
- Obliterate/revegetate 1.5 mile of existing 4WD road from Emery Canyon Pass to Indian Grove | 559,043 | 106,668 | 665,730 |

**Backcountry**
- Remove 1.5 miles of road from NE boundary at Graham Creek to Indian Grove and convert to trail use | 50,723 | 9,680 | 60,403 |
- Improve and modify 7 miles of hiking and horseback riding trail from Breadloaves to Indian Grove | 465,212 | 88,781 | 553,993 |

**Twin Sisters Basin**
- Rip back and revegetate 2 miles of 16' gravel road to an unmarked road for local use | 108,208 | 20,650 | 128,858 |

**Trails Junction**
- Construct fully accessible interpretive wayside/trailhead | 30,261 | 5,775 | 36,036 |
- Construct parking for 7 cars | 35,763 | 6,825 | 42,588 |
- 2 interpretive signs (Type IV) | 10,087 | 1,925 | 12,012 |
- 1 orientation sign for Twin Sisters loop trail (Type III) | 2,162 | 413 | 2,575 |

**Twin Sisters**
- Parking for 7 cars and 2 service vehicles | 66,967 | 12,780 | 79,747 |
- 1 two-compartment vault toilet | 78,600 | 15,000 | 93,600 |
- 1 orientation sign for Twin Sisters loop trail (Type III) | 2,162 | 413 | 2,575 |
- 2 interpretive signs (Type IV at Twin Sisters and Pinnacle Pass) | 10,087 | 1,925 | 12,012 |
- Garbage receptacle | 0 | 0 | 0 |
- Remove 2 vault toilets, picnic tables, and parking at Twin Sisters | 72,650 | 13,865 | 86,515 |
- Construct 4 miles of loop hiking trail between Twin Sisters and Stage Station | 265,838 | 50,732 | 316,570 |

**Outside Reserve**
- Visitor center (9,500 sq ft) | 2,800,000 | 535,000 | 3,335,000 |
- Furnishings for visitor center | 867,000 | 165,000 | 1,032,000 |
- Interpretive media for visitor center | 944,000 | 180,153 | 1,124,153 |
- Parking for 45 cars, 8 RVs/2 buses, 15 service spaces | 658,370 | 125,643 | 784,013 |
- 1 specialty type III sign of wood/brick or stone matching | 46,112 | 8,800 | 54,912 |
- 1 well (85 ft) | 25,938 | 4,950 | 30,888 |
- Construct 2.4 miles paved road within DCP area | 2,452,000 | 468,000 | 2,920,000 |
### Appendix E: Proposed Development and Estimated Operating Costs

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct 1/2 mile drainage structure on DCP road</td>
<td>$3,275</td>
<td>$625</td>
<td>$3,900</td>
</tr>
<tr>
<td>Water distribution system for DCP area; VC, maint., house, dump station, CG, and storage tank</td>
<td>1,173,800</td>
<td>224,000</td>
<td>1,397,800</td>
</tr>
<tr>
<td>Electrical service and distribution for DCP area — direct buried cable and lighting</td>
<td>800,000</td>
<td>152,700</td>
<td>952,700</td>
</tr>
<tr>
<td>Septic system for visitor center</td>
<td>72,050</td>
<td>13,750</td>
<td>85,800</td>
</tr>
<tr>
<td>Provide landscaping and irrigation system (8,000 sq. ft.)</td>
<td>36,680</td>
<td>7,000</td>
<td>43,680</td>
</tr>
<tr>
<td>Construct 500' of 6' walks 7.20/sq. ft.</td>
<td>4,716</td>
<td>900</td>
<td>5,616</td>
</tr>
<tr>
<td>Site grading and drainage .10/sq. ft. (9,000 sq. ft.)</td>
<td>11,790</td>
<td>2,250</td>
<td>14,040</td>
</tr>
<tr>
<td>Obliterate and revegetate 1/4 mile x 24' vacated road</td>
<td>19,650</td>
<td>3,750</td>
<td>23,400</td>
</tr>
<tr>
<td>Provide low level pedestrian outdoor lighting (10 fixtures)</td>
<td>19,650</td>
<td>3,750</td>
<td>23,400</td>
</tr>
<tr>
<td>Revegetate 8A disturbed site (3,000 x A)</td>
<td>31,440</td>
<td>6,000</td>
<td>37,440</td>
</tr>
<tr>
<td>Construct 75 x 30' entrance plaza with 6 benches</td>
<td>45,195</td>
<td>8,625</td>
<td>53,820</td>
</tr>
<tr>
<td>Construct outdoor interpretive display with sign</td>
<td>19,650</td>
<td>3,750</td>
<td>23,400</td>
</tr>
<tr>
<td>Provide sign lighting (2 fixtures)</td>
<td>5,240</td>
<td>1,000</td>
<td>6,240</td>
</tr>
<tr>
<td>Construct 200' x 40' road widening</td>
<td>172,920</td>
<td>33,000</td>
<td>205,920</td>
</tr>
<tr>
<td>Trailer dump station, 2-station facility</td>
<td>172,920</td>
<td>33,000</td>
<td>205,920</td>
</tr>
<tr>
<td>Septic tank and drainfield for dump station</td>
<td>131,000</td>
<td>25,000</td>
<td>156,000</td>
</tr>
<tr>
<td>Maintenance facilities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10,000 sq. ft. of covered storage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3) warehouses @ 7,500 sq. ft. total</td>
<td>343,875</td>
<td>65,625</td>
<td>409,500</td>
</tr>
<tr>
<td>(1) shops/bays/sak/water treatment @ 2,500 sq. ft.</td>
<td>442,125</td>
<td>84,375</td>
<td>526,500</td>
</tr>
<tr>
<td>1400 lf of privacy &amp; security fencing</td>
<td>53,186</td>
<td>10,150</td>
<td>63,336</td>
</tr>
<tr>
<td>1400 x 20 of screening vegetation (28,000 sq. ft.)</td>
<td>73,360</td>
<td>14,000</td>
<td>87,360</td>
</tr>
<tr>
<td>Housing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct 12 permanent and/or seasonal quarters with attached garage</td>
<td>2,784,000</td>
<td>531,300</td>
<td>3,315,300</td>
</tr>
<tr>
<td>Landscaping for each residence (1090 x 6) (17,710)</td>
<td>277,700</td>
<td>53,000</td>
<td>330,700</td>
</tr>
<tr>
<td>Septic system shared w/maintenance</td>
<td>283,000</td>
<td>54,000</td>
<td>337,000</td>
</tr>
<tr>
<td>Site work &amp; landscaping for seasonal residences (1090 x 12)</td>
<td>103,752</td>
<td>19,800</td>
<td>123,552</td>
</tr>
<tr>
<td>Developed Campground</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Develop campground – 80-100 sites w/hookups</td>
<td>4,714,221</td>
<td>899,660</td>
<td>5,613,882</td>
</tr>
<tr>
<td>2-mile 18' gravel access road (existing 4WD alignment)</td>
<td>1,126,600</td>
<td>215,000</td>
<td>1,341,600</td>
</tr>
<tr>
<td>100-seat amphitheater</td>
<td>158,510</td>
<td>30,250</td>
<td>188,760</td>
</tr>
<tr>
<td>20-car parking lot at the amphitheater</td>
<td>102,180</td>
<td>19,500</td>
<td>121,680</td>
</tr>
<tr>
<td>Construct 1 mile interpretive trail from amphitheater</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct 2.7 mile gravel hiking/bicycle trail westward into the reserve</td>
<td>248,000</td>
<td>62,000</td>
<td>310,000</td>
</tr>
<tr>
<td>Well</td>
<td>8,574</td>
<td>1,636</td>
<td>10,210</td>
</tr>
<tr>
<td>Comfort Station – two compartment flush toilets w/showers</td>
<td>458,500</td>
<td>87,500</td>
<td>546,000</td>
</tr>
<tr>
<td>Septic system</td>
<td>285,580</td>
<td>54,500</td>
<td>340,000</td>
</tr>
<tr>
<td>1 registration sign</td>
<td>432</td>
<td>83</td>
<td>515</td>
</tr>
<tr>
<td>Site identification posts</td>
<td>28,165</td>
<td>5,375</td>
<td>33,540</td>
</tr>
<tr>
<td>Orientation signs (Type III)</td>
<td>51,876</td>
<td>9,900</td>
<td>61,776</td>
</tr>
<tr>
<td>Lighting for amphitheater (10 fixtures)</td>
<td>19,650</td>
<td>3,750</td>
<td>23,400</td>
</tr>
<tr>
<td>Construct 1-mile 18' gravel road to water storage tank</td>
<td>311,780</td>
<td>59,500</td>
<td>371,280</td>
</tr>
</tbody>
</table>
## APPENDIXES

### Development Item/Phase

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Almo Entrance</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct entrance station staffed (fee collection) and 10 car, 3 RV pulloff</td>
<td>$205,632</td>
<td>$39,243</td>
<td>$244,875</td>
</tr>
<tr>
<td>Construct unstaffed entrance kiosk</td>
<td>57,640</td>
<td>11,000</td>
<td>68,640</td>
</tr>
<tr>
<td><strong>Emery Canyon Entrance</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct parking area for 10 cars, 3 RVs</td>
<td>107,382</td>
<td>20,493</td>
<td>127,875</td>
</tr>
<tr>
<td>Construct staffed entrance station</td>
<td>98,250</td>
<td>18,750</td>
<td>117,000</td>
</tr>
<tr>
<td>Construct 1 two-compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>1 orientation sign (Type III) kiosk panel</td>
<td>8,407</td>
<td>1,604</td>
<td>10,011</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Junction (Moulton) Entrance</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct parking for 5 cars, 3 RVs</td>
<td>73,825</td>
<td>14,089</td>
<td>87,914</td>
</tr>
<tr>
<td>Construct unstaffed entrance kiosk</td>
<td>57,640</td>
<td>11,000</td>
<td>68,640</td>
</tr>
<tr>
<td>1 interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td>Signs – metal unicor road signs</td>
<td>6,052</td>
<td>1,155</td>
<td>7,207</td>
</tr>
<tr>
<td>Metal unicor custom signs for posted regulations at fee station</td>
<td>432</td>
<td>83</td>
<td>515</td>
</tr>
<tr>
<td>2 entrance signs</td>
<td>92,224</td>
<td>17,600</td>
<td>109,824</td>
</tr>
<tr>
<td>1 modified entrance signs</td>
<td>8,646</td>
<td>1,650</td>
<td>10,296</td>
</tr>
<tr>
<td>1 visitor sign</td>
<td>46,112</td>
<td>8,800</td>
<td>54,912</td>
</tr>
<tr>
<td>2 kiosk panels</td>
<td>4,323</td>
<td>825</td>
<td>5,148</td>
</tr>
<tr>
<td>Anodized aluminum sign</td>
<td>1,441</td>
<td>275</td>
<td>1,716</td>
</tr>
<tr>
<td><strong>Granite Pass View</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct parking (5 cars) w/interpretive sign</td>
<td>32,160</td>
<td>6,137</td>
<td>38,298</td>
</tr>
<tr>
<td><strong>Utilities/Roads</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bury 9 miles electric service across unit</td>
<td>1,074,200</td>
<td>205,000</td>
<td>1,279,200</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>$39,136,860</td>
<td>$7,489,656</td>
<td>$47,495,585</td>
</tr>
</tbody>
</table>
## Estimated Development Costs

### Alternative 3: California Trail Emphasis

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside Reserve – Circle Creek Basin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Obliterate and revegetate 3.5 miles of 18' gravel road</td>
<td>$1,009,637</td>
<td>$192,679</td>
<td>$1,202,316</td>
</tr>
<tr>
<td>Obliterate and revegetate 1.5 miles of 10' hardened ranch road across Circle Creek</td>
<td>559,043</td>
<td>106,688</td>
<td>665,731</td>
</tr>
<tr>
<td>Construct 4 miles of 18' gravel road from the Nicholson house</td>
<td>790,611</td>
<td>150,880</td>
<td>941,491</td>
</tr>
<tr>
<td>Nicholson Ranch</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking for 5-10 vehicles, 2 RV spaces</td>
<td>129,258</td>
<td>24,667</td>
<td>153,925</td>
</tr>
<tr>
<td>1-2 compartment vault toilets</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>1 orientation/interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td>Inscription Rocks</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking for 10 vehicles</td>
<td>74,408</td>
<td>14,200</td>
<td>88,608</td>
</tr>
<tr>
<td>2 interpretive signs (Type IV)</td>
<td>10,088</td>
<td>1,926</td>
<td>12,014</td>
</tr>
<tr>
<td>Twin Sisters Rise</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interpretive/wayside parking 10 vehicles</td>
<td>74,408</td>
<td>14,200</td>
<td>88,608</td>
</tr>
<tr>
<td>1 interpretive sign (Type IV)</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Corrals/historic rural setting</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking for 10 vehicles and 2 horse trailers</td>
<td>74,408</td>
<td>14,200</td>
<td>88,608</td>
</tr>
<tr>
<td>Unloading area for horses</td>
<td>23,056</td>
<td>4,400</td>
<td>27,456</td>
</tr>
<tr>
<td>1 interpretive sign</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Seating for activity area</td>
<td>16,391</td>
<td>3,128</td>
<td>19,519</td>
</tr>
<tr>
<td>Rim/Silent City</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Obliterate and revegetate 3 miles of social trails, 6' wide (2.2 A)</td>
<td>653,166</td>
<td>124,650</td>
<td>777,816</td>
</tr>
<tr>
<td>Obliterate and revegetate 5 miles of social roads, 16' wide along rim (9.7A)</td>
<td>2,813,880</td>
<td>537,000</td>
<td>3,350,880</td>
</tr>
<tr>
<td>Restore and revegetate 15 areas (6,000 sq. ft.) of random parking along the rim</td>
<td>613,080</td>
<td>117,000</td>
<td>730,080</td>
</tr>
<tr>
<td>Improve 2.5 miles existing hiking trails within Silent City</td>
<td>73,491</td>
<td>14,025</td>
<td>87,516</td>
</tr>
<tr>
<td>Construct 1 mile fully accessible trail from Turtle Rock to Parking Lot Rocks</td>
<td>319,214</td>
<td>60,919</td>
<td>380,133</td>
</tr>
<tr>
<td>Parking Lot Rocks</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct day-use area parking for 10 vehicles and 3 service vehicles</td>
<td>96,730</td>
<td>18,460</td>
<td>115,190</td>
</tr>
<tr>
<td>3-5 picnic sites/tables</td>
<td>5,764</td>
<td>1,100</td>
<td>6,864</td>
</tr>
<tr>
<td>1-2 compartment vault toilet</td>
<td>76,600</td>
<td>15,000</td>
<td>91,600</td>
</tr>
<tr>
<td>3 orientation signs</td>
<td>1,297</td>
<td>248</td>
<td>1,545</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td>Bath Rock</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct fully accessible parking for 25 cars and 2 service vehicles</td>
<td>137,943</td>
<td>26,325</td>
<td>164,268</td>
</tr>
<tr>
<td>5-8 picnic sites/tables</td>
<td>9,222</td>
<td>1,760</td>
<td>10,982</td>
</tr>
<tr>
<td>1-2 compartment vault toilet relocated from existing lot</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>1 information/orientation sign</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td>Development Item/Phase</td>
<td>Gross Construction Cost</td>
<td>Advance and Project Planning Cost</td>
<td>Total Project Cost</td>
</tr>
<tr>
<td>------------------------------------------------------------</td>
<td>-------------------------</td>
<td>-----------------------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td><strong>Turtle Rock</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct fully accessible parking for 10 cars and 2 service vehicles</td>
<td>$89,290</td>
<td>$17,040</td>
<td>$106,330</td>
</tr>
<tr>
<td>1-2 compartment toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>3-5 picnic tables</td>
<td>5,764</td>
<td>1,100</td>
<td>6,864</td>
</tr>
<tr>
<td>Information/orientation sign</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Indian Grove</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking 20 vehicles</td>
<td>178,580</td>
<td>34,080</td>
<td>212,660</td>
</tr>
<tr>
<td>2 RVs</td>
<td>17,292</td>
<td>3,300</td>
<td>20,592</td>
</tr>
<tr>
<td>Horse unloading area chute/hitching post</td>
<td>7,565</td>
<td>1,444</td>
<td>9,009</td>
</tr>
<tr>
<td>Hitching post</td>
<td>360</td>
<td>69</td>
<td>429</td>
</tr>
<tr>
<td>1-2 compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td><strong>Twin Sisters Basin</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rip back and revegetate 2 miles of 16' gravel road</td>
<td>108,208</td>
<td>20,650</td>
<td>128,858</td>
</tr>
<tr>
<td>Construct day use area parking for 10 vehicles</td>
<td>74,408</td>
<td>14,200</td>
<td>88,608</td>
</tr>
<tr>
<td>2 interpretive signs (Type IV)</td>
<td>10,087</td>
<td>1,925</td>
<td>12,012</td>
</tr>
<tr>
<td>1 mile fully accessible trail</td>
<td>128,249</td>
<td>24,475</td>
<td>152,724</td>
</tr>
<tr>
<td><strong>Twin Sisters</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fully accessible parking for 25 vehicles and 2 RVs</td>
<td>137,943</td>
<td>26,325</td>
<td>164,268</td>
</tr>
<tr>
<td>A half-mile fully accessible trail to Pinnacle Pass</td>
<td>32,062</td>
<td>6,119</td>
<td>38,181</td>
</tr>
<tr>
<td>1 two-compartment vault toilet</td>
<td>78,600</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>2 interpretive signs (Type IV)</td>
<td>10,087</td>
<td>1,925</td>
<td>12,012</td>
</tr>
<tr>
<td>Garbage receptacle</td>
<td>0</td>
<td>0</td>
<td>1,100</td>
</tr>
<tr>
<td>Remove 2 pit toilets</td>
<td>52,400</td>
<td>10,000</td>
<td>62,400</td>
</tr>
<tr>
<td><strong>Backcountry</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Obliterate 1.5 miles existing 4WD road</td>
<td>91,302</td>
<td>17,424</td>
<td>108,726</td>
</tr>
<tr>
<td><strong>Outside Reserve</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construct 7,500 sq. ft. of visitor center</td>
<td>2,210,625</td>
<td>421,875</td>
<td>2,632,500</td>
</tr>
<tr>
<td>Furnishings for visitor center at 20% of construction cost</td>
<td>684,763</td>
<td>130,680</td>
<td>815,443</td>
</tr>
<tr>
<td>Interpretive media for visitor center</td>
<td>944,000</td>
<td>180,153</td>
<td>1,124,153</td>
</tr>
<tr>
<td>Parking lot for 45 cars, 5 RVs/buses, 15 service spaces</td>
<td>470,264</td>
<td>89,745</td>
<td>560,009</td>
</tr>
<tr>
<td>1 specialty type III sign of wood/brick or matching stone</td>
<td>46,112</td>
<td>8,800</td>
<td>54,912</td>
</tr>
<tr>
<td>Well (85 sf)</td>
<td>25,938</td>
<td>4,950</td>
<td>30,888</td>
</tr>
<tr>
<td>Water distribution system for DCP area; VC, maintenance, housing, dump station, CG and storage</td>
<td>1,087,300</td>
<td>207,500</td>
<td>1,294,800</td>
</tr>
<tr>
<td>Electrical service and distribution for DCP area — direct buried cable and lighting</td>
<td>765,040</td>
<td>146,000</td>
<td>911,040</td>
</tr>
<tr>
<td>Septic system for visitor center</td>
<td>72,050</td>
<td>13,750</td>
<td>85,800</td>
</tr>
<tr>
<td>Provide landscaping and irrigation system (8,000 sq. ft.)</td>
<td>36,680</td>
<td>7,000</td>
<td>43,680</td>
</tr>
<tr>
<td>Construct 500' of 6' walks 7.20/sq. ft.</td>
<td>4,716</td>
<td>900</td>
<td>5,616</td>
</tr>
<tr>
<td>Site grading and dainage .10/sf (9,000 sq. ft.)</td>
<td>11,790</td>
<td>2,250</td>
<td>14,040</td>
</tr>
<tr>
<td>Obliterate and revegetate 1/4 mile x 24' vacated road</td>
<td>19,650</td>
<td>3,750</td>
<td>23,400</td>
</tr>
</tbody>
</table>
## Appendix E: Proposed Development and Estimated Operating Costs

<table>
<thead>
<tr>
<th>Development Item/Phase</th>
<th>Gross Construction Cost</th>
<th>Advance and Project Planning Cost</th>
<th>Total Project Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide low-level pedestrian outdoor lighting (10 fixtures)</td>
<td>$19,650</td>
<td>$3,750</td>
<td>$23,400</td>
</tr>
<tr>
<td>Revegetate 8A disturbed site (3,000 x A)</td>
<td>31,440</td>
<td>6,000</td>
<td>37,440</td>
</tr>
<tr>
<td>Construct 75' x 30' entrance plaza with 6 benches</td>
<td>45,195</td>
<td>8,625</td>
<td>53,820</td>
</tr>
<tr>
<td>Construct outdoor interpretive display with sign</td>
<td>19,650</td>
<td>3,750</td>
<td>23,400</td>
</tr>
<tr>
<td>Provide sign lighting (2 fixtures)</td>
<td>5,240</td>
<td>1,000</td>
<td>6,240</td>
</tr>
</tbody>
</table>

### Maintenance Facilities

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>10,000 sq. ft. of covered storage</td>
<td>343,875</td>
<td>65,625</td>
<td>409,500</td>
</tr>
<tr>
<td>3 warehouses @ 7,500 sq. ft. total</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(1) shops/bays/water treatment @ 2,500 sq. ft.</td>
<td>442,125</td>
<td>84,375</td>
<td>526,500</td>
</tr>
<tr>
<td>1,400 ft of privacy and security fencing</td>
<td>53,186</td>
<td>10,150</td>
<td>63,336</td>
</tr>
<tr>
<td>1,400 x 20 of screening vegetation (28,000 sq. ft.)</td>
<td>73,360</td>
<td>14,000</td>
<td>87,360</td>
</tr>
</tbody>
</table>

### Housing

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct 6 permanent quarters with attached garage</td>
<td>1,392,006</td>
<td>265,650</td>
<td>1,657,656</td>
</tr>
<tr>
<td>12 season quarters</td>
<td>1,037,520</td>
<td>198,000</td>
<td>1,235,520</td>
</tr>
<tr>
<td>Landscaping for each residence (1,090 x 6) (17,710)</td>
<td>139,200</td>
<td>26,565</td>
<td>165,765</td>
</tr>
<tr>
<td>Septic system shared w/maintenance</td>
<td>141,480</td>
<td>27,000</td>
<td>168,480</td>
</tr>
<tr>
<td>Site work and landscaping for seasonal residence (1,090 x 12)</td>
<td>103,752</td>
<td>19,800</td>
<td>123,552</td>
</tr>
</tbody>
</table>

### Emery Entrance

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct entrance station, manned kiosk w/storage (fee collection)</td>
<td>30,261</td>
<td>14,089</td>
<td>87,914</td>
</tr>
<tr>
<td>Construct parking area for 5 cars, 3 RVs</td>
<td>73,825</td>
<td>15,000</td>
<td>93,600</td>
</tr>
<tr>
<td>Construct two-compartment vault toilet</td>
<td>78,600</td>
<td>1,604</td>
<td>10,011</td>
</tr>
<tr>
<td>1 orientation sign (Type III) kiosk panel</td>
<td>8,407</td>
<td>0</td>
<td>1,100</td>
</tr>
</tbody>
</table>

### Garbage receptacle                                                                              |            |               |                  |

### Moulton Entrance

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct parking for 5 cars, 3 RVs</td>
<td>73,825</td>
<td>14,089</td>
<td>87,914</td>
</tr>
<tr>
<td>1 orientation sign (Type III) kiosk panel</td>
<td>8,407</td>
<td>1,604</td>
<td>10,011</td>
</tr>
</tbody>
</table>

### Granite Pass View

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parking for 5 vehicles, interpretive sign</td>
<td>32,160</td>
<td>6,137</td>
<td>38,298</td>
</tr>
</tbody>
</table>

### Signs

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metal unicor road sign</td>
<td>6,052</td>
<td>1,155</td>
<td>7,207</td>
</tr>
<tr>
<td>Metal unicor custom signs for posted regulations at fee station</td>
<td>432</td>
<td>82</td>
<td>514</td>
</tr>
<tr>
<td>Type III - 2 entrance signs 4' x 8' wood/stone</td>
<td>17,292</td>
<td>3,300</td>
<td>20,592</td>
</tr>
<tr>
<td>2 entrance signs</td>
<td>92,224</td>
<td>17,600</td>
<td>109,824</td>
</tr>
<tr>
<td>1 modified entrance sign</td>
<td>8,646</td>
<td>1,650</td>
<td>10,296</td>
</tr>
<tr>
<td>1 visitor center sign wood/brick/stone</td>
<td>46,112</td>
<td>8,800</td>
<td>54,912</td>
</tr>
<tr>
<td>2 kiosk panels 3' x 5' anodized aluminum</td>
<td>4,323</td>
<td>825</td>
<td>5,148</td>
</tr>
<tr>
<td>Type IV — anodized aluminum 2' x 3' on 4' posts</td>
<td>5,044</td>
<td>963</td>
<td>6,007</td>
</tr>
</tbody>
</table>

### Utilities/Roads

<table>
<thead>
<tr>
<th>Description</th>
<th>Cost</th>
<th>Planning Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct 1 mile of 18' gravel service road to water storage tank</td>
<td>311,780</td>
<td>59,500</td>
<td>371,280</td>
</tr>
<tr>
<td>Construct 2 miles paved road within DCP area</td>
<td>1,690,031</td>
<td>322,525</td>
<td>2,012,556</td>
</tr>
<tr>
<td>Buy 9 miles electric service across unit</td>
<td>1,074,200</td>
<td>205,000</td>
<td>1,279,200</td>
</tr>
<tr>
<td>Development Item/Phase</td>
<td>Gross Construction Cost</td>
<td>Advance and Project Planning Cost</td>
<td>Total Project Cost</td>
</tr>
<tr>
<td>------------------------------------------------------------</td>
<td>-------------------------</td>
<td>-----------------------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>Construct 1/2 mile drainage structure on DCP road</td>
<td>$3,275</td>
<td>$625</td>
<td>$3,900</td>
</tr>
<tr>
<td>Construct 10 miles of paved county/state highway/w/</td>
<td>$16,524,340</td>
<td>$3,153,500</td>
<td>$19,677,840</td>
</tr>
<tr>
<td>1/2 mile erosion control</td>
<td>$8,993</td>
<td>$1,716</td>
<td>$10,709</td>
</tr>
<tr>
<td>10 mile stripping</td>
<td>$13,100</td>
<td>$2,500</td>
<td>$15,600</td>
</tr>
<tr>
<td>10 mile shoulder revegetate/reseed</td>
<td>$2,766</td>
<td>$528</td>
<td>$3,294</td>
</tr>
<tr>
<td>2 mile silt fence</td>
<td>$96,835</td>
<td>$18,480</td>
<td>$115,315</td>
</tr>
<tr>
<td><strong>Bypass Road Subtotal</strong></td>
<td></td>
<td></td>
<td><strong>$23,489,694</strong></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$39,001,759</strong></td>
<td><strong>$7,520,461</strong></td>
<td><strong>$46,889,793</strong></td>
</tr>
</tbody>
</table>
STAFFING AND OPERATING COSTS

Alternative 1: No Action

The reserve operating budget for fiscal year 1991 was approximately $295,000. Of that amount, $195,000 was provided by the National Park Service and $100,000 by the state of Idaho.

The following is a list of staff at the reserve in fiscal year 91:

Administration
   National Park Service
   Superintendent (1/2 time City of Rocks, 1/2 time Haggeman)
   Administrative Assistant (1/2 time City of Rocks, 1/2 time Haggeman)
   Clerk-Typist (1/2 time City of Rocks, 1/2 time Haggeman)

Idaho Department of Parks and Recreation
   Park Manager
   Clerk-typist

Visitor Protection and Resource Management
   National Park Service
   Ranger (full time City of Rocks)

Idaho Department of Parks and Recreation
   Park Ranger
   2 park aids (part time)

Interpretation and Visitor Services
   Idaho Department of Parks and Recreation
   Interpretive specialist

Maintenance
   Idaho Department of Parks and Recreation
   State Job Program trainee
   1 park aid (part time)

Note: Please see the "Staffing and Operating Costs" section of the draft plan for budget and staffing estimates for alternative 2.
## STAFFING AND OPERATING COSTS

### Alternative 3: California Trail Emphasis

The reserve's operating budget for fiscal year 1991 was approximately $295,000. Of that amount, $195,000 was provided by the National Park Service and $100,000 by the state of Idaho.

The following staff would be needed to implement alternative 3:

<table>
<thead>
<tr>
<th>Staff Category</th>
<th>Positions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Administration</strong></td>
<td></td>
</tr>
<tr>
<td>Superintendent (GS-12)</td>
<td>1.0</td>
</tr>
<tr>
<td>Administrative Officer (GS-7)</td>
<td>1.0</td>
</tr>
<tr>
<td>Clerk-Typist (GS-4)</td>
<td>1.0</td>
</tr>
<tr>
<td><strong>Visitor Protection and Resource Management</strong></td>
<td></td>
</tr>
<tr>
<td>Chief Ranger (GS-11)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, Visitor Protection (GS-7)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, Visitor Protection (GS-5)</td>
<td>0.9</td>
</tr>
<tr>
<td>Resource Management Specialist (GS-9)</td>
<td>1.0</td>
</tr>
<tr>
<td>Park Ranger, Resource Management Specialist (GS-5)</td>
<td>1.0</td>
</tr>
<tr>
<td>2 Park Rangers, (GS-4)</td>
<td>0.7</td>
</tr>
<tr>
<td>Clerk-Typist (GS-4)</td>
<td>0.7</td>
</tr>
<tr>
<td>Park Ranger, Fee Collection (GS-5)</td>
<td>1.0</td>
</tr>
<tr>
<td>4 Park Rangers, Fee Collection (GS-3)</td>
<td>3.0</td>
</tr>
<tr>
<td><strong>Interpretation and Visitor Services</strong></td>
<td></td>
</tr>
<tr>
<td>Chief of Interpretation (GS-9)</td>
<td>1.0</td>
</tr>
<tr>
<td>Historian, (GS-7)</td>
<td>1.0</td>
</tr>
<tr>
<td>2 Park Rangers (GS-4)</td>
<td>1.8</td>
</tr>
<tr>
<td><strong>Maintenance</strong></td>
<td></td>
</tr>
<tr>
<td>Chief of Maintenance (WS-10)</td>
<td>1.0</td>
</tr>
<tr>
<td>Maintenance Worker (WG-6)</td>
<td>0.9</td>
</tr>
<tr>
<td>2 Laborers (WG-5)</td>
<td>3.1</td>
</tr>
</tbody>
</table>

**Note:** The annual cost of the above combined salaries based on step I of all pay grades would be $410,000. An additional $205,000 would be required for operating expenses. The total annual estimated operating costs would be $615,000 in 1993 dollars.
APPENDIX F: ACTION PLANS AND RESOURCE STUDIES CALLED FOR IN COMPREHENSIVE MANAGEMENT PLAN

Architectural Themes and Guidelines Study
Operations Plan for State administration of the area. (this is the same as (1) Evaluation Plan for State and (2) Implementation Plan for . . .")

Resource Management Plan for Natural and Cultural Resources
Natural Resources Management Plan
Wildlife/Hunting Management Plan
Grazing Management Plan
Fire Management Plan
Climbing Management Plan
Trails Plan

Cultural Resources Management Plan. Please note that the 1990 Programmatic Agreement allows for the postponement of consultation to a later date for both plans and specific actions.

Collections Management Plan
Comprehensive Research and In-depth Documentation of Cultural Landscapes
Historic Resource Study
Historic Landscape Study
Scope of Collections Statement
Documentation of Ethnographics Resources
Mitigation Plan for Cultural Resources
Interpretive Prospectus
Wayside Exhibit Plan
Sign Plan

Visual Resource Management Plan for the entire reserve, including, but not limited to the California Trail viewshed
APPENDIX G: CASSIA COUNTY ZONING PERTAINING TO RESERVE

In harmony with section 202(c) of PL 100-696, an interim ordinance for the regulation of private land uses within City of Rocks National Preserve follows. This interim ordinance expires on December 31, 1994. Cassia County is in the process of finalizing these ordinances, but a final version could not be included in this document due to time constraints.

1-3 Declaration

In establishing the zones, the boundaries thereof, and the regulations applying within each of the zones, due and careful consideration was given among other things to the suitability of land for particular uses with a view to conserving the value of buildings and encouraging the most appropriate use of land throughout the county. The location and boundaries of cities, villages, reserves, and other areas not subject to zoning regulations by the Board of County Commissioners of Cassia County, together with the regulations applying within each city, village, or reserve were also considered in the preparation of this ordinance.

6-1 COUNTY DIVIDED INTO ZONES. In order to accomplish more fully the objectives and purposes of this Ordinance, Cassia County, Idaho is hereby divided into zones which shall be known by symbols and/or names as follows:

<table>
<thead>
<tr>
<th>Zone</th>
<th>Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-1</td>
<td>Residential Agricultural Zone</td>
</tr>
<tr>
<td>RA-2</td>
<td>Agricultural Residential Zone</td>
</tr>
<tr>
<td>AP</td>
<td>Prime Agricultural Zone</td>
</tr>
<tr>
<td>MU</td>
<td>Multiple Use Zone</td>
</tr>
<tr>
<td>HP</td>
<td>Interim Historical Preservation Zone</td>
</tr>
<tr>
<td>IC</td>
<td>Industrial Commercial Zone</td>
</tr>
<tr>
<td>B1</td>
<td>Albion City Buffer Zone</td>
</tr>
<tr>
<td>B2</td>
<td>Burley City Buffer Zone</td>
</tr>
<tr>
<td>B3</td>
<td>Declo City Buffer Zone</td>
</tr>
<tr>
<td>B4</td>
<td>Malta City Buffer Zone</td>
</tr>
<tr>
<td>B5</td>
<td>Oakley City Buffer Zone</td>
</tr>
<tr>
<td>OR</td>
<td>Outdoor Recreational Zone</td>
</tr>
</tbody>
</table>

6-2 MAP The location boundaries of each of the zones are shown on the Cassia County Zoning Map, and all boundaries, notations and other data shown thereon are as much a part of this Ordinance as if fully described herein. The Zoning map shall be identified by the signature of the Chairman of the Board of County Commissioners, attested by the clerk, and shall bear the following words:

"I hereby certify that this is the official Cassia County Zoning Map which was

7-9 INTERIM HISTORICAL PRESERVATION ZONE HP

The purpose of the Interim Historical Preservation Zone is to designate the City of Rocks National Reserve as well as such other areas as are designated by the Planning Commission, as areas of great historical significance that should be preserved and protected for the benefit and education of future generations. A comprehensive planning process is underway at the present time involving Federal, State, Local and private interests regarding the long range use and development of these historically significant areas. The intent of the Interim Historical Preservation Zone is to preserve and protect the geologic features, the rocks and remnants associated with the California and other trails, the historic sites and current ranching activities that contribute to an historic western rural setting and the scenery, mystery, and silence of the landscape, as well as to manage recreation in these areas to ensure preservation and protection of resource values, while the planning process continues.

The restrictions and regulations contained in this zone shall not be valid after December 31, 1994, unless reenacted or amended prior to that time by Commissioners action.

Inclusions in the HP Zone of lands outside the formal boundaries of the City of Rocks Natural Reserve is not intended nor is it to be construed as an attempt to link such lands with the Reserve in any way.

Development in these areas should be limited to those uses made of the areas during the period from 1850 to 1940. Construction and development that is permitted in these areas should be required to conform to and maintain the purpose of the reserve.

Publicly maintained facilities for education, sightseeing and appropriately restricted recreational uses are permitted. Residential uses are limited to one residence for each private land owner existing as of the date of passage of this ordinance. Architectural design of said residences and all other developments should be subject to review and approval by the Planning Commission to assure its conformity to the purposes for which the Reserve was established.

All development within the HP Zones during the period of this interim zone shall be required to meet the above criteria and shall require a development permit issued in accordance with the provisions of Chapter 11 of this ordinance.

8-2 SCHEDULE OF ZONING REGULATIONS ADOPTED Zoning regulations shall be as set forth in the following schedules of zoning regulations and in the performance standards contained within Chapter Nine hereof. The schedules of zoning regulations divided into four land use groups consisting of agriculture, residential, commercial, and industrial. To determine in which zone a specific use is allowed, it is necessary to find the use in one of the groups and read across the schedule until either the letter "s" or the letter "g" appears in one of the columns. If the letter "s" appears, the use is a permitted use. If the letter "g" appears, the use is only allowed upon issuance of a special or conditional use permit. If no letter appears, the use is prohibited in
that zone. The Zoning Administrator shall interpret the appropriate zone for land uses not specifically mentioned by determining a zone in which similar uses are permitted. When several combined land uses exist, or are proposed, the most intensive land use shall be considered as the primary activity.

11-1 HISTORICAL PRESERVATION ZONE DEVELOPMENTS

DEVELOPMENT PERMIT: The Planning Commission may issue a Development permit for construction, demolition, or development of facilities of any type within the Historical Preservation Zone in accordance with the procedures and standards that follow.

11-1-1 Purpose: The Development permit process is intended to be the mechanism by which the purposes of establishing the Historical Preservation Zone are fulfilled. It is the process by which the Planning Commission is authorized to review plans for work on structures within the Historical Preservation Zone to assure that the work complies with protective standards created to preserve the special qualities of the Historical Preservation Zones. The preservation work permit is intended to authorize review of exterior work only.

11-1-2 Permit Required: A person shall not perform or cause to be performed any construction, alteration or demolition of any improvement of real property located within an Historical Preservation Zone without having first obtained a Development permit for such work.

11-1-3 Improvement: "An Improvement of Real Property" means any addition to a piece of real property as illustrated by, but not limited to: any building; structure; wall; house; gate; fence; corral; or barn.

11-1-4 Demolition: "Demolition" of any improvement means a partial or total removal, destruction, wreckage or tearing down of an improvement as illustrated by but not limited to:
   (a) The tearing down of a building
   (b) The tearing down of a corral
   (c) The tearing down of an exterior wall
   (d) The total removal of an improvement by tearing it down to its foundation.

11-1-5 Application: A person may initiate proceedings for obtaining a development permit by sending a permit application to the Zoning Administrator.

11-1-6 Application Information: The Zoning Administrator may specify the information required in a permit application and may from time to time change the content of that information, but at all times the Zoning Administrator shall require the following information:
   (a) The applicant’s name and address
   (b) The owner’s name and address if the owner is not the applicant.
   (c) The owner’s signed consent to the making of the application, if the owner is not the applicant.
   (d) The location and legal description of the property
   (e) Photographs of the current condition of the property
   (f) The plans for the work to be done including any surveys, drawings, and blueprints for the work.
   (g) A statement of the reasons for the work to be done
   (h) A copy of any permit or variance required in connection with the work to be done.

11-1-7 Application: Delivery to the Planning Commission. The Zoning Administrator shall deliver a completed application for a development work permit to the Planning Commission.

11-1-8 Planning Commission Resolution: The Planning Commission shall review an application for a development work permit and adopt a resolution either granting or refusing the permit. The Board shall take this action within 20 days after the date on which the application was received from the Zoning Administrator.

11-2 PLANNING COMMISSION RESOLUTIONS; SCIENTIFIC FACTORS

The Planning Commission shall base a review of an application for a development work permit upon the following:
   (a) The purpose of development work permits.
   (b) The purposes of the Historical Preservation Zone Designation
   (c) The standards for granting a permit in Section 11-3 below

11-2-2 Notification of Grant or Refusal: Within 5 days after the date on which a resolution is adopted by the Planning Commission, the Zoning Administrator shall mail a copy of the resolution to the applicant.

11-2-3 Issuance of Permit: If the resolution of the Planning Commission grants the permit, the Administrator shall immediately send the development work permit to the Applicant including it with the notification required above.

11-3 STANDARDS FOR GRANTING A PERMIT

11-3-1 The Planning Commission shall not grant a development work permit unless it finds that standards of visual compatibility consistent with the purpose of the Historical Preservation Zone will be present upon completion of the work. Reference shall be had to the Cassia County Historical Preservation area development standards guide for examples of acceptable designs and architecture when it is developed.

11-3-2 All improvements should conform to the intent and purpose for which the reserve was established.

11-3-3 Permit Limitation. A development work permit is limited to an authorization of the work shown on plans required by this article.

11-3-4 Permit Term. A development work permit expires two years after the date on which the Resolution granting it was adopted.

11-3-5 Repeat Application. A person may make a repeat application for a development work permit as often as desired. The procedure for a repeat application is the same as the procedure for an initial application.
APPENDIX H: SECTION 106 COMPLIANCE REQUIREMENTS

Actions that will cause site disturbance

The actions listed below would be either programmatic exclusions under the programmatic agreement among the National Conference of State Historic Preservation Officers (SHPO), the Advisory Council on Historic Preservation, and the National Park Service (NPS) or would be subject to further consultation with the state historic preservation officer and the advisory council. Note that the 1990 Programmatic Agreement allows for the postponement of consultation to a later date for both plans and specific actions. Should the NPS and the SHPO so decide, other actions not meeting the programmatic exclusion definition may be determined to need no further review under section 106 of the National Historic Preservation Act. Any such agreement, however, must be determined mutually and must be fully documented.

Archeological clearances are indicated for a number of projects. The archeological clearance data would be gathered by the Park Service and provided to the state historic preservation officer. If any sites are within the area of project impacts, consultation with the state historic preservation officer would be required. Depending upon the effect, consultation may be needed with the advisory council.

Actions that could cause visual impacts on the historic scene

To soften the impact of placing man-made elements into the cultural landscape, visual compatibility standards would be developed by the regional staff which would provide direction for incorporation of these elements.

Please see appendix F for a list of plans that will be prepared after the comprehensive management plan is complete.

<table>
<thead>
<tr>
<th>LOCATION</th>
<th>ACTION</th>
<th>COMPLIANCE REQUIREMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reservewide</td>
<td>Visitor/recreation use outside foreground viewshed of California Trail prism (approximately 1/4 mile on each side of prism in California Trail subzone. Foreground includes Twin Sisters and Salt Lake Alternate foreground</td>
<td>To be addressed in climbing and trails management plans</td>
</tr>
<tr>
<td>Reservewide</td>
<td>Grazing use outside areas described in Statement of Findings for Wetlands (Appendix J) in California Trail subzone</td>
<td>To be addressed in grazing management plan</td>
</tr>
<tr>
<td>Reservewide</td>
<td>Climbing use outside foreground viewshed of California Trail prism (approximately 1/4 mile on each side of prism) in California Trail subzone, including Twin Sisters</td>
<td>To be addressed in climbing management plan</td>
</tr>
<tr>
<td>Reservewide Utilities</td>
<td>Bury 9 miles of electric service across reserve, remove unused lines, and construct 1/2 mile drainage structure</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Circle Creek Basin – General</td>
<td>Convert 3.5-mile gravel road and 1.5-mile 4WD road to trails and construct 4-mile gravel road</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Circle Creek Basin – Overlook</td>
<td>Construct 1-mile gravel road, day-use parking area, 1/4-mile hardened trail, 1.4-mile foot trail, 5-mile gravel trail to Pinnacle Pass, interpretive sign, garbage receptacle</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Circle Creek Basin – Nicholson Ranch</td>
<td>Construct day-use parking area, vault toilet, orientation/interpretive and orientation/backcountry signs, garbage receptacle</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Circle Creek Basin – Inscription Rocks</td>
<td>Construct parking area, two interpretive signs, and 4.8 miles of gravel trail</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Circle Creek Basin – Twin Sisters Rise Overlook</td>
<td>Construct interpretive wayside, parking area, picnic tables, vault toilet, and interpretive sign</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>LOCATION</td>
<td>ACTION</td>
<td>COMPLIANCE REQUIREMENT</td>
</tr>
<tr>
<td>----------</td>
<td>--------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Circle Creek Basin - Corrals/Historic Rural Setting</td>
<td>Construct parking area, unloading chute, corrals, interpretive sign, seating for activity area</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Rim/Silent City - General</td>
<td>Obliterate/revegetate 3 miles of social trails and 5 miles of social roads, restore/revegetate 16,000 sq. ft. random parking areas, improve 2.5 miles of existing hiking trails, construct 1-mile trail, construct 1.6 miles of gravel trail</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Rim/Silent City - Parking Lot Rocks</td>
<td>Construct day-use parking area, picnic sites/tables, vault toilet, 3 orientation signs, garbage receptacle</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Rim/Silent City - Bath Rock</td>
<td>Construct parking area, picnic sites/tables, interpretive and information/orientation signs, garbage receptacle, and relocate vault toilet</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Rim/Silent City - Turtle Rock</td>
<td>Construct parking area, picnic sites/tables, vault toilet(s), information/orientation and interpretive signs</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Rim/Silent City - Breadloaves</td>
<td>Construct parking area, 3 group campsites with parking, vault toilets, information/orientation, backcountry registration/information interpretive signs, garbage receptacle</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Primitive Campground/Trailhead</td>
<td>Construct 1/2-mile gravel road, 5.6-mile hiking trail, 50 walk-in sites, 2-mile hardened trail, vault toilets, parking area, gravel road, 2 trailheads with information and interpretive signs</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Indian Grove - General</td>
<td>Construct overlook parking area, day-use trail, interpretive wayside and sign, gravel road, 5.6-mile hiking trail, 50 walk-in sites, 2-mile hardened trail, vault toilets, parking area, gravel road, 2 trailheads with information and interpretive signs</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Indian Grove - Backcountry</td>
<td>Obliterate/revegetate 1.5-mile existing road and improve/modify 7-mile trail from Breadloaves to Indian Grove</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Twin Sisters - General</td>
<td>Rip back/revegetate 2-mile gravel road to minimally discernible route</td>
<td>Programmatic exclusion (b)</td>
</tr>
<tr>
<td>Twin Sisters Basin - Trails Junction</td>
<td>Construct interpretive wayside/trailhead, parking area, 2 interpretive signs, 1 orientation sign</td>
<td>Requires archeological clearance</td>
</tr>
<tr>
<td>Twin Sisters Basin - Twin Sisters</td>
<td>Construct parking area, vault toilet, 1 orientation sign, 2 interpretive signs, garbage receptacle, 4-mile loop trail between Twin Sisters and Stage Station, and remove 2 vault toilets and picnic tables on north side of existing parking area</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Headquarters - Almo Entrance</td>
<td>Construct visitor center, entrance station, kiosk, administrative offices, trailer dump station, support facilities, and utilities infrastructure</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Maintenance Facilities</td>
<td>Construct maintenance warehouses/shops and fencing, and plant screening vegetation</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Housing</td>
<td>Construct NPS housing with associated utilities infrastructure</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Developed Campground</td>
<td>Construct 80-100 site campground, amphitheater, parking area, well, comfort station, signs, lighting, 2-mile road, 2.7 mile trail, and 1-mile road to water tank</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Emery Canyon Entrance</td>
<td>Construct entrance station, parking area, vault toilet, orientation/sign, information kiosk and sign, garbage receptacle</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
<tr>
<td>Junction (Moulton) Entrance</td>
<td>Construct orientation/information kiosk, parking area, garbage receptacle</td>
<td>Programmatic exclusion (g) if within disturbed area. If action involves disturbing ground outside previously disturbed areas, archeological clearance would be required.</td>
</tr>
</tbody>
</table>
### APPENDIX I:
**CHANGES IN THE PROPOSAL (ALTERNATIVE 2) SINCE THE DRAFT COMPREHENSIVE MANAGEMENT PLAN / DEVELOPMENT CONCEPT PLAN / ENVIRONMENTAL IMPACT STATEMENT**

**Part One: Final Comprehensive Management Plan**

The editorial changes and changes made in direct response to comments made in letters received are not included.

<table>
<thead>
<tr>
<th>Purpose and Need for the Plan</th>
<th>Text has been changed to &quot;City of Rocks has a long tradition of recreational use by local residents and is now receiving attention as an outstanding rock-climbing area.&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major Planning Considerations</td>
<td>Three objectives have been added:</td>
</tr>
<tr>
<td></td>
<td>• Pending historic documentation, stabilize stage station site</td>
</tr>
<tr>
<td></td>
<td>• Interpret historic landscape at the stage station site reflective of the scene in 1869-82</td>
</tr>
<tr>
<td></td>
<td>• Provide for an appropriate level of recreational opportunities</td>
</tr>
<tr>
<td>Management Objectives</td>
<td>One management objective has been deleted:</td>
</tr>
<tr>
<td></td>
<td>Restore general historic landscape to approximate conditions of the stage station site reflective of the scene in 1869-82, pending the location of documentary evidence.</td>
</tr>
<tr>
<td></td>
<td>Several management objectives have been changed as follows:</td>
</tr>
<tr>
<td></td>
<td>Provide opportunities for people to learn about the natural vegetation, with an emphasis on piñon pine, and about the wildlife, with an emphasis on special species such as mountain lions and birds of prey has been changed to wildlife within the reserve.</td>
</tr>
<tr>
<td></td>
<td>Manage recreational activities so they do not detract from the experiences of other visitors has been changed to as to minimize the potential for conflicts among different users.</td>
</tr>
</tbody>
</table>

The land protection plan would be prepared in consultation with area landowners.

The reserve would be turned over to the state before principal visitor and administrative facilities are cooperatively developed.

The description of where recreation use is concentrated has changed.

The plan now calls for a visual resource management plan.

The landownership pattern on the maps has been changed because private land has been obtained since the draft.

The names, descriptions, and uses of some management zones has changed as shown on the following page.

The road from Emery Canyon to Indian Grove and north past Graham Peak is now shown as a four-wheel-drive road rather than a gravel road comparable to other main roads in the reserve.

Tent campsites are now called primitive campsites.

Appropriate recreation would be . . . camping in campgrounds has been changed to designated sites.

The "Land Protection" section, column 1 from page 18 in the draft has been moved to follow the "Management Zoning" section of the plan.

The map Areas of Special Concern Outside the Reserve Boundary has been changed as follows:

Under resource values in the legend, middleground of the California Trail has been deleted.
The proposed addition to the national historic landmark has been changed to a potential addition and only the foreground shown. The middleground has been eliminated.

The area of special concern just south of the reserve boundary is now suggested for potential addition to the national historic landmark, subject to landowner consent.

**RESOURCE MANAGEMENT**

**Cultural Resources**

The scope of the proposed plan would focus on the reserve's history from prehistoric times to present day ranching has been changed to ranching practices present at the time the reserve was established.

It has been reiterated that actions proposed on private land would require permission of the landowner or a willing seller acquisition of the interest necessary to provide for the intended public use.

**California Trail/Salt Lake Alternate**

The proposal that no recreational activities, grazing, or commercial or residential development would be permitted in these protected areas has been deleted.

**Historic Rural Setting**

The definition of the historic rural setting has been changed from ending in modern-day ranching to through the establishment of the reserve in 1988.

Roads should remain in their existing unpaved condition has been changed to remain unpaved but improved sufficiently to ensure safe use and maintenance.

**Additional Planning Requirements**

A historic landscape study that was proposed in the draft is now underway.

A comprehensive reserve wide survey, inventory, and assessment of archeological resources will evaluate their contextual significance and interpretive value has been added.

The Idaho state historic preservation officer will be asked to comment on these ongoing studies as well as the studies described in appendix F.

**RESOURCE MANAGEMENT**

**Natural Resources**

Reserve managers would seek technical assistance from the U.S. Fish and Wildlife Service in restoring wetlands and riparian areas and in completing a comprehensive inventory of natural resources within the reserve, especially for rare and sensitive species.

A Statement of Findings for Wetlands has been added in appendix J. It details how wetlands would be managed under the proposal.

Many rocks in the reserve used by rock climbers also provide essential habitat to many species that are sensitive to human activity has been changed to many rocks in the reserve provide essential habitat to some species that are sensitive to human activity.

Any outcrops with occupied [breeding raptor] nests would be closed to climbing for the duration of the breeding season. Outcrops in sight of golden eagle and ferruginous hawk nest sites also would be closed has been changed to breeding season for sensitive species and Outcrops within 300 meters and in sight of

Any grazing allotments in the reserve that were vacated for any reason by the recognized permittee of record would be reallocated consistent with sound range management principles or would be permanently withdrawn from domestic livestock grazing if it was in the best interest of resource protection and visitor use has been changed to allocated to remaining or adjoining permittees with no increase in AUMs for those permittees. In these cases, the same number of AUMs would be permitted for larger allotments, and the total number of AUMs available in the reserve would decrease.

Prior to any water development on public land a detailed on-site evaluation of wetlands in the reserve would be completed has been changed to prior to any new water development that would affect wetlands on public land.

The following statement has been added: trailing corridors would remain for all other historic trailing routes. Trailing would be prohibited in the research natural area and where California Trail ruts are best preserved.

The [climbing management] plan will provide strategies for protecting sensitive resources from climbing impacts has been changed to protecting cultural and natural resources from significant climbing impacts.
<table>
<thead>
<tr>
<th>VISITOR USE</th>
<th>Two interpretive themes have been added: Vegetative Diversity and Stage Route.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interpretation</td>
<td>An interpretive trail has been added to the amphitheater and parking lot development.</td>
</tr>
<tr>
<td>Interpretive Themes</td>
<td>Twin Sisters basin would be returned as closely as possible to an open expanse with no signs of modern development has been changed to Twin Sisters basin would be managed to retain an open expanse with little or no signs or modern development</td>
</tr>
<tr>
<td>East-West Road</td>
<td>Historic Continuum Trails. Visitors would now be encouraged to visit a homestead and mining site. In addition to a trail from the primitive campground to a high point, a trail would be added from the primitive campground all the way to Twin Sisters.</td>
</tr>
<tr>
<td></td>
<td>Silent City Trail. The trail from Turtle Rock to Parking Lot Rocks would not be accessible to all visitors under the final proposal.</td>
</tr>
<tr>
<td>RECREATION</td>
<td>The statement that no RVs would be permitted at the primitive campground has been deleted.</td>
</tr>
<tr>
<td></td>
<td>Vehicle parking [primitive campground] would be centralized in one area from which campers would walk to campsites has been changed to vehicle parking would be clustered in multiple areas to provide walk-in access to campsites.</td>
</tr>
<tr>
<td></td>
<td>A group campground would be developed in the area behind Breadloaves has been changed to A group campground for large groups</td>
</tr>
<tr>
<td>Climbing</td>
<td>The extensive rockclimbing activity within the reserve would be supported within the front country recreation area of the natural area subzone, which would encompass all of section 36 and portions of adjacent sections 25 and 31 that offer prime climbing opportunities. Most of the climbing activity within the reserve would occur within this area has been changed to the majority of rockclimbing activity within the reserve would continue to occur in the natural and recreational resource area, which encompasses all of section 36 and portions of adjacent sections 25 and 31. These areas offer prime climbing opportunities.</td>
</tr>
<tr>
<td></td>
<td>Two of three paragraphs of this section have been deleted and replaced with a new discussion (see the &quot;Recreation, Climbing&quot; section).</td>
</tr>
<tr>
<td></td>
<td>The following sentence has been deleted:</td>
</tr>
<tr>
<td></td>
<td>Backcountry recreational use in the portion of the natural area subzone west of the research natural area would be by registration only. This area would have no convenient access, and use would be expected to be limited has been changed to A trail plan will be developed to identify the locations of designated trails within the reserve. Note that the final proposal map shows a new trail from the first overlook just inside the reserve connecting to the Silent City trail to Indian Grove, and a trail from the primitive campground to Twin Sisters, most of which is new.</td>
</tr>
<tr>
<td></td>
<td>Mountain bikes . . . would be permitted only on existing roads that are open to all motorized vehicles has been changed to mountain bikes would be limited to designated secondary roads or bicycle trails.</td>
</tr>
<tr>
<td>Roads</td>
<td>A statement has been added — Gravel, sand, and materials would not be taken from within the reserve for road maintenance or construction. These materials would come from a nearby source and be petrologically and mineralogically compatible with the native rock of the reserve. Rock material used for road maintenance or construction would reflect the integrity of the lithologic units of the reserve.</td>
</tr>
<tr>
<td></td>
<td>A spur trail connecting the primitive campground with Twin Sisters has been added.</td>
</tr>
<tr>
<td>Trails</td>
<td>Two existing trail segments would be removed and their traces obliterated has been changed to two existing road segments would be removed and converted to trail use</td>
</tr>
<tr>
<td></td>
<td>1.5 miles of ranch road/trail from Emery Canyon Pass up to Indian Grove</td>
</tr>
<tr>
<td></td>
<td>Approximately 1.5 miles of ranch road/trail from the northeast boundary at Graham Creek to Indian Grove</td>
</tr>
</tbody>
</table>
Table I: Day Use Activity Areas Accessible by Car

Inside the reserve

Circle Creek Basin Overlook
  draft — 5-20 cars, no trailhead or other final — 20 cars, trailhead for ridge access, sign, garbage

Circle Creek Basin — Nicholson Ranch
  draft — trail to backcountry final — interpretive trail

Twin Sisters View
  draft — 5-10 car parking, no picnicking final — 5-12 car parking, 3-5 picnic sites/tables, 1 two compartment vault toilet

Indian Grove Overlook has been added
  5-7 car parking, interpretive wayside, sign, garbage

<table>
<thead>
<tr>
<th>Breadloaves Group Camping Area Trailhead</th>
<th>Words in bold type have been deleted.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Design of a group camping area at Breadloaves would use shaded areas to the north and to the west of the existing disturbed site on the west side of the rocks. Parking...would use the disturbed area with a 100-foot setback from the western rock faces.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Indian Grove Backcountry Camping Area</th>
<th>The following sentences have been deleted: Of the potential seven sites, up to two may be designated for group camping. Fire rings for those two sites and a vault toilet might be provided.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>FACILITIES OUTSIDE THE RESERVE</th>
<th>The size of the visitor center/administrative offices has been increased from 7,500 square feet to 9,500. A museum and 25- to 30-seat multipurpose room would be part of this addition.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Headquarters Site</th>
<th>Roads</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The proposal to build a bypass road around the southern end of the reserve has been deleted.</td>
</tr>
</tbody>
</table>

Septic systems would service most of the junction site. A holding tank would be used at the trailer dump station. has been changed to

A sewage system would service most of the Almo junction site. The sewage system would be designed to meet state codes.

RV Campground has been changed to Developed Campground.

The final includes a proposal to phase development by building 50 units initially and adding 50 units later as needed.

The proposal that the developed campground would have a separate well from the visitor center has been deleted.

Statements have been added:

Domestic water and sewage facilities would be designed to meet Environmental Quality and Clean Water Act requirements.

The 100-seat amphitheater would be expandable to 200 seats.

The existing four-wheel-drive road would continue past the developed campground and provide access to other public lands.

A hiking/bicycle trail would be built from the developed campground westward into the reserve to encourage nonmotorized use.

Statements have been deleted:

Half of this [road to the developed campground] would follow an existing four-wheel-drive road, and the rest would be new alignment.

The following statements have been added:

Orientation/information signs would be used outside the reserve on interstate and state highways. Requests to state highways to install signs would be made at the following locations:

Type I signs would be on I-84 south at Sublette exit (2)
DRAFT PLAN — PRESERVATION AND PUBLIC EDUCATION ZONE

California Trail Subzone: Outstanding features (major landmarks, trail remnants, inscription rocks, encampment area): Emphasis on preserving outstanding features and interpreting them to the public.
  • Walking; nature viewing; photography; Picnicking allowed at Twin Sisters pending research  • No grazing  • No commercial or residential development

Public Access (entire trail corridor, encampment area): Emphasis on allowing visitors to walk along the trail and to wander freely through the encampment area.
  • Walking; informal picnicking; nature viewing; photography; incidental, equipment-free scrambling on rocks  • Grazing on public/private lands •no commercial or resident development

Impact Monitoring (northern end of encampment area): Emphasis on allowing same activities as in public access zone plus low-impact recreation, including minimum-impact climbing

Natural Area Subzone: Outstanding features (research natural area): Emphasis on preserving outstanding features and interpreting them to the public. (Entire area currently in public ownership).
  • Nonmanipulative research by permit, walking, photography, nature viewing  • No grazing  • No commercial or residential development

General Natural Area: Emphasis on protecting important resource values.
  • Hiking, informal picnicking, photography, nature viewing, minimum-impact climbing
  • No grazing  • no commercial or residential development

Backcountry recreation: Emphasis on backcountry recreation use, with management attention to protect natural resources; grazing would be managed to protect natural resources and the backcountry visitor experience on this public land.
  • Backcountry camping by permit only (walk-in), hiking, minimum-impact climbing
  • Grazing continued

Front country recreation: Emphasis on recreational use with management attention to protect natural resources.
  • Climbing, camping, hiking, picnicking, photography, sightseeing  • No grazing; no commercial or residential development

Historic Rural Setting Subzone: Emphasis on preserving the historic rural setting that existed at the time the reserve was established.

Public Land
  • Cross-country hiking, informal picnicking, photography, nature viewing, minimum-impact climbing  • Grazing continued  • No commercial or residential development  • Management request to limit recreation to same uses as for public land

Private Land
  • Recreation by permission of landowner only  • Grazing continued; no commercial or residential development  • Management request to limit recreation to same uses as for public land

Impact Monitoring: Emphasis on more intense natural resource monitoring and management to ensure sensitive habitats are not degraded; no commercial or residential development.

DEVELOPMENT ZONE: Emphasis on providing facilities needed to support visitor use and reserve operations.
  • Driving, bicycling, picnicking, camping, visitor education facilities  • No grazing  • No commercial or residential development

NOTE: Private land overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.

FINAL PLAN — HISTORIC AND NATURAL PRESERVATION ZONE

California Trail Subzone: Emphasis on preserving outstanding features (major landmarks, trail remnants, inscription rocks, encampment area, California Trail corridor) and interpreting them to the public.

Foreground of California Trail

Emphasis on preserving the California Trail corridor and interpreting it to the public. Recreation uses not directly associated with the access or the enjoyment and interpretation of the California Trail would generally be precluded. Precluded activities would be the siting of recreation facilities such as campgrounds and picnic areas and recreation uses such as bicycling, climbing, or scrambling on the Inscription Rocks, Twin Sisters formation, Pinnacle Pass, and other physical features that have cultural significance. Grazing would be discontinued on areas shown in appendix J.

General Use

Emphasis on preserving outstanding features outside the foreground of the California Trail corridor.

Recreation uses not directly associated with access, enjoyment, and interpretation of the California Trail would generally be precluded. Climbing use would be determined based on the climbing management plan. Grazing would be discontinued on areas shown in appendix J. Grazing use in other parts of this area would be determined by the natural resource management plan and grazing management plan.

Natural Area Subzone: Emphasis on preserving exceptional natural resource values and providing recreational opportunities where appropriate.

Research Natural Area

Emphasis on protecting natural processes and conducting nonmanipulative research. Use by permit only. Grazing would not occur.

General Natural Area

Emphasis on protecting important natural resource values and providing for a level of public and private use that does not degrade the natural qualities of the area. Registration required. Grazing would be discontinued on areas shown in appendix J. Grazing in other areas would be determined by the natural resource management plan and grazing management plan.

Natural and Recreational Resource Area

Emphasis on providing prime resource-based recreational opportunities managed in balance with the protection of natural resources. No grazing.

HISTORIC RURAL SETTING ZONE

Emphasis on preserving the historic rural setting that existed at the time the reserve was established. Climbing and grazing use would be determined by the resource climbing and grazing management plans.

PUBLIC USE AND DEVELOPMENT ZONE

Emphasis on providing facilities needed to support visitor use and reserve opportunities.

NOTE: Private land overlaps zoning. Remains in private use under county zoning unless government acquires sufficient interest on an opportunity basis.
**Housing**

The draft plan stated that: A housing fund would be established for acquiring property as it becomes available in Almo. Money in the housing fund should not be used for anything else.

Design and construct housing in small increments; possibly on permanent and three seasonal units (1/4 of need) evenly spaced over a 10- to 15-year period. Housing should not all look alike. It should fit into the local character. This incremental building would allow for housing to increase as the staff, development, and programs of the reserve grew.

Participants: Provision of housing is expected to be the responsibility of the Idaho Department of Parks and Recreation. The department proposes to lease land for the visitor center/ administrative facility, the RV campground, maintenance area, and the employee housing from the Bureau of Land Management.

**The final plan has been changed to:**

Employee housing is expected to be part of the reserve's administrative complex at Almo Junction on land owned by the Bureau of Land Management.

Participants: The provision for employee housing is expected to be the responsibility of the Idaho Department of Parks and Recreation. The National Park Service would be expected to cost-share housing design and utility development for the housing area as part of a total development package. It is recognized that some permanent and seasonal staff might elect to reside in Almo or other nearby communities and thus reduce the need for additional housing at Almo Junction.

Participants: It is expected that this project would be funded by the National Park Service has been changed to **cooperatively**.

The discussion has been expanded and moved to follow the discussion of the developed campground. Construction has been added to the short-term phase.

The following statement has been deleted:

Staffing would be phased, with the majority expected to be provided by the Idaho Department of Parks and Recreation.

**The final proposal** states that funding for some specialized positions may be augmented by other entities, including the National Park Service, cooperating associations, volunteers, and others.

The proposal to continue use of the existing site near Almo on leased land has been deleted as a long term use. The Almo site would be replaced by the new administration and maintenance facilities.
DEVELOPMENT PHASING SCHEDULE — DRAFT PLAN

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct RV campground, potable water, trailer dump station</td>
<td>Plan, design, and construct visitor center/museum/administrative offices</td>
<td>Plan, design, and construct maintenance support facility</td>
</tr>
<tr>
<td>Stabilize existing interior roads; build entrance stations and first overlook on east</td>
<td>Plan, design, and construct new realigned interior roads</td>
<td></td>
</tr>
<tr>
<td>Prepare California Trail wayside exhibits</td>
<td>Construct remaining wayside exhibits and day use recreation areas</td>
<td>Develop backcountry camping in Indian Grove area</td>
</tr>
<tr>
<td>Initiate coalition to assist planning the road around the south end of the reserve</td>
<td>Design road around south end of reserve</td>
<td></td>
</tr>
<tr>
<td>Construct primitive campground area</td>
<td>Construct employee housing in phase 1 (1 permanent and 4 seasonal quarters)</td>
<td>Construct employee housing in phase 2 (1 permanent and 4 seasonal quarters)</td>
</tr>
</tbody>
</table>

DEVELOPMENT PHASING SCHEDULE — FINAL PLAN

<table>
<thead>
<tr>
<th>Areas</th>
<th>Short-Term Phase</th>
<th>Medium-Term Phase</th>
<th>Long-Term Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inside Reserve</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Circle Creek Basin Overlook</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Circle Creek Wayside Basin-Nicholson Ranch</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inscription Rocks Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Twin Sisters View Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Corrals/HRS</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Turtle Rock</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Bath Rock</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Parking Lot Rocks</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>West Breadloaves</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Trails Junction Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Twin Sisters Wayside</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Primitive Campground</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Indian Grove Overlook</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Indian Grove backcountry camping</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Stabilize interior roads</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Realign interior roads</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Outside Reserve</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Almo Entrance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Emery Canyon Entrance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Junction (Moulton) Entrance</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Granite Pass View</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Visitor Center</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Trailer Dump Station</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Maintenance Facility</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Employee Housing Phase 1</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Phase 2</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Developed Campground</td>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
CHANGES IN THE PROPOSAL (ALTERNATIVE 2) SINCE THE DRAFT COMPREHENSIVE MANAGEMENT PLAN / DEVELOPMENT CONCEPT PLAN /
ENVIRONMENTAL IMPACT STATEMENT

Part Two: Environmental Impact Statement

Table 2: Summary Comparison of Development, Alternatives 1-3

Alternative 2 has been revised as follows:

Parking Lot Rocks
   Changed construct 5-10 car parking lot to 15-20-car

Primitive Campground/Trailhead
   Add 5.6 mile of hiking trail from the primitive campground to a ridge overlook and another segment from the primitive campground to Twin Sisters

Indian Grove
   Delete "Obliterate 1.5 mi. of existing 4WD road up Graham Creek."
   Change 3 backcountry type vault toilets near campsites to composting

Twin Sisters Basin
   Change Rip back 2 mi. of 16' gravel road to create a minimally discernible ranch route through the Twin Sisters basin to road for local use
   Delete "Realign 1 mile of the road"

RV Campground changed to Developed Campground
   Change 2 two-compartment vault toilets to flush toilet facilities

Reserve Headquarters/Operations/Employee Housing
   Changed 8,000 sq. ft. covered warehousing to covered shop space and warehousing.

A section has been added on Rocky Mountain mule deer.

A Statement of Findings for Wetlands, Appendix J, details how wetlands would be managed under the proposal. The percentage of riparian and wetland areas directly affected by livestock grazing changed from 74% in the draft to 34% in the final. The percentage protected from direct livestock grazing increased from 26% in the draft to 66% in the final. This would result in fewer impacts to wetland and riparian areas.

The draft proposal included a moratorium on climbing Twin Sisters, pending the outcome of a resource impact study.

The current proposal would emphasize resource protection of the foreground of the California Trail, including Twin Sisters. There would be a permanent ban on climbing and other recreational opportunities in the foreground of the California Trail, including Twin Sisters. These restrictions on climbing and other activities in the viewshed from the California Trail would make some routes inaccessible to climbers. Of the eight favorite climbing rocks, seven would be available for climbing.

Under the current proposal closing 283 acres of public land to grazing would have adverse economic impacts on ranchers/permittees.

If all the development proposed in the draft plan were constructed, over the life of the plan, short-term benefits from construction would be total sales benefits of about $98.2 million and tax revenue benefits of about $13 million, and about 3,928 short-term jobs would be created.

ENVIRONMENTAL CONSEQUENCES

Impacts on the Natural Biological Diversity

Closure of Twin Sisters to climbing would result in added protection to that rock formation.

Because of changes to the proposal reflected in the Statement of Findings for Wetlands (Appendix J), grazing would continue to adversely impact up to 9,895 acres in the reserve over the long term compared to 10,721 acres in the draft.
Under the current proposal if all the development proposed in the draft plan were constructed, over the life of the plan, short-term benefits from construction would be total sales benefits of about $78 million and tax revenue benefits of about $10.3 million, and about 3,120 short-term jobs would be created.

### APPENDIX D:
SITE DESIGN CONSIDERATIONS

#### ROADS AND TRAILS
The road into Twin Sisters from Junction Valley road would not be repositioned to the north of the present alignment under the final proposal.

#### CAMPSITES
**Added:** A second route into the backcountry camping area would be from the parking area along the Almo Park Road to the northwest of Indian Grove. This would require about a 1-mile hike in.

#### STRUCTURES
Housing for six permanent employees and up to 12 seasonals would be constructed on a location south of the existing town.

**Deleted:** Housing for up to 12 seasonal workers would be built or leased on sites located in and around Almo. If newly constructed, choice locations would include areas where septic and water systems are most suited, structures would not be viewed by visitors, traffic from residences would not load onto the main north-south route through town, nor the east-west arrival route south of town presence of mature trees would alleviate harsh weather conditions, neighboring uses are not negatively impacted and vice versa.

### APPENDIX E:
PROPOSED DEVELOPMENT AND ESTIMATED OPERATING COSTS

#### Circle Creek Basin Overlook
Add construction of trail(s) between Circle Creek Basin overlook and Inner City and Indian Grove

5.0 miles of gravel trail from overlook to Pinnacle Pass (not hardened)

#### Circle Creek Basin
Obliterate and revegetate 1.5 miles of hardened 4WD road across Circle Creek Basin has been changed to: Ripback 1.5 miles of 10' hardened road across Circle Creek basin to a 3' natural surface trail corridor. Revegetate remaining 7' width.

**Inscription Rocks**

Change 10-car parking to 20-car.

**Twin Sisters Rise**

Add construction of

- 3-5 picnic sites/tables
- 1 2-compartment vault toilet

Change parking from 10 to 12 cars

**Rim/Silent City**

Add construction of

1.6 miles of gravel trail from Circle Creek Basin, along Center Creek to just south of the Emery Canyon Road

Change rehabilitate 5 miles of social trails to rehabilitate 5 miles of social roads

**Primitive campground/trailhead**

Change construct 1.5 miles of hiking trail to construct 5.6 miles of hiking trail; one segment to high point, one segment to Twin Sisters

Construct 25 walk-in sites has been changed to 50.

Added Construct 1 mile of trail to rim climbing area.

Add construction of 2.2 miles of gravel trail from primitive campground along Trail Creek to reserve boundary

**Twin Sisters**

Remove 2 vault toilets on north side of Twin Sisters has been changed to: Remove 2 vault toilets, picnic tables and parking at Twin Sisters.

**Indian Grove**

Add construction of 3 car parking and overlook
| Place interpretive sign (Type III) | Add construction of 2.7-mile gravel hiking/bicycle trail westward from campground to the reserve |
| Place garbage receptacle | Developed Campground |
| Add obliterate/revegetate 1.5 mile of existing 4WD road from Emery Canyon Pass to Indian Grove | Add 2-mile 18' gravel access road (existing 4WD alignment) |
| Backcountry | Change construct 1/2-mile road to water storage tank to 1-mile road. |
| Add "Improve and modify 7 miles of hiking and horseback riding trail from Breadloaves to Indian Grove." | Almo Entrance |
| Add construction of 2.7-mile gravel hiking/bicycle trail westward from campground to the reserve |
| Twin Sisters Basin | Add 10 car/3 RV pulloff to staffed entrance station. |
| Change "Rip back and revegetate 2 miles of 16' gravel road to an unmarked, minimally discernible route to road for local use" | Add unstaffed entrance kiosk. |
| Outside Reserve | Emery Canyon Entrance |
| Change size of visitor center from 7,500 to 9,500 sq ft | Change construct parking area for 5 cars/3 RVs to 10 cars/3RVs. Add construct staffed entrance station |
| Change construct parking for 45 cars, 5 RVs/buses, 15 service spaces to construct parking for 45 cars, 8 RVs, 2 buses, 15 service spaces | Junction (Moulton Entrance) |
| Change holding tank for trailer dump station to septic tank and drainfield | Add construct unstaffed entrance kiosk |
| Housing | This appendix has been added since the draft. |
| Change construct 6 permanent quarters with attached garage to construct 12 | APPENDIX H |
| Change RV campground to Developed Campground | SECTION 106 |
| This appendix has been added since the draft. | COMPLIANCE REQUIREMENTS |
| This appendix has been added since the draft. | APPENDIX J |
| STATEMENT OF FINDINGS FOR WETLANDS |
APPENDIX J: STATEMENT OF FINDINGS FOR WETLANDS

STATEMENT OF FINDINGS

INTRODUCTION

The Proposed Action

The City of Rocks Comprehensive Management Plan proposed action would have an overall beneficial effect on wetlands compared to existing conditions reflected in the no action alternative. Actions that would have beneficial impacts include restoring disturbed areas, closing some roads and trails, relocating some facilities and roads, acquiring interests in private lands, limiting livestock access, cooperative management with private landowners and other agencies, and carrying out erosion control measures.

The proposed roads, trails, campground, and other facilities will be placed outside wetlands and floodplains unless design analysis and compliance demonstrates that there are no practicable alternatives. The NPS will reroute a segment of road near Emery Canyon out of a wet area and rehabilitate about 1.7 acres of wetland. The proposed primitive campground near the southwest corner of section 36 will also be located near wet areas. The campground and access to it will be designed and located to ensure that there will be no modification in or near wetlands that would cause adverse impacts. Additional mitigation and environmental compliance, including a statement of findings, will likely be required when the exact location of the proposed roads, primitive campground, and other facilities are decided.

Continued grazing is the only other action under the proposal that will be located in or near wetlands and is not excepted under NPS wetland guidelines. Grazing in the reserve will be managed under a grazing management plan now being developed that includes livestock control strategies to protect wetlands, riparian areas, and water quality. Grazing and agricultural uses of water would directly affect about 244 acres of wetlands and riparian areas in the reserve. The no action alternative would directly affect 688 acres, or 444 more acres than the proposed action. When the grazing management plan is completed and methods are instituted to limit livestock access in these areas, conditions in wetlands and riparian areas on public land should improve. The extent of impacts on privately owned wetlands and riparian areas would depend on the level of cooperation between private landowners and reserve managers to use wetland protection methods in the grazing management plan. The grazing management plan will need to be reviewed by National Park Service, Washington Office, Water Resources Division for consistency with this statement of findings and additional mitigation and environmental compliance including a statement of findings may be required.

Site Description

In the arid and semiarid west, wetlands and riparian areas cover only a very small percentage of land and much has been lost or severely degraded because of overuse. These wetlands have ecological importance far beyond their relatively small acreage, providing high productivity, critical habitats, water quality and quantity enhancements, and other important functions. They also have a greater quantity and diversity of vegetation than adjoining uplands.

Wetlands and associated riparian vegetation are limited to a small portion of the reserve next to stream courses and springs, covering about 724 acres. Of this total, 458 acres are on private land, and 266 acres are on public land. Like other parts of the interior west, severe degradation of wetlands and riparian areas has occurred in the reserve. Past land use activities have accelerated soil erosion,
reduced water flows, and eliminated native wetland plant species in many areas of the reserve. Where riparian areas are in good condition plants may include aspen, willow, Rocky Mountain maple, boxelder, thimble alder, chokecherry, rushes, sedges, and bluegrasses. Reserve riparian habitat also supports a variety of wildlife including prey for golden eagle, ferruginous hawks and other raptors. The ferruginous hawk has been designated as a candidate species for listing under the Endangered Species Act.

Detailed on-site evaluations of condition, ecological functions, and location of wetlands have not been conducted for most areas of the reserve. The U.S. Fish and Wildlife Service, however, has prepared draft National Wetlands Inventory (NWI) maps for the reserve and adjacent areas. The NPS also mapped riparian and wet areas independent of the FWS. To ensure that most of the wetlands were considered during planning the two maps were combined in the Geographic Information System vegetation map (see map). Although some mapped riparian areas may not be true wetlands, these areas buffer wetlands and support an important and sensitive community needing additional protection.

JUSTIFICATION FOR USE OF WETLANDS

Why the Proposed Action Must be Located in Wetlands

The legislation establishing the reserve directed that the Comprehensive Management Plan (CMP) identify those areas or zones within the reserve which would most appropriately be devoted to 1) public use and development, 2) historic and natural preservation; 3) private use subject to appropriate ordinances designed to protect the historic rural setting. The CMP identified riparian zones and wetlands as natural preservation areas to be protected. Where private grazing use on public land occurs to maintain the historic rural setting livestock will be managed to protect wetlands and riparian areas.

Investigation of Alternatives

In addition to the proposed action described on the preceding page, three alternatives for City of Rocks National Reserve were considered. One alternative would be to phase out grazing on all public land in the reserve and restore wetlands to natural conditions. Although this alternative offered the greatest beneficial impact on wetlands it was rejected because it would have an adverse economic impact on ten permittees and the local economy.

A second alternative would be to protect wetlands by phasing out grazing on part of the reserve and limiting livestock access to other wetlands on public lands. This would have protected at least 183 acres of wetlands and riparian areas from the direct impacts of cattle grazing, while allowing livestock grazing to continue on most of the public land on the reserve. This alternative was rejected because it would have an adverse economic impact on four permittees and the local economy.

The no action alternative would continue managing livestock grazing under the BLM and USFS without limiting livestock access to wetlands. This alternative was not considered suitable because there would be no mitigation to prevent wetland impacts or to restore wetlands damaged by past land uses. Therefore, this alternative would not meet the objectives of Executive Order 11990 for protection of wetlands.
Grazing would be excluded from riparian areas and wetlands in these areas on public land.

WETLANDS AFFECTED BY THE PROPOSED ACTION
CITY OF ROCKS NATIONAL RESERVE
United States Department of the Interior
National Park Service
DSC • September 94 • 003 • 20053

- Riparian Areas and Wetlands

0 MILE
MODIFICATIONS TO MINIMIZE HARM

Under this alternative, domestic livestock grazing and trailing activities on public lands will be excluded from wetlands and riparian areas in the California Trail subzone (includes the foreground of the California Trail, Circle Creek Basin, and stage station site), the General Natural Area, the Research Natural Area, portions of the South Fork of Circle Creek Basin, Taylor Springs, Mahogany Springs, and some damaged wetlands and riparian areas on public lands in any zone. This would result in the protection of about 220 acres of public wetlands and riparian areas. This will protect 30 percent of the total wetland and riparian acreage within the reserve, which is 83 percent of the publicly owned wetland and riparian areas. The NPS would also give a high priority to acquiring private land within the California Trail subzone from willing sellers. If willing sellers and land acquisition funds were available, this would eventually protect an additional 260 acres (36 percent) of wetlands and riparian areas from the direct impacts of livestock grazing. A total of 480 acres (66 percent) of wetlands and riparian areas in the reserve would eventually be protected from the direct affects of livestock grazing.

The protection of all wetland and riparian areas within the reserve will be addressed through the following planning actions:

1. Under the new Resource Management Plan a wetland inventory, monitoring, and protection program will be developed. The program will include a detailed on-site evaluation of all wetlands in the reserve. The study would determine the location, condition, threats to, and ecological function of all wetlands. Baseline water quality and quantity data would also be gathered from all streams and springs in the reserve. Measurements would include biotic and abiotic elements. The data would be used to monitor and mitigate impacts, including those caused by grazing. Strategies to restore damaged wetlands will be developed to reestablish their natural ecological functions. Methods such as limiting livestock access and structural improvements to abate soil erosion may be required to improve wetland conditions in some areas. If additional water was needed to protect or restore wetlands, water rights would be obtained where possible according to state law.

2. A Grazing Management Plan now being developed will incorporate wetland protection and restoration strategies developed under the Resource Management Plan. This plan would include livestock management techniques to limit access to wetlands. Techniques will vary depending on the condition and sensitivity of wetlands in a particular area. In some cases, fences or other restrictive barriers would be built to keep livestock out of wetlands, either permanently or until wetland vegetation has recovered and soils have stabilized. In other wetland areas, livestock would continue, but be more limited. For example, grazing rotation and deferred seasons might be used to protect riparian areas during periods when they are most vulnerable to damage. Direct water pollution by livestock grazing under commercial grazing permits will also be prevented by eliminating existing corrals and watering sites near all streams and springs that originate in the reserve. The grazing management plan would include strategies to develop alternate water sources to move stockwater tanks and livestock away from wetlands on public lands. Only water sources that did not directly modify wetlands or change the timing, distribution, or amount of water supplying wetlands on public lands would be developed. The reserve will work cooperatively with private water rights owners that divert water from wetlands on public land to encourage them to mitigate any damage they may cause to wetlands. In some cases, livestock grazing permits may be modified to ensure the protection of wetlands. Additional environmental compliance, including a statement of findings, may be required to address the impacts caused by specific actions under the grazing management plan.

3. All applicable state and federal environmental permits would be obtained before any construction that affected wetlands, including any new water diversion systems. Additional mitigation may be required by the Army Corps of Engineers and the State of Idaho to ensure that wetland manipulation activities in the reserve comply with the federal Clean Water Act.
SUMMARY

The CMP proposed action would generally improve the degraded conditions of reserve wetlands. Actions that would have beneficial impacts include restoring damaged areas, closing some roads and trails, relocating some facilities and roads, acquiring interests in private land, and cooperative management with private landowners and other agencies. In addition, excluding grazing from approximately 220 acres of riparian habitat on public land and limiting livestock access to riparian areas in other public portions of the reserve would improve wetland conditions. Acquiring land within the California subzone from willing sellers would eventually protect an additional 260 acres of riparian habitat from the direct effects of livestock grazing. Proposed new developments and road improvements will be placed outside wetlands and floodplains unless there were no practicable alternatives. But, if the final site of new facilities would still cause impacts, additional compliance, including a Statement of Finding will be necessary.

Recommended:  
Keith B. Dunbar  
Pacific Northwest Region, Compliance Chief  
9/16/94

Approved:  
Dan R. Klarer  
Washington Office, Water Resources Division Chief  
9/16/94

C. H. Megarity  
Pacific Northwest Region, Regional Director  
9/16/94
BIBLIOGRAPHY

Armstrong, R. E.


Armstrong, R. L. and F. A. Hills

Arrington, Leonard J.

Barbour, R. W. and W. H. Davis

Bicentennial Commission, Idaho Historical Society, and Idaho Transportation Department

Bostick, Vernon, and Wesley Niles

Boyle, S. A. and F. B. Samson

Bureau of Land Management, U.S. Department of Interior


Bureau of Land Management and Idaho State Historical Society, U.S. Department of the Interior

Burkhardt, J. W. and E. W. Tisdale

Burleigh, T. D.

Chance, David H.

Chance, David H. and Jennifer V.

Cronquist, A., A. H. Holgren, N. H. Holgren, and J. L. Reveal

Cunningham, F. F.
Cymerys M. and B.J. Walton

Environmental Protection Agency
1990 Computer printout of water quality data for City of Rocks and vicinity from EPA's storet database.

Federal Emergency Management Agency
1982 "Draft Habitat Suitability Index Model: Mule Deer."
1983 Flood Insurance Rate Map, Cassia County, Idaho. Community-Panel Number 160041 0550 B.

Fish and Wildlife Service, U.S. Department of Interior
1982 "Draft Habitat Suitability Index Model: Mule Deer."


Forest Service, U.S. Department of Agriculture


1981 Albion Division Soil Resource Inventory, Burley Ranger District, by D.R. Gilman.


Genetti, C.M. and P. G. Zenone

Geological Survey, U.S. Department of Interior
1990 Computer printout of water quality data for City of Rocks and vicinity. Water Resources Division, Boise, ID.
Grier, J. W. and R. W. Fyfe  

Haden, Gary L.  

Haines, Aubrey L.  

Helfrich, Devere and Helen, and Thomas Hunt  
1984 *Emigrant Trails West*. Klamath Falls, Oregon: Trails West, Inc.

Hironaka, M., M. A Fosberg, and A. H. Winward  
1983 *Sagebrush-Grass Habitat Types of Southern Idaho*. University of Idaho, College of Forestry, Wildlife, and Range Sciences Bulletin no. 35.

Howard, P. P.  

Hunt, C. B.  

Idaho Department of Fish and Game  


Idaho Historical Society  


Johnson, S. J.  

Jones, R. W.  
1973 Evaluation of Cassia Silent City of Rocks, Cassia County, Idaho, for eligibility for registered natural landmark designation.

Kochert, M. N.  

Larrison, E.J. and D.R. Johnson  

Laundre, J.W., Streubel, C.A. Lopez-Gonzalez, T. Clark, and J. Proksa  
1993 *Behavior, Ecology, and Conservation of Mountain Lions in Fragmented Habitat*. Department of Biological Sciences, Idaho State University, Pocatello, ID.

Link, P. K. and W. R. Hackett, eds.  

Mackie, R.S.  

Madsen, Brigham D.  
1986 *Chief Pocatello: The 'White Plume'.* Salt Lake City: University of Utah Press.

Malm, W.J. Sisler, D. Huffman, R. Eldred, and T. Cahill  
National Park Service, U.S. Department of the Interior
1975a Draft Environmental Statement, Proposed City of Rocks National Monument.
1987 Study of Management Alternatives for the City of Rocks Area, Cassia County, Idaho.
1991b Raptor Survey Results: City of Rocks National Reserve, by M. W. Britten.
1991c Scenic Resources Analysis. Denver Service Center (Laura R)
National Parks and Conservation Association
1988 City of Rocks Description. New Area Brief.
National Register of Historic Places
Nussbaum, R. A., E. D. Brodie, and R. M. Storm
Palmer, Ralph S., Ed.
Sharp, A. Lee and Kenneth D. Sanders
Sisler, James F., Dale Huffman, and Douglas A. Latimer
Soil Conservation Service, U.S. Department of Agriculture
1990a Computer printout of climatic data for City of Rocks Region.
1990b Computer printout of soil survey data for City of Rocks.
Stewart, George R.
Suter, G. W., II and J. L. Jones
Author Unknown
Thomas, A. E.
Trost, C.H. and C. Webb
Unruh, John D., Jr.
Urness, P.J. and D. D. Austin

U.S. Air Force

Vale, T. R.

Wallmo, O.C., Ed.
1981  "Mule and Black-tailed Deer of North America." University of Nebraska Press.

Wells, M. W.
1989  City of Rocks Historical Report. (Draft).

West, N. E.
Oakley, 35, 48-49, 52, 60, 86, 88, 103, 109, 123-127, 132-133, 159-161, 166-167, 169-171
ORV use, 121
Private land, 13, 15, 18, 20, 25, 31, 33-34, 38, 44-46, 52-53, 70, 72, 75, 79-80, 83-84, 87-90, 92, 112, 123, 125, 128, 131, 133, 139, 142-144, 146-154, 156-158, 164, 166, 169-170, 173
Public involvement, 170
newsletters, 71, 169
public meetings, 71, 169
scoping, 71, 169
public meetings, 169
Raptors, 139, 143-144, 164
Resource management, 17-18, 33, 38, 41, 44, 61, 70, 84, 87, 89, 132, 134, 142, 154, 157
Riparian areas, 14, 30-31, 41-42, 44-45, 71, 76-77, 83, 111, 114-115, 131-132, 139, 142, 147-149, 165
Scenic byway, 49
Soils, 42, 44-45, 109-110, 111, 114, 131-133, 141-142, 147, 150
Toilets, 51, 55, 95-96, 127
Townsend's bat, 71
Vegetation, 12-13, 15, 21, 42-45, 51, 56, 71, 86-87, 89, 105, 110-114, 116-117, 127, 131-133, 136, 139-145, 147, 149-150, 164, 169
Visitor center, 18, 34, 47, 49, 51, 55-58, 60-63, 86-87, 89, 92, 97, 126, 143, 145, 148, 154, 157, 160-161, 166, 170
Visitor use, 9, 14, 18, 20, 33-34, 43-44, 52, 65, 70, 76-77, 79-80, 84, 90, 121, 132-133, 139-140, 144, 146, 151, 156, 159, 164-165, 170
Water resources, 31, 169
Water rights, 42, 44, 70, 111, 148, 169
Wetlands, 14, 21, 24, 30-31, 41-42, 44-45, 62, 69, 71-72, 83, 87, 111-112, 131-132, 139, 146-149, 165
Wildlife, 9, 12-13, 15, 24, 41-45, 47, 52, 70-71, 86, 89, 111, 114-115, 131-132, 139-140, 142, 147, 149, 164-165, 167, 170-172
Zoning, 17-18, 20, 30, 32-34, 45, 48, 53, 72, 75-77, 79, 80, 83-84, 86, 88-90, 93, 124, 135-137, 139, 143-144, 146, 148, 150-152, 164-165, 170
As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

D-12A  September 1994