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Cassia Resource Management Plan Amendment at Castle Rocks

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PURPOSE AND NEED FOR ACTION

BACKGROUND

Castle Rocks is a dramatic geologic area located in the southern Albion Mountain Range of Cassia County, Idaho. Castle Rocks consist primarily of Quartz-monzonite, a type of granite associated with the Almo Pluton. Pinnacles and monoliths, towering over 400 feet in local relief, characterize the area. Similar in appearance to features in City of Rocks National Reserve a few miles south, Castle Rocks is also popular with climbers. Castle Rocks currently contains near pristine cultural and natural resources.

Until 2003, access to Castle Rocks public lands was limited to a difficult and lengthy hike from Steins Pass. The Castle Rock Ranch Acquisition Act of 2000 authorized the National Park Service (NPS) to purchase a private ranch that provided convenient public access on the east side of the geologic area. The NPS was not authorized to manage the property for recreation, but instead was instructed to exchange it with the Idaho Department of Parks and Recreation (IDPR) for property within Hagerman Fossil Beds National Monument. Since May 25, 2003, IDPR has provided park facilities and managed recreation at Castle Rocks. Climbers are the largest user group, and many pass through the state park to climb the higher granite towers on lands administered by the Bureau of Land Management (BLM) and the USDA Forest Service.

Jurisdiction of the geologic area, known administratively (yet unofficially) as Castle Rocks Interagency Recreation Area, includes 480 acres of the Sawtooth National Forest (Minidoka Ranger District), 400 acres of the Bureau of Land Management's (BLM) Burley Field Office (Twin Falls District), and 1,420 acres of IDPR's Castle Rocks State Park. In 2003, representatives from these agencies, in cooperation with rock climbing enthusiasts, developed a draft Climbing Management Plan for the Castle Rocks area. This draft interagency Climbing Management Plan was developed to (1) manage recreation uses, (2) establish pre-approved routes and trails, (3) protect natural and cultural resources, and (4) reduce confusion related to separate management policies and jurisdictional boundaries.

City of Rocks National Reserve, which is located a few miles south of Castle Rocks, is internationally recognized as a climbing area and offers exceptional rock climbing. However, at City of Rocks National Reserve the majority of climbing occurs near roads. At Castle Rocks most of the climbing requires a longer hike and visitors are more likely to achieve a backcountry experience than they would at the Reserve.

There are three types of climbing uses that occur at both City of Rocks and in the Castle Rocks area.

Traditional: A style of climbing where protection is placed by the ascending climber and removed by the seconding partner. Traditional climbs are protected by removable climbing equipment and do not impact the rock surface.

Sport: Climbs are protected exclusively with fixed protection, usually bolts. These climbs are usually short (typically one rope length, 50 - 60 meters). Sport climbs are generally more popular and provide a safer climbing environment.

Bouldering: Ropeless climbing that concentrates on short, sequential moves on rock usually no more than 15 feet off the ground. Falls are short and typically inconsequential. Use of a bouldering crash pad at the base of the climbing area is common.

Social Trails: Sometimes called "social trails," these user-created trails develop as climbers make repeated visits to climbing-specific destinations that are not serviced by existing trail systems, or move around in predictable ways within a climbing area. Typically, climber trails develop in three general locations: (1) along the quickest route from a parking area to the climbing site; (2) on the simplest descent from the top of a mountain or cliff; and (3) on routes between cliffs and boulders within the climbing site.

Since 2003, the 400-acre BLM parcel has been closed to rock climbing, camping, staging, and trail building through a series of temporary closure orders. The unique ownership pattern and geography of the lands surrounding the BLM parcel have preserved rare resources on the BLM lands that are rare and of great importance to the Shoshone-Bannock Tribes of Fort Hall and the Shoshone-Paiute Tribes of Duck Valley. Both Tribes consider the area a sacred site and have requested the Burley Field Office's help in nominating the area to the National Register of Historic Places (NHPA) as a Traditional Cultural Property (TCP).

The latest Notice of Temporary Closure was published in the Federal Register on November 16, 2010 and expired on November 16, 2012. The associated EA ID-220-2009-EA-3768 analyzed four alternatives; (1) Implementation of the draft Castle Rocks Interagency Recreation Area Climbing Management Plan, (2) Traditional Climbing, (3) No Climbing or Trail Construction, and (4) No Action or Unmanaged Climbing. Outstanding remarkable resources discovered by BLM staff performing botanical, wildlife, and cultural clearance work throughout the 400 acres of BLM lands significantly limited the Authorized Officer's ability to select alternatives 1, 2, and 4. Significant resource effects were associated with the infrastructure necessary to implement these alternatives.

On March 26, 2010, the Burley Field Manager issued a Decision Record and Finding of No Significant Impact (FONSI) selecting Alternative 3, No Climbing or Trail Construction. Paragraph 1 of the Decision Record notes,

"I have decided to select Alternative 3 because the other alternatives have the potential to cause adverse cumulative effects to historic properties (defined under 36 CFR 800.16); a FONSI cannot be reached for the Proposed Action, Alternative 2, or the No Action Alternative."

The Access Fund appealed the decision and on September 27, 2010, the Office of Hearings and Appeals, Interior Board of Land Appeals affirmed the Field Manager's Decision (IBLA 2010-135). In the appealed decision, the Burley Field manager recognized that an EIS would have to be completed to analyze and disclose potential adverse cumulative effects to historic properties before climbing on BLM lands in the Castle Rocks area could be authorized. The Cassia

Resource Management Plan (CRMP) is scheduled for a revision beginning in 2015. The plan revision process will result in decisions related to allowable uses of resources, and may result in decisions regarding intensity and limits of use. The upcoming land use plan revision will consider resource uses in the Castle Rocks area. Because of the upcoming Burley Field Office land use plan revision process, an EIS for climbing uses in the Castle Rocks area will not be prepared at this time.

On August 23, 2011, the Burley Field Office published a Notice of Intent in the Federal Register announcing the intent to,

"…prepare a Resource Management Plan (RMP) amendment with an associated Environmental Assessment (EA) for the Cassia and Monument RMPs to consider closing BLM –managed lands to certain activities to protect cultural and historic properties…."

The scoping process lasted until December 16, 2011, and is documented in the Scoping section below.

Location of Proposal

Castle Rocks Interagency Recreation Area is located near Almo, Idaho. The BLM managed public lands affected by this proposal are within T. 15 S., R. 24 E., Sec. 8 and Sec. 17, Boise Meridian (see appendix 1).

PURPOSE AND NEED FOR ACTION

The purpose of the proposed action is to amend the Cassia Resource Management Plan to preserve and protect significant cultural resources in the Castle Rocks area. The Castle Rocks area, including BLM managed lands, is designated a National Historic Landmark and a National Natural Landmark. Resource conflicts with rock climbing and the associated infrastructure pose a risk to multiple historic properties. In addition to the presence of historic properties, the Shoshone-Bannock Tribes of the Fort Hall Indian Reservation and the Shoshone-Paiute Tribes of the Duck Valley Indian Reservation have requested assistance from the BLM to nominate this area to the NRHP as a Traditional Cultural Property (TCP).

BLM needs to amend the Cassia Resource Management Plan to ensure that the significant historic, geologic, and scenic values that occur in the Castle Rocks area are protected and preserved. The need for the proposal is to reduce imminent threats and resolve conflicts to ensure irreplaceable cultural resources that occur in fragile granitic soils within the Castle Rocks area are protected. Some cultural resources are concentrated in areas viewed as desirable for climbing routes and would be affected and potentially lost, trampled, and/or broken in the staging areas and associated trail infrastructure.

In the Cassia Resource Management Plan (p. 27), Castle Rocks is within Management Area 8 – City of Rocks. The area contains significant historic, geologic and scenic values. The RMP (p. 27) includes an objective to preserve the geologic, historic, and scenic values but does not identify any specific restrictions on allowable uses.

The BLM land use planning handbook (Appendix C, p. 9) indicates that RMPs will "Seek to reduce imminent threats and resolve potential conflicts from natural or human-caused deterioration, or potential conflict with other resource uses (FLPMA Sec. 103(c), NHPA 106, 110 (a) (2)) by ensuring that all authorizations for land use and resource use will comply with the NHPA Section 106."

DECISION TO BE MADE

The decision to be made is whether to amend the Cassia RMP to protect and preserve significant cultural resources and maintain the pristine setting and feel of an area considered to be a Traditional Cultural Property by the Shoshone-Bannock and Shoshone-Paiute Tribes. If the Cassia RMP is amended, traditional rock climbing, sport rock climbing and bouldering, camping, staging and trail building would not be allowed on the 400 acres of BLM managed lands at Castle Rocks. If the RMP is not amended, these uses would occur unregulated on a casual-use basis.

SCOPING, PUBLIC INVOLVEMENT, AND ISSUES

The beginning of scoping for this project was announced through a Notice of Intent in the Federal Register on August 23, 2010. Public scoping meetings were held in Pocatello, ID on September 26, 2010, Burley, ID on September 28, 2010 and in American Falls, ID on October 12, 2010. In addition, the Burley Field Manager met and briefed the Power County Commissioners on September 13, 2010, the Bannock County Commissioners on September 14, 2010, and the Cassia County Commissioners on September 26, 2010. The Cassia County Commissioners expressed a desire for BLM to leave the area open to climbing, camping, staging and trail building for the purpose of not limiting economic growth potential in remote southern Cassia County.

Public comment that suggested a useable alternative received during the comment period largely fell into the alternatives analyzed in the ID-220-2009-EA-3768. Other comments expressed concern or frustration that the BLM is systematically discriminating against climbers through this proposed action.

Examples of comments received during the comment period include:

- Increase or require permit fees if the cost of upkeep is not adequate. Chain link fence around monuments if necessary for preservation but closure is not the appropriate action.
- By specific climb and location, BLM personnel will determine the potential impact on cultural of other resources in question and declare a climb either open for climbing or closed. Ban climbing on all other formations pending the development of a new climb application and approval process.
- Educating climbers about the cultural significance of the area, directing trails away from sensitive areas, and limiting or restricting climbing on specific formations would protect cultural resources without banning climbing.

- Eliminate off-road vehicles, restrict camping, and eliminate grazing instead of eliminating climbers.
- Promote education and devise reasonable regulations for preserving resources without denying access.
- If done correctly climbing is not only safe, but has a very minor impact on the environment. The key is education and cooperation not drastic ends and harsh restraints.
- The Access Fund commented: The Access Fund through a grant process could assist partial one-time funding. We can identify sensitive areas and avoid conflict; we can set up programs to educate user groups about the cultural significance of each area, work with the Tribes to understand and respect each areas cultural importance, provide volunteers to help direct trails away from sensitive areas, and limit or restrict climbing on specific formations. We favor effective education programs; we encourage sensible fixed anchor policies that include required orientation on regulation, a first ascent registration form, and a bolting permit application.

PROPOSED ACTION AND ALTERNATIVE(S)

PROPOSED ACTION

BLM proposes to amend the Cassia Resource Management Plan to protect and preserve cultural and geologic resources in the 400 acres of BLM lands described in the background section. Traditional rock climbing, sport rock climbing and bouldering, camping, staging and trail building would not be allowed in order to protect fragile and irreplaceable resources eligible as historic properties (36 CFR CFR 800.16). All bolted climbing routes would be physically removed. Public education, including signage, would be included in the management action.

NO ACTION

Under this alternative, the Cassia RMP would not be amended and rock climbing, camping, staging and trail building would not be prohibited.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED STUDY

In 2010, the Burley BLM prepared Environmental Assessment ID-220-2009-EA-3768 to analyze four alternatives; 1) Implementation of the draft Castle Rocks Interagency Recreation Area Climbing Management Plan, 2) Traditional Climbing, 3) No Climbing or Trail Construction, and 4) No Action or Unmanaged Climbing. On March 26, 2010, the Burley Field Manager issued a Decision Record and FONSI selecting Alternative 3, No Climbing or Trail Construction, because the other alternatives had the potential to cause adverse cumulative effects to historic properties. Alternatives 1 and 2 will not be reconsidered. No new alternatives were identified in the public scoping process.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The no-action alternative reflects the current situation within the project area and will serve as the baseline for comparing the environmental effects of the alternatives.

During the analysis process, the interdisciplinary team considered several resources and supplemental authorities. The interdisciplinary team determined that the resources discussed below would be affected by the proposed action.

For cumulative effects, past and present actions include recreation uses such as trail use and rock climbing in the Castle Rocks Area. There were no reasonably foreseeable future actions that would add to cumulative impacts. The Forest Service has not proposed any actions at this time. Idaho Parks and Recreation has already constructed trails and authorized climbing routes and is not proposing additional facilities.

CULTURAL AND HISTORICAL RESOURCES

Until 2009, limited archaeological research was conducted or reported in the area immediately surrounding Castle Rocks and no surveys had taken place within the BLM parcels of the proposed Castle Rocks Interagency Recreation Area. However, one archaeological survey was conducted directly adjacent to the BLM parcels. Approximately 1,240 acres of private land immediately north of Castle Rocks State Park was purchased by NPS in 2000, with the intent to transfer it to Idaho Department of Parks and Recreation (IDPR) as part of a land exchange. As part of this project, an intensive survey was conducted on the newly acquired federal land, also known as Castle Rocks Ranch, prior to its transfer to IDPR (Lyon 2002). A total of 41 archaeological resources were recorded and limited test excavations were conducted at one site (10CA986). The southern portion of the aforementioned land was opened to climbing activities on May 25, 2003, and the northern portion was opened on October 29, 2005.

Approximately 200 acres in the northern portion of IDPR land, acquired from private ownership subsequent to the Castle Rocks Ranch land transfer, has yet to be investigated by archaeological pedestrian survey. This parcel, known as the Erickson Acquisition, was opened to climbing on October 25, 2008. In the last 5 years, Idaho State University (ISU) has performed excavations at several rock shelters and open sites on lands included in both the Castle Rocks Ranch and Erickson Acquisitions (Lohse et al. 2006, Lohse et al. 2007, Sammons 2007, Lohse et al. 2008). Draft technical reports are available for some of the excavated sites.

Additional information regarding the archaeology of Castle Rocks was gathered during the 2009 intensive survey conducted by archaeologists from the BLM Burley Field Office throughout the entire 400 acres managed by the BLM. A number of archaeological resources in excellent condition were identified. Many of these archaeological resources have been undisturbed by contemporary human activities.

Based on the results of the 2009 survey, human occupation of the area may have occurred as early as the terminal Pleistocene, roughly 11,000 years ago. The recovery of a fluted point

preform (Guenther and Henrikson 2009) suggests the potential availability of now-extinct megafauna in the vicinity of Castle Rocks. While Clovis and Folsom points have been found associated with Pleistocene megafauna in dated excavations in the Plains and Southwest, few of these projectile points have been found in datable contexts in southern Idaho. One exception is represented by the earliest cultural components from Owl Cave, which produced four obsidian fluted points in association with mammoth bones dated 12,850±150 ry before present (B.P.), 12,250±200 ry B.P., and 10,920±150 ry B.P. (Butler 1978, Miller and Dort 1978). Unfortunately, the Simon Clovis cache, unearthed on the Camas Prairie in the early 1960s, was accompanied by no datable organic remains (Butler 1963), and the same is true of a variety of fluted points encountered on the Snake River Plain as surface finds (Titmus and Woods 1988).

Other projectile points recovered during the 2009 survey indicate that the area was occupied during the middle Holocene period, around 5,500 years ago, and continued to be utilized well into the late Holocene period (around 150 years ago). The majority of the points date between 3,000 and 100 years before present time. The recovery of projectile points from Castle Rocks indicates that the area served as an important hunting locality for Shoshone and Bannock groups. However, due to the lack of available data from previous excavations in the area, information regarding potential prey species remains conjectural. The region is currently prime habitat for mule deer, elk, moose, pronghorn antelope, mountain lion, bobcat, coyote, marmot, hares, rabbits, sage grouse and blue grouse. Bison, mountain sheep and gray wolf may have been present in the area historically.

In addition to hunting implements, tools indicative of both animal and plant processing were also documented during the 2009 inventory. The presence of these artifact types indicates that family groups occupied the Castle Rocks area, probably on a seasonal basis. Many of the ground stone tools were likely used in the processing of pinyon pine nuts, which are rich in fat and nutrients. The economic importance of pine nuts in the Great Basin has been noted by early ethnographers (Madsen 1986:29). One method of processing required the collection of unopened cones in the early fall by hooking branches of the tree, partially roasting the cones until the nuts could be extracted, ground and winnowed to remove the hulls from the nuts (Madsen 1986:29). Another method consisted of laying mats below trees, beating nuts from the opened cones in the trees, and winnowing them with coals to remove the hulls (Madsen 1986:30). Collection may have been done by men, women, and children from a single family or in larger groups of several families (Madsen 1986:30). Once processed, pine nuts could be consumed, but a large quantity of them could be stored for the winter months. If stored, the nuts would be cached into small pits that were sometimes rock-lined and covered with dirt (Madsen 1986:30).

Due to climate change, the range of pinyon pine has fluctuated during the past 12,000 years. However, it is suspected that many Shoshone and Bannock groups have relied heavily on pine nuts as a staple food for thousands of years (Madsen 1986, Grayson 1993). Because so little is known about the archaeology of the area, the pre-contact sites on BLM administered lands should be viewed as extremely important, providing invaluable insights on regional prehistory as well as ethnographic use of the area.

The historic period within the valley containing Castle Rocks is characterized by Euro-American migration, settlement, agriculture, and grazing over the past 150 years. This is evident from the

presence of irrigation canals and ranching structures throughout the area. The adjacent "Castle Rock Ranch" ranch house, corrals, roads, canals, and other related infrastructure dominate the historic landscape, and remnants of that use can be seen across much of the area.

National Historic Landmark

As early as 1941, the Historic Sites Survey conducted by the National Park Service identified the Silent City of Rocks as a historically significant site along the California Trail. In 1963, an area of approximately 22 square miles incorporating what was to become the City of Rocks National Reserve was listed as a historic district on the National Register of Historic Places. The City of Rocks National Historic Landmark was designated on July 19, 1964. 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 includes much of the City of Rocks National Reserve and extends north to include the Castle Rocks, the end of the stone monolith formations that can be viewed from the California Trail corridor. The Landmark 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.

The extent 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 area on their westward trek. City of Rocks was designated a highly significant site along the California National Historic Trail because of its state of preservation and the ability of contemporary visitors to experience the same views, largely unchanged, that awed the emigrants. Thus, the "viewshed" or the extent of the views seen from the two emigrant trails are a significant feature of the National Historic Landmark, and the Castle Rocks were included as significant elements thereof.

Additional elements of significance associated with the City of Rocks National Historic Landmark include Native American history and archaeological resources. The original nomination acknowledges the utilization of pine nuts in the vicinity by Shoshone groups and, although very little archaeological research had been done at this point, it was noted that the "monolithic outcroppings and overhangs suggest that City of Rocks may have potentially important sites" (Wells 1972).

Impacts of No Action

Because rock formations on BLM would be open to climbing, this alternative would result in the greatest loss or destruction to cultural resources. Impacts would occur over a larger area because some rock formations that may contain cultural resources would not be closed to climbing. According to the Shenandoah National Park Rock Outcrop Management Plan (2012: 5), "intense visitor use of rock outcrop areas, such as informal social trail development and proliferation, illegal or poorly located campsites, and human waste disposal issues has led to widespread resource impacts". Likewise, at Massacre Rocks (near American Falls, Idaho), rock graffiti, fire

rings and loss of soil at staging areas has resulted in adverse effects to cultural resources (Henrikson and Camp 2011).

In evaluating the effects of adopting the interagency climbing plan on cultural resources managed by BLM, it is necessary to examine the current condition of archaeological sites on adjacent NPS/IDPR lands and how management decisions by NPS/IDPR have functioned in reducing cumulative effects to historic properties. Previously, Lyon (2002) identified natural and human related threats to historic properties on newly acquired NPS lands (Castle Rocks Ranch). Natural erosion was identified as a constant threat to archaeological sites, especially to sites located near washes and ephemeral drainages. Human impacts to cultural resources were associated with recreational development and subsequent activities. Recreational development included the establishment of trail systems and access to rock climbing routes.

In addition to the anticipated human-related direct impacts on IDPR land, Lyon (2002) noted that the developments at Castle Rocks State Park would more than likely adversely affect historic properties. Lyon (2002:10) explained that conflicts would occur between archaeological resources and proposed placement of recreation trails, trailhead development, rock climbing access and associated staging areas. Along with these direct conflicts, artifact collection could become more frequent in the areas visited by recreationists. Lyon (2002) also asserted that the acquisition of the Erickson Property had the potential to create adverse effects on historic properties on adjacent BLM land. Lyon (2002:11) cautioned that, once the land was transferred out of federal ownership, future development of the park and the cumulative impacts associated with this development "may result in irreparable damage to these resources." As such, Lyon (2002) recommended that additional work be "completed prior to, or concurrent with, the development of protective easements for the land transfer," because potential threats to the integrity of the resources are high.

Despite these recommendations, the National Park Service determined that the land transfer involving Castle Rocks Ranch would have "no adverse effect on the nationally significant resources of this property" and a Memorandum of Agreement (MOA) between NPS, IDPR, Idaho SHPO and the ACHP was signed on January 28, 2003. This MOA was preceded by a Programmatic Agreement (PA) between the Idaho SHPO and IDPR (signed on May 29, 2002), in which IDPR agreed to "take into account the effects of its undertakings within Idaho state parks on historic properties eligible for or listed on the National Register of Historic Places and to provide the SHPO a reasonable opportunity to comment on these undertakings".

The involvement of ISU in the evaluation of Shock and Awe Rockshelter, the Buried Beach Site, and various pedestrian surveys represent an effort on the part of IDPR to comply with the 2002 PA. However, due to pressures associated with opening newly acquired lands to climbing and recreational activities, cumulative effects to historic properties may not have been fully considered in planning efforts. Appendix II (from Guenther and Henrikson 2010) shows the placement of formal trails and climbing routes in relation to historic properties, including Shock and Awe Rockshelter (10CA1022), Erickson Cave, and the Buried Beach Site (10CA986). In many cases, trails have been placed directly adjacent to or through historic properties documented by Lyon (2002). Climbing routes and staging areas are also located in close proximity. According to Kirsten Bastis, IDPR archaeologist at Castle Rocks, roughly 200 acres

involved in the Erickson Exchange have yet to be intensively inventoried for cultural resources (personal communication 2013).

Although an evaluation of recreational impacts to historic properties at City of Rocks National Reserve (the Reserve) would provide insight to the potential cumulative effects at Castle Rocks, very few inventories or Section 106 compliance efforts have occurred at the Reserve following the initial sample survey completed by Chance and Chance in 1992 (Kirstie Haertel, National Park Service archaeologist, personal communication 2010). Because the original studies were primarily focused on the historic use of the area, assessing the nature and significance of prehistoric sites was not a priority. As a consequence, baseline data on potentially eligible prehistoric properties is sorely lacking. This concern is clearly stated in the 1996 City of Rocks Comprehensive Management Plan. In regard to cultural resource protection, the plan states that:

> The reserve's more than 60 identified archaeological 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 archaeological sites in the reserve (NPS 1996:70).

Information gathered during the 2009 survey of the BLM parcel (Guenther and Henrikson 2010) and prior research (Chance and Chance 1992, Lyon 2002, Lohse et al. 2009), indicates that many prehistoric archaeological sites in Castle Rocks and on the Reserve are located below overhangs or at the base of granite boulders and monoliths. Because climbing activities also occur in these areas, inadequate efforts to identify, document and monitor prehistoric cultural resources at the Reserve have likely resulted in adverse effects to NRHP eligible properties (Kirstie Haertel, National Park Service archaeologist, personal communication 2010). Human related activities have exacerbated natural erosion. Foot traffic on trails around monoliths and repeated use of staging areas at climbing routes has greatly reduced vegetative cover. The loss of vegetation on highly erodible sediments at staging areas within the City of Rocks Reserve has resulted in the loss of 30-40 centimeters (over 12 inches) of soil in many heavily visited areas (Figures 1 through 2). Some efforts to prevent further vegetation loss have included the construction of wooden barriers at some staging areas (Figure 3). These barriers are an attempt to save what little existing vegetation is left. If this level of erosion has occurred at undocumented prehistoric sites, significant damage and loss of archaeological data has already taken place.

Figure 1. Loss of soil at staging area at City of Rocks Preserve (08/26/09).

Figure 2. Soil loss at staging area, City of Rocks Preserve.

Figure 3. Barriers designed to save remaining vegetation at staging area, City of Rocks

Cumulative

Previously established trails and staging areas have increased the potential for loss or destruction to cultural resources in the Castle Rocks area (see Appendix II). Social trails and staging areas would not be controlled or regulated to minimize impacts to cultural resources because they would not be constructed with design features to properly design or limit staging areas and trails to certain areas.

Due to the increasing popularity of both the City of Rocks National Reserve and Castle Rocks State Park, cumulative effects would be difficult to prevent under this alternative. Impacts would result from visitors migrating off existing trails or creating social trails between climbing routes. Heavy foot traffic would result in soil loss and erosion due to damage or removal of vegetation. Significant impacts would likely occur to buried archaeological resources located near these areas. Cumulatively, this alternative would likely result in an adverse effect to historic properties.

Impacts of the Proposed Action

Rock climbing, staging, camping, and trail building would not be allowed. As a result of climbing restrictions, recreation use in the Castle Rocks area would decrease and so would impacts to cultural resources associated with climbing activities. Impacts typically include soil compaction at the base of climbing routes, soil erosion, loss of vegetation, removal of or damaged to vegetation at the base of climbs (broken tree limbs, removal of shrubs and bushes).

There would also be a decrease of impacts to soil and vegetation from visitors straying from existing trails. Specifically, as climbing activities and recreation use decrease at Castle Rocks, so would the impacts associated with staging areas and social trails that would cause a loss of vegetation and soils resulting in loss, damage, and displacement of artifacts.

VISUAL RESOURCES

The resource management objective on page 27 of the Cassia Resource management plan is to preserve the scenic value of the area.

The Castle Rocks area consists of nearly flat bottom to moderate slopes with a number of large monolithic granite rock outcroppings of varied shapes. Vegetation consists primarily of sage and grass communities on the valley floor and low slopes with juniper and pinyon pine more evident on the upper slopes. The Albion Range provides background. The area consists of private and a mixture of public lands (State, BLM and Forest Service).

Impacts of No Action

BLM managed land would be open to climbing with minimal regulations and restrictions.

As climbing routes and recreation use continues to increase at Castle Rocks so would the visual impacts from social trails or modification to the rock surface, rock climbing equipment left in place (bolts, slings, fixed ropes, chain anchors, etc.), chalk residue on the rock, and bare soil associated with staging areas or trails. The presence of more people and articles that visibly contrasts with the natural scenery would increase.

This alternative would result in an overall decline in the quality of visual and recreational resources with the creation of user-created trails, loss of vegetation, and increase in bare soils that will contrast with natural scenery.

Cumulative

Visual contrast or changes will increase as social trails and staging areas are developed by users. This would add to the small amount of visual contrast from existing trails and staging areas. Social trails and staging areas would not be designed to minimize contrast because they would not be constructed with design features to properly design or limit trails and staging areas to certain areas or incorporate topography to linear features to not dominate the view of the casual observer.

Impacts of the Proposed Action

Rock climbing, staging, camping, and trail building would not be allowed. As climbing routes and recreation use due to no climbing activities decrease at Castle Rocks so would the visual impacts from social trails or modification to the rock surface, rock climbing equipment left in place (bolts, slings, fixed ropes, chain anchors, etc.), chalk residue on the rock, and bare soil

associated with staging areas or trails. The decreasing presence of people and articles that visibly contrasts with the natural scenery would decrease.

Cumulative

There are existing roads, trails and staging areas that have increased visual contrast or changes in the Castle Rocks area. However, under this alternative there would be no new trails, staging areas or climbing activities so there would be a decrease to visual contrast.

RECREATION

The City of Rocks is internationally recognized as a climbing area and Castle Rocks has become recognized as a climbing area as well. This recognition has brought more climbers into the area and visitation to the area by recreationists in search of new climbing areas has increased. Between 2006 and 2009, available information for the Castle Rocks State Park indicates there has been a 20% increase in visitation, from roughly 22,000 to 27,000 people per year, during this 3-year period.

Currently, the BLM-managed portion of the Castle Rocks Interagency Recreation area contains approximately 0.8 mile of existing trails. There are an estimated 33 rock formations on BLM that have been identified as being of interest to climbers. Many of these formations already have bolted climbing routes that were placed before the BLM closure was enacted in 2003 (approximately 40+ fixed anchor bolts). There are approximately 20 climbing routes on BLM that have fixed anchors either in the form of bolts or webbing slings. There are also approximately 20 climbing routes on BLM without anchors.

The BLM managed portion of the Castle Rocks area is within an Extensive Recreation Management Area (ERMA). ERMAs offer recreation opportunities that facilitate visitors' freedom to pursue a variety of outdoor recreation activities and attain a variety of outcomes. Based on field observations and professional knowledge, rock climbing, hiking, horseback riding, and photography are the primary activities that occur or may occur within the area.

The following visitor experiences and benefits are typically sought after by rock climbers visiting Castle Rocks State Park: developing skills and abilities, savoring the total sensory (sight, sound and smell) experience of the natural landscape, and enjoying being able to participate in desired activities and desired settings including escaping crowds of people who recreate at the City of Rocks. Personal benefits include improved mental well-being, improved skills, closer relationship with the natural world, and improved physical capacity to perform a favorite recreation activity. These experiences and benefits are what make Castle Rocks State Park a unique and desirable rock climbing destination. Climbers find the geology at Castle Rocks attractive because it is characterized by pinnacles and monoliths with many over 400 feet tall. The area also offers a variety of climbing opportunities that include traditional, sport and bouldering.

Recreation related issues are classified as use/user conflicts, visitor health and safety issues, and recreation related impacts on cultural and natural resources. Currently there are no known use

conflicts but there are some instances of user conflicts. These user conflicts relate to interactions between climbers who leave their dogs unattended at the base of a climb and other parties visiting the same area. There are some visitor health and safety issues with occasional human and pet waste.

There are impacts on natural resources from recreationists, specifically rock climbers. They consist of soil compaction at the base of climbing routes, removal or damaged vegetation at the base of climbs (broken tree limbs, removal of shrubs and bushes), and occasional human and pet waste. There are also impacts to soil and vegetation from visitors straying from existing trails. Also many of the trails within the area are used to connect the dots from one climb to another in direct fashion, which oftentimes results in steep unsustainable trail grades (exceeding 10-15%). The impacts associated with trails are soil compaction, trail widening, trail incision, and soil loss. Climbers, like other outdoor enthusiasts, have the potential to disturb soil, particularly in heavily used areas or where environmental and other factors cause these areas to be more susceptible to damage.

Existing conditions on BLM land within the Castle Rocks State Park administrative boundary can be characterized as:

Physical – Within 1/2 mile of mechanized routes, natural landscape with any modifications in harmony with surroundings and not visually obvious or evident and no structures, foot/horse trails only.

Social – (Seasonal average) Fewer than 6 encounters/day on travel routes, fewer than or equal to 3 people per group and areas of alteration uncommon, little surface vegetation wear observed and sounds of people infrequent.

Operational – All travel is non-motorized (controlled by State Parks vehicle restrictions), basic maps (climbing guide books) available, staff infrequently present, and regulations strict and ethics prominent, use is limited by permit (State Parks).

The majority of climbing routes at Castle Rocks fall within Middle Country. Unique to Castle Rocks is that a longer hike is required to reach climbing rocks and a Back Country experience can be obtained more often than it does at City of Rocks because at City of Rocks most climbing routes are adjacent to parking areas and roads. Many prefer a quieter walk-in approach that is available at Castle Rocks to maintain quiet which allows for a peaceful visitor experience.

Castle Rocks State Park was established in 2003. It is estimated that approximately 21,665 people visited the State Park in 2006, 23,137 in 2007, 25,831 in 2008. In 2009 use numbers were 26,865. Visitation is increasing at an average of 4% from 2006 through 2009. Estimates were made from traffic counter information and not everyone gets out of their vehicle for extended periods of time to hike, climb, etc.

Castle Rocks State Park includes two picnic areas, approximately 11 miles of multiple-use trails and 213 sport climbing routes (Figures 4 and 5). Castle Rocks State Park and City of Rocks share two park facilities near Almo. Smoky Mountain Campground offers 38 campsites, an RV

dump station, an equestrian trailhead and an administrative site which includes a visitor center for Castle Rocks and City of Rocks.

Figure 4. Bolted climbing routes on northwest face of Castle Rocks, Castle Rocks State Park.

Figure 5. Bolted climbing routes at Comp Wall, Castle Rocks State Park.

The granitic rock formations found within Castle Rocks State Park and City of Rocks offers unique and highly desirable rock climbing opportunities. This quality granitic rock provides a different experience than other local basalt climbing areas such as Connor Columns and Derkies Lake. As a result these features attract rock climbers from around the world.

City of Rocks National Reserve is internationally recognized as a climbing area and offers exceptional rock climbing. Today, about 700 climbing routes have been identified. Over 22 miles of hiking trails traverse the City of Rocks National Reserve, leading to arches, windows and dramatic overlooks. Trails vary from level and easy to steep and strenuous. Short walks to all-day hikes deep into the backcountry are available. Using the same comparison at City of

Rocks as for Castle Rocks, approximately 79,372 people visited in 2006, 88,020 in 2007, 103,620 in 2008. In 2009 use numbers reached 117,861. Therefore visitation is increasing at City of Rocks at an average of 10% from 2006 through 2009. Estimates were made from traffic counter information and not everyone gets out of their vehicle for extended periods of time to hike, climb, etc.

Impacts of No Action

Because rock formations on BLM would be open to climbing , this alternative would result in an overall gradual decline in the quality of recreation and natural resources and overall visitor satisfaction at Castle Rocks, as more users will take advantage of the experience.

The overall impact of this alternative on recreation is that it provides no vision for the future of Castle Rocks as a recreation area. It provides no limits to how much recreational use is too much. At some point, increasing use would require changes to management of the area to prevent further loss and damage to natural and cultural resources.

Cumulative

When Castle Rocks State Park was established, access to BLM lands was allowed. Prior to this access was restricted by the private property owner. The rock formations that exist on BLM lands adjacent to the State Park offer the potential for world class rock climbing opportunities.

Recreation use will increase as climbing routes, social trails and staging areas are developed by users. This would add to the amount of recreation use from climbing routes, existing trails and staging areas.

Impacts of the Proposed Action

Rock climbing, staging, camping, and trail building would not be allowed. Under this alternative BLM would not meet the demand for climbing opportunities. However, a wide variety of climbing uses and opportunities currently exists on adjacent lands managed by Idaho State Parks and Recreation at Castle Rocks State Park and also at the City of Rocks. Approximately 0.8 mile of existing trail would remain and would be designated as non-motorized and would serve other users, such as recreational hikers, backpackers, sightseers, etc. The BLM managed lands within the Castle Rocks area would be designated as day use only.

Cumulative

There are existing climbing routes, trails and staging areas in the Castle Rocks area that are currently being utilized by climbers. The closure to climbing activities would decrease recreation use on BLM managed lands. However, future recreational use at City of Rocks and Castle Rocks State Park could see an increase as a result of closing BLM lands to climbing.

GEOLOGY

The major geologic features in the vicinity of Castle Rocks are outcrops of 29-million-year-old granitic rock of the Almo pluton surrounded by more recent alluvial and colluvial deposits from decomposition of the pluton and from eroded and transported material from the flanks of the nearby Albion Mountains (Forrest et al., 1994). The coarse-grained granite has been uplifted and eroded into a complex of spectacular large scale domes, spires, and fins up to 150 meters in height. The distribution and overall shape of the landforms is the result of deep subsurface weathering of the granite along fracture systems followed by exhumation from geologically recent uplift and erosion. During this process, the surfaces of the outcrops were sculpted by weathering and erosion, creating small-scale landforms that are now a showcase of granitic weathering phenomena. These features include panholes (round flat-bottomed weathering pits), tafoni ("honeycomb" weathering), case hardening (formation of a durable crust), flared slopes, and caves and hollows produced by cavernous weathering (National Park Service, 2002).

Both the large- and small-scale landforms of the Castle Rocks are similar in size, shape, and origin to the nearby City of Rocks. The greatest difference is the tendency in the City of Rocks for the spires to develop an overall fin shape due to the prominence of a north-striking fracture set. The Castle Rocks outcrops tend to be more dome-shaped due to the lack of a dominant fracture orientation. The unconsolidated alluvial and colluvial deposits of the area consist largely of pebble- to boulder-sized fragments of Precambrian quartzite near stream channels and coarse gravelly soil made of decomposed granite near the spires. There are no landforms or rock types that are unique to the Castle Rocks area: geologically, it can be considered an extension of the City of Rocks to the south (National Park Service, 2002).

Impacts of No Action

Rock formations on BLM would be open to climbing with minimal regulations and restrictions. Under the No Action alternative, recreation use in the Castle Rocks area would increase and so would user created trails and staging areas.

Specifically, as climbing routes and recreation use continues to increase at Castle Rocks so would the impacts modification to the rock surface, rock climbing equipment left in place (bolts, slings, fixed ropes, chain anchors, etc.), chalk residue on the rock and bare soil associated with staging areas or trails. Fixed anchors (i.e. bolts), require the drilling of a small hole in the rock, typically 3/8-inch, or 1/2-inch in diameter. When a new climbing route is established, rock flakes, dirt, lichen, mosses and other vegetation are often removed from the rock surface along the route. Loose rock is commonly removed by climbers when it is perceived to cause a safety hazard. Route "cleaning" as it is known, is normally done by the first ascent party. In most cases, this is when the most substantial erosion or vegetation loss occurs on the rock. Through repeated ascents of a route and climbers hands, shoes, and climbing rope coming in contact with the rock, some additional erosion and vegetation disturbance will occur; however, the rate at which this occurs has not been determined.

Cumulative

Climbing routes increase the potential for rock erosion in the Castle Rocks area. Rock erosion will increase as new climbing routes are developed by users. Increased use would add to the amount of erosion to rock from existing climbing routes.

Impacts of the Proposed Action

Rock climbing, staging, camping, and trail building would not be allowed. As a result of climbing restrictions, recreation use in the Castle Rocks area would decrease and so would bolting or placement of fixed anchors. Erosion of rock as a result of climbing would decrease as use decreases.

Cumulative

There are existing climbing routes, trails and staging areas in the Castle Rocks area that are currently being utilized by climbers. The closure to climbing activities would decrease recreation use on BLM managed lands and impacts to geology.

SOILS AND VEGETATION

A survey of the soils in the eastern part of Cassia County was produced by the US Department of Agriculture (1994). This report identifies three different soil units within the project area.

- Acord very stony loam, 4 to 12 percent slopes
- Rock outcrop-Kanlee complex, 3 to 30 percent slopes
- Rock outcrop-Ola complex, 35 to 55 percent slopes

No prime farmland soils are present. These soils are particularly susceptible to erosion and therefore the effects of climbing activities are more extensive that they would be on more clayey soils.

Vegetation at Castle Rocks consists of pinyon pine, mountain mahogany, Utah juniper, mountain big sagebrush, rabbitbrush, snowberry, bitterbrush, bluebunch wheatgrass, Sandberg's bluegrass, needlegrass, June grass, western wheatgrass, Indian ricegrass, Basin wildrye, bulbous bluegrass, cheatgrass, buckwheat, lupine, arrow-leaf balsamroot, groundsel, prairie star, hookers balsamroot, lomatium, prickly pear, phlox, yarrow, death camas, Oregon grape, tragopogon, false dandelion, Davis thistle, wild onion, Louisiana sage and annual mustard.

Impacts of No Action

User-created trails and staging areas would occur as a result of rock formations on BLM that would be open to climbing, staging, camping and trail building.

Soil and vegetation loss throughout Castle Rocks would increase as the number of user-created trails and staging areas increase. Common impacts of climbing include destruction of cliffside

vegetation and lichens at the base of climbs (staging areas), and on approach and descent trails (Figures 6 through 9). These types of impacts have been documented in the Shenandoah National Park Rock Outcrop Management Plan Environmental Assessment/Assessment of Effect (2012). Of the 50 study sites examined as part of the EA, "human impacts…included social trails, trampled or absent vegetation, compacted or stripped soil, polished or tarnished rock surfaces, lack of lichens, rock graffiti, trash, fire rings and footprints" (2012:20, 23). Loss of plant cover at staging areas has also been noted in the Swiss Jura Mountains (Rusterholz et al. 2004), on cliff systems in Minnesota (Farris 1998), at Joshua Tree National Park (Camp and Knight 1998) and at Cedar Fields in southern Idaho (Henrikson and Camp 2011). Along with the loss of vegetation there would also be an expected increase in the amount of soil erosion. Loss of soil would result in a long-term loss of vegetation.

Figure 6. Staging area below bolted routes in Upper Snake Field Office BLM.

Figure 7. Social trail associated with climbing walls in the Upper Snake Field Office BLM.

Figure 8. Staging area at Massacre Rocks.

Figure 9. Devegetated staging area at Massacre Rocks.

Cumulative

Soil erosion and vegetation loss would increase as social trails are developed by users. This would add to the small amount of erosion from existing roads and trails. Social trails would not

be designed to minimize erosion because they would not be constructed with design features such as water bars, out sloping, or drainage berms.

Figures 6 through 9 demonstrate the loss of vegetation and soil erosion that would be expected to occur over time at user-created staging areas. Soils and vegetation in the City of Rocks Preserve are similar to soil and vegetation at Castle Rocks and loss of soil as a result of climbing activities is expected to be similar.

Impacts of the Proposed Action

Rock climbing, staging, camping, and trail building would not be allowed. As a result of climbing restrictions, recreation use in the Castle Rocks area would decrease and so would soil and vegetation impacts associated with climbing. Impacts typically include soil compaction at the base of climbing routes, removal or damaged vegetation at the base of climbs (crushed grasses and forbs, broken tree limbs, removal of shrubs and bushes), and loss of soil associated with loss of vegetation. The impacts associated with trails are soil compaction, trail widening, trail incision, and soil loss. Specifically, as climbing activities and recreation use continues to decrease at Castle Rocks so would the impacts to soils.

Cumulative

There are existing climbing routes, trails and staging areas in the Castle Rocks area that are currently being utilized by climbers. The closure to climbing activities would decrease recreation use on BLM managed lands and thus impacts to soils and vegetation would decrease.

WILDLIFE RESOURCES

Threatened, Endangered, and Candidate Species

The Endangered Species Act (ESA) provides protection for imperiled species (Threatened/Endangered) and their habitats. ESA prohibits the take of listed species and their habitats; take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct (FWS, 2013)." U.S. Fish and Wildlife Service (FWS) also maintain a list of "Candidate" species. These are species identified as warranted for listing under ESA, but have been precluded due to higher listing priorities (FWS, 2013). BLM is required to complete Section 7 Consultation with FWS for any agency action that has the potential to affect listed species.

Idaho FWS maintains a web-based species list categorized by county. The proposed action would occur in Cassia County. There is one listed species within Cassia County: Snake River physa (*Haitia* (Physa) *natricina* (FWS, 2013). There are two species classified as "candidates" within Cassia County: greater sage-grouse (*Centrocercus urophasianus*) and yellow-billed cuckoo (*Coccyzus americanus*). Of these species the proposed action would potentially impact greater sage-grouse. Greater sage-grouse are analyzed under the BLM sensitive species subheading.

Migratory Birds

Migratory Bird Treaty Act:

The Migratory Bird Treaty Act (MBTA) protects over 800 species. The regulations of the MBTA make it unlawful to "pursue, hunt, take, capture, kill, possess, sell, purchase, barter, import, export, or transport any migratory bird, or any part, nest, or egg or any such bird, unless authorized under a permit issued by the Secretary of Interior (FWS, 2009)."

The Bald and Golden Eagle Protection Act:

The Bald and Golden Eagle Protection Act (BGEPA) provides protection for bald and golden eagles, both of which are migratory birds. The regulations of the BGEPA makes it unlawful "to take, possess, sale, purchase, barter, offer to sell, purchase or barter, transport, export or import, of any bald or golden eagle, alive or dead, including any part, nest, or egg, unless allowed by permit". Take is defined as, "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb (FWS, 2012)". Effects to eagles are analyzed below.

Executive Order 13186 provides additional direction to agencies to further implement the MBTA, including: (1) development of a Memorandum of Understanding (MOU), (2) evaluation of the effects of agencies actions on migratory birds, particularly migratory birds of conservation concern, and (3) identify where unintentional take reasonably attributable to an agency action is having, or is likely to have, a measureable negative impact on migratory bird populations (E.O.13186, 2001). BLM and FWS have completed a MOU to promote the conservation of migratory birds (2010). The MOU re-affirms the responsibilities of BLM to avoid unintentional take and identifies conservation measures to avoid such take. Migratory birds of conservation concern are analyzed below.

The action area provides suitable habitat for a variety of migratory birds, including migratory bird species of conservation concern. The following are the migratory bird species of conservation concern, including some BLM sensitive species, known to occur or potentially occur within the action area.

Table 1. Migratory bird species of conservation concern, focal species, and BLM sensitive migratory birds potentially impacted by the proposed action.

Impacted Species	Likelihood of Occurrence	Habitat
Brewer's sparrow	Occurs. This species is frequently observed within the sagebrush-steppe habitat type throughout the region. Occurrence within the action area would be limited to shrubland habitat.	Inhabits sagebrush-steppe (Groves, et al., 1997).

Impacted Species	Likelihood of Occurrence	Habitat
Calliope hummingbird	Potential. This species has been documented in south-central Idaho during the breeding season (Stephens, et al., 1991).	Inhabits montane shrublands and riparian thickets (Groves, et al., 1997).
flammulated owl	Potential. This species has been documented in the region during the breeding season (Stephens, et al., 1991)	Coniferous woodlands, particularly ponderosa pine (Groves, et al., 1997).
golden eagle	Occurs. This species is known to inhabit the region year round. There are known nesting territories in adjacent City of the Rocks National Reserve. The region is host to winter transient and migrating eagles as well.	Inhabits desert and montane shrublands (Groves, et al., 1997).
loggerhead shrike	Occurs. This species is known to occur within the region. Occurrence within the action area would be limited to shrubland habitat.	Inhabits sagebrush-steppe (Groves, et al., 1997).
olive-sided flycatcher	Potential, this species is known to occur in the region during the breeding season (Stephens, et al., 1991)	Coniferous woodlands (Groves, et al., 1997).
Peregrine falcon	Potential. There are no known nesting territories for this species locally. However, suitable nesting substrate is present. This species has been documented as a winter transient to the region (Stephens, et al., 1991)	Inhabits a variety of habitat types, including desert and montane shrublands (Groves, et al., 1997). In Idaho, this species has been documented to nest on cliffs, towers, buildings, and other tall infrastructure (Sallabanks, 2003).
pinyon jay	Occurs. This species is known to inhabit the region. This species has been documented in adjacent City of the Rocks National Reserve (Johnson, et al., 1999)	Low elevation coniferous forests, predominately pinyon/juniper woodlands (Wiggins, 2005).

Impacted Species	Likelihood of Occurrence	Habitat
prairie falcon	Occurs. This species is known to inhabit the region. There are documented nesting territories for this species in the adjacent City of the Rocks National Reserve (Johnson, et al., 1999)	Inhabits grasslands and montane shrublands, nest on cliffs (Groves, et al., 1997).
sage-sparrow	Occurs. This species is known to occur within the region. Occurrence within the action area would be limited to shrubland habitat.	Inhabits sagebrush-steppe (Groves, et al., 1997).
Sage Thrasher	Occurs. This species is known to occur within the region. Occurrence within the action area would be limited to shrubland habitat.	Inhabits sagebrush-steppe (Groves, et al., 1997).
Green-tailed Towhee	Occurs. This species is known to inhabit the region. This species has been identified in adjacent City of the Rocks National Reserve (Johnson, et al., 1999). This species is commonly observed in montane shrublands, particularly within Artemisia tridentata ssp. vaseyana /Purshia tridentata mix.	Inhabits montane shrublands (Groves, et al., 1997).
Mourning Dove	Occurs. This species has been identified in adjacent City of the Rocks National Reserve (Johnson, et al., 1999).	This species inhabits a variety of habitat types, of which include desert/montane shrublands (Groves, et al., 1997).
willow flycatcher	Potential. Approximately 420 meters of Stines Creek crosses the action area. Willows are present along this segment. This species has been documented in the region during the breeding season (Stephens, et al., 1991)	Riparian woodlands and thickets (Groves, et al., 1997).
Virginia's warbler	Occurs. This species has been documented in adjacent City of the Rocks National Reserve (Johnson, et al., 1999)	Montane shrublands and deciduous woodlands, and riparian areas. Strong association with pinyon/juniper woodlands in Idaho (Karl, 2000).

BLM sensitive species

The following are the BLM sensitive species, excluding migratory birds, known to occur or potentially occur within the action area and are potentially impacted by the proposed action and/or alternatives. Those BLM sensitive species also classified as migratory birds are discussed under the migratory bird sub-heading.

Table 2. BLM sensitive species potentially impacted by the proposed action.

Affected Species	Likelihood of Occurrence	Habitat
cliff chipmunk	Occurs. The entire action area provides suitable habitat.	Inhabits rocky escarpments within pinyon/juniper woodlands (Groves, et al., 1997)
Greater sage-grouse	Occurs. There are 2 leks within one mile of the action area. The greater area is classified as Preliminary Priority Habitat (Makela et al 2012). However, suitable habitat within the action area is limited due to presence of pinyon/juniper woodlands.	Inhabits sagebrush steppe (Groves, et al., 1997).
spotted bat	Potential; There are no known occurrences of this species within the action area. However, the action area are provides extensive roost potential.	Inhabits a variety of habitats including desert and montane shrublands and coniferous woodlands (Groves, et al., 1997)
Townsend's big-eared bat	Potential; There are no known occurrences of this species within the action area. However, the action area are provides extensive roost potential.	Inhabits desert shrublands and woodlands and is commonly found in canyons and cliffs (Groves, et al., 1997)

Non-Sensitive Species

The action area provides suitable habitat for a variety of non-sensitive wildlife including big game, small game, upland game, and non-game. The action area contains mule deer winter range. Mule deer are managed within the state as a big game animal. Mule deer are highly

revered amongst sportsmen and wildlife enthusiasts. Mule deer populations are decreasing in Idaho and other states. Cumulative impacts of habitat loss, predation, harvest, weather, competition, recreation, and weeds has resulted in decreased mule deer populations in Idaho and other states (IDFG, 2010).

Impacts of No Action

All wildlife species:

Direct impacts to wildlife from recreation can include behavioral modifications and immediate physiological impacts (Cline, et al., 2007). Indirect impacts could include habitat fragmentation, habitat loss, and displacement.

Under the No Action alternative the action area would be open to climbing without prohibitions (i.e. casual use). Climbing actions would result in an increase of human activity throughout the action area. Climbing actions include: rock climbing, staging, camping, and trail building. Interests in climbing actions are expected to be similar to those experienced in adjacent Castle Rocks State Park and City of the Rocks National Reserve. Empirical evidence from the adjacent use areas indicate a high interest in climbing actions from spring through fall.

The action area consists of relatively small acreage, compared to the surrounding landscape. Consequently, the density of human activity would be high. Concentrations of humans within the action area could impact wildlife due to noise pollution, social intolerance/displacement, habitat fragmentation, habitat loss (i.e. removal of vegetation), and mortality. Adverse impacts to wildlife would increase commensurate with the timing and intensity of climbing activities within the action area.

Climbing actions locally have been documented to result in confined areas of soil compaction, soil erosion, and removal of vegetation (i.e. bare ground) (Henrikson, et al., 2011). Such impacts would alter previously undisturbed habitats. These impacts are expected to be localized to access trails and the base of climbing routes. Direct adverse impacts (behavioral modification, mortality, and displacement) to wildlife would be exacerbated during sensitive times, such as during the breeding and winter season. Without prohibitions climbing activities could result in mortality and nest abandonment of cliff nesting migratory birds. These impacts would depend on the proximity of climbing routes to nesting locations, if it all present. Adverse impacts to cliff nesting birds from climbing actions have been documented elsewhere. As cited by Boyle and Samson (1985), impacts to cliff nesting birds are predominately seasonal and local.

Cliff nesting migratory birds, bats, and cliff chipmunk:

Impacts to these species are of greatest concern. These specialized species inhabit rocky escarpments, cliffs, and boulders within the action area. These same areas are where rock climbing would occur. The action area is unique because it provides exceptional nesting

substrate for cliff nesting migratory birds and potential roost sites for bats. Rocky escarpments, boulders, and cliffs are known to provide suitable nesting substrate, roost habitat, and escape cover for specialized species. The following special status species are closely tiered to this habitat type: golden eagle, peregrine falcon, prairie falcon, spotted bat, Townsend's big-eared bat, and cliff chipmunk. Specialized species are more susceptible to disturbances because their habitat is limited and non-renewable (Nicholoff, 2003). Adverse impacts (behavioral modifications, mortality, and displacement) to bats and migratory birds are expected be most pronounced in proximity to roosting and nesting locations. Spotted bats are susceptible to roost disturbance locally, including disturbance from rock climbing (Luce, et al., 2007). It is expected that other bat species would be equally susceptible to disturbance at roost sties.

BLM has responsibilities to protect migratory birds and minimize unintentional take through the implementation of best management practices. A systematic survey of the action area would be necessary to inventory wildlife resources prior to implementation of best management practices. Application of best management practices would be contingent on the location of sensitive resources within the action area.

Mule deer:

Climbing actions during the winter season could result in conflicts with mule deer. Impacts to mule deer during the winter season would likely be limited as climbing actions are not expected to occur throughout the winter season. Impacts to mule deer could be mitigated through implementation of seasonal timing restrictions.

Cumulative

Human activity associated with climbing activities would contribute to adverse impacts to wildlife resources within the region. Other actions potentially impacting wildlife resources in the region include fire and other forms of casual and permitted use. Casual and permitted actions within the region include: hiking, mountain biking, OHV travel, dispersed camping, hunting, livestock grazing and bird watching. All of the aforementioned activities would result in an increased presence of humans on the landscape. Impacts of each action vary locally, but all potentially contribute to adverse impacts to wildlife through alteration in behavior, displacement, fragmentation, and degradation of otherwise unaltered habitats. Although the No Action would result in adverse impacts it is not expected that the impacts of the No Action when added to past, present, and reasonably foreseeable future actions would result in significant impact to wildlife resources, particularly if best management practices are implemented. Wildlife in the region would continue to utilize suitable habitat within the region, but potentially avoid the action area during times of increased activity. Migratory birds would be expected to continue to utilize seasonal habitats within the region, potentially with decreased nesting opportunity locally.

Impacts of the Proposed Action

Under this alternative, climbing actions (rock climbing, staging, camping, and trail building) would be prohibited. Prohibition of climbing actions would appreciably reduce the density of human activities within the action area. Wildlife resources locally would benefit from a more natural setting, predominately free of human occupancy. The demand for climbing opportunities within the region would not change. Prohibition of climbing activities locally may result in increased climbing activities at adjoining climbing areas within the region, potentially increasing adverse impacts to wildlife at these locations. If climbing impacts do not increase at other locations then there would be a decrease in adverse impacts to wildlife in the region.

Cumulative

Other actions impacting wildlife resources in the administrative area including casual and permitted use, would continue. These actions would continue to result in adverse impacts to wildlife throughout the region. Casual and permitted actions within the region would include: hiking, mountain biking, hunting, livestock grazing, snowshoeing, cross-country skiing, and bird watching. Adverse impacts from these past, present, and reasonably foreseeable actions include displacement of wildlife due to social intolerance, noise pollution and localized habitat loss/fragmentation would continue. However, these actions are not expected to occur at the same density of climbing actions. The action area would predominately be free of these impacts, allowing wildlife resources to inhabit the area with relatively limited disturbance. The impacts of other forms of casual use are expected to result in limited disturbance because they occur infrequently and/or outside sensitive timeframes. As such, the proposed action would minimize adverse impacts to wildlife resources by limiting the bulk of human activity within the action area. Reducing the density disturbance locally would result in a net benefit to wildlife resources within the region.

Impacts of No Action

BLM would be open to climbing with minimal regulations and restrictions. As a result of minimal climbing regulations and restrictions, recreation use in the Castle Rocks area would increase and so would the chances of human presence to stress or displace wildlife, particularly during breeding, feeding or nesting.

Cumulative

Human presence or recreation use to stress or displace wildlife will increase as climbing routes, social trails and staging areas are developed by users. This would add to the amount of recreation use and stress and displacement of wildlife from climbing routes, existing trails and staging areas. Climbing routes, social trails and staging areas would not be designed to minimize impacts to wildlife because they would not be constructed with design features to limit climbing routes, trails and staging areas to certain areas.

Impacts of the Proposed Action

Rock climbing, staging, camping, and trail building would not be allowed. As a result of climbing restrictions, recreation use in the Castle Rocks area would decrease and so would climbing activities on or near rock formations. Impacts from human presence that may stress or displace wildlife, particularly during breeding, feeding or nesting would be reduced due to a lack of climbing activities. Because climbers and cliff-dwelling birds use some of the same vertical space, climbing may specifically affect swallows, raptors and other birds and mammal species. The behavior of cliff-nesting birds has been shown to be affected by human presence when activity is in close proximity to nest sites, above nest sites, when nest is active, or until the young have successfully fledged. Specifically, as climbing routes and recreation use continues to decrease at Castle Rocks so would the impacts to wildlife.

CHAPTER 5, CONSULTATION AND COORDINATION

TRIBES, INDIVIDUALS, ORGANIZATIONS, OR AGENCIES CONSULTED

Shoshone-Bannock Tribes
Shoshone-Paiute Tribes
Access Fund
State of Idaho Dept. of Parks & Recreation
Twin Falls District Resource Advisory Council
Idaho State Historic Preservation Office
Advisory Council on Historic Preservation

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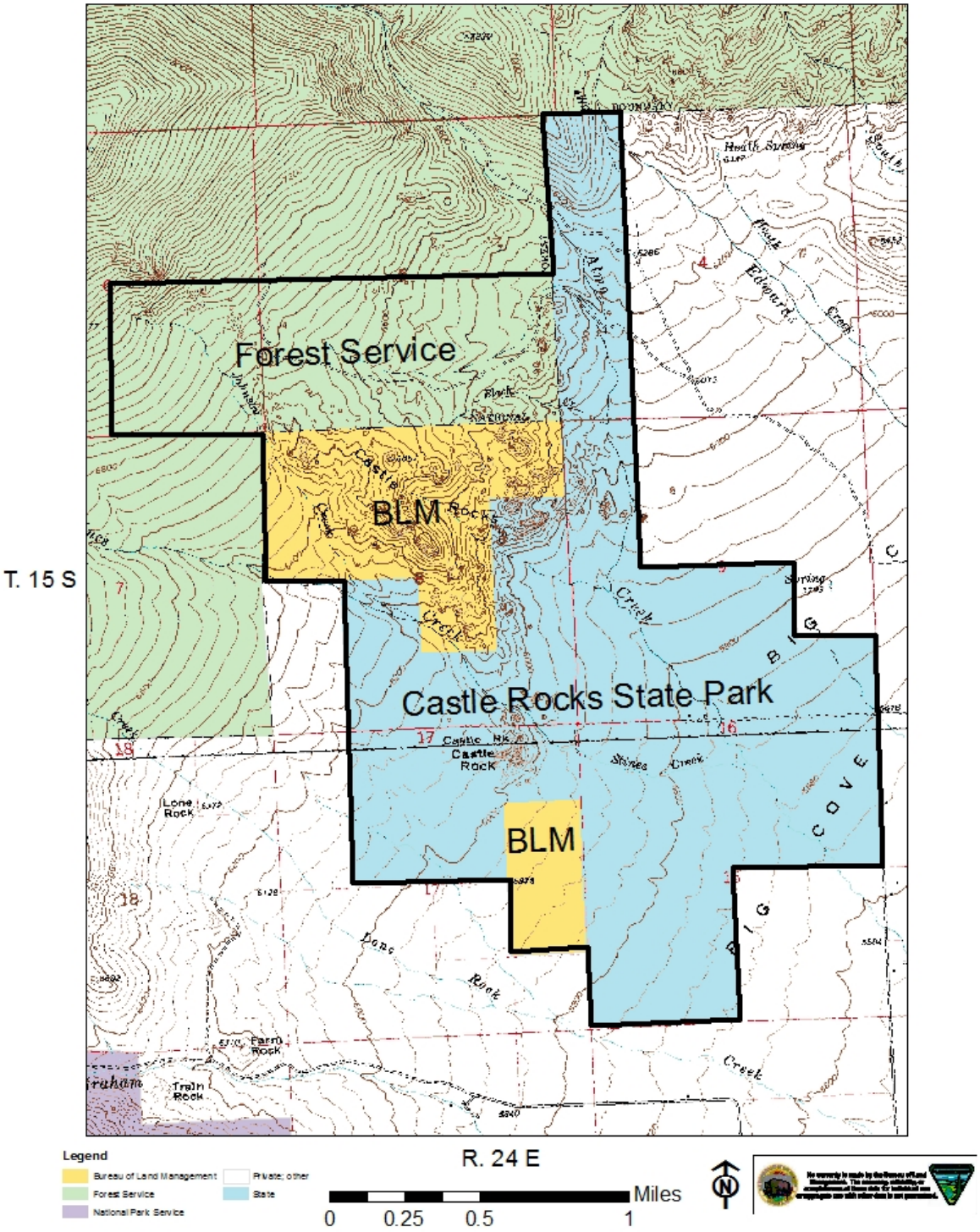
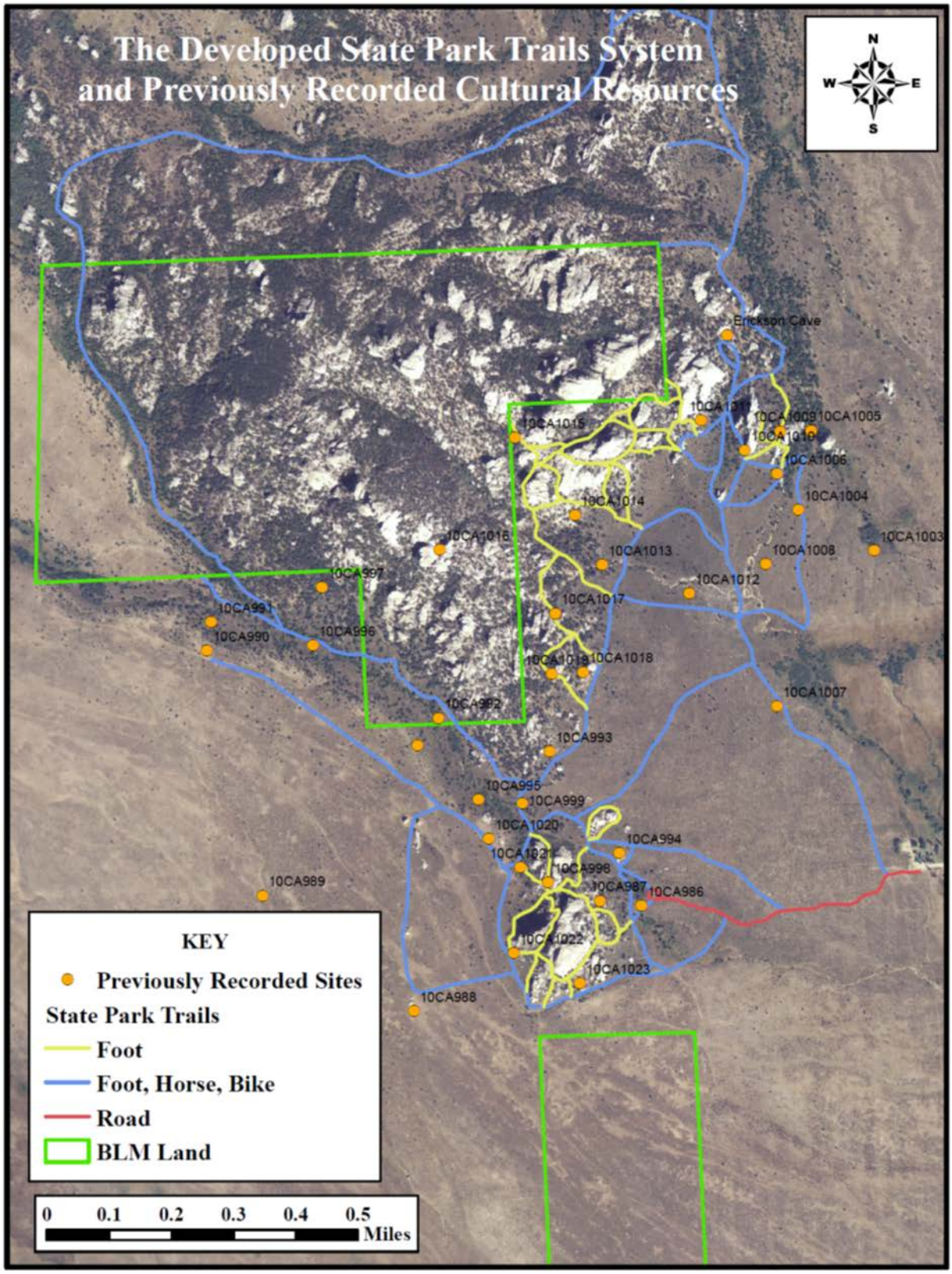
APPENDIX I (map)
Castle Rocks Administrative Boundary



Appendix II (MAP) Location of the current IDPR Trails System in relation to previously recorded sites.