



December 21, 2023

Bureau of Land Management
Attn: Northern Corridor Project SEIS
345 East Riverside Drive
St. George, UT, 84790

Submitted Via: <https://eplanning.blm.gov/eplanning-ui/project/2026562/570/8010003/comment>

RE: Access Fund and Salt Lake Climbers Alliance Comments for the Northern Corridor Project SEIS

Dear BLM Planning Staff,

We appreciate the opportunity to provide comments on the Northern Corridor supplemental environmental impact statement (SEIS). The SEIS is being prepared to reconsider the highway-right-of-way application and associated incidental take permit in Washington County, Utah. The proposed four-lane highway passes through Red Cliffs National Conservation Area (NCA) which is critical Mojave desert tortoise habitat.

About the Access Fund

Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 6.8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing organization with over 20,000 members and 123 affiliates. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about Access Fund, visit www.accessfund.org.

About the Salt Lake Climbers Alliance

The Salt Lake Climbers Alliance (SLCA) is a Utah climbing advocacy group whose mission is to engage as an advocate to protect outdoor climbing access and as a steward to maintain sustainable climbing resources in the Wasatch and surrounding areas. The SLCA is a 501(c)(3) nonprofit that serves over 20,000 climbers in the Wasatch Region. For more information about the SLCA, visit Saltlakeclimbers.org.

Comments

Access Fund, SLCA and the Utah climbing community have been closely tracking both the Desert Tortoise Habitat Conservation Plan Expansion Act (H.R 5597) and the Northern Corridor EIS project, both of which currently propose adding ~6,800 acres to the Red Cliffs Desert Reserve and Red Cliffs National Conservation Area (Zone 6) to mitigate for desert tortoise habitat impacted by the Utah Department of Transportation's right of way request for road development on land north of St. George, UT. Access Fund, SLCA and the climbing community at large strongly support desert tortoise conservation efforts.

Our user group deeply values Zone 6 and strongly supports continued protection and preservation of this area. The Zone 6 area is important habitat for a variety of endangered and threatened species, including hundreds of Mojave Desert Tortoises, a thriving population of Gila Monsters, and critical habitat for the endangered Dwarf Bear Poppy flowers, which occur nowhere else on earth. The habitat in Zone 6 is some of the most densely populated habitat for desert tortoises range-wide. Additional studies need to be conducted to analyze the ecological significance of Zone 6 to prevent further development from destroying these precious resources. The recreational opportunities within Zone 6 are important to the health of locals, and also to the economic health of the surrounding communities. With over 65 miles of non-motorized trail systems, this area contributes to the physical and psychological health of the locals who enjoy the trails. These trails bring in important revenue for the local economy, with large scale events happening regularly.

That being said, we do not support the development of a highway through Red Rocks NCA in exchange for protection of Zone 6. We request the Bureau of Land Management (BLM) and Fish and Wildlife Service (FWS) select an alternative that prevents the construction of the Northern Corridor Highway through Red Cliffs NCA. The 2009 Omnibus Public Land Management Act¹ established the Red Cliffs with the purpose "*to conserve, protect, and enhance, for the benefit and enjoyment of present and future generations, the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the National Conservation Area.*" We request the BLM analyze the impacts of the proposed highway in this context and evaluate and disclose whether the proposed highway is consistent with BLM's statutory direction. We support finding an alternative transportation solution that keeps Red Cliffs NCA intact as well as preserves Zone 6.

The proposed boundary of Zone 6 encompasses numerous world-renowned climbing and bouldering areas within Zone 6. These include Moe's Valley, Zen Wall, Mario Land, and Green Valley Gap. People travel here from all over the world to climb, and also to attend the annual climbing and cleanup events which happen in this area. These travelers are spending a significant amount of money at local businesses. We request additional studies to be conducted which analyze the recreational significance of the area, both in terms of health and also economic contributions to the economy. We also request that long term protection be

¹ See <https://www.congress.gov/bill/111th-congress/house-bill/146>

applied to Zone 6 to ensure future conservation and preservation of this important area.

Access Fund and the local climbing community support continued access to Zone 6 and are committed to continued stewardship of the climbing area and the surrounding environment. We request language be included in the SEIS, plan, or other management prescription for Zone 6 that explicitly notes "rock climbing as an appropriate recreational activity" within the area. In addition, existing trails to access climbing resources should be recognized and allowed along with appropriate stewardship and maintenance within Zone 6. Access Fund is available to provide detailed maps and locations of all existing climbing resources and access trails within Zone 6 to assist in management efforts associated with the SEIS process.

The Northern Corridor Highway would impact culturally significant and historic properties in Red Cliffs NCA. The BLM and USFWS need to take proactive measures to enhance engagement opportunities for Bands and Tribes with cultural ties to this landscape. We request the BLM to conduct a comprehensive survey of the Area of Potential Effects for historic properties. We are also concerned that cultural resources are potentially at risk of destruction within the Zone 6 area if the area is not protected from future development. We request the BLM and/or SITLA conduct a comprehensive study of the area to analyze these historical resources and take proactive steps to engage with any Tribal authorities to assess cultural resources at risk.

Thank you for your consideration of these comments. Access Fund has the experience, local contacts, and resources to help land managers craft plans that encourage climbing while sustaining the health, diversity and productivity of this important habitat. Feel free to contact me via telephone (303-552-2843) or email (katie@accessfund.org) to discuss this matter further.

Sincerely,



Katie Goodwin, Policy Analyst- Access Fund



Drew Brodhead, Advocacy Coordinator - Salt Lake Climbers Alliance

Cc:

Erik Murdock, Interim Executive Director - Access Fund