



Central Wasatch Commission

RE: Central Wasatch Commission Stakeholder Comments on Discussion Draft of Central Wasatch National Conservation and Recreation Area Act

September 19, 2019

Central Wasatch Commission:

The Salt Lake Climbers Alliance (SLCA) and the Access Fund (jointly referred to herein as the “Climbers’ Coalition”) provide these comments in response to the Central Wasatch Commission’s (CWC) Discussion Draft to the yet to be introduced Central Wasatch National Conservation and Recreation Area (CWNCRAA) legislation.

Background on the SLCA and Access Fund

The Salt Lake Climbers Alliance (SLCA) is a 501(c)(3) non-profit organization that exists to provide a unified voice for climbers in Utah’s Wasatch area through advocacy, stewardship, community, and education. The affected area under the CWNCRAA is a world-class climbing area that many SLCA members use on a daily basis throughout the year. The SLCA has conducted conservation and policy work in the affected area for years and plans to continue to do so for years to come in order to achieve its mission to protect climbing resources in the Wasatch for its members.

The Access Fund is the national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 7 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest U.S. climbing advocacy organization with nearly 20,000 members and 130 affiliates.

The SLCA and Access Fund work jointly in many policy and on-the-ground conservation efforts. For example, the SLCA and Access Fund are joint lease holders for a 140-acre recreational lease agreement with The Church of Jesus Christ of Latter-day Saints for the Gate Buttress area in Little Cottonwood Canyon. Given the federal nexus to the CWNCRA, the SLCA and Access Fund are coordinating these comments, so the legislation becomes crafted and ultimately introduced into Congress in a way that aligns both with the SLCA’s objectives as well as the Access Fund’s national policy objectives.



Climbing Resources within the Recreation and Conservation Area:

Established climbing resources exist throughout the Recreation and Conservation Area. For reference, the Climbers' Coalition provides an overlay map identifying existing climbing resources; additional climbing resources may exist that are not identified in the enclosed overlay map. The enclosed overlay clearly demonstrates the significant amount of climbing resources throughout the Recreation and Conservation Area and moreover the need to incorporate more specific legislative language to ensure the preservation of these climbing resources while meeting the other objectives in the legislation.

Specific Legislative Language Comments by Climbers' Coalition:

The Climbers' Coalition understands that the CWNRCA would preserve existing uses such as climbing in the affected area; however, the Climbers' Coalition believes the legislation can benefit from the following additions to best ensure climbing as a recreational use while balancing this use amongst the other objectives of the legislation.

1. Line 157 add the following language shown in underline. “(D) promote public safety, including through avalanche control and maintenance of fixed anchors for climbing...”
2. Consider deleting references to Mountain Accord throughout the legislation.
3. Line 278 add new subsection (m) FIXED ANCHOR MAINTENANCE. —The Secretary may allow the maintenance (including replacement) of fixed anchors for climbing within the Conservation and Recreation Area to protect public health and property in accordance with the management plan and applicable law (including regulations).
4. Given the legislative title, it would seem more language should be added to better describe the recreational opportunities in the proposed designation. Specifically, climbing should be expressly called out as a recreational opportunity within the Recreation and Conservation Area.

Specific Questions and Comments for the CWC Related to the CWNRCA:

1. What is the “other” in the legend on the story map?
2. The Church of Jesus Christ of Latter-day Saints should be communicated with as part of these efforts given their extensive land ownership within Little Cottonwood Canyon and namely their willingness to enter into a recreational lease agreement with the Climbers' Coalition. Garnering The Church of Jesus Christ of Latter-day Saints' support for the legislation may facilitate the passage of the CWNRCA. To this end, the SLCA is willing to help facilitate this



dialogue given the SLCA's vested interest in the recreational lease agreement for the Gate Buttress.

3. The SLCA is in the process of working on a forest-wide Climbing Management Plan with the U.S. Forest Service, which will have management implications for the climbing resources within the CWNCA. The SLCA does not anticipate any conflict with the CWRNCA legislation and the Climbing Management Plan but, rather, felt it appropriate to make the CWC aware of this initiative as yet another management consideration amongst the myriad of management considerations that the U.S. Forest Service will have to consider as part of the eventual management plan for the Recreation and Conservation Area.

Concluding Remarks:

The Climbers' Coalition appreciates the opportunity to comment on this Discussion Draft and of course welcomes the opportunity to discuss any of the comments raised in this letter with the CWC staff.

Sincerely,
Julia Geisler
Executive Director, Salt Lake Climbers Alliance
Julia@saltlakeclimbers.org

Erik Murdock
Policy Director, Access Fund
erik@accessfund.org

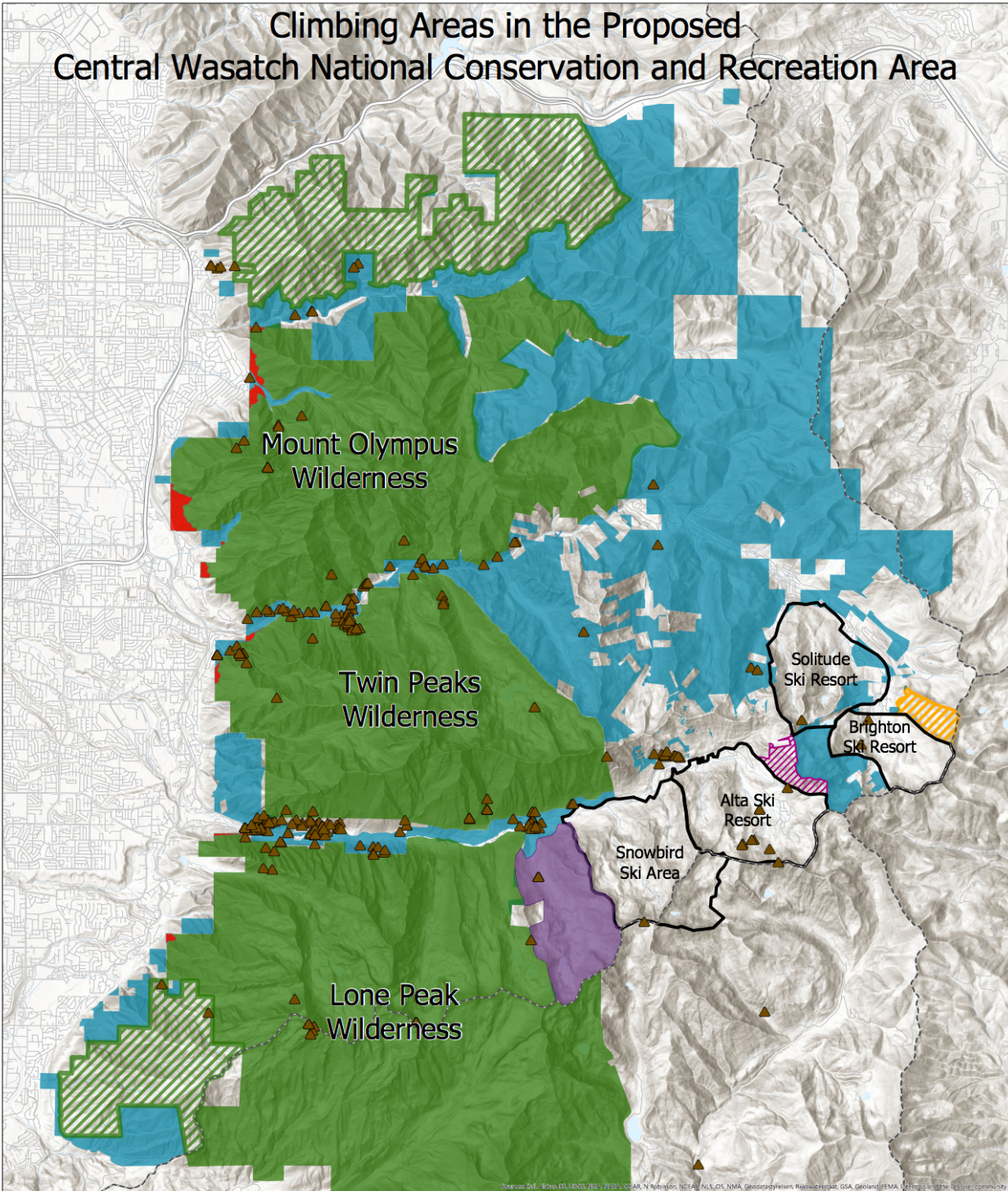


SLCA
SALT LAKE CLIMBERS ALLIANCE

Protect America's Climbing



Climbing Areas in the Proposed Central Wasatch National Conservation and Recreation Area



Legend

- Proposed CWNCR Boundaries
- Wilderness Boundary Adjustments
- Proposed Wilderness
- White Pine Watershed Protection Area
- Alta Ski Lifts (ASL) Avalanche Protection Zone Permit Area
- Existing Ski Resort Boundaries
- Existing Wilderness Boundaries
- Climbing Areas
- Proposed Brighton Resort Boundary Adjustment



0 0.5 1 2 3 Miles

Data Sources: Central Wasatch Commission, Mountain Project, Wild Utah Project, Utah AGRC





SLCA

SALT LAKE CLIMBERS ALLIANCE



Protect America's Climbing