



July 8, 2020

Utah Department of Transportation
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RE: Salt Lake Climbers Alliance Comments to UDOT's Little Cottonwood Canyon Environmental Impact Statement Draft Alternatives Development and Screening Report

UDOT Planners:

The Salt Lake Climbers Alliance (SLCA) appreciates the opportunity to provide input to UDOT's Little Cottonwood Canyon Environmental Impact Statement Draft Alternatives Development and Screening Report. The SLCA provided comments during the scoping period on June 14th, 2019 and has had two site visits with UDOT planners to the LCC climbing resource.

About the SLCA

The Salt Lake Climbers Alliance is the local climbing advocacy 501(c)(3) non-profit in and around Salt Lake City, Utah. The mission of the Salt Lake Climbers Alliance is to serve as the unified voice of all climbers in the greater Wasatch region, engaging as an advocate to protect outdoor climbing access and as a steward to maintain sustainable climbing resources in the Wasatch and surrounding regions. SaltLakeClimbers.org

The SLCA supports the Alternative of Enhanced Bus and no additional roadside capacity, with caveats (#1-14 below), as this Alternative would have the least impact on the climbing resource with the information currently provided by UDOT.

Overall, any Alternative needs to carefully consider dispersed recreation, especially in the lower part of Little Cottonwood Canyon. The climbing areas in the lower portion of the canyon are heavily used throughout the year and the Alternatives will potentially negatively affect the user opportunities, user experience, and environment.

The SLCA has invested heavily into the recreation infrastructure in the canyon via hundreds of thousands of dollars in a sustainable trail system that spans both USFS and private land. The potential impact to this trail system needs to be analyzed. Further, there must be analysis of the

visual and auditory impacts to the climbing and bouldering resources that are in close proximity to the roadside. Finally, UDOT should analyze the loss of these resources due to road widening, road re-configurations, and/or gondola infrastructure.

SLCA recognizes that the removal of roadside parking along the highway increases safety and has responded by working to formalize trails and increase connectivity from centralized parking and access points such as the Little Cottonwood Canyon Park & Ride, Gate Buttress and the Grit Mill parking lots. However, during the winter months these parking lots are not available to climbers because they are full (skiers), closed, or unplowed. As such, roadside parking is utilized. UDOT must analyze how the elimination of roadside parking during the winter months will impact climber access.

In addition, the EIS must also include substantive analysis on the following:

1. Analysis of current and future dispersed recreation usage, transportation and parking needs in the whole of the canyon during all times of the year, spring, summer, fall, and winter. Dispersed recreation areas including, but not limited to the lower LCC Park & Ride, Grit Mill, Gate Buttress, Coalpit, Y-Couloirs, Tanners, Mt. Superior, and Hellgate.
2. Analysis of impacts contributing to anthropogenic climate change.
3. Analysis of public transit options for dispersed recreational users.
4. Analysis of metrics for how vehicles will be reduced in the canyons.
5. Analysis of how tolls will impact dispersed recreation and aid in maintenance and infrastructure of dispersed recreational resources. Dispersed recreational users travel at off-peaks hours.
6. Contain substantive details, including GIS referenceable points for road improvements, including widening, passing or third lane, realignments, or the installation of snowsheds which will have impacts on climbing resources.
7. Contain substantive details, including GIS referenceable points for the gondola, including base station, tower locations, tower heights, and terminus stations which will have impacts on climbing resources.
8. Contain substantive details on the transportation hub including plans for public transit connectivity to the hub from the Salt Lake City Airport, as well as along the Wasatch front and back.
9. Contain substantive details on the transportation hub Alternatives to the "Gravel Pit" location which is on private land, currently in use for the foreseeable future (5-7 years)

and may not be available afterwards. The transportation hub Alternative should include locations utilizing public land, namely part of the Old Mill Golf Course.

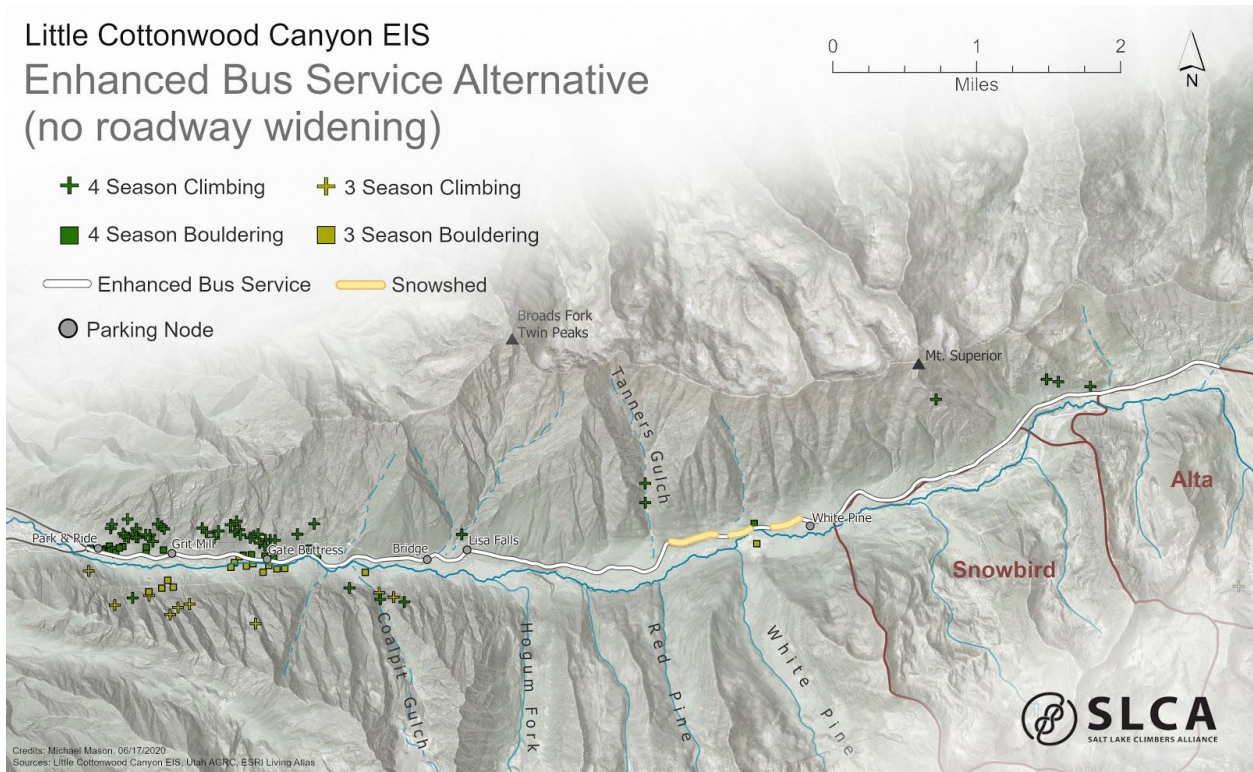
10. Contain details on utilization of transportation when multiple forms are required. That is, will people drive to a transportation hub, take a bus, then a final bus or gondola over just driving directly to the destination?
11. Contain capacity analysis for the additional parking at White Pine Trailhead. It is proposed to expand the parking at White Pine Trailhead to well above the recommendations without any analysis.
12. Contain details on the environmental impacts, including visual, auditory, wildlife habitat. As well impacts to the scenic byway designation.
13. Contain analysis that there will be continued traffic growth in the canyons. The ski resorts have a finite capacity and will not be able to expand.
14. Contain analysis to economic feasibility of a running gondola and how it would be operated such as via a private/public model.

Alternatives

Again, the SLCA supports the **Alternative of Enhanced Bus and no additional roadside capacity with the caveats above.**

The SLCA gathered input from the local climbing community in order to provide an inclusive climbers' perspective. To date over 90 comments have been received. These comments and concerns have been considered and summarized below. Ultimately, the SLCA continues to advocate for **year-round** dispersed recreation access to climbing resources with transit solutions that accommodate appropriately for traffic safety as well as current and future access to climbing resources. Growth trends in climbing as a sport are increasing as is the use of outdoor climbing resources in LCC. The SLCA overlaid main climbing areas on UDOT's Alternatives to better understand the breadth of the impacts to the climbing resource in the maps below.

1. Alternative Enhanced Bus - no additional roadside capacity



Pros

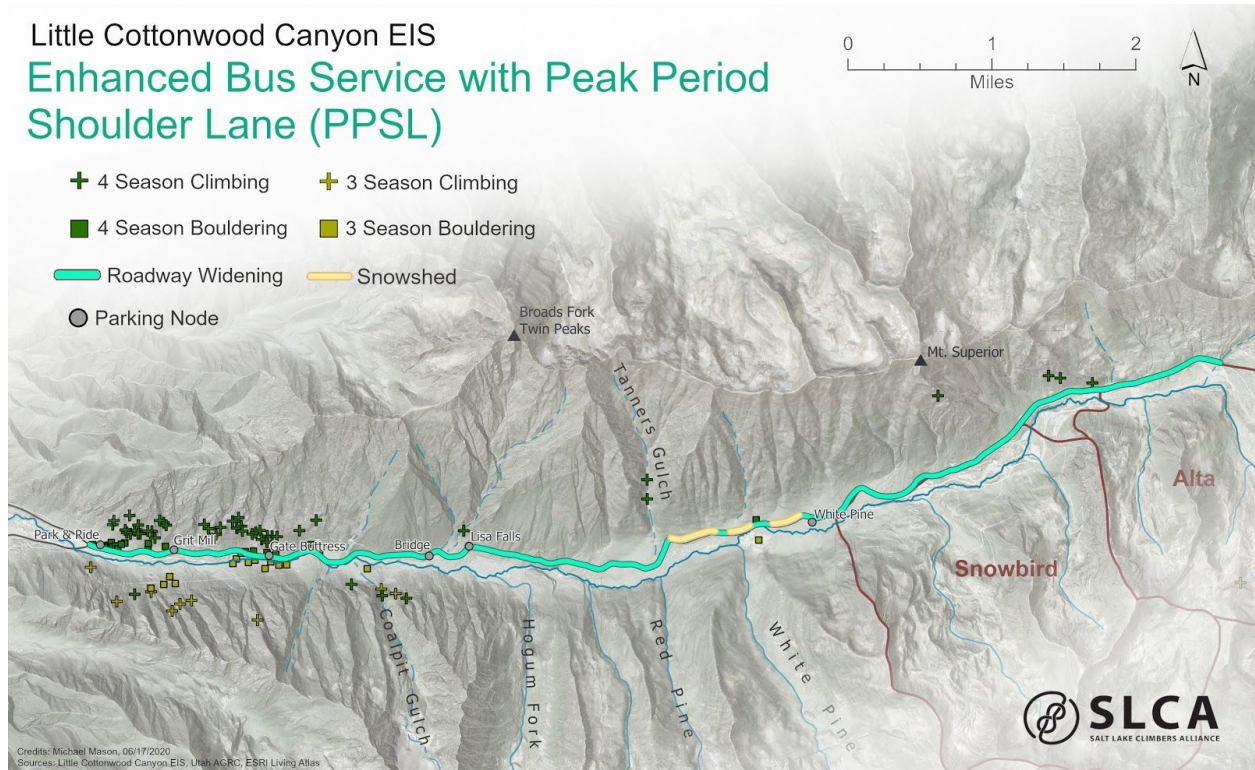
This Alternative would have the least impact on climbing areas, especially those that exist on the roadside or within proximity to gondola infrastructure. The other two Alternatives are ski resort centric and fail to acknowledge climbers and other dispersed users as a substantial user group. This Alternative would leave the viewshed open for the enjoyment of climbers and would also limit noise pollution. Enhanced buses would be a versatile asset that allows for a trial and error solution and would encourage more ridership and use of the public transportation resource. Additionally, this Alternative would require minimal environmental disruption to the canyon. Further, canyon transportation is needed during weekends which is when city transportation is reduced. As such, the buses that run on the weekends can be utilized during the weekdays; thus not be idle.

Cons

This Alternative currently lacks bus or shuttle capacity and pull outs to serve dispersed recreational users. Without capacity and pullouts people will not alter their habits and continue to use personal vehicles. There needs to be an analysis on the lack of vehicle capacity limitation or toll included in this Alternative as no one will be encouraged to take public transit. Electric buses or shuttles need to be vetted considering anthropogenic climate change. Closing roadside parking during the winter months will negatively impact access as climbers access the

whole of the canyon year-round. The Alternative needs details on the proposed avalanche mitigation in the form of snow sheds which will have considerable impact on climbing access.

2. Alternative Enhanced Bus - with roadway widening for peak period (shoulder lane)



Given the potential impacts to the Gate Butress parking and roadside climbing resources, as well as the extent of the roadway widening, this Alternative must be fully defined and analyzed so as not to impact climbing resources and trails that the SLCA and the community have invested in substantially. Avoidance and/or mitigation of impacts to climbing resources from cut and fill and other construction activity within and outside the roadway widening must be analyzed. Overall there must be detailed analysis of the impacts of widening of the roadway on recreation in the canyon.

Pros

Adding an additional lane would allow the passing of slower traffic, and would open up more space for pedestrians and cyclists in the summer allowing more flexible use of the roadway. Having the bus only lane would incentivize skiers to take the bus and not drive in their own vehicles.

Cons

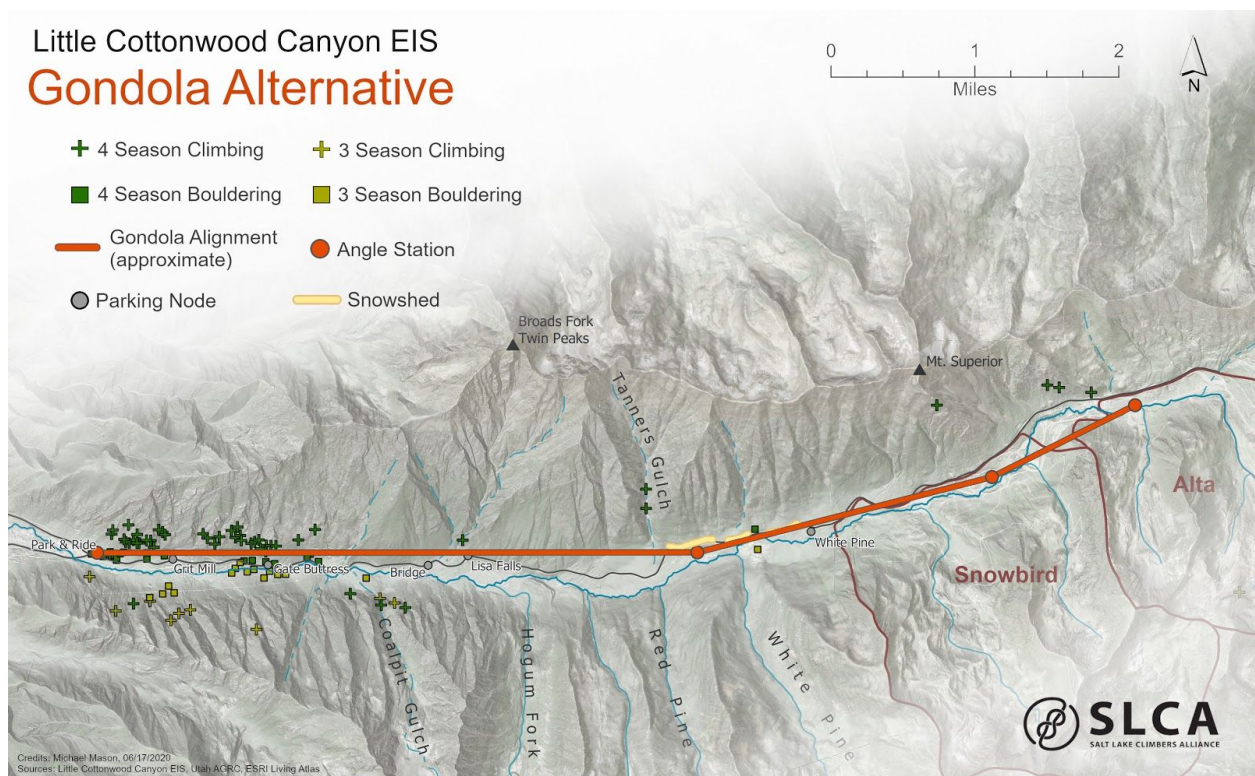
Some of the most popular climbing/bouldering areas such as the Secret Garden, Cabbage Patch, 5 Mile, the Hill and others are all within 30 feet of the roadway. Understanding their location in relation to any proposed changes to the roadway is critical to understanding any

impacts to these recreational resources. The EIS must have substantive details of roadway widening including estimated cut and fill as they relate to climbing resources.

There are high capital costs and a long construction time for any road improvements. This plan would also drastically compromise parking at climber trailheads. The statement from Appendix C, "The presence of the PPSL would not allow roadside parking on S.R. 210 at any time of year." contradicts the attached Alternative that infers roadside parking would be allowed when beyond a quarter mile from developed trailhead parking. Adding a new lane would have a very significant environmental impact in the canyon. Again, electric buses or shuttles need to be vetted considering anthropomorphic climate change. The Alternative needs details on the proposed avalanche mitigation in the form of snow sheds which will have considerable impact on climbing access.

3. Alternative Gondola - with bus from mobility hub - no additional roadway capacity

This Alternative needs a detailed economic feasibility study of the gondola and its operation. The gondola Alternative also needs a detailed engineering study showing specific impacts to recreation in the lower part of the canyon. Including the lower LCC Park & Ride and impacts to the Alpenbock Loop and Gate Buttress trail networks. The Alternative needs substantive analysis of the visual and noise impacts as well as the impacts to the user experience by the gondola. Further, the Alternative needs substantive analysis of the impacts of the gondola to the Scenic Byway designation as defined by Utah Administrative Code section R926-13.



Pros

This Alternative would allow for continued travel into the canyons during road closures due to hazardous winter conditions. It would potentially reduce carbon emissions from vehicles.

Cons

The gondola is ski resort centric and would most likely only be utilized during the winter months as during the other months the ski resorts are either closed or have a greatly reduced visitation and traffic is not an issue. Thus, it would lack capacity, especially given parking would be very limited at the base station and people will not be inclined to take a bus from a transportation hub. During weekdays of the winter months, when traffic is light, people will not be motivated to use the gondola as it will require parking at a transportation hub, waiting 10-15 minutes for a bus, riding for 10-15 minutes, waiting 5 minutes for the gondola, riding for 40-45 minutes, etc. Whereas driving will be much faster and convenient. Because of these factors, the gondola needs a detailed economic feasibility study of its operation.

The gondola and its associated infrastructure will negatively impact the viewshed of the canyon, especially for climbers on the north side of the lower canyon. The added noise will detract from the user experience. Additionally, it does not service dispersed recreation users, therefore offering no benefit to climbers. The gondola would require infrastructure that will be expansive and pose unknown errors, challenges, and problems. There would need to be infrastructure at the base of the canyon leading to impacts to the Wasatch Boulevard communities as well as limiting access to the Alpenbock Trail network. Towers need to be built where infrastructure does not currently exist and would likely be placed adjacent to or within close proximity to climbing resources that could potentially force them to be closed. Overall, the gondola would have a large and lasting impact on LCC without benefiting the majority of the users.

Pedestrian Safety

While pedestrian safety at Lisa Falls with a cross walk and signal is addressed, it is not addressed throughout the canyon. For instance at the Gate Buttress parking lot across the road to the pipe that the public uses to access the Little Cottonwood Trail. Pedestrian safety needs to be considered at the mouth of the canyon where during the winter months climbers cross the road from the Park and Ride lot to access the “Scruffy Band” for ice climbing.

Gate Buttress Parking

The Gate Buttress parking lot is currently on land privately owned by The Church of Jesus Christ of Latter-day Saints and leased by the SLCA and the Access Fund. To that end, substantive conversations need to be had between these parties regarding future ownership and development.

The Gate Buttress parking lot capacity in the document is significantly reduced compared to current use levels. At times there are 50 to 80 vehicles parked in the Gate Buttress Lot and on both sides of the roadway. From April 1st to November 24th, 2019 over 14,500 individuals were

recorded on an infrared trail counter at the Gate Buttness trailhead, indicating the high level of use of this property for the general public's enjoyment. This number does not include all users who accessed the property during that time. Some were parked alongside the road and used side trails to access the climbing resource. Further, congestion is compounded in this area due to the parking at the large pull out adjacent to the pipe bridge to the east on the southside of the highway. Without overflow parking and/or a viable bus or shuttle option, recreation access would be severely limited if roadside parking is eliminated in this area under the current parking lot design.

Again, parking needs in this area must be fully analyzed. The proposed 21 sites and no roadside parking within a quarter mile of the Gate Buttness is not adequate for current use let alone for increased future use. There must be public transit options. Leaving the Gate Buttness lot unimproved allows for more parking than what is potentially proposed.

* * *

Overall, SLCA is very concerned that the draft EIS report does not adequately analyze the impacts of the Alternatives on dispersed recreation, especially in the lower portion of Little Cottonwood Canyon.

Ultimately, the SLCA continues to advocate for year-round dispersed recreation access to climbing resources with transit solutions that accommodate appropriately for traffic safety as well as current and future access to climbing resources. Growth trends in climbing as a sport are increasing as is the use of outdoor climbing resources in LCC. This use needs to be appropriately considered in UDOT's Alternatives. The SLCA is willing and able to answer any questions about our comments or provide additional information on climbing in the canyon.

Sincerely,



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