



October 18, 2020

To: The Central Wasatch Commission  
Ralph Becker, Director  
41 N. Rio Grande St., Ste 102  
Salt Lake City, UT 84101

From: The Salt Lake Climbers Alliance  
P.O. Box 9157  
Salt Lake City, Utah 84109

Re: **Salt Lake Climbers Alliance comments on the Central Wasatch Commission's Mountain Transportation System Draft Alternatives Report**

Dear Central Wasatch Commission Officers, Commissioners, and Staff:

**Introduction:** The Salt Lake Climbers Alliance (SLCA), a 501(c)(3) nonprofit representing thousands of Wasatch-area climbers, appreciates the opportunity to respond to the Central Wasatch Commission's Mountain Transportation System Draft Alternatives Report (the "MTS Draft Report"). The SLCA is the unified voice of 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 this role, the SLCA has engaged with the Mountain Accord/CWC since 2014, originating with Julia Geisler, SLCA Executive Director, serving on the Mountain Accord and then Dr. Nate Furman, of the SLCA Board of Directors and Policy & Conservation Committee, serving as a CWC Stakeholder Council Member.

**In short, the SLCA is concerned that the MTS Draft Report fails to adequately recognize and incorporate the needs of climbers and other dispersed recreation participants. In doing so, it outlines several alternatives which are potentially detrimental to Wasatch area climbing resources and surrounding environments; including possible permanent climbing resource loss.**

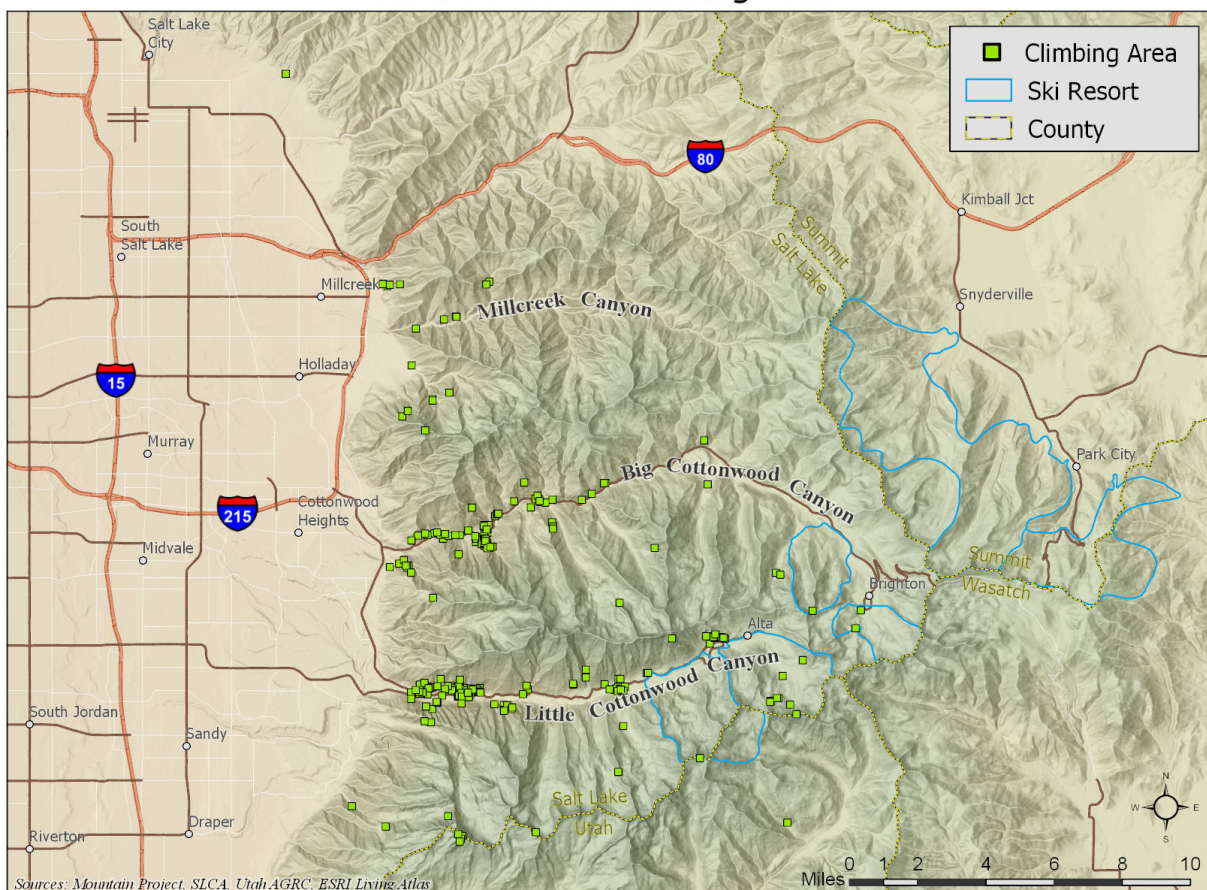
The popularity of climbing and other forms of dispersed recreation have grown steadily in recent decades, with an especially dramatic spike in interest more recently due to the SARS-CoV-2/COVID-19 pandemic. Yet, little is reflected regarding dispersed recreation use, resource capacity, and the environmental impact of all forms of recreation (dispersed and not) in the MTS Draft Report. Any regional planning process that fails to incorporate such analysis is incomplete and will ultimately prove ineffective. The MTS Draft Report needs to recognize, account for the needs of, and analyze the impacts of any proposed actions on climbing activity in the MTS study area.

The MTS Draft Report contains six issues that are of particular concern to the SLCA due to the potential impact to climbing resources and surrounding environments and reduced access to the public. These six issues are listed here and elaborated in the following letter.

- 1) Roadside parking reduction is not acceptable at this time;
- 2) Roadside widening continues to threaten climbing resources;
- 3) Exclusion of additional bathrooms at trailheads threatens water quality;
- 4) Supporting the needs of climbers supports general dispersed use;
- 5) Aerial-based alternatives do not serve climbers and threaten viewsheds; and
- 6) Canyon tolls should be directed to the infrastructure of recreation resources and conservation of the watershed.

Before elaborating on these six concerns, we provide the following data including a map of the breadth of climbing resources in the study area and (Table 1), collected by the SLCA via infrared trail counters located in lower LCC. This data is provided for readers to understand the extent of climbing resources in the study area as well as usage at just two climbing trailheads in LCC. Importantly, the CWC has assisted in funding the climbing-specific recreation infrastructure projects found at these trailheads.

### Central Wasatch Climbing Areas



**Table 1.** Alpenbock Loop and Gate Buttress trail counter data from June to Mid-October, 2020

	<b>Alpenbock Loop</b>	<b>Gate Buttress</b>
<i>May</i>	n/a	9,041
<i>June</i>	5,073	5,418
<i>July</i>	5,507	2,827
<i>August</i>	2,279	1,590
<i>September</i>	2,792	3,565
<i>October (first 2 weeks)</i>	4,523	4,766
<b>Total Counts</b>	<b>20,175</b>	<b>27,207</b>
<b>Total Users</b>	<b>10,087</b>	<b>13,603</b>

NOTE: Total Count values above reflect each time someone passes a counter and are divided by two to account for Total Users; Alpenbock Loop counter was not installed until June, hence there are no May numbers to report.

This table above illustrates the substantial use of climbing resources that are also used by other dispersed recreation users. These trail systems were developed by the SLCA with support of our partners, including the CWC and should be used as models for other dispersed recreation infrastructure needed across the study area. These models funnel dispersed recreation users to main trail heads with supporting transit options and facilities.

Beyond this general recognition and analysis of climbing activity and other dispersed recreation, the MTS process should address the following concerns:

**1. Reduction in Roadside Parking is Not Acceptable at this Time:** The SLCA is concerned about the reduction in roadside parking without alternatives in place to maintain access. As provided in past comments, we support the reduction in roadside parking if it is preceded by an increase in off-roadside parking (parking lots) or other infrastructure (public transit) to allow for continued public access to climbing resources. We believe that the development of the Alpenbock Trail system and adjacent parking lots is an appropriate model for serving climbers and other dispersed recreation users and reduces the need for roadside parking. Developing an electric shuttle-based program is a responsible alternative that may serve climbers well and address climate concerns. We request that an electric shuttle-based program be analyzed as a transportation alternative for dispersed users, especially in the lower canyons.

**2. Roadside Widening Continues to Threaten Climbing Resources:** The SLCA requests the CWC MTS to address the persistent threats to climbing resources by roadside widening in Little Cottonwood Canyon. As recently as May 2020, UDOT implemented plans without a public comment period to widen roads directly adjacent to the climbing areas known as the Cabbage Patch and the Secret Garden. We request that the CWC Mountain Transportation Plan assist in safeguarding roadside climbing that may be threatened by transportation development.

**3. Exclusion of Additional Bathrooms at Trailheads Threatens Water Quality:** The CWC MTS does not include provisions for additional restrooms in either Big or Little Cottonwood Canyon. This oversight threatens the water quality on which Salt Lake Valley residents and businesses depend. The SLCA requests that the CWC MTS be amended to include provisions for additional restrooms in the canyons that service dispersed recreationalists to preserve water quality.

**4. Supporting the Needs of Climbers Supports General Dispersed Use:** Hikers, birdwatchers, trail runners, cyclists, and general family recreation seeking additional access points are all served by creating durable resources that feature parking areas and bathrooms. The SLCA has led the way in creating multi-use trails in lower Little Cottonwood Canyon at the Alpenbock Trail network (serviced by the Grit Mill Parking Lot and the Little Cottonwood Canyon Park and Ride). Similar resources are needed throughout the study area. Sustainable and well-maintained recreation infrastructure, that addresses the entire user system from parking, to restrooms and trails, needs to be in place before public transit can bring more people to dispersed recreation sites.

**5. Aerial-Based Alternatives Do Not Serve Climbers and Threaten Viewsheds:** While aerial-based alternatives, such as a tram or gondola, may serve those recreating in upper LCC, such alternatives do not improve access to dispersed recreation throughout the rest of the canyon. Further, we anticipate that aerial-based alternatives will detract from “user experience and visual quality”, a Tier 1 MTS Objective and “quality of recreation experience”, a Tier 2 MTS Objective. In addition, as a leaseholder for the privately-owned Gate Butress area, we have concerns about unintended consequences of an aerial solution on the security of the properties of the owner around the Church of Jesus Christ of Latter-day Saints vault. More analysis is needed to determine possible detrimental consequences to lower canyon resources. We believe that aerial-based solutions serve a small portion of Wasatch recreationists and only then for just a few days of the year and only during winter months. Transportation needs are better served by utilizing and improving the existing infrastructure (roads, parking lots, increased public transit, and bathrooms). For additional information regarding our analysis of aerial-based alternatives, please review our recent comments to UDOT’s LCC EIS (attached and link provided at the end of this document).

**6. Canyon Tolls Should Be Directed to the Infrastructure and Maintenance of Recreation Resources and Conservation of the Watershed:** If tolls are to be implemented within Big and Little Cottonwood Canyons, specific details about how this income will be spent should be included in the plan. The CWC MTS estimates that \$24,000,000 in revenue will be generated through 2050. How will this 24 million dollars be spent?

**Conclusion:** In sum, the SLCA is deeply concerned that the MTS Draft Report fails to recognize, analyze, or address the needs of climbers and other practitioners of dispersed recreation. In short, the absence of the words “climb” or “climbing” from the entire document raises concerns that the CWC does not understand or acknowledge the scope of recreation use in the CWC study area. The MTS Draft Report fails to recognize that many of the actions it outlines would have negative, and sometimes irreversible, impacts on valuable, world class climbing resources that have been enjoyed by the general public for decades.

We are deeply grateful to be included in the conversations regarding the CWC MTS, however feel that concerns for climbers have not been well attended to. By incorporating the suggestions made above, we hope that the MTS can move forward for the benefit of all users. We continue to serve as a stakeholder in the CWC process and are available for questions or concerns regarding our comments.

Sincerely,



Nate Furman,  
Salt Lake Climbers Alliance, Board Member  
CWC Stakeholder Council Representative



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Attachment: SLCA Comments to UDOT LCC EIS

[https://static1.squarespace.com/static/58e52138ff7c50175cc0d206/t/5f05079eadf9984d8a54ecd7/1594165152267/20200707\\_+SLCA%27s+Little+Cottonwood+EIS+Comments+%28Final%29.pdf](https://static1.squarespace.com/static/58e52138ff7c50175cc0d206/t/5f05079eadf9984d8a54ecd7/1594165152267/20200707_+SLCA%27s+Little+Cottonwood+EIS+Comments+%28Final%29.pdf)

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