



September 3, 2021

Little Cottonwood Canyon EIS  
Utah Department of Transportation  
c/o HDR  
2825 E Cottonwood Parkway, Suite 200  
Cottonwood Heights, UT 84121

**RE: Access Fund Comments regarding Little Cottonwood Canyon Transportation Alternatives Draft Environmental Impact Statement**

UDOT Planners,

The Access Fund welcomes this opportunity to provide comments to the Utah Department of Transportation's (UDOT) Little Cottonwood Canyon (LCC) Draft Environmental Impact Statement (DEIS). The Wasatch Mountains and Little Cottonwood Canyon in particular host nationally significant climbing resources that have a long history and attract visitors from all over the world, contributing significantly to the local economy. The Access Fund is concerned that the narrowly conceived preferred alternatives for this DEIS focus far too much on the needs of two ski areas at the head of Little Cottonwood Canyon at the expense of dispersed recreational users who visit the entire canyon. Access Fund and Salt Lake Climbers Alliance are lessees for 140 acres in LCC.<sup>1</sup> The parcel, known as the Gate Buttress, is about one mile up LCC canyon and has been popular with generations of climbers because of its world-class granite. These unnecessary proposals would destroy climbing resources, significantly impair the canyon's natural experience, limit parking and damage trails in a highly popular recreation area (including Gate Buttress), and otherwise reduce access opportunities for underprivileged people with limited financial means.

**The Access Fund**

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and 131 local affiliates. Access Fund provides climbing management expertise, stewardship, project-specific funding, and educational outreach. Utah is one of Access Fund's largest member states and many of our members climb regularly in Little Cottonwood Canyon. For more information about Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

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<sup>1</sup> See:

<https://www.accessfund.org/news-and-events/news/climbers-partner-with-lds-church-on-stewardship-of-little-cottonwood-canyon-climbing>

The Access Fund supports the position of the Salt Lake Climbers Alliance (SLCA),<sup>2</sup> and hereby incorporates their comment letter by reference into our comment letter. Specifically, we endorse SLCA’s proposal that before any permanent changes are made to Little Cottonwood Canyon, a new alternative must be considered that is based on an expanded bus service coupled with traffic mitigation strategies and addresses the needs of dispersed recreation. The DEIS’s highly destructive Preferred Alternatives should only be considered after less impactful options have been implemented and shown not to be effective. The climbing resources that will be damaged by these proposed alternatives are highly significant and valued by local climbers and climbers visiting from around the country.

### **Little Cottonwood Canyon Climbing History**

Climbing and mountaineering in the United States has a long and storied history, originating with Native American explorers who summited alpine peaks and scaled canyon walls, on through Anglo-European adventurers who scaled summits in the Sierra Nevada and Rocky Mountains in the 1800s such as Cathedral Peak, Longs Peak, and the Grand Teton. Into the 1900s gear and skill progressed, ushering in more technical and daring ascents on larger climbs in Yosemite and mountain ranges throughout the Rockies, Sierras, Cascades and Alaska. Many highly technical climbs were also achieved by the mid-1900s at places like the Shawangunks, NY and Devils Tower (Bear Lodge), WY, among others. By the 1950s and 1960s Yosemite’s El Capitan and Half Dome were climbed as well as the Diamond on Longs Peak and the Great White Throne in Zion National Park. By the 1970s, climbers were simultaneously climbing at much higher technical grades while also moving towards a “clean climbing” ethic.

Since at least the 1950s many climbs were established in Utah’s Wasatch Mountains, especially on the high-quality granite found in Little Cottonwood Canyon,<sup>3</sup> which became the training ground for a local group of climbers known as the Alpenbock Climbing Club. Especially during the 1960s, the Alpenbock Climbing Club was a prolific source of first ascents, scaling many routes that remain classics today including *The Coffin*, the Wilson-Love Route, *The Sail*, *S-Crack* on the Thumb, and various routes on the Gate Buttress. Increasingly difficult routes were established from the late 1960s into the 1970s such as *Dorsal Fin*, *Mexican Crack*, *The Green Adjective*, *Split Fingers*, *Butterfingers*, and *Fallen Arches* were as difficult and high quality as any climbs in the country. Even more advanced climbs were established since the 1980s and beyond. As climbers worked through the grades, the interest in and popularity of bouldering also took hold in LCC, which boasts extensive bouldering areas such as 5 Mile Boulders, White Pine Boulders, Cabbage Patch Boulders, the Gate Boulders, the Secret Garden where the problem *Copperhead* (V10) can be found—a seminal climb in the experience of Nathaniel Coleman, a recent US silver medal winner in the 2021 Tokyo Olympics. All of the climbs listed here would be impacted in some way, either through direct destruction or by the industrialization of the area resulting from UDOT’s preferred alternatives.

### **UDOT’s Preferred Alternatives Will Cause Significant Damage to Climbing Resources**

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<sup>2</sup> See <https://www.saltlakeclimbers.org/lcc-udot-eis>.

<sup>3</sup> See <https://www.mountainproject.com/area/105739277/little-cottonwood-canyon>.

The Salt Lake Climbers Alliance estimates that 29 boulders and 131 bouldering problems would be impacted by the road-widening alternative: “Boulders located within areas of direct impacts from roadway widening would be removed, destroyed, or buried by fill. Newly built trail segments lost to hillside cuts would be rerouted.” And 35 boulders and 142 problems would be impacted by the gondola alternative due to their location under the gondola alignment/inside the easement, and/or being located inside the proposed park and ride station footprint. Additionally, trailhead parking and access trails would also be significantly limited by these proposals, especially under the gondola alternative where the canyon itself would transform into an industrial atmosphere with new piles of construction debris, retaining walls, gondola towers, slope destabilization/erosion, forever degrading the unique and historic experience of climbing in LCC.

Well before climbing became an Olympic event, the sport had been growing dramatically in popularity all across the country and in the Salt Lake City area, with as many as 30,000 estimated climbers visiting LCC every year. Multiple climbing gyms have sprouted up in every city across the country, climbing guides are busy nearly everywhere, and even major Oscar-winning motion pictures feature climbing—all which contribute to the \$12 billion<sup>4</sup> generated every year by the sport.

Unfortunately, UDOT’s DEIS fails to recognize the importance of the climbing resource in LCC—with its rich history, high quality, popularity, and economic contributions. Indeed, according to analyses done by the Salt Lake Climbers Alliance not only would hundreds of bouldering problems be impacted, but basic access to various trailheads within the canyon would be limited to serve the needs of 2 ski areas at the top of the canyon. Not only do these limited transportation alternatives fail the needs of dispersed recreational users such as climbers, but also does a dis-service to under-privileged communities who may not be able to afford expensive ski tickets but want to visit their public lands especially in the lower canyon.

By imposing additional financial costs, whether it be a toll, gondola fee, or bus fare, UDOTs proposals systemically disenfranchise lower income visitors (more likely to also be people of color) who wish to access LCC. This perpetuates wider environmental justice trends in which those of lower socioeconomic status and of racial and/or ethnic minority identities are not only more likely to be exposed to environmental hazards, but also have a harder time accessing environmental amenities.

### **Summary of Access Fund position**

Access Fund supports the Salt Lake Climbers Alliance position related to UDOT’s preferred alternatives, to wit:

- 1) Access Fund opposes the Enhanced Bus Peak Period (Shoulder Lane Expansion) Alternative that would result in the unnecessary destruction of many climbing resources. UDOT failed to consider a reasonable range of alternatives due to its purpose and need

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<sup>4</sup> See national Bureau of Economic Analysis report: <https://www.bea.gov/data/special-topics/outdoor-recreation>

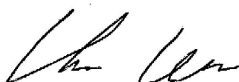
statement being too narrow. Access Fund also opposes UDOT's Gondola Alternative that will also result in the unnecessary destruction of many climbing resources. Here again, UDOT failed to consider a reasonable range of alternatives due to its narrow purpose and need statement.

- 2) Access Fund opposes UDOT's proposed trailhead parking and access "improvements" for the Gate Buttress parking lot which would severely limit parking, while threatening roadside climbing resources and access trails. Access Fund, a lessee of Gate Buttress, would be significantly harmed by the proposed changes because the climbing experience at Gate Buttress would be measurably diminished. Access Fund believes that the purpose and need statement for UDOT's EIS is too narrowly defined and thus significantly limits the range of alternatives UDOT considered in the LCC DEIS including lesser destructive alternatives supported by Access Fund and SLCA, among others. Also, UDOT's U.S. Forest Service partner also fails to meet its obligations under the National Environmental Policy Act by seeking to make decisions based on a Forest Plan that is nearly 20 years old.

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Access Fund urges UDOT and its partners to reconsider its range of alternatives and analyze the needs of the dispersed recreation community as well as for potential visitors with limited financial means. We support an alternative analysis based on enhanced bus service combined with other traffic mitigation strategies. The preferred alternatives offered by UDOT address a traffic problem primarily focused on the 30 busiest days during the winter ski season. This DEIS must address the transportation needs in the canyon year-round for all users.

Sincerely,



Chris Winter  
Access Fund Executive Director

Cc: Salt Lake Climbers Alliance