



Overall Recreation System

The SLCA supports advancing the Idealized Recreation System to the Mountain Accord Executive Board for consideration in the analysis of combined scenarios, with the understanding that there are still some unresolved topics without consensus (i.e., land preservation mechanisms, transportation connection, and One Wasatch).

Potential Federal Land Preservation Actions

- Neutral/Undecided

Currently, the SLCA does not agree that the current USFS Forest Plan (Plan) or an amendment to the Plan is sufficient to protect recreation areas in the Central Wasatch. To ensure long-term protection against development while maintaining flexibility for recreation, the SLCA believes the best approach is to consider additional congressional or executive designations (i.e. national conservation management area designations). This approach would include the potential modifications of existing wilderness area boundaries to accommodate the completion of the Bonneville Shoreline Trail.

The SLCA is concerned that an appropriate recreational management buffer between the highway and the wilderness be instated via a land management designation. There are many popular rock climbing crags with hundreds of bolts in designated wilderness that are within easy access from a road. Additional wilderness designation along the highway corridors could encompass more of these destinations, further complicating the maintenance of fixed anchors that climbers rely upon to recreate safely. Consequently, the SLCA opposes new wilderness area designation that would prohibit necessary maintenance activities for fixed anchors, new trails, and trail maintenance. To properly address this concern, the SLCA suggests evaluating land management designations that ensure the existing preservation of climbing in these areas while affording the necessary flexibility to allow for required maintenance.

Should the SLCA support a ski lift connection through the Central Wasatch as proposed in by Ski Utah through the One Wasatch initiative?

- Neutral/Undecided

As proposed, the One Wasatch Initiative (Initiative), as a winter on/over the snow connection between the ski resorts, does not directly impact climbing. Further, at this point in time, it is not apparent that there will be any indirect impacts from the Initiative, especially as the lift alignments, changes to ski area boundaries, and management plans are not yet fully known. While the SLCA recognizes that many of our members utilize the affected backcountry for ski-touring, taking a stance on the initiative is outside the scope of the SLCA's mission because the Initiative, as currently proposed, does not directly or indirectly impact climbing resources.

That said, the SLCA will continue to re-evaluate its position as more becomes known regarding the Initiative and particularly the specific impacts. For instance, if the lift alignments were to require a change in land use policies that could negatively impact climbing or affect a public transportation policy, then it would be appropriate for the SLCA change its position accordingly. The SLCA's abstention stance is meant to send the message that the SLCA views it premature to take a "yes" or "no" position on the Initiative due to the currently available information.

Should the SLCA support a public transportation oriented development connecting the Salt Lake valley, Park City, Big Cottonwood Canyon (BCC), and Little Cottonwood Canyon (LCC)? (Transportation Concepts B and D)

- Neutral/Undecided

This would be a public transportation connection as opposed to a ski industry specific connection, although it would greatly benefit the ski resorts. Despite the significant costs, it would have a more significant, long term, economic benefit to the region than a ski lift connection. The SLCA realizes that a public transportation connection, especially a rail connection, is the most reliable transportation solution with the most capacity given the traffic, weather and avalanche hazards in BCC and LCC that will continue to make vehicular access and bus service a challenging operation.

Based on the 2040 population projections, there will be capacity issues in the Central Wasatch. A transportation connection will draw canyon visitors and control their dispersal to centralized nodes away from many of the dispersed recreation access points. This could help preserve the quality of the dispersed recreation experience as long as alternate access is supported via automobile, shuttles/buses, and adequate parking opportunities in BCC and LCC.

We all love Little Cottonwood Canyon, but its current configuration is not sustainable. Outside of peak traffic congestion and the hazards of recreating in close proximity to a busy road, there are significant existing impacts that could be mitigated vis-à-vis a large infrastructure project. Integral to this possibility, is the resolution of recreation management questions at the Gate Buttress and along the stream corridor in lower LCC. A rail alignment adjacent the Hwy 210 right-of-way in LCC poses possible impacts to boulders, the LCC Trail, and private property owners, but it could have a smaller footprint than a potential widening of the highway to accommodate Bus Rapid Transit. Higher in the Central Wasatch, tunnels would be important to minimizing the potential impacts of the connections between Little Cottonwood, Big Cottonwood, and Park City.

The SLCA understands that such a potentially large infrastructure investment would, in part, need to be justified by reducing the number of vehicle miles traveled in the project area. It is possible that constraints will be applied to the unfettered vehicular access and roadside parking that we now enjoy in order to make public transit a more attractive option. Reducing the number of vehicles in LCC and BCC would improve the overall quality of the recreation experience, facilitate recreation management and a hypothetical fee structure could be a long term source of much needed funding, but restricting roadside parking without additional developed parking or expanded transit service would severely limit access to dispersed recreation sites.

The SLCA supports a transportation solution that will enhance recreation in the Wasatch Front and Back. Concepts B and D from Mountain Accord represent a fundamental change in the way the general public might access the Central Wasatch, and could respectively add or mitigate impacts to

climbing resources and access to dispersed recreation. That said, the SLCA requests more detailed information relative to the transportation scenarios presented by Mountain Accord. In conjunction with this request, the SLCA will solicit feedback from our members and the climbing community to help further develop our position and provide direct feedback from this user group in response to these potential transportation solutions.

Other Potential Actions

The SLCA supports efforts to preserve lands that provide unique recreation experiences. This is especially important for popular areas such as the Gate Buttriss (private LDS Church land) where permanent public access is not secured. The SLCA is interested in the Gate Buttriss remaining open for recreation, and we are working with LDS Church representatives and the Forest Service to address future management of the property. To help ensure that the Gate Buttriss property remains under consideration as private property with high value, recreational opportunities in the context of Mountain Accord, we wish to forward a presentation, recently submitted to the LDS Church, summarizing the history of the climbing resource on their property to the Mountain Accord, Land Preservation subcommittee.

The SLCA also supports the establishment and funding of an organization to provide long-term recreational planning, management, and public education. Given the current growth in the popularity of climbing and the limited number of permitted, guided user days, educational opportunities are severely lacking in the Central Wasatch. The SLCA would like to work with such an organization to develop and permit a climbing specific education program. Improved and interconnected trail systems are a priority for the climbing community, and the SLCA is working as a member organization of the Wasatch Legacy Project to this end. The SLCA supports this public/private partnership as an appropriate model that could be expanded to fulfill the mission of Mountain Accord.

Specific Comments to the “Mountain Accord System Group Narratives”:

- Pg 2 paragraph 2 – add “trail heads and parking” in the line “connect and improve the trail system, including trail heads and parking, and provide transit service...”
- Pg 3 – One Wasatch – point 1 under “how action would detract from vision and goals” – take out the word “beginner” – subjective

Todd Leeds, P.G.
Mountain Accord Comments
November 20, 2014

My comments below encompass all four aspects of the Mountain Accord: Transportation, Recreation, Environment, and Economy.

Transportation

It would be a mistake to connect Big and Little Cottonwood with a train, road, tunnel, or aerial device. Each canyon has its own character and a connection between canyons makes the Wasatch a smaller place. The carrying capacity of the canyons may not be able to support the influx of additional visitors.

I support the Wasatch Backcountry Alliance Transportation Vision which I authored and is incorporated by reference into this set of comments. I have attached it to these comments as an appendix.

Little Cottonwood Canyon Train

A train in Little Cottonwood Canyon has several inherent problems:

- Environmental Impacts;
- Viewshed impacts;
- Costs;
- Service for dispersed users. The train has a bias for resort users. I would prefer a system that works for dispersed users;
- The train may form a hard boundary for dispersed users;
- The train will have to travel through Snowbird, this will delay skiers to Alta and make it a less attractive transportation option;
- Up to 12 stops may be required for dispersed users;
- Tourists coming from the airport may require too many modal changes;
- The train will not eliminate use of the road; and
- The train will act as a "Trojan Horse" for additional development in the canyon.

Tunnels

My tunnel comments are based on my experience as a Professional Geologist with underground mining experience. My experience includes preparation of underground mine water management plans.

In my professional opinion, tunnels between the canyons have the following inherent problems;

- Hydrology, not enough is known. A detailed study should have been conducted prior to introducing the idea of tunnels. This would have confirmed the presence of or lack of fatal flaws. If tunnels are selected as an alternative and a fatal flaw is discovered at a later date, we are back to the drawing board, delaying the process.
- Water rights, the tunnels may disrupt subsurface flow regimes, this may impact water rights. This is another reason why a study should have been conducted prior to introducing the tunnel idea.
- Construction and operational dewatering. Treatment plants may have to be built.
- The tunnels may provide a large influx of visitors which may exceed the carrying capacity of the canyons.
- The excavation of each tunnel (LCC to BCC and BCC to PC) may require the removal of 30,000 to 70,000 truckloads of rock for each tunnel. This is based on 10 ton loads to increase the safety factor of hauling rock down a steep canyon. The current canyon infrastructure may be overwhelmed by this amount of trucking. The traffic flow at the base of the canyons and in Park City may not be able to handle this amount of truck traffic.

Lift tickets should be discounted for using mass transit or driving to resorts with 3 or more in a vehicle. Improving mass transit and discouraging auto use would help S.L County comply with EPA air quality standards.

A train from Park City to SLC airport would have significant air quality and economic benefits and would serve a larger segment of the population than a train up Little Cottonwood Canyon.

Recreation

I do not support ski resort expansion and One Wasatch . They are unique, world-class resorts that already have a huge imprint on the Wasatch.

Dispersed users have been losing ground for 40-plus years. This trend should not continue. Dispersed use has been growing steadily. Dispersed users are not asking for a reduction in ski area size. We are seeking to maintain the current balance.

Given the certainty of climate change and the fact that only a minor portion of Utah residents ski or snowboard, resort expansion makes no sense. The impacts to the watershed do not justify resort expansion.

A lift up Grizzly Gulch or Flagstaff Mountain will eliminate most of the only high elevation access in upper Little Cottonwood Canyon.

I support realigning wilderness to accommodate the Bonneville Shoreline trail.

I support buying and preserving private property.

Economics

The Mountain Accord must do a full cost benefit analysis to determine the environmental, watershed and socio-economic value of land preservation. This analysis must include valuation of watershed health and quality.

The Idealized Scenario appears biased towards the ski resorts. This is not the Idealized Scenario for the general public.

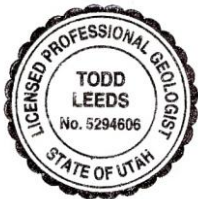
Ski area expansion should not be included in the Idealized Scenario. The only benefit of this portion of the scenario are the ski resorts. Preserving watershed health outweighs the benefits of resort expansion. EPA has determined that ski area use is the cause of major impacts to watershed health.

Environment

The Mountain Accord must work to preserve the water shed and remaining natural habitat of the Central Wasatch Mountains. Additional impacts need to be assessed in a cumulative manner.

Thank you for taking the time to address these comments. Please feel free to contact me at anytime if you need further information.

Todd Leeds, P.G.



Appendix A

WASATCH BACKCOUNTRY ALLIANCE TRANSPORTATION VISION STATEMENT

SUMMARY

The Wasatch Backcountry Alliance envisions a low cost, low emission, energy efficient year-round multi-modal transportation scenario. The system we envision must be capable of providing time efficient and predictable service for both developed location and dispersed users in the Mountain Accord project area. All components of the transportation system must be developed and implemented with a minimum of environmental impacts to air, land, biologic and water resources. The transportation system should use the best currently available technology to serve all user groups on a year-round basis. The Wasatch Backcountry Alliance feels that the best currently available technology that meets our criteria is a flexible and dynamic fleet of energy efficient buses using a series of transportation hubs. Bicycle safety should be an integral part of this transportation system. Further, the transportation system should not place an undue tax or monetary burden on any single socio-economic or demographic group. Finally, any future transportation system should be designed to reduce the number of cars currently in the canyons, minimize environmental impacts and enhance the experience of everyone using the Wasatch Mountains.

SPECIFIC ELEMENTS OF OUR TRANSPORTATION VISION

BEST AVAILABLE TECHNOLOGY - BUSES

At this time the Wasatch Backcountry Alliance feels that the best available mass transit technology is based on buses and vans of varying sizes. The Wasatch Backcountry Alliance proposes that future mass transit be conducted using a fleet of energy efficient clean fuel buses and vans. The Wasatch Backcountry Alliance realizes that the transportation system should evolve over time as changes in technology occur.

We have performed a feasibility analysis to compare the two currently available modes: Bus and rail based (e.g. trains). The Wasatch Backcountry Alliance determined that the option of using a rail based system is too costly, does not permit sufficient flexibility and has adverse impacts to the environment. Our reasoning for supporting buses are as follows:

Environmental Impacts - Trains would require the construction of rail lines in adversely steep canyons. Construction of a rail alignment would likely more than double the current infrastructure footprint in the canyons. This would increase environmental impacts. These impacts could be mitigated somewhat by using the current roadway alignment. However, this would open up a new series of non-environmental impacts. Construction of a secondary alignment would likely have to occur in environmentally sensitive and possibly wilderness areas. National wilderness groups would object to a reduction in wilderness areas.

Dispersed User Impacts - Train tracks also have the potential to form a hard barrier for dispersed users. This scenario manifested itself in Glacier National Park, BC, Canada. Backcountry skiers had to cross and/or walk on train tracks to access certain areas. This created a dangerous situation with several near-miss skier-train encounters.

Economics - Buses are less costly than trains and do not require construction of a new type of infrastructure. Buses can be purchased ready for use at a fraction of the cost.

Scheduling - Buses can be purchased and put into service in one to two years. The planning (including NEPA) design and construction of train infrastructure could take up to 10 years. Construction of a rail line on the current road alignment would likely entail extended canyon closures. This could have significant impacts on public safety.

Flexibility - Bus transit patterns and schedules can be adjusted to fit demand on an as-needed basis. Stops can be added/reduced seasonally to service both resort and dispersed users. Trains typically have to rely on a limited number of fixed stops.

CLEAN FUELS

Wasatch Backcountry Alliance envisions that all public transportation will be conducted using the best available clean fuel technology. Fuel systems should be updated as required to evolve with best available technologies. Currently clean fuels are likely limited to use of natural gas over diesel. Wasatch Backcountry Alliance's vision would support changes in fuel types as they become feasible.

TRANSIT HUBS

Transit hubs should be established in logical locations including but not limited to:

- Proximal to the base of Little Cottonwood Canyon

- Proximal to the base of Big Cottonwood Canyon
- Proximal to the base of Millcreek Canyon (3900 South)
- Within the boundaries of each Wasatch Front and Back Ski Area (7 total)
- Downtown Salt Lake City
- Salt Lake City International Airport
- Parleys Canyon
- Mountain Dell
- Utah County
- Downtown Park City
- Heber City

Each transit hub should be connected by a well-scheduled system of buses/vans as described above. Each hub should contain sufficient parking based on anticipated future growth. The hubs need to be located at easy to access areas close to the mouth of each canyon (where applicable). These hubs may also include recreation and resort based amenities. One example may include a kiosk for the purchase of lifts tickets which include free transit to the resort.

The use of transit hubs will help reduce the need for additional growth-based parking at the ski resorts. Wasatch Backcountry Alliance does not support increased parking at any of the resorts.

SUPPORT FOR DISPERSED RECREATIONAL USERS

Support for dispersed users is one of the primary criteria for the Wasatch Backcountry Alliance. The transportation system envisioned by Wasatch Backcountry Alliance must provide support for year-round dispersed recreational users. This may include a system of "Flag Stops". This could be conducted with the use of small buses and vans on a semi-regular or demand based schedule. The possibility of calling ahead to arrange these types of stops should be evaluated. Large groups would be able to reserve and travel on customized schedules.

BICYCLES

Wasatch Backcountry Alliance envisions a safe environment for bicycles in the Mountain Accord Study area. Each canyon should contain independent bike lanes and/or paths.

REDUCTION OF CARS IN THE CANYONS

Any transportation plan must include incentives for public transport. This should include providing affordable or free transportation. It is in the best interest of the ski resorts to help fund this program. This will provide for an increase in use during periods where resort use is constrained by on-site parking. Incentives for use of mass-transit would include destination specific express buses (e.g. Brighton or Alta specific routes). This will reduce the transit time and hence provide a more positive experience.

The implementation of a program to reduce car traffic may need to include disincentives for car use. This may include charging a fee (e.g. toll) for automobile traffic. The fee may be structured based on the number of passengers if technology allows. This can be conducted digitally using an EZ Pass type of system. Waivers for low-income populations will need to be evaluated. This program may be initially applied during high-use periods only.

GUARDSMAN PASS ROAD

The Wasatch Backcountry Alliance does not support year-round use of the Guardsman Pass Road for the following reasons:

- The road is not currently designed or suitable for year-round traffic.
- UDOT's middle cost estimate to design, permit, purchase right-of-ways and construct a road suitable for year-round traffic is over 100 million dollars (UDOT, 2014). This cost coupled with annual maintenance, snow removal and avalanche control does not provide a suitable return for taxpayer investment.
- A member of the Wasatch Backcountry Alliance was involved in the construction of the runaway tuck ramp in Ontario Canyon. It is our understanding that the road into Park City (Marsac Avenue) was not designed to accommodate the additional traffic load that would occur if the road was used for year-round traffic between Big Cottonwood Canyon and Park City.
- Parking issues both within avalanche zones and the summit area have not been evaluated. The impacts of dispersed parking need to be fully evaluated.
- Based on data provided by UDOT (2014), time savings by use of the Guardsman Pass Road are only realized for locations within Big Cottonwood and Empire canyons.

MILLCREEK CANYON

Millcreek Canyon needs to be included in all transportation planning.

ADDITIONAL INFRASTRUCTURE IMPROVEMENTS

Wasatch Backcountry Alliance understands that significant improvements will be required to implement an efficient bus-based public transit system. The following infrastructure improvements should be evaluated:

- Increased road width and travel lanes in Parleys, Big Cottonwood and Little Cottonwood canyons need to be evaluated. This could include reversible traffic lanes designed to accommodate peak traffic periods. One option may include limiting canyon roads to one-way traffic during peak loading periods (e.g. weekend mornings from 8.30 am to 9.30 am). The impacts of widening a preexisting road far outweigh those of an additional alignment.
- Underground tunnels may need to be evaluated. However, at this time Wasatch Backcountry Alliance is not able to support an alternative with such a high cost without a detailed justification and a study of all potential environmental impacts.
- Increased parking at the base of each canyon.
- Millcreek Canyon road improvements.
- Additional parking areas as described above with transit hubs. Additional parking areas will need to be evaluated in conjunction with future transportation planning.
- Both passive and active avalanche mitigation. This may range from use of remote controlled equipment such as gazex to snow sheds and bridges. The goal of future avalanche mitigation should be to provide an increase in efficiency and safety for all transportation systems.

The costs and benefits of each improvement must be fully evaluated prior to design and construction.

SUMMARY

The Wasatch Backcountry Alliance is confident that effective year-round transportation systems capable of addressing the needs of all recreational users of the Central Wasatch are possible with careful planning. We feel that well-planned, thoughtful increases in bus/van use and the associated infrastructure are far superior to rail-based systems.



March 13, 2014

Utah Governor Gary Herbert
Utah State Capitol Complex
350 North State Street, Suite 200
Salt Lake City, UT 84114

Dear Governor Herbert,

As exhibitors and participants in the semi-annual Outdoor Retailer Market each of us and the companies we represent extend our gratitude to you and the State of Utah for your warm hospitality and we compliment you on Utah's unparalleled outdoor beauty and recreation amenities. As active participants in the outdoor activities we represent, we are drawn to Utah – and many of us have moved our businesses here – because of the spectacular backcountry recreation opportunities. We appreciate the important balance Utah has achieved between developed and undeveloped recreation.

It is about preserving this balance that we write. In light of recent promotion of the Interconnect proposal to link the seven resorts of the Central Wasatch via ski lifts, we urge you and other state and local leaders to be mindful of the important role backcountry recreation plays in Utah's attractiveness as a winter recreation mecca. We call upon you to lead the way in ensuring the critical balance between resort and backcountry winter recreation opportunities is preserved.

While there may indeed be viable options to connect the Wasatch resorts in a way that maintains the current balance and avoids negative environmental and watershed impacts, any consideration of an Interconnect system should take place within the context of a broad and inclusive public planning process such as the current Mountain Accord initiative. Furthermore, this process must incorporate an overall transportation solution for the Wasatch area.

We also call upon you to listen to the citizens of Utah who overwhelmingly support maintaining the current recreational and environmental balance. As you know, in the 2010 *Wasatch Canyons Tomorrow* report sponsored by the State of Utah, Salt Lake County, and Salt Lake City, 94 percent of Wasatch Front residents supported limiting future resort expansion in a way that it would not infringe on existing winter backcountry ski areas and have little or no effect on environmental resources.

Given the significant growth in backcountry skiing and snowshoeing in the face of declining or flat resort skiing numbers, it is evident that backcountry skiing, snowshoeing, winter mountaineering and other forms of human-powered winter recreation are increasingly important contributors to Utah's economy and quality of life.

Indeed, the future of Utah's recreation and tourist economy may very well lie more in what is protected than in what is developed.

The Wasatch Mountains are an ecological and scenic treasure, a vital source of drinking water, a place to find solitude and respite from the noise and stress of city life and to experience wild open spaces and wilderness on their own terms. Please, be vigilant and wise in preserving this irreplaceable resource not just for today but for future generations.

We, as members of the outdoor recreation industry, look forward to participating in partnership with you and with the Utah ski resort industry, local governments and other stakeholders to ensure recreation and transportation solutions worthy of the splendor of the Wasatch Range.

Sincerely,

Jamie Kent
Board Chair
Wasatch Backcountry Alliance

Mark Menlove
Executive Director
Winter Wildlands Alliance

Peter Metcalf
CEO
Black Diamond, Inc.

Ryan Gellert
Brand President
Black Diamond Equipment

Roody Rasmussen
Senior Vice President
Petzl America, Inc.

Nazz Kurth
President
Petzl America, Inc.

Jill Layfield
CEO
Backcountry.com

David Grissom
Sales & Marketing Manager, Partner
Voile Manufacturing

John Pieper
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Gregory Mountain Products

Mike Hattrup
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Jimmy Wilderman

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Kyle McDonald
Outdoor Empower Network

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Dave Cummings
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Dave Mutert
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Hailey Dahle

Ashley Reefer

Troy Tritscheir

Dustin Woolford

Linda Uhler

Shawn Johnson

Jason Buttrick

Dustin Eroh

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Dale Robotham

Adam Lewis

Kenny Jones

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Sean Goss
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Drew Braithrate
Brandi Schnmac
Matt Haberstock
Meghan Higgins
Andrew Broadbent
Bill Cotton
Mark Ritchie
Vanessa Christie
Tami Fairweather
Nick Hogon
Jennifer Dumas
Andrea Karpinski
Arian Finch
Michelle Devine
Krista Connors
Anne Wiper
Greg Sagon
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Kris Lundstrom
Rachel Metcalf
Roxanne Weppert
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Nathan Koder
Dave Campbell
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Eric Bonin
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Derick Naffsinger
Scot Heistman
Ian Connor
Ben Peters
Margaret Carlson
Jeff Rose
Jill Daller

Peter Brownstein
Sara Malachowski
Robert Bethke
Richard Steiner
Sheila Steiner
Travis Harkness
John Garder
Shareece Pfeiffer
Brittany Jones
Shelley Pursell
George Vargyas

cc: Senator Orrin Hatch
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Congressman Rob Bishop
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Nathan Rafferty, President & CEO - Ski Utah
Mayor Ralph Becker, Salt Lake City
Mayor Ben McAdams, Salt Lake County
Mayor Tom Dolan, Sandy City
Mayor Kelvyn Cullimore, Cottonwood Heights
Mayor Tom Pollard, Town of Alta
Mayor Jack Thomas, Park City
Andy Beerman, Park City Council Member
Dave Whittekiend, Uinta-Wasatch-Cache Forest Supervisor
Cathy Kahlow, Salt Lake District Ranger
Nora Rasure, Intermountain Regional Forester
Gordon Seabury, CEO, Horny Toad
Jenn Mull, CEO, Backwoods