

## **APPENDIX 2H**

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### **Base Station and Bus Stop Modifications from Draft EIS**



# Memo

Date: Wednesday, July 13, 2022

Project: Little Cottonwood Canyon EIS

Preparer: UDOT Department of Transportation

Subject: S.R. 210 EIS – Evaluation of Supplemental Draft EIS – Base Station and Bus Stop Modifications

## Introduction

Following issuance of the Draft Environmental Impact Statement (EIS) and consideration of public comment, the Utah Department of Transportation (UDOT) made changes to certain primary alternatives: Gondola Alternative B, the Cog Rail Alternative, and the enhanced bus service alternatives. The same change was made to both the Gondola Alternative B and Cog Rail Alternative: to eliminate the mobility hubs and instead concentrate parking at the base station near La Caille. For the enhanced bus service alternatives, the change consisted of adjusting the locations of the bus stops at Snowbird and Alta. This memo contains UDOT's assessment of whether these changes would result in significant new environmental impacts that require preparation of a supplemental draft EIS.

## Requirement to Prepare a Supplemental EIS

According to Federal Highway Administration (FHWA) National Environmental Policy Act (NEPA) regulations at 23 Code of Federal Regulations (CFR) Section 771.130:

An EIS must be supplemented whenever the Administration determines that:

- (1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or
- (2) New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.

However, a supplemental EIS will not be necessary where:

- (1) The changes to the proposed action, new information, or new circumstances result in a lessening of adverse environmental impacts evaluated in the EIS without causing other environmental impacts that are significant and were not evaluated in the EIS; or
- (2) The Administration decides to approve an alternative fully evaluated in an approved final EIS but not identified as the preferred alternative. In such a case, a revised ROD [Record of Decision] must be prepared and circulated in accordance with § 771.127(b).

According to FHWA NEPA guidance:

Whenever there are changes, new information, or further developments on a project which result in significant environmental impacts not identified in the most recently distributed version of the draft or final EIS, a supplemental EIS is necessary (40 CFR 1502.9(c)). If it is determined that the changes or new information do not result in new or different significant environmental impacts, the FHWA Division Administrator should document the determination. (After final EIS approval, this documentation could take the form of notation to the files; for a draft EIS, this documentation could be a discussion in the final EIS.)<sup>1</sup>

Based on this FHWA guidance, UDOT provides the discussion below, which will be included in the Final EIS.

## Changes to the Gondola Alternative B and Cog Rail Alternative Base Stations

Between the release of the Draft and Final EISs, changes were made to the Gondola Alternative B and Cog Rail Alternative base stations, based on public comment that having to park a portion of transit riders at mobility hubs and use buses to transfer them to the base station would make the service less attractive because of mode transfers and longer travel times, thereby undermining the goal of reducing the number of vehicles using State Route (S.R.) 210 in Little Cottonwood Canyon.

To improve travel times and user convenience, UDOT increased the number of parking spaces at the gondola base station and the cog rail base station from 1,500 to 2,500, which would eliminate the bus-to-gondola or bus-to-cog rail mode change, thereby reducing travel time, and increasing traveler convenience. With the additional parking spaces, there would be no need for mobility hubs at the gravel pit or at 9400 South and Highland Drive. All gondola or cog rail users would drive directly to the base station without needing to take a bus from a mobility hub. To facilitate better traffic movement to the higher-capacity parking structure, UDOT also added a new one-way access road from Wasatch Boulevard about 2,500 feet north of the Wasatch Boulevard/S.R. 209 intersection (about 650 feet north of the La Caille restaurant entrance) to the base station designs that were considered in the Draft EIS.

UDOT determined that the refinements to Gondola Alternative B and the Cog Rail Alternative made for the Final EIS would not cause new or different significant environmental impacts from those analyzed in the Draft EIS, and thus no supplementation is required, as follows:

- The 2,500-space parking structure would be in the same location with the same general footprint as the 1,500-space parking structure analyzed in the Draft EIS, but it would likely include two additional levels. The structure overall would look and operate similarly to what was described in the Draft EIS.
- The additional access road is a 12-foot-wide, one-way road, in a future planned development, that would provide another access to the parking structure. This access road is designed to improve traffic flow and reduce potential congestion around the base station.

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<sup>1</sup> See FHWA Technical Advisory T 6640.8A, *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (October 30, 1987), Section XII.

The access road is similar to other access roads from North Little Cottonwood Road to the parking structure considered in the Draft EIS.

- Eliminating the bus service and mobility hubs would reduce air pollutant emissions associated with the bus terminals and construction-related impacts from the mobility hubs.
- Eliminating the mobility hub at 9400 South and Highland Drive would lessen noise, lighting, traffic, and visual impacts to an existing residential area adjacent to the proposed parking structure at that location.
- Traffic analysis in the Draft EIS for Gondola Alternative B and the Cog Rail Alternative concluded that a 1,500-space base station parking structure would not cause congestion on S.R. 210 during the peak hours of 7 AM to 10 AM.<sup>2</sup> That analysis assumed that all drivers who intended to use Gondola Alternative B or the Cog Rail Alternative would gravitate first to the base station parking lot, and that drivers would resort to the less-convenient mobility hubs only when the 1,500 spaces were full. Increasing the size of the parking structure to 2,500 parking spaces means that those later arrivals could park at the base station, but it would not increase peak-hour traffic and associated congestion; that is, the same number of vehicles are expected to travel to the parking structure during the peak period. Increasing the size of the parking structure to 2,500 parking spaces would allow personal vehicles in the off-peak time to drive directly to the base station without using off-site mobility hubs and buses. In addition, implementing the new one-way access road would further reduce traffic congestion on S.R. 210 by having an additional entrance into the parking structure. Traffic modeling showed that the new access would not substantially increase traffic on Wasatch Boulevard between its intersections with North Little Cottonwood Road and S.R. 209 (Fehr & Peers 2022).
- The one-way access road would not result in exceedances of UDOT's noise-abatement criteria, and it would not cause increased air pollutant emissions (see the Gondola Alternative B analysis in Section 10.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 10, *Air Quality*, and Section 11.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 11, *Noise*, of the Final EIS).
- The one-way access road would not result in any impacts to cultural resources, wildlife habitat, wetlands, or water quality (see the Gondola Alternative B analysis in Section 12.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 12, *Water Quality*; Section 13.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 13, *Ecosystem Resources*; and Section 15.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 15, *Cultural Resources*, of the Final EIS).
- The amount of additional disturbance for the access road would be approximately 3 acres, which is not a significant increase in impervious area over the approximately 20 acres disturbed by the base stations without the road. Road runoff would be managed with a stormwater collection system (see Section 12.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 12, *Water Resources*, of the Final EIS).

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<sup>2</sup> See Section 7.4.5.2, *S.R.210 – North Little Cottonwood Road to Alta*, in Chapter 7, *Traffic and Transportation*, of the Final EIS.

- The taller parking structure would be more visible to area residents and users of S.R. 210 but would not change the conclusion of the analysis in the Draft EIS, which determined that the parking structure would have a high level of visual impact, which is the highest impact rating. The analysis stated that project elements, such as the gondola base station and towers, would introduce elements and/or patterns that would be visually dominant and would create strong contrast compared with other features in the landscape (see Section 17.4.6.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 17, *Visual Resources*, of the Final EIS). Although the taller structure would be more prominent, the impacts would not be substantially different than what was evaluated in the Draft EIS. It would not substantially obstruct views of the surrounding mountains from nearby residences or vehicles on S.R. 210, and the setting change associated with the parking structure would be substantially the same as evaluated in the Draft EIS, that being the introduction of a parking structure into the viewshed. Viewers would see more of the top two tiers of the structure instead of the top parking deck (see Visual Simulation for Key Observation Point 20 in Appendix 17A, *Key Observation Points for the Enhanced Bus Service and Gondola Alternatives*, of the Final EIS). With a 2,500-space parking structure, the analysis and conclusion are the same, and thus the taller structure would not result in a new significant visual impact.

In sum, UDOT determined that the impacts associated with the modifications to Gondola Alternative B and the Cog Rail Alternative, as described above, are not significant. The Gondola Alternative B and the Cog Rail Alternative described in the Final EIS are minor variations from the alternatives evaluated in the Draft EIS. In addition, because the modifications would not introduce any new modes, elements, or approaches (for example, both Gondola Alternative B and the Cog Rail Alternative as described in the Draft EIS included a parking structure with access roads, and the modification merely adds to the capacity of that structure and an additional access road), UDOT determined that Gondola Alternative B and the Cog Rail Alternative, as modified for the Final EIS, were qualitatively within the spectrum of alternatives considered in the Draft EIS. See *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations* ("Forty Questions"), 46 Federal Register 18026 (March 23, 1981), Question and Answer No. 29b.

Therefore, a supplemental draft EIS was not required.

## Changes to Enhanced Bus Service Alternatives Resort Bus Stops

Between the release of the Draft and Final EISs, UDOT changed the locations of the bus stops at the Snowbird and Alta resorts with the enhanced bus service alternatives. In the Draft EIS, the Snowbird Resort bus stop was located on the Alta Bypass Road, and the Alta Resort bus stop was located at their Wildcat parking lot. To better facilitate bus movement and avoid potential congestion, the Snowbird bus stop would be located at a parking area at Entry 1 near the Creekside building, and the Alta bus stop would be located on the south side of S.R. 210 between the Alta Lodge and Alta's Rustler Lodge at the same location as the existing uphill bus stop. The ski resort bus stops at the changed locations are analyzed as part of the enhanced bus service alternatives in the Final EIS.

- The Snowbird Resort bus stop was moved to the location of an existing paved bus stop near the Creekside day-use facility and just south of S.R. 210 (see Figure 2.6-2, *Enhanced Bus Service Alternative – Snowbird Bus Stop*, in Chapter 2, *Alternatives*, of the Final EIS). Most of the bus stop would be located in the currently paved area, and the remainder would be in

an adjacent, previously disturbed forested area causing about 1 acre of new disturbance. This location has minimal habitat value and is farther from Little Cottonwood Creek than the prior location (245 feet away versus 75 feet in the Draft EIS). Siting the bus stop at this new location has the potential to reduce water quality runoff to the creek during construction. There would be no other new or different environmental impacts from the changed location.

- In discussions with the Town of Alta, Alta Ski Resort, and the Utah Transit Authority (UTA), UDOT moved the Alta resort bus stop from the existing Wildcat parking lot at the Alta Ski Resort to the south side of S.R. 210 between the Alta Lodge and Alta's Rustler Lodge at the location of an existing uphill bus stop on an old mine dump (see Figure 2.6-3, *Enhanced Bus Service Alternative – Alta Bus Stop*, in Chapter 2, *Alternatives*, of the Final EIS). The bus stop would cover about an acre of land that contains little vegetation with minimal habitat value and was heavily disturbed by past mining and construction. The new Alta bus stop would be located within the Town of Alta archeological site (42SL52, which is 79.8 acres) and would disturb about 1 acre, resulting in an adverse effect on this site from the enhanced bus service alternatives. UDOT is proposing data recovery and construction monitoring as mitigation for the impact, which would be incorporated into a memorandum of agreement with the State Historic Preservation Office. The site is exempt from Section 4(f) protections because it has minimal value for protection in place. See Section 15.4.3, *Enhanced Bus Service Alternative*, in Chapter 15, *Cultural Resources*, of the Final EIS. The bus stop would be located on USDA Forest Service lands in the town of Alta and would be consistent with relevant land use planning. It would fit within the current transportation infrastructure and ski-related facilities (hotels, restaurants, and lifts). The Town of Alta General Plan (2016) states that this area should support commercial development and that the Town should encourage improved multimodal connections among winter and summer destinations in Alta (see Section 3.4.3.2, *S.R. 210 – North Little Cottonwood Road to Alta*, in Chapter 3, *Land Use*, of the Final EIS). There would be no other new or different environmental impacts from the changed location.

UDOT determined that the environmental impacts resulting from the changed location of the resort bus stops, as described above, are not significant. The enhanced bus service alternatives described in the Final EIS are minor variations of the enhanced bus service alternatives evaluated in the Draft EIS. In addition, because the bus stop modifications would not introduce any new modes, elements, or approaches (only the locations of the bus stops would change), UDOT determined that the enhanced bus service alternatives, as modified in the Final EIS, were qualitatively within the spectrum of alternatives considered in the Draft EIS. See *Forty Questions*, Question and Answer No. 29b. Therefore, preparation of a supplemental draft EIS was not required.

## Public Review and Comment

In determining that a supplemental draft EIS is not required for the changes describe above, UDOT also considered that the Final EIS will be subject to a 45-day public review and comment period. A primary purpose of EIS supplementation is to provide an opportunity for public review and comment, and for agency consideration of public input, prior to an agency decision. UDOT is providing a 45-day review and comment period on the Final EIS and thus will have the benefit of any public input on the impacts of the changes to the base station parking and the resort bus stops prior to making a decision regarding the project in the Record of Decision.

## References

### Fehr & Peers

2022 Gondola Base Station Traffic Analysis – La Caille Access Road. February 3.

### Town of Alta

2016 Town of Alta General Plan.