Little Cottonwood Canyon ENVIRONMENTAL IMPACT STATEMENT
S.R. 210 | Wasatch Blvd. to Alta

# APPENDIX 32B

## Reproductions of Comments on the Draft EIS

Comments 13336–13443

**COMMENT #:** 13336
**DATE:** 8/4/21 3:20 PM
**SOURCE:** Email
**NAME:** Courtney Hoover (National Park Service)

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**COMMENT:**

Hello, please see the attachment for comments on the Little Cottonwood Canyon Project.

If you have any questions for National Park Service, or U.S. Geological Survey, please contact the POCs listed in the letter. If you have any questions for DOI, please let me know.

Thank you,

-Courtney

# United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 53
Post Office Box 25207
Denver, Colorado 80225-0007

ER21/0248 August 3, 2021

Josh Van Jura
Utah Dept. of Transportation

Subject: Comments on Draft Environmental Impact Statement, Little Cottonwood Canyon Wasatch Boulevard to Alta, Salt Lake City, Utah

Dear Mr. Van Jura,

The U.S. Department of the Interior (Department), has reviewed the Utah Department of Transportation Draft Environmental Impact statement (DEIS) and Section 4(f) for the transportation improvement project in Little Cottonwood Canyon in Utah. Utah Department of Transportation is considering these three main alternatives for the improvement project: enhanced Bus Service with No Widening of S.R. 210 in Little Cottonwood Canyon, enhanced Bus Service in Peak-period Shoulder Lanes on S.R. 210 in Little Cottonwood Canyon, and use of a gondola.

National Park Service (NPS) 4(f) and 6(f) comments

We understand the purpose of the project seeks to provide an integrated transportation system that improves use and safety for users of SR-210 from Fort Union Boulevard to the town of Alta, UT, with five alternatives including enhanced Bus Service, Peak-Period Shoulder Lanes, Cog Rail, and Gondola Alternatives A and B to improve safety, travel time, and mobility. Actions include lane expansion and stabilization and additional infrastructure for commercial transportation and avalanche control. The proposed action alternatives are analyzed in an Individual Section 4(f) Evaluation.

The Department concurs with the individual Section 4(f) Evaluation that there are no prudent and feasible avoidance alternatives for Section 4(f) use of the historic properties noted, and that UDOT and the U.S. Department of Agriculture (USDA) Forest Service (FS) have adequately planned to minimize harm to the Section 4(f) property. The Department concurs that the 4(f) evaluation describes the affected Section 4(f) resources, including properties that are listed or eligible for listing in the National Register of Historic Places (NRHP). As noted in Appendix 15B, the project will result in an Adverse Effect to Historic Properties. Contingent upon an executed Memorandum of Agreement with the UT State Historic Preservation Office (SHPO), the Department has no objection to Section 4(f) approval of this project.

32.26A

While 6(f) properties are located within the project area, there are no anticipated impacts to 6(f) properties by this project.

The Department has a continuing interest in working with UDOT to ensure that impacts to resources of concern to the Department are addressed. For matters related to NPS comments, please coordinate with Karen Skaar, NEPA Specialist, National Park Service Region Serving Department of Interior Regions 6, 7, and 8 at 303-349-4160 or karen_skaar@nps.gov

U.S. Geological Survey (USGS) Comments

USGS' comments are intended to inform readers of documentation for a water-quality model cited within the DEIS. Chapter 12 (water resources) of the DEIS mentions a USGS water-quality model, done in cooperation with the Federal Highway Administration, called the Stochastic Empirical Loading and Dilution Model (SELDM), but does not provide the appropriate citation for the model. The model is referred to in this chapter of the DEIS as the "USGS Model." The following sentence from pages 12-15 of Chapter 12 indicates the model reference provided in the DEIS: 32.12G

> "UDOT used a water quality model (the Stochastic Empirical Loading and Dilution Model or the USGS Model), which was developed by the U.S., Geological Sur vey (USGS) in cooperation with the Federal highway Administration, to estimate the water quality effects of the project alternatives on Little cottonwood Creek."

The suggested citation to this USGS model is the following:

> Granati, G.E., 2021. Stochastic Empirical Loading and Dilution Model (SELDM) software archive: U.S. Geological Survey software release, https://doi.org/10.5066/P9PYG7T5.

The USGS hopes you consider making this improvement in the final environmental impact statement. For questions about this comment, please contact William Guertal, Deputy Associate director, Water Mission Area, USGS, at [redacted].

If you have any questions for the Department, please contact me at [redacted] or [redacted].

Sincerely,

Courtney L Hoover

Courtney Hoover
Regional Environmental Officer
Office of Environmental Policy and Compliance

**COMMENT #:** 13337
**DATE:** 8/18/21 7:29 AM
**SOURCE:** Email
**NAME:** Lance Kovel

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**COMMENT:**

Josh,

Please see the attached letter from the Acting Forest Supervisor, Chad Hudson, indicating that the Forest Service has no additional comments on the LCC DEIS at this time.

Please do not hesitate to contact me with any questions.

USDA United States Department of Agriculture | Forest Service | Uinta-Wasatch-Cache National Forest Supervisor's Office | 857 West South Jordan Parkway South Jordan, UT 84095 801-999-2103 Fax: 801-253-8118

**File Code:** 1950; 2330
**Date:** August 12, 2021

Mr. Josh Van Jura
Little Cottonwood Canyon EIS Project Manager
Utah Department of Transportation
PO Box 141245
Salt Lake City, UT 84114-1245

Dear Josh,

As you are aware, the USDA Forest Service has worked closely with UDOT as a cooperating agency during the development of the Little Cottonwood Canyon Environmental Impact Statement, specifically as it pertains to National Forest System lands and resources in the canyon. The Forest Service had an interdisciplinary team of specialists perform a technical peer review of the Draft Environmental Impact Statement, and it appears that UDOT has adequately addressed the Forest Service comments in the released draft document. Therefore, the Forest Service has no additional comments at this time.

The Forest Service is looking forward to reviewing the formal public comments on the Draft Environmental Impact Statement to better inform potential future Forest Service decisions. We appreciate the opportunity to participate as a cooperating agency on this project and look forward to our continued partnership managing transportation on National Forest System lands in Utah.

Please continue to coordinate with our UDOT Liaison, Mr. Lance Kovel, on this project.

Sincerely,

CHAD HUDSON
Digitally signed by CHAD HUDSON
Date: 2021.08.12 13:30:24 -06'00'

CHAD HUDSON
Deputy Forest Supervisor

Caring for the Land and Serving People

Printed on Recycled Paper

**COMMENT #:** 13338
**DATE:** 8/30/21 6:39 PM
**SOURCE:** Email
**NAME:** Michael DeVries

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**COMMENT:**

Please see the attached comments from the Metropolitan Water District of Salt Lake & Sandy regarding the LCC Draft EIS.

Please contact me with any questions.

Thanks,

Michael J. DeVries
General Manager
Metropolitan Water District of Salt Lake & Sandy

*Metropolitan Water District of Salt Lake & Sandy*
3430 East Danish Road, Cottonwood Heights, UT 84093
Phone: 801-942-1391 Fax: 801-942-3674
www.mwdsls.org

August 30, 2021

Little Cottonwood Canyon EIS c/o HDR
2825 E. Cottonwood Parkway, Suite 200
Salt Lake City, UT 84121-7077
littlecottonwoodeis@utah.gov

**Subject: Comments for the Little Cottonwood Canyon Draft EIS**

To Whom It May Concern,

This letter transmits comments from Metropolitan Water District of Salt Lake & Sandy (MWDSLS) in response to the *Draft Little Cottonwood Canyon Environmental Impact Statement, S.R. 210 – Wasatch Boulevard to Alta* (LCC EIS). This letter also expresses MWDSLS support for Salt Lake City Department of Public Utilities' and Sandy City's comments on the LCC EIS.

As a wholesale provider of drinking water, MWDSLS treats and delivers Little Cottonwood Creek water to Salt Lake City, Sandy City, and Jordan Valley Water Conservancy District. This water is then delivered within the respective service areas of these entities, with the potential to be conveyed to over one million people in the Salt Lake Valley. Source water protection of Little Cottonwood Creek is essential to the public health of nearly the entire Salt Lake Valley.

MWDSLS supports improving the safety and reliability of transportation in the canyon and understands that improving the safety and reliability of transportation in the canyon can improve the safety and reliability of Little Cottonwood Creek as a drinking water source. However, MWDSLS also has concerns that transportation improvements can negatively affect drinking water quality by changing physical aspects of the watershed, increasing recreational usage, and adding developmental pressure. MWDSLS's desire when considering the alternatives presented in the LCC EIS is to ensure that the safety and reliability of drinking water is adequately addressed along with the safety and reliability of transportation. MWDSLS is concerned that short term impacts to water quality, like significant increases in turbidity, could result in the need to stop treating and delivering water. MWDSLS is also concerned that a long term increase in pollutants and pathogens could require expensive changes or upgrades to the water treatment process to accommodate the increase in pollution.

32.12A, 32.12B, 32.20A, 32.20C, 32.20E

32.12J

From the beginning of the EIS process, MWDSLS has submitted comments urging UDOT to consider source water protection and drinking water quality as part of the process for developing and selecting alternatives. Despite these requests, source protection and drinking water quality were not added to the Screening Methodology used during the process. As a result, MWDSLS has concerns that the transportation alternatives could impact drinking water through increased visitation, usage, and development that will likely result from implementation of the preferred alternatives.

32.2.2UUU

32.12A, 32.12B, 32.20A, 32.20C, 32.20E

*Metropolitan Water District of Salt Lake & Sandy*
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While the LCC EIS document has addressed some aspects of the risk to water quality with the modelling that was completed, MWDSLS does not feel that indirect and cumulative impacts from increased visitation, recreational use, and development pressure have been adequately addressed. This is a direct result of UDOT's previously mentioned unwillingness to add drinking water quality to the Screening Methodology used to identify alternatives. A specific frustration is the statement in the LCC EIS document that alternatives will "…have de minimis impacts to Little Cottonwood Creek as a primary drinking water source". While this statement about de minimis impacts may be true regarding Clean Water Act Standards, these standards are far less comprehensive than the Safe Drinking Water Act Standards that MWDSLS is required to meet. Making this statement suggests that MWDSLS's ability to reliably and safely provide water will not be impacted; however, impacts to drinking water cannot be adequately assessed by only considering Clean Water Act Standards.

32.20A, 32.20C, 32.20E 32.2.2UUU

Another concern about the LCC EIS document is that it links transportation improvements to the Mountain Accord suggesting that the LCC EIS document is in alignment with the Mountain Accord process. The problem with this suggestion is that it leaves out important aspects of the Mountain Accord process such as a visitor capacity study and land conservation efforts that were to take place in conjunction with transportation improvements. The LCC EIS document should be clear that it does not include either of these important aspects.

32.12K

Another concern from the LCC EIS document is that the least impactful alternative, the enhanced bus option, was not one of the preferred alternatives. This alternative has the least amount of increase to impervious surfaces and does not add a completely new mode of transportation that may attract a lot more visitors based on the novelty of the concept. Combined with tolling, the enhanced bus option could reduce the number of private vehicles travelling in the canyon. Additionally, with the enhanced bus option, other transportation improvements could be implemented later, following more in depth study, more implementation of conservation efforts, and completion of a visitor capacity study. One of the concerns about the gondola method specifically is that, while it may be more reliable in avalanche conditions, there are too many transfers required and it will be too inconvenient for people to use consistently. While MWDSLS is not specifically advocating to implement the advanced bus option, MWDSLS feels this option poses the least amount of risk to its ability to provide safe water to its customers.

32.20B, 32.29F

32.2.9A

32.2.4A, 32.1.2D

32.29R, 32.20B 32.2.6.5II, 32.2.6.5J 32.2.9A

MWDSLS appreciates the opportunity to work with UDOT throughout the EIS process and looks forward to continuing to work together in the future no matter the outcome of the EIS process because MWDSLS recognizes that such partnerships are key to ensuring protection of the watershed, water quality, and public health. Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Michael J. DeVries
MWDSLS General Manager

*Metropolitan Water District of Salt Lake & Sandy*
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Phone: 801-942-1391 Fax: 801-942-3674
www.mwdsls.org

CC: Vince Izzo, HDR [redacted]

**COMMENT #:** 13339
**DATE:** 8/31/21 5:27 PM
**SOURCE:** Email
**NAME:** Laura Briefer

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**COMMENT:**

Good afternoon Josh and Vince,

Attached please find Salt Lake City's comments pertaining to the Little Cottonwood Canyon Draft Environmental Impact Statement. Please let me know if submitting comments via email is appropriate ‚Äì the submittal form on the website does not appear to allow for us to attach a file. I hope you both are doing well.

Thank you,

Laura Briefer, MPA

ERIN MENDENHALL
*Mayor*

DEPARTMENT OF
PUBLIC UTILITIES

August 30, 2021

Utah Department of Transportation (UDOT)
Little Cottonwood EIS
c/o HDR
2825 E. Cottonwood Parkway, Suite 200
Cottonwood Heights, Utah 84121

**Re: *Little Cottonwood Canyon Draft Environmental Impact Statement***
***Salt Lake City Comments***

Dear UDOT Project Team:

Thank you for providing Salt Lake City Municipal Corporation (Salt Lake City, or the City) the opportunity to participate as a Cooperating Agency through the development of the *Little Cottonwood Canyon Draft Environmental Impact Statement, S.R. 210 – Wasatch Boulevard to Alta*, dated June 2021 (LCC DEIS or DEIS). The UDOT Project Team and Salt Lake City representatives together spent countless hours in meetings and in developing and reviewing information. We are grateful for the time and commitment given by the UDOT Project Team and our Salt Lake City staff to the LCC DEIS process.

Salt Lake City has invested significant time and resources for more than a century in the protection of its water supplies and environment in Little Cottonwood Canyon and other nearby watersheds. We continue to extensively collaborate with many stakeholders to achieve these protections. In addition, the City played a significant role in Mountain Accord, now serving on the board of the Central Wasatch Commission and many of its subcommittees. It is Salt Lake City's obligation to ensure the provision of clean and reliable drinking water to the public that guides our participation in the DEIS process and the comments presented herein.

Based on our analysis of the LCC DEIS, we have significant concerns with the two preferred alternatives and shortcomings in the development of the LCC DEIS in failing to meet the required standards of the National Environmental Policy Act (NEPA). The City's concerns for the two preferred alternatives include, but are not limited to, impacts to the watershed and water resources, costs of the project, equity, and environmental justice. The majority of our concerns have been stated previously in our Cooperating Agency comments, thus we incorporate by reference our previous comments regarding the LCC DEIS submitted to UDOT (attached). We feel there are multiple deficiencies in the DEIS pursuant to NEPA. These include deficiencies in the LCC DEIS purpose and need, scope. In addition, there is an inadequate analysis of connected actions, cumulative impacts, direct impacts, and indirect impacts.

32.12A, 32.12B, 32.1.2B, 32.5A

We recognize the significant traffic congestion and safety concerns on some days during the winter season as our growing population seeks to access the world-class ski resorts and dispersed recreation in Little Cottonwood Canyon. However, we believe that the large-scale development associated with the DEIS preferred alternatives within the watershed will unnecessarily place the Little Cottonwood water resources at risk, which is relied upon by many businesses, residents, and visitors to Salt Lake County.

Rather than implement large-scale transportation development in the Little Cottonwood watershed, Salt Lake City encourages UDOT to make more immediate investments into a phased approach that could entail

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the establishment of transit sites, expanded and improved bus service, traffic demand strategies, and carpooling. This would provide an opportunity to study how these changes affect visitation patterns, natural resource impacts, and canyon capacity, including whether these strategies could exacerbate or alleviate transportation and natural resource issues in Big Cottonwood Canyon at the same time. This approach would better align with concurrent and integrated adaptive management of transportation and natural resources as our agencies continue to respond to pressures such as population growth and persistent drought. It would also provide an approach that would better protect the Little Cottonwood water resources. It is our hope and vision that UDOT and Salt Lake City could be partners in protecting the watershed while improving transportation conditions in the canyon.

32.29R, 32.2.9A, 32.2.4A 32.20B 32.20D, 32.1.1A

**Water Supply Nexus to the LCC DEIS**

The mountains and streams of the Central Wasatch Mountains provide high-quality drinking water sources for more than 360,000 people within the City's service area for its public water supply. The City's service area includes all of Salt Lake City, and portions of Mill Creek, Holladay, Cottonwood Heights, Midvale, Murray, and South Salt Lake, all within Salt Lake County. The City's most recent Water Supply and Demand planning through the year 2060 includes projected population growth in our service area, the new State Correctional Facility in the City's Northwest Quadrant, and the industrial zoning within the new Inland Port. The planning effort shows that by 2060 Salt Lake City's water resources will not support the projected growth in our service area without significantly more water conservation by our community members. This assumes the City can continue to rely on all of its existing water resources, including Little Cottonwood Creek.

The City's water supply planning additionally documents the threats and risks to the reliability of its water resources. The most significant risks to the water resources in Little Cottonwood and other nearby watersheds include overuse and increasing development of the watershed, which are greatly exacerbated by the impacts of climate change, including drought and wildfire. The reliance on current and future water supplies by more than 360,000 people underscore the necessity of careful alignment between transportation development and water resource protection. The City is concerned that the magnitude of transportation development and likely resulting increase of recreational and development pressures in the watershed associated with the DEIS' preferred alternatives will increase the risk of degradation of the City's water resources and reduce the ability of the public to rely upon their drinking water supply.

32.12A, 32.12B, 32.20A, 32.20C, 32.20F

It should be noted that the residents and businesses in Little Cottonwood Canyon are not within Salt Lake City's water service area, but they do rely upon Salt Lake City's water resources. The Town of Alta, Service Area #3, Alta Ski Lifts Co., Snowbird Ski and Summer Resort, and the United States Forest Service all rely upon the City's water resources in the canyon via water supply contracts that are based on the City's water rights, and would also be affected should the water resources become degraded.

For 174 years, Salt Lake City has developed, through the rates and taxes paid by its residents, an extensive water treatment and distribution system that encompasses more than 141 square miles within Salt Lake County. This includes the Little Cottonwood Water Treatment Facility that treats the City's water by the Metropolitan Water District of Salt Lake and Sandy (MWDSLS). The City's residents pay property tax and water rates to support MWDSLS capital and operational costs. The City has also acquired substantial water rights over the last century, and pursuant to state statutes maintains those water rights for the beneficial use of the residents of the City's water service area. Salt Lake City holds water rights to about 70% of Little Cottonwood Creek, while Sandy City, as a public water provider, holds water rights to about 30% of the stream. The City's water infrastructure investment and assets are valued in the hundreds of millions of dollars. Salt Lake City's investments in water resources and infrastructure rely upon its ability to effectively treat and convey the water emanating from Little Cottonwood Canyon and the other nearby watersheds.

A large percentage of Little Cottonwood Canyon and nearby watersheds are comprised of lands owned and managed by the United States Forest Service (USFS). Because the City recognized since the 19th Century the connection between watershed protection and clean and reliable water, the City and the State of Utah petitioned the federal government to create the Wasatch Forest Reserve, which was established in the early 1900s. Federal legislation enacted in 1914 and 1934 continues to direct the USFS to manage the federal lands within these watersheds in a manner consistent with the protection of the City's drinking water supply. Now called the Uinta-Wasatch-Cache National Forest, the main management goal for Little Cottonwood Canyon and the other municipal watersheds to this day remains the protection of culinary water supply (see the current Wasatch-Cache Forest Plan, 2003).

For over a century, the protection of the watershed has allowed clean water from Little Cottonwood Canyon to be provided to residents and businesses in Salt Lake County. The LCC DEIS falls short in recognizing the importance of protecting the watershed and analyzing the impacts of the two preferred alternatives to the City's water resources, both of which put the Little Cottonwood Canyon watershed and water resources at significant risk.

32.12A
32.12B

## Deficiencies of LCC EIS NEPA Process

### *A. Purpose and Need*

The City is concerned that the Purpose and Need of the LCC DEIS is too narrow. The City recognizes that UDOT is a transportation agency. However, UDOT and other state representatives participated in Mountain Accord and are aware of the suite of connected actions from that envisioning process. The purpose and need should have reflected Mountain Accord's vision for the Wasatch and the connected actions.

32.1.2G

The preferred alternatives do not fit the stated purpose. The stated purpose is to "substantially improve roadway safety, reliability, and mobility on SR 210 from Fort Union Blvd through the Town of Alta for all users on SR 210." The preferred alternatives, with no stops except at the resorts, do not address safety, reliability, and mobility for all users, only a select group of users: skiers and snowboarders at two resorts.

32.1.2B, 32.1.2D, 32.2.7A, 32.7B, 32.7C
32.1.1A, 32.1.1C

In addition, the problems the preferred alternatives are trying to solve are too narrowly defined so as to limit the range of alternatives. Thus, the LCC DEIS misses opportunities to solve problems and address impacts in other canyons and elsewhere, such as Big Cottonwood Canyon (BCC). According to the LCC DEIS, the primary objective is to identify a transportation system that could solve what is essentially a traffic congestion problem several days a year each winter. In an effort to solve that problem, the DEIS analyzed a variety of systems based on how well each system meets the purpose and need elements of "mobility, reliability and safety," while achieving the ultimate goal of a "stable flow of traffic." The Purpose and Need states the need to also solve the issue of limited parking at trailheads and ski areas, along with decreasing mobility on Wasatch Boulevard resulting from commuter traffic (Section 1.2.2). It is not adequately explained how the Gondola B preferred alternative will address these and other deficiencies that occur on S.R. 210, especially as the Gondola stops only at the two resorts. Further, the LCC DEIS indicates the preferred alternatives will also benefit traffic in the neighborhoods around the mouth of the canyons. However, the preferred alternatives each require that people drive through these same neighborhoods to transit modules at the base of the canyons.

32.1.4D
32.1.2B
32.7B, 32.7D
32.2.4A,
32.2.6.2.1C,
32.2.6.5E

### *B. Scope*

The analysis of the two preferred alternatives does not incorporate the summer impacts to the watershed, as summer use is outside the purpose and need and scope of this project. This is critically important because of the significant growth of summer use of all the canyons along the Wasatch. This DEIS has not been structured to contemplate and analyze cumulative, direct, and indirect impacts of summer use of any of the preferred alternatives. Pollutants introduced into the Little Cottonwood Canyon watershed can be found in the nearby water treatment plant in minutes, which demonstrates the importance of fully evaluating the impacts of both winter and summer use resulting from the two preferred alternatives. UDOT has focused

32.12A, 32.12B,
32.20A
32.1.5L
32.20A

solely on winter considerations throughout the entire process. Further, the Gondola B preferred alternative is outside the geographic scope of the LCC DEIS and impacts have not been sufficiently analyzed. Please reference the City's previous comments submitted.

32.1.2C, 32.1.5L
32.1.5C

*C. Legal Obligations*

Salt Lake City is legally bound by state and federal regulations to provide clean, safe water and to protect public health. The City must comply with requirements promulgated through federal and state water quality statutes, including the Safe Drinking Water Act (SDWA) and Clean Water Act (CWA). As a Public Water System (PWS), the City must meet regulatory obligations requiring the protection of drinking water sources as critical to safeguarding public health. The City is subject to the state SDWA requirements and Administrative Rules regulating Public Water Systems. The preferred alternatives will make it more difficult for the City to meet these obligations. The DEIS does not analyze the alternatives' impacts on the City's ability to comply with these water quality mandates.

32.12A, 32.12B,
32.12K

Further, the City remains concerned that UDOT did not include the legal obligations of the City and water resources and quality as a level 1 screening criteria. We remain concerned because the preferred alternatives induce increased visitation pressure within the watershed without analysis of how this growth will be accommodated or mitigated. The City has seen increased visitation in the past that has negatively impacted water resources due to sanitation, erosion, and infrastructure impacts. As water resources and quality are not a level 1 screening criteria, the alternatives are not measured against the ability of entities to avoid, manage for, and mitigate impacts. Due to the heavy public reliance on Little Cottonwood Creek as well as other watersheds for drinking water purposes, the importance of water resources and quality should have much greater weight in the DEIS process.

32.1.2F, 32.2.2UUU
32.20A, 32.20C

The City emphasizes that water resources and quality should be considered a primary metric for the preferred alternatives analyzed, as well as our legal commitments and responsibilities. Due to these responsibilities, the City necessarily prioritizes water quality and views both proposed alternatives through this lens. We ask you please reference previous comments submitted.

32.1.2F, 32.2.2UUU

*D. Connected Actions*

The LCC DEIS does not thoroughly address connected actions of the preferred alternatives, thus does not meet the rigor of the NEPA Process. Unanalyzed connected actions include Amending the 2003 Forest Plan to accommodate the preferred alternatives and increased bus service caused by the inevitable spillover from Little Cottonwood Canyon if the preferred alternatives are implemented.

32.28G, 32.20D,
32.20I

*E. Direct Impacts*

As stated in previous comments, both proposed alternatives will have direct impacts on water resources, the environment, and equity and fairness. Further, we feel the direct impacts were not adequately studied per the NEPA process, especially for the Gondola B preferred alternative. Please reference previous comments submitted.

32.12A, 32.12B,
32.5A, 32.13A,
32.13B

*F. Water Quality Impact Analysis (Chapter 12)*

The SELDM water quality model used in the DEIS unevenly compares alternatives as this model relies on stormwater quality data collected from roadways and is adequate for roadway water quality impact analysis. It is not adequate for a Gondola B alternative. Gondolas are not roadways and produce different impacts. As analyzed, the gondola relies on infrastructure located in close proximity to the creek (Snowbird gondola station) or potential wetlands (Tower 19, Alta gondola station.) The SELDM model does not incorporate any potential impacts to these as it relies on runoff data from pavement. Both the SELDM model and the lack of further water quality analysis (spills, accidents, concentration of new industrialized uses, etc.) are

32.12L

inadequate and do not encompass all potential impacts of either proposed alternative. Please reference previous comments submitted.

*G. Cumulative Impacts*

The LCC DEIS does not thoroughly address cumulative impacts of the preferred alternatives, thus does not meet the requirements of NEPA. The LCC DEIS does not address the overloading of the canyon and the natural capacity of the canyon. The analysis of impacts to water resources, for example, focuses on whether the alternatives will cause water quality exceedances or impact waters of the United States, specifically technical violations. It does not address canyon capacity. Currently, the use and visitation in the canyon are naturally limited due to the amount of parking available. The alternatives could lead to the overuse of the canyon as they will likely contribute more people into the canyon at an increased frequency.

32.20A, 32.20B, 32.20C, 32.21C

Further, the LCC DEIS does not address the impact to the City's water resources, including water rights, water quality, and infrastructure to address the additional 111,000+ visitors the preferred alternatives will induce. With the overloading of the canyon, the City will need to significantly increase watershed enforcement to protect water quality.

32.20U

The LCC DEIS does not address the limited water resources and the City's obligations associated with these water resources. Chapter 20: Indirect Impacts of the LCC DEIS states, "With the increase in skiers, the resorts might want to improve some infrastructure to handle the increased demand… and add other facilities such as more restrooms and additional lodge capacity." As a result of the City's significant water right holdings in Little Cottonwood Canyon, it is the primary provider of raw water in the canyon through contracts with the resorts and the Town of Alta. The City cannot expand the quantity or geographic area associated with these contracts. Furthermore, there are no additional water rights that can be developed.

32.20U

The LCC DEIS does not acknowledge these capacity issues, and water resources in Little Cottonwood Canyon are not limitless. Decades ago, Salt Lake City established watershed ordinances (Chapter 17.04 of Salt Lake City Code) that protect the City's water resources and limited future sales of water outside of the City's service area. As a result, the City believes that water resources may not be sufficient to accommodate the future increase in demand caused by the proposed increased transportation capacity. The City's water resources are obligated to provide water to the designated service area, as stated in these and previous comments. Further, we are asking people, businesses, and industry within the City's service area to conserve more water so that the City has the water supplies available to support future population growth. Due to this year's severe drought, the City has placed water use restrictions on customers across our service area. Climate change impacts will continue to result in deep and long-lasting droughts. It should be noted that Salt Lake County Service Area #3 relies on the City's water rights and is also impacted by drought, water resources, and water quality.

32.20B
32.20U

Finally, the LCC DEIS analyzes winter use only. Summer use should also be analyzed as a cumulative impact for both preferred alternatives. Further, the City is concerned the Gondola B preferred alternative could be the first segment of a long-discussed ski interconnect between Little Cottonwood Canyon, Big Cottonwood Canyon, and Park City, which was not addressed as a cumulative impact.

32.1.5L
32.20T

*H. Indirect Impacts*

The LCC DEIS does not fully analyze the indirect impacts of the preferred alternatives. It does not incorporate a rigorous analysis of whether people will actually ride the Gondola B preferred alternative. Also, the LCC DEIS has not addressed the impact on other canyons and watersheds, including Big Cottonwood Canyon. For example, as a result of tolling or having to get on a bus to get on the gondola, many people may choose to access Big Cottonwood Canyon. This impact is mentioned in the indirect

32.2.4A, 32.2.6.5II

32.1.1A, 32.20D

impacts section of the DEIS (Chapter 20) where it states that UDOT will need to implement tolling and increased bus service in Big Cottonwood Canyon also. The impacts of this action are not analyzed.

Further, as identified above, the LCC DEIS does not analyze if there are sufficient water resources, water rights, or infrastructure for an additional 111,000 people in the winter. It does not address whether increased visitation in the canyon will cause a diminished water supply for the people, businesses, and industry in Salt Lake Valley that currently rely on the availability of water from Little Cottonwood Canyon, which are indirect impacts. Please reference the Cumulative Impacts section of these comments and previous comments submitted.

*1. Chapter 24 – Permits, Reviews, Clearances and Approvals*

Alternatives may not be reasonable if they are impossible to implement. The DEIS does not analyze whether the preferred alternatives are consistent with the 2003 Wasatch-Cache National Forest Plan and the 1934 and 1914 federal legislation directing the USFS to manage the federal lands within the City's watersheds in a manner consistent with the protection of the City's culinary water supply. We believe that the FHWA appropriation of USFS lands conflicts with the intent of the federal legislation that overlays the area.

Conclusion

Salt Lake City recommends careful consideration before embarking on either preferred alternative in the LCC DEIS. Both alternatives are substantial development projects within the watershed that have impacts that have not been evaluated, especially impacts to the City's water resources. We recognize there are transportation concerns and strongly encourage a phased approach to address these issues to better allow for adaptive management to mitigate watershed impacts. This could include expanded bus service year-round, traffic demand management, tolling, and carpooling. These alternatives also provide an opportunity for substantial cost savings over the proposed alternatives. A phased approach would additionally align with the work of the Central Wasatch Commission in implementing Mountain Accord's multi-faceted stakeholder agreement.

Thank you for your consideration of Salt Lake City's input on the LCC DEIS. We appreciate the time and efforts of the UDOT Project Team and are hopeful that UDOT will be a strong partner with Salt Lake City in the protection of water resources. Please do not hesitate to contact us if you have any questions or would like to discuss further.

Sincerely,

Erin Mendenhall
Mayor, Salt Lake City

Laura Briefer
Director, Salt Lake City
Department of Public Utilities

CC: Vince Izzo, HDR
Mike Devries, Metropolitan Water District of Salt Lake and Sandy
Rusty Vetter, Salt Lake City Deputy City Attorney
Marian Rice, Salt Lake City Department of Public Utilities
Patrick Nelson, Salt Lake City Department of Public Utilities

Attachment: Previous City Comments Submitted for UDOT LCC DEIS

6

32.20D

32.20U

32.2.6W, 32.28H

32.29G
32.12A, 32.12B,
32.20A, 32.20C,
32.29R, 32.2.9A,
32.1.2C, 32.2.4A

Attachments

Previous City Comments Submitted for UDOT LCC DEIS

ERIN MENDENHALL
*Mayor*

DEPARTMENT OF
PUBLIC UTILITIES

March 19, 2021 *(corrected on June 10, 2021)*

Little Cottonwood EIS
c/o HDR
2825 E. Cottonwood Parkway, Suite 200
Cottonwood Heights, Utah 84121

**Subject: Comments for the Little Cottonwood Canyon Environmental Impact Statement preliminary draft resource chapters (Group 2), March 2021.**

To Whomever This May Concern:

This letter transmits comments from the Salt Lake City Department of Public Utilities (Salt Lake City, or the City) in response to the Utah Department of Transportation's (UDOT) *Little Cottonwood Canyon Environmental Impact Statement, S.R. 210 – Wasatch Boulevard to Alta*, preliminary draft resource chapters (Group 2), dated March 2021 (LCC EIS). As a cooperating agency, the City appreciates the opportunity to provide input for the preliminary draft chapters.

## 1. Legal Obligations and Special Expertise

The Little Cottonwood Canyon (LCC) watershed provides a significant portion of the City's water supply. The City has legal jurisdiction within Little Cottonwood Canyon related to its water rights, watershed management, and water infrastructure. Therefore, the City has specialized expertise within the LCC EIS study area, which we feel benefits the process.

As noted in previous LCC EIS comments to UDOT, the City is committed to fulfilling its critical duty of providing clean, safe, affordable, and high-quality water for the more than 360,000 Salt Lake Valley residents. Further, federal and state regulations obligate the City to provide clean, safe water to protect public health. This includes the federal Safe Drinking Water Act (SDWA), the Utah Water Quality Act, and state statutes related to the management and use of public water resources. The City in turn regulates certain activities in order to meet these legal obligations.

In addition to our legal obligations and specialized expertise, the Salt Lake City Municipal Corporation has divisions and departments that have service obligations related to transportation, transit, equity, and quality of life, to name a few.

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## 2. Category 2 Chapters - General Comments

**Chapter 2 - Alternatives**
Consistent within each alternative are avalanche sheds, trailhead parking, limits on roadside parking, and additional impervious surfaces resulting from road widening or parking lot paving. Therefore, these items will be addressed separately with the intent that the concerns are understood as applying to each alternative. Following these general comments are comments specific to each alternative.

**General Comments**

*Purpose and Need: Water and Reliability*
1. As described in earlier comments, the City remains concerned that UDOT did not include water resources and quality as a level 1 priority. We remain concerned because the transportation alternatives each create additional capacity for increased visitation within the watershed. Increased visitation has the potential for negatively impacting water resources due to sanitation, erosion, and infrastructure impacts. Each alternative also has a construction and operational impact on the watershed. Because water resources and quality are not a level 1 priority, the alternatives are not measured against the ability of entities to manage for and mitigate impacts. Due to the heavy public reliance on Little Cottonwood Creek for drinking water purposes, the importance of water resources and quality should have much greater weight in the EIS process. UDOT's EIS advances the proposition that the project's purpose is narrowly focused upon transportation efficiency and reliability. The City, once again, emphasizes that water resources and quality should be considered a primary measure for the alternatives analyzed, as well as our legal commitments and century-old responsibility for efficiently and reliably provide affordable, high-quality water to the Salt Lake Valley. Due to these responsibilities, the City necessarily prioritizes water quality and views all proposes transportation alternatives through this lens.

32.2.2UUU
32.1.2F

*Avalanche Sheds: Resource Impacts*
1. **Water Access and Capture:** Providing water to the avalanche sheds requires reviewing the water's source, water rights, water quality, and potential impacts downstream and on the surrounding environment. Little Cottonwood Creek's classification pursuant to the Clean Water Act (CWA) may also affect the way water is managed for this purpose. Per the Utah Division of Drinking Water (DWQ), Little Cottonwood Creek is protected as a Category 1 water, thus is protected for antidegradation (UAC R317-2.12). Therefore, new point source discharges of wastewater, treated or otherwise, are prohibited. Further, other diffuse sources (nonpoint sources) of wastes shall be controlled to the extent feasible through the implementation of best management practices or regulatory programs. Thus, if the water source is a nearby mine, an analysis of the water needs to be performed to ensure there will not be negative impacts on water quality through runoff to Little Cottonwood Creek. Attention needs to be paid to capturing and containing water used at the avalanche sheds in case of leaks or use for fire protection/suppression. The proposed stormwater BMPs insufficiently deal with vehicle fires, potential spills from

32.12M

commercial and residential traffic, etc. SLCDPU requests full secondary containment of any runoff from the fire suppression system as well as a process for disposing of the volume of water used in suppression.

2. Unaddressed concerns exist relative to the water source for the avalanche sheds and full area containment to prevent hazardous spills, accidents, erosion to the hillside that can result in sediment contribution, or fire suppression methods from contaminating the creek. 32.12E

3. UDOT should further analyze the impact of avalanche sheds and accompanying berms on the riparian corridor and water quality. The avalanche sheds will require side fill material, increase streamside slope angles, and shorten the distance between the road and the waterway. We request further analysis to determine the impact of these proposed changes on water quality, vegetation, and habitat. For example, will the increase in slope and side fill material increase sediment flow to the creek? Existing analysis in the EIS dismisses potential impacts as negligible without adequately looking at the potential for point source deposition. The three avalanche paths proposed to be outfitted with snowsheds have runoff and deposition zones close to the creeks. Thus, SLCDPU requests further analysis to ensure water quality considerations with the proposed designs are properly incorporated. 32.13E 32.12E

4. The impacts of fill slope, cut slope, and decreased buffer zones on water quality and riparian corridors are not addressed by the EIS. UDOT should produce a robust analysis of these impacts on the riparian corridor, water quality, and ecosystem functions 32.13E 32.12E

5. The City feels there are multiple questions to address regarding the avalanche sheds. Will increased slope angles and decreased buffers between the roadway and creek result in more significant water quality impacts? Will further narrowing the riparian corridor result in creek temperature increases, water turbidity, or wildlife habitat? Avalanche sheds, berms, and fill present concerns of accelerating avalanches and concentrating detritus directly into the riparian corridor. What will the effect be of berms and avalanche sheds directing avalanches flow directly into the riparian corridor? Is the intended purpose of the berms to channelize avalanche flow towards the sheds? Will this channelization increase avalanche velocity serving to condense flow and directly injecting detritus into the creek? If so, how will the increased avalanche velocity and concentration of avalanche material impact the riparian corridor and water quality? UDOT is proposing over three thousand (3,000) square feet of avalanche sheds in the upper canyon. Such a significant change requires a further review of the potential impacts on this area's riparian corridor and water quality. 32.13E 32.12E

6. How does UDOT plan to adapt the final avalanche shed designs in response to on-the-ground circumstances once construction begins? Should design adaptations be required, what will the process be for reviewing the changes? The City asks to be involved in this process to ensure that any last-minute design changes account for potential impacts to the watershed. 32.12E

*Avalanche Sheds: Aesthetic Impacts*

1. City residents and others visit Little Cottonwood Canyon (LCC) for various reasons, including appreciating the canyon's natural beauty. The proposed avalanche sheds will cover much of the upper canyon road, eliminating views from the roadway and impacting the viewshed from nearly every point in the canyon — including from designated wilderness areas. UDOT's analysis of the avalanche sheds neglects to assess the potential impact such significant disruption of the canyons aesthetics and character will have on user experiences. The avalanche sheds will have a near-permanent effect on the beauty and character of Little Cottonwood Canyon. Far from just an aesthetic inconvenience, the sheds stand to have a meaningful and long-lasting impact on the experiences of those visiting the Canyon.

32.17C

*Avalanche sheds - Need*

1. Climate change scholarship estimates snow line levels at 2,450 meters (8,040 feet) at Wasatch area ski resorts by 2050.[1] For perspective, Little Cottonwood Canyon's Snowbird Ski Resort is located at 2,365 meters (7,760 feet) with a base elevation of 2,469 meters (8,100 feet). Climate research reports scenarios for the Central Wasatch Mountains with an annual increase in temperature ranging from +2.2 °F to +5.8 °F with an average 3.7 °F increase in annual temperature.[2] Recent modeling suggests that by midcentury, the Wasatch Range will "receive more than 50 percent (50%) of December to February precipitation in the form of rain" with the center of runoff shifting "approximately three days earlier per 1°F of warming."[3]

32.2.2E

2. Climate modeling specific to Park City Mountain Resort predicts that by 2050 snowpack buildup will be delayed by 1.5 to 2 weeks, and spring melt will occur one week to twelve days earlier than 2010 levels.[4] The report estimates that by 2050 there will be "either little to no snow at the base area by Thanksgiving, and mid-winter snow depths will be 20% to 40% less than historically observed values" with skiable snow "unlikely during spring break under all scenarios..."[5] According to this report, by 2050, the ski season window will shrink, occurring for roughly twelve weeks between mid-December to late March. A 2020 UDOT memo cites the above studies and analysis, yet EIS concludes that climate variability is unlikely to impact LCC infrastructure needs. This is particularly relevant as the LCC transportation project's justification relies heavily on assessments of the dangers posed by avalanches and impacts to transportation times resulting from avalanches. In this context, it would appear that climate change modeling revealing significant declines in snowfall and snowpack is relevant for analyzing the LCC transportation project's purpose and need.

32.2.2E

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[1] BRIAN LAZAR & MARK W. WILLIAMS, *Potential Impacts of Climate Change for U.S. Wasatch Range Ski Areas: Projections for Park City Mountain Resort in 2030, 2050, and 2075*. 2010 International Snow Science Workshop. https://arc.lib.montana.edu/snow-science/objects/ISSW_P-023.pdf.

[2] JANINE. RICE & TIM BRADLEY, ET AL. ASSESSMENT OF ASPEN ECOSYSTEM VULNERABILITY TO CLIMATE CHANGE FOR THE UINTA-WASATCH-CACHE AND ASHLEY NATIONAL FORESTS, UTAH. (2017). https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr366.pdf.

[3] *Id.* at 14, 15.

[4] LAZAR & WILLIAMS, *supra* 1, at 441.

[5] *Id.* at 441.

3. It would be beneficial for UDOT to review the need for avalanche-related infrastructures, such as the avalanche sheds, in light of prevailing climate estimates. According to UDOT, on average, 10.4 days per year are impacted by road closure due to avalanche activity. UDOT projects that by 2050, avalanche activity will double, impacting 21 days per typical 120-day ski season. Climate models and the 2020 UDOT memo estimate that a typical ski season will shrink by nearly two weeks on each end by 2050. This projection reduces the typical ski season from 120 days to roughly 92 days. By mid-century, UDOT expects the days impacted by avalanche activities to double from 10.4 to 21. As a percentage, avalanche closures on S.R. 210 will occur on nearly a quarter of the ski season days. To reiterate, current UDOT projections upon which UDOT bases the need for additional canyon infrastructure identifies 8.67% of days in the ski season as impacted by avalanche-related road closures. However, while acknowledging the future shortening of the ski season due to climate change and decreases in the snowpack at high elevations, UDOT projects that road closures related to avalanches will include 22.83% of days making up the ski season.

32.2.2E

4. UDOT has projected an approximate 25% reduction in ski days. Does the decrease in ski days projected by climate modeling impact UDOT's transportation proposals, all of which exclusively serve canyon ski resorts? In light of expected climate impacts, does it make sense to institute a solution to current canyon transportation crowding that is flexible and may quickly adapt to future uncertainties rather than large projects that are inflexible and require significant sunken costs?

32.2.2E, 32.1.2D 32.29R

*Impervious Surfaces*

1. UDOT alternatives that include adding impervious surfaces, whether by road widening, increasing shoulders, or paving parking lots, need to consider the resulting impacts on water quality. The City asks that UDOT maintain Best Management Practices (BMPs) where adding impervious surfaces and increasing stormwater runoff zones. Further, the City asks that UDOT incorporate post-construction BMPs in locations of LCC that are not part of the identified alternative. The City asks that UDOT continue maintenance of stormwater impact reduction measures and limit the potential for waste stream water channels to discharge into the creek.

32.12A, 32.12B

2. UDOT should further analyze actions that will decrease the existing buffer between the road and the creek. In areas with a high slope degree, wide buffers are necessary to trap sediment and pollutants, maintain stream temperature, protect stream banks from erosion, moderate stormwater flows, and provide wildlife habitat. Increasing the slope or decreasing the distance between the road and the creek will impact water quality. UDOT should identify all instances where either the slope angle will increase or where the existing buffer will decrease. UDOT should then identify impacts on water quality and implement mitigation measures to protect water quality, counter rising stream temperatures, combat erosion, moderate water flows, and limit wildlife habitat impacts.

32.12B, 32.12P, 32.13B

3. SLCDPU proposes collaborating with UDOT stormwater monitoring programs to analyze roadway impacts on stormwater runoff and water quality.

32.12N

*Avoidance and Minimization: Impacts on Water Resources*

1. The City supports UDOT's efforts to mitigate impacts to water resources by providing buffer areas around trailheads and parking areas. The City requests that BMPs be applied in these areas to minimize the effects of runoff. The City further supports stormwater drainage designs to reduce water quality impacts of runoff from alternative improvement areas to Little Cottonwood Creek. Additionally, the City requests double-walled fuel tanks, full secondary containment, and appropriate safety measures for the backup diesel generators required for the cog rail alternatives and in other alternatives requiring diesel fuel storage. Further, the City requests containment of the associated piping and filling area to mitigate against spills and leaking. The City seeks future partnership opportunities with UDOT to right size any and all culverts throughout the project area when possible during the project. 32.12O

*Travel Demand Management Strategies*

1. Tolling: Please review City's earlier comments regarding tolling and the potential environmental justice, equity and fairness impacts as well as possible unintended impacts on canyon recreation in the lower and upper canyon. 32.5A

2. The EIS's argument that environmental justice issues are appropriately minimized because environmental justice communities will continue to have access to the lower canyon ignores the fundamental problem that access to the lower canyon is not access to the entire canyon. The possibility remains that some Salt Lake Valley residents may very well be priced out of experiencing the grandeur of Little Cottonwood Canyon in its entirety. Executive Order 12898 (EO 12898) (1994) requires agencies to identify and address "disproportionately high and adverse...environmental effects of its programs, policies, and activities on minority populations and low-income populations." This order includes the directive to "identify differential patterns of consumption of natural resources among minority populations and low-income populations."[6] 32.5A

3. The LCC EIS does not adequately address the impact of tolling on minority and low-income populations. The City would like to emphasize the importance of introducing tolling, should this occur, in both Little and Big Cottonwood Canyons so that one canyon's remedy does not become the other's malady. UDOT readily acknowledges that effective tolling requires instituting tolling regimes at both Little and Big Cottonwood Canyons.[7] Since tolling in one canyon necessitates tolling in both canyons, any environmental justice review of tolling requires the analysis of both canyons. If tolling is contemplated for one canyon, the environmental justice analysis must be of both canyons since the two are inextricably linked. Reviewing the impacts of tolling on environmental justice populations in the canyons independent of one another will result in a skewed perspective that will not adequately reflect the project's actual impacts on the populations identified in EO 12898. 32.5A 32.20D

[6] Exec. Order No. 12,898, 59 Fed. Reg. 7629 (1994).
[7] Josh Van Jura, UDOT Project Manager, Presentation Central Wasatch Commission, LCC EIS Update (Mar 2, 2021).

*Land Appropriations, Easements, and/or Special use Permits*

1. Concerning the transfer of lands under 23 USC Section 317, the City requests that any lands transferred from National Forest Service management to UDOT due to this project be maintained for watershed and water quality purposes. Similarly, in instances where land is not transferred but a special use permit is required, the City requests that the special use permit prioritize watershed health and water quality. Finally, the City requests additional information concerning which lands UDOT anticipates will be transferred or have special use permits apply, the quantity and acreage of these lands, the management, and maintenance of these lands, as well as the access and containment issues. The City further asks to be included in all future management conversations regarding these impacted lands as there may be repercussions to watershed health and water quality impacts.

32.28H

a. **Management of new trailheads, recreational facilities, etc.** The City requests UDOT consider a mechanism for which to fund future capital expenditures, ongoing operations and maintenance, and associated costs with the new facilities such as the proposed development of the Lisa Falls Trailhead, Bridge Trailhead, etc. New facilities such as restrooms, striped parking, etc., will induce more use. UDOT needs to ensure the US Forest Service has the needed resources to appropriately manage and maintain these facilities.

32.2.6N

**Alternatives - Specific Comments**

*Enhanced Bus Service Alternative*

1. Road widening to accommodate enhanced bus services will result in additional impervious surfaces in the canyon. How will UDOT mitigate road widening impacts? *See* previous section *Impervious Surfaces.*

32.2.9A

2. The impacts of fill slope, cut slope, and decreased buffer zones on water quality and riparian corridors are not addressed by the EIS. UDOT should produce a robust analysis of these impacts on the riparian corridor, water quality, and ecosystem functions.

32.12B
32.12P
32.13B

3. Trailhead Parking: We request the Grit Mill parking be included in the analysis. Further, is there existing research showing the benefits of asphalt over the current dirt parking areas? *See* previous section *Impervious Surfaces.*

32.12Q

*Enhanced Bus Service in peak-period Shoulder Lane Alternative*

1. Road widening will result in additional impervious surfaces in the canyon. *See* previous section *Impervious Surfaces.*

32.12B

2. Avalanche sheds, berms, and fill: *See* previous Sections *Avalanche Sheds: Resource Impacts, Avalanche Sheds: Aesthetic Impacts,* and *Avalanche sheds – Need.*

32.12E,32.17C,
32.1.2B

3. This analysis states that roadway alteration results in "no clear zones" and areas with steep canyons walls or drop-offs. However, the study does not identify these

areas. Will these areas include additional roadway hardening to protect against future vehicular accidents? The City request that UDOT reviews the potential impacts to the water quality of significantly increasing the amount of roadway directly adjacent to the creek?

32.12B

4. Trailhead Parking: *See* previous Section *Enhanced Bus Service Alternative* (3).

32.12Q

5. UDOT anticipates additional vehicular collisions resulting from drivers illegally using the bypass lane to get around slow-moving traffic. This is concerning as, in our experience, vehicular collisions can result in an impact on water quality. For example, a vehicular collision could result in vehicles in the creek and the discharge of associated fluids, including fuel, propylene glycol or ethylene glycol (antifreeze), and other hydrocarbons. Therefore, the City requests that UDOT mitigate impacts of increased vehicular collisions on water quality with infrastructure to protect water resources where necessary.

32.2.6.3B

32.12B

*Gondola Alternative A*

1. Transfers: Presenting an attractive transportation alternative to the broadest possible audience requires the option involving as few transfers as possible, ensuring that the public option is more efficient than a private vehicle and for the public alternative to be less expensive than the personal vehicle option. This option does not identify whether parking used for accessing the gondolas will be free or require payment. The expense of parking is a crucial consideration in personal economic decisions guiding individual use of private or public transportation. UDOT should identify whether this parking will require payment or not and how this may impact ridership. UDOT should also identify ongoing operations and maintenance costs associated with parking and transfer stations.

32.2.6.4B, 32.2.6.5II, 32.2.4A

2: Stoppages: Does the analysis of this option's travel and transfer time include the impacts of estimated stoppages during avalanche mitigation and times of increased avalanche risk such as inter-lodge events? The analysis states that after avalanche shelling, gondola cables will require assessments to ensure that the shelling did not impact the cables' integrity. How often does UDOT anticipate these stoppages occurring? How will these stoppages increase the anticipated travel time of the gondola option? What is the time it will take for the gondolas to be fully loaded and usable as a transportation mode after the canyon is cleared for travel so that this option will enhance travel times? How will buses and other transportation modes transferring passengers to the gondola base stations be impacted by avalanche control stoppages and the subsequent need to clear the cables of gondola cars? What emergency precautions will UDOT put in place for those captured inside gondolas during stoppages? What is the expense of these precautions, and who will bear the cost of the ongoing operations and management of the emergency precautions and emergency assistance?

32.2.6.5H
32.2.6.5K

32.2.7A

3. The gondola alternative relies on a toll to meet the target 30% reduction in canyon vehicle use. The gondola is expected to relieve escalating private vehicle use in the canyon. How does UDOT anticipate sufficiently motivating individuals to leave behind

32.2.4A

private vehicles when the gondola requires multiple transfers, takes more time than personal vehicular travel, and – particularly for families – will be more expensive than merely paying the toll?

4. The gondola alternative relies on the use of roadway avalanche sheds. The sheds account for substantial infrastructure costs and taxpayer burdens. The sheds are required for all of the options, including those involving buses. What is the gondola option's real utility as they constitute significant additional permanent infrastructure in the Canyon?

32.2.6.5D, 32.2.6.5H

5. This option requires the enlargement of the existing park and ride to accommodate the gondola footprint. The option requires an angle station at Tanner's Flat. The station will include vegetation clearing and diesel generation. The analysis does not include vegetation clearing impacts on water quality, wildlife habitat, and aesthetics. UDOT should analyze the effect of vegetation clearing. The City requests that the required diesel generators and backup fuel tanks be double-walled and that UDOT fully contain these areas to limit the possibility of contamination. Further, the City requests containment of the associated piping and filling area to mitigate against spills and leaking.

32.12A, 32.13A
32.12O, 32.2.6.5B

6. Gondola Towers: This option includes twenty (20) gondola towers ranging from a height of 131 feet to 230 feet. Each tower will require security fencing, and some towers will require FAA approval along with warning lights. The UDOT analysis does not include a review of the impacts resulting from the security fencing. We feel there are many unanswered questions that need to be addressed to make a holistic assessment of the overall development footprint of the gondola option. How large will the fenced-in area be? How high will the fencing be? What precautions will UDOT take to decrease the impacts of such fencing on wildlife? What effects will the fencing and the secured area have on water runoff? What will the restoration of these areas entail? Does UDOT anticipate any complications in achieving the necessary Federal Aviation Agency approval for the towers? Similarly, under FAA requirements, towers will require lights. How will UDOT mitigate the impacts of the required lights, and how will the lights impact the canyon's aesthetic integrity? UDOT states that FAA required warning systems on the gondolas will include audio signals. What are the potential impacts of the audio alerts? What is the decibel range and duration of the alerts? What are the alerts' expected frequency, and how often does UDOT anticipate that the alerts will be triggered?

32.4B, 32.4G
32.13A, 32.17A,
32.2.6.5W,
32.2.6.5B

7. UDOT identifies tower construction methods and access. What are the access methods for ongoing maintenance of the towers? Will new roads or clearances being required to access the towers? If so, how will these access points be maintained, and what measures will UDOT take to ensure limited impacts to ecosystem health and water quality?

32.2.6.5K
32.2.6.5L

8. UDOT takes pains to ensure that pole tower designs near ski resorts will be adjusted to accommodate aesthetic impacts to those in the resorts. We request UDOT also take measures to mitigate the impact of the gondola towers on all areas of the canyon.

32.17A, 32.15E

9. The analysis estimates that the noise emanating from the gondola line will be equivalent to that of the noise resulting from traffic on the nearby roadway. In addition to the aesthetic impacts of the gondola proposal, the gondola's acoustic impact and resulting noise pollution stand to impact the canyon's overall character. Further, another source of noise equivalent to that of the roadway will negatively impact the recreation experience. UDOT should conduct a comprehensive analysis of the impacts of the additional noise on recreation safety, the recreation experience, and wildlife, with specific consideration paid to the effects of the increased noise on avian nesting and behaviors. UDOT should seek to mitigate potential noise impacts for the benefit of wildlife, recreation, and aesthetic values.

32.11D, 32.17A, 32.13A, 32.4I

10. The gondola alternatives present concerns for the invasion of privacy and noise pollution impacting recreation experiences, camping at Tanner's Flat, and private residences. UDOT's analysis should investigate mitigation opportunities to relieve these impacts.

32.4E
32.4GG

11. Gondola angle stations require diesel fuel tanks. The City requests that diesel fuel tanks be double-walled to prevent spills and harmful environmental impacts. Further, there is secondary containment for all piping and filling areas.

32.12O

12. Angle stations require vegetation clearance of 2 to 3 acres. The City requests UDOT analyze the effect of vegetation clearing and the maintenance of the clearing. The City also requests that UDOT contemplate an invasive weeds mitigation strategy in these areas.

32.2.6.5B, 32.13A, 32.12C

13. In past comments submitted for consideration by UDOT's project team, the City encouraged the Project's Purpose and Need to comprehensively analyze both summer and winter use for Big and Little Cottonwood Canyon. Summer use is outside the purpose and need and scope of this project. The City does not support the summer use of the gondola without sufficient analysis. This EIS has not been structured to contemplate and analyze cumulative and direct impacts of summer use of any of the Alternatives. UDOT has focused solely on winter considerations throughout the entire process. The City encourages UDOT to remove any mention of summer use that does not encourage a separate process that is outside of USFS administrative processes.

32.20A, 32.20C, 32.1.1A, 32.1.5L

*Gondola Alternative B*

1. The impacts of Gondola Alternative B are similar to those discussed in Gondola Alternative A above. Please reference previous Sections for the City's comments relative to the Gondola Alternatives A and B.

See response above

2. As discussed during the appreciated water quality focused meetings with the project team, the City encourages UDOT to expand its water quality analysis of this Gondola Alternative B to incorporate threats to the water treatment plant for the Metropolitan Water District of Salt Lake and Sandy's intake. This analysis would depart from strict adherence to the SELDM model's Monte Carlo style simulation modeling and incorporate feedback from the City to ensure any spills, crashes, accidents, etc., would

32.12A, 32.12K, 32.12O, 32.12L

protect the intake from contamination. The bottom terminal for Gondola Alternative B locates a new non-residential, commercial and industrial use with significant traffic very near this intake posing a new threat to water quality, millions of dollars of treatment plant infrastructure, and thus public health. Any consideration of Gondola Alternative B should incorporate a protective and proactive design that protects this water treatment plant intake located only a very short distance downstream from Wasatch Boulevard. The City is happy to coordinate with UDOT's team to provide further guidance.

32.12A

*Cog Rail Alternatives*

1. The cog rail alternative has significant disadvantages impacting recreation, severe disruption of canyon character, increased emissions, and additional runoff. This alternative requires rail lines extending the canyon's length and demands heavy infrastructure investments such as avalanche sheds also required by other alternatives. For example, the cog line will require the placement of enlarged and expanded avalanche sheds, will remain susceptible to avalanches, and will be subject to significant delays during avalanche mitigation efforts and inter-lodge events.

32.2.9M
32.4D, 32.12C,
32.12E

2. Access Impacts: The cog alternative will severely impact recreational access. The cog will be used only in the winter and will only serve the resorts. Thus, the cog will not provide benefits during the summer season, as well as portions of spring and fall. This option restricts access to the north side of Little Cottonwood Canyon and requires eight railroad-style crossings. These intersections will negatively impact canyon character and aesthetics. The cog alternative substantially affects the existing park and ride facility, impacts trails and recreational opportunities, and forever alters the character of the canyon. Further, the cog rail footprint at the Canyon's mouth will result in additional noise and light pollution.

32.4D, 32.2.6.6A,
32.1.2D, 32.11L,
32.17D

3. The cog alternative will result in significant trail loss to nine named trails and approximately 10,000 feet of informal trails. Many of these trails have resulted from public-private partnerships and have been brought about by the volunteered labor and recreation and conservation communities' resources. Further, some proposals will eliminate or remove access to fourteen (14) different bouldering areas in Lower Cottonwood Canyon. These areas have been the subject of conservation actions and graffiti removal efforts using taxpayer dollars and significant citizen volunteer hours.

32.4D

4. Alignment: The cog rail requires 8 foot wide shoulders and concrete barriers between the travel lane and rail alignment. UDOT declined to further analyze earlier proposals with similar barriers arguing that the barriers constituted an obstruction to wildlife. We request the same analysis be performed to determine the potential obstruction of wildlife travel. Similarly, the specifics of the railroad crossings and emergency precautions are not described. These crossings will likely result in aesthetic and noise impacts that UDOT does not adequately determine or describe.

32.13F
32.17D
32.11L

5. SLCDPU expects that any toxic or hazardous substances required to be on-site for transportation purposes will feature full site containment. The utility requests that UDOT implement full site contamination similar to UDOT's Parley's road shed at

32.12O

Mountain Dell. Fuel tanks should be double-walled and include an indicator alarm in case of a breach. Additionally, the filling of the tanks and the associated pipes and tank infrastructure should consist of BMPs to mitigate contamination and contain spills. The City is concerned with the possibilities of contamination to water quality and the potential for ecosystem disruption that will follow the placement of a 10,000-gallon diesel tank, filling area, and associated piping at the mouth of Little Cottonwood Canyon.

32.12O

6. The City asks that UDOT further analyze cog rail equipment impacts on stormwater runoff, water quality, and contributions to noise and light pollution.

32.12C, 32.11L, 32.17D

7. The cog line requires eight crossings. UDOT does not analyze the impacts of these crossing on private and public vehicular travel. Intersections will detrimentally impact vehicular travel time and lengthen the duration of travel up Little Cottonwood for all roadway traffic. UDOT's analysis does not account for this predictable increase in travel time. Further, UDOT does not account for the impacts of the crossings on canyon bicycle traffic and safety. Crossings may pose a significant safety risk to individuals bicycling down the canyon. Similarly, the inclusion of eight crossings requiring vehicular traffic to stop contradicts UDOT's emphasis on efficiency and roadway avalanche safety concerns as more vehicles will be on the road waiting at railway crossings.

32.4D

8. Finally, the cog rail alternatives require alteration of trailhead parking areas. Among the parking areas impacted is the new Grit Mill parking area. This area was recently built with the assistance of partner organizations and financial contributions from various entities including the City.

32.4D

9. Operations and Maintenance Facility: The presence of a two-story cog rail facility at the mouth of the canyon will adversely impact the canyon character. Based on UDOT's analysis, the cog line and station will have the most significant capital costs, as well as uniquely negative impacts on overall transportation efficiency, visual impacts, and canyon character.

32.17D, 32.13F

## Chapter 3 – Land Use

UDOT'S acquisition of land for transportation purposes will occur either by appropriation under 23 USC Section 317 or by gaining special use authorization from USDA Forest Service (USFS). Both options present concerns to the City due to potential watershed impacts. Further, it would be beneficial for UDOT to detail the primary purpose of the land is for drinking water purposes and provides drinking water to the Salt Lake Valley.

32.28H

Then Planning Section 3.3.2.1 reviews the applicable parts of local planning documents that are relevant to the land use impact analysis area, which include plans developed by Cottonwood Heights City, Sandy City, Granite Community, the Town of Alta, Salt Lake County, and the USFS. We feel UDOT needs to also review and incorporate the 2009 Salt Lake County Water Quality Stewardship Plan and the associated 2015 Salt Lake County Integrated Watershed Plan.

32.12A, 32.12B

For ease of reference, it would be helpful if UDOT would create a grid illustrating the amount of land required for each transportation component and the corresponding management prescription. It's currently difficult to assess where UDOT's land requirements overlap with different management directives, and the total acreage of land UDOT requires for each alternative.

32.28H

Federal legislation from 1914 and 1934 directs the USFS to manage the federal lands within these watersheds in a manner consistent with the protection of the City's culinary water supply. Thus, the purpose of the USFS watershed emphasis management prescription is to provide protection, maintenance, and restoration of quality aquatic habitats, watershed conditions, and terrestrial habitats. The USFS manages these lands to meet mid to long-term watershed and habitat objectives. All the transportations alternatives require UDOT to appropriate or acquire easements on land currently managed for watershed purposes. Acquisition through 23 USC Section 317 removes these lands from their current federal watershed emphasis management prescription.

32.28H
32.2.6W

Of the existing lands managed for watershed purposes, what percentage is UDOT proposing to acquire or gain easements for under each alternative? It is helpful to understand this information to comprehensively evaluate the real impact of UDOT's various proposals on land necessary for watershed management. The acquisition of these lands, either by easements or through 23 USC Section 317, will decrease the buffer between pollution sources and Little Cottonwood Creek. Reducing this buffer stands to impact water resources by limiting the amount of land available for filtering pollutants, protections against aquatic temperature increases, slope impacts, and the riparian corridor's overall health.

32.28H

32.12A, 32.12B, 32.12P, 32.13A, 32.13B

Please assist the City in better understanding UDOT's land use strategy relating to acquired lands:

- Under each proposal, how much of a buffer of watershed priority lands will remain between transportation sources and the creek if UDOT successfully acquires the land?
- What will the management prescription be of the newly acquired land, and how will UDOT retain any of the previous prescriptions efforts to manage these lands for watershed purposes?
- How will the acquisition of these lands impact bordering lands' ability to meet mid to long-term management goals?
- How will the overall decrease of Little Cottonwood Canyon lands managed for watershed purposes and the changing of land management impact land use, and ultimately the riparian corridor and water quality?

32.12P
32.28I
32.28H
32.28H

Each of the alternatives requires some combination of construction access easement or slope easements. Please assist the City's understanding by answering the following questions:

32.28H

13

- How much of the acreage proposed for easements and acquisitions does UDOT intend to remediate following the project's completion?
- How much acreage does UDOT expect to remain in the new management prescription without remediation?
- Will UDOT remediate construction access easements and acquisitions areas following construction, or will access be maintained?

32.13A, 32.13B, 32.13C
32.28H, 32.13C
32.13C, 32.19F

Should either transfer of lands under 23 USC Section 317 or special use permits occur to accommodate any transportation alternatives, including snow sheds, the City expresses its preference that USFS special use permits be the preferred means of acquisition. Special use permits allow greater opportunities for management of the affected areas in the best interest of water quality and watershed health. Should special use permits be the selected method, the City asks to be involved in decisions regarding the permit requirements. Should the chosen alternative be to acquire land under 23 USC Section 317, the City requests that UDOT continue prior watershed priority prescriptions to the greatest extent possible. Further, the City requests involvement and review of land use decisions for the selected lands to ensure that potential impacts to water quality are addressed, mitigation measures taken, and that canyon water quality remains protected.

32.28H

## Chapter 10 – Air Quality

Air quality is of critical importance to Salt Lake City and each of the transportation alternatives has an air quality impact. We would like more time to review this section and provide comments.

32.10A

## Chapter 11 – Noise

City comments regarding noise are included in other Chapter comments.

See response above

## Chapter 12 – Water Resources

Watershed Protection (Section 12.2.3)
The City appreciates UDOT's inclusion in the chapter the importance of the Big and Little Cottonwood Canyon watersheds as culinary source waters for the Salt Lake Valley. We ask UDOT also include that this is, and will continue to be, the primary purpose of the watersheds as they have been for over 100 years.

The figure depicting water rights and points of diversions is incomplete. The City can help update this figure. Salt Lake City holds the majority of surface water rights in the Big Cottonwood and Little Cottonwood watersheds. Sandy City also holds water rights in Little Cottonwood Canyon. Additionally, there are non-consumptive water rights held by energy interests that are not shown.

32.12R

For instance, the City treats its water resources at the mouth of Big Cottonwood Canyon at the Big Cottonwood Treatment Plant, which is not shown on the figure. The

water systems shown that are operated by the Town of Alta and Service Area #3 use a contractually limited amount of the City's water rights pursuant to water supply contracts and do not have their own water rights. The City and Sandy City put to beneficial use the majority of Little Cottonwood water through treatment at Metropolitan Water District of Salt Lake and Sandy's Little Cottonwood Water Treatment Facility. This water is then distributed to and relied upon by residents within the service areas of Salt Lake City, Sandy City and the Metropolitan Water District of Salt Lake and Sandy (MWDSLS).

32.12R

The chapter does not adequately address whether any of the alternatives have the potential to impair surface water rights through impacts to water diversions or water delivery infrastructure. It may be helpful to UDOT to meet with Salt Lake City, MWDSLS, and Sandy City to better understand the water rights and delivery infrastructure in the study area.

32.12S

The chapter does not identify whether any of the alternatives could result in an increased demand for water in the study area. There are significant current and future limitations in the use and availability of water in Little Cottonwood and Big Cottonwood Canyons. We see two areas where water demand could be affected: 1) through increased visitation to the ski resorts that rely on the City's water rights and do not have their own; and 2) through the development of transit facilities and amenities. The City's ordinances do not permit new or expanded water supply contracts within the watershed.

32.20A, 32.20C
32.20U

The City requests clarification concerning water resources and the implementation of the following: Best Management Practices (BMPs), assertions that snow sheds will have no impact on water quality, the impacts of avalanche detritus, vegetation of external roofs, and that water fire suppression.

32.12E

Environmental Consequences and Mitigation Measures (Section 12.4)
The City appreciates the efforts to include additional contaminants of concern requested. We recognize the modeling assesses the impact on water quality from the change in impervious surface. However, we request additional modeling to address other elements that have the potential to impact water quality such as increased use of the watershed, change in habitat and vegetation, etc.

32.12A, 32.12B, 32.12C, 32.12E, 32.12J, 32.12N, 32.12O, 32.12P, 32.13C, 32.20A, 32.20C

**General Assessments**

*Best Management Practices*
The UDOT MS4 permit requires UDOT to address postconstruction stormwater runoff for new and redeveloped roads. The City requests UDOT address stormwater runoff for all alternatives throughout Little Cottonwood Canyon, even if it does not include new or redeveloped roads. For example, incorporating BMPs along the current road and associated parking would benefit water quality and riparian habitat. All BMPs must be monitored and maintained in perpetuity to ensure they function according to design. The City requests more information from UDOT specific to the

32.12A, 32.12B, 32.12C, 32.13C, 32.12J, 32.12N, 32.12O

15

percentage of new impervious surfaces associated with each alternative that will not allow for the implementation of BMPs to be specified in the LCC EIS. For instance, UDOT states that with regard to the proposed Enhanced Bus Service, only 64% of the new pavement area will allow for the installation of BMPs. The City asks UDOT for more information concerning each of the alternatives and the percentage of new impervious surfaces that will not qualify for the installation of BMPs. The City requests that UDOT identify in the chapter the specific areas that will not support BMPs under each alternative.

*Snow Sheds with Berms*

The City requests more information regarding avalanche berms and potential changes to slope angles resulting from both the implementation of berms and the construction of the avalanche sheds. 32.12E

*Snow Shed Detritus*

UDOT ascertains snow sheds will not result in avalanche detritus deposited into the creek. However, no evidence, nor support for the argument that avalanche sheds will not direct detritus into the creek, is found in Chapter 12. Please describe how UDOT reached this conclusion. 32.12E

*Vegetation*

- UDOT states that the external roofs of the avalanche sheds will contain vegetation. Please supply more information regarding vegetating the tops of the avalanche sheds. How will UDOT manage the vegetation and soil to limit runoff into the creek in the event of storms or avalanches? 32.12E

- Fire Protection: UDOT asserts the adequacy of fire protection and states that the effluent from any fire will not be pumped into the creek should contaminants be present. In an emergency where fire suppression occurs, how will UDOT identify whether pollutants are present and whether the site is contained? What is the anticipated response time to identify whether contaminants are present before the decision to contain or pump the effluent into the stream? What specific criteria determine whether the effluent is directed to the stream or into a containment area? Further, UDOT must assure that PFAS containing fire suppression will be used. 32.12E

- Accident Data: The City supports UDOT's evaluation of accident data and the locations of roadway departure accidents within the canyon and the review of mitigation measures to ensure that future accidents limit the harm resulting from those accidents and the potential for water contamination. The City requests continued analysis and collaboration on mitigation of the immediate risks from crashes and associated spills to water quality intakes associated with the existing Highway 210 roadway to continue improving protections for not only public safety on the roadway but public health associated with water quality. Identification of crash hotspots and situations where crashes either have spills leaking into the creek or vehicles crashing into the creek and mitigating these impacts would go a 32.12T

long way towards protecting water quality threats from Highway 210. The City believes this is not only mandated by UDOT's compliance with their MS4 permit, but also the spirit of this analysis.

- Emerging Contaminants: The LCC EIS addresses existing contaminants of concern, but does not address the potential for emerging contaminants. The City requests UDOT include the potential for emerging contaminants associated with the alternatives, and incorporate a statement UDOT will develop strategies to prevent and mitigate impacts from emerging contaminants. 32.12U

**Transportation Alternatives**

*Enhanced Bus*

The modeling demonstrates UDOT's projection under the enhanced bus peak shoulder lane alternative that instances of high-end streamflow would result in ten (10) days per year or 3% of annual streamflow time with elevated phosphorous levels. We recognize that according to the model, this does not exceed the numeric standards for headwater criteria. However, the City feels it is important to demonstrate the downstream impact to the lower watershed, including the Jordan River. Elevated Phosphorous, as well as other nutrients, contributes to eutrophication, reduction in dissolved oxygen (DO), contribute to harmful algal blooms (HABs), as well as other impacts to the ecological system. Should the alternative demonstrate elevated nutrients, does UDOT have a strategy to address the nutrients to mitigate impacts to the area detailed in the EIS as well as downstream impacts? 32.12V

*Gondola Alternatives*

The City is pleased to see that UDOT will be investigating a leak-detection system and an alarm for the fuel tanks associated with the gondola alternatives. The City asks that UDOT keep the City apprised of this investigation's results and requests a commitment that should a suitable alarm system be located, that implementation will follow. Additionally, the City appreciates UDOT's determination that UDOT will use dual-walled fuel containers with full contamination measures where fuel storage is necessary. The City additionally requests full secondary containment for any above ground storage, regardless of double walled tanks, especially with Gondola Alternative B with the La Caille base station as it is so close to not only the creek but also the water treatment plant for Little Cottonwood Creek. Further, the City requests UDOT ensure to address the potential for spills and leaks from associated piping and filling areas. The City notes that even with prevention and contamination measures present, the presence of multiple large fuel storage areas results in risks to the watershed that do not exist in alternatives where such containers' presence is not required. 32.12A 32.12O

*Cog Rail*

As requested in the General Assessments above, the City requests clarification regarding the percentage of areas impacted by the cog rail that will allow for the implementation of BMPs for stormwater runoff. Of the 43 acres of new impervious

surfaces associated with this alternative, how much of the acreage will include BMP mitigation measures? The introduction of any new impervious surfaces in the watershed has cascading impacts on ecosystem viability and integrity throughout the canyon and downstream waterbodies

32.12C

On what basis does UDOT assert that the 23-miles of track components comprising the cog rail corridor will result in runoff pollutants generated at the same concentration as highway stormwater runoff? Why are no BMPs assumed? Would the 23-mile cog rail corridor not result in additional contaminants introduced from either the tracks or the cog?

32.12C

## Chapter 13 – Ecosystems

The Wasatch Mountains present City residents with the nearest opportunity to view wildlife. For many residents, the opportunity to view a moose or follow a raptor's flight is their primary reason for accessing the Wasatch. For this reason, the City comments briefly on the project's impacts on wildlife and would like to direct attention to the 2015 Presidential Memorandum directing agencies to avoid and minimize adverse impacts to land, water, wildlife, and ecological resources.[8]

*Snow Sheds with Berms and Snow Shed with Road Realignment*

Both snow shed alternatives are integral to each transportation alternative. Rather than repeating snow shed related comments with each alternative, the City will address the snow sheds here for the sake of brevity. UDOT states that the snow sheds with berms option will impact 15 and 18 acres, respectively. All options but the cog rail consist of three sheds totaling 2,465 feet. The cog option requires five snow sheds to cover the combination of road and cog rail alignment fully. The five sheds associated with the cog will impact 20 acres.

- **Wildlife:** UDOT asserts that the 2,465 feet of additional snow shed infrastructure will not hamper wildlife and "only slightly increase the barrier effect on an area that is likely already avoided by most wildlife." *See* 13-31. The City asks that UDOT provide the data forming the basis of this statement. UDOT also states that construction impacts to sensitive species such as raptors that may be present will result only in short-term consequences, and "no long-term impacts would occur." *See* 13-32. Concerning raptors, the U.S. Fish and Wildlife Service defines short-term impacts as activities that occur outside of a breeding season and end prior to nesting season. The service defines long-term activities as those which extend beyond the nesting season.[9] Under these parameters, UDOT's project should be considered a long-term impact. General guidelines to protect raptor nest and rooting recommend spatial and seasonal buffers, with limited activities near to

32.13E

32.13C

[8] Presidential Memorandum, 80 Fed. Reg. 68743 (Nov. 6, 2015).

[9] LAURA A. ROMIN & JAMES A. MUCK, U.S. FISH AND WILDLIFE SERVICE, UTAH FIELD OFFICE, UTAH FIELD OFFICE GUIDELINES FOR RAPTOR PROTECTION FROM HUMAN AND LAND USE DISTURBANCES (2002 Update). https://www.resolutionmineeis.us/sites/default/files/references/usfws-2002.pdf.

occupied or unoccupied nesting areas due to raptors' high degree of fidelity to nesting locations.[10]

32.13E

To ensure minimum impacts on wildlife, UDOT should follow Utah-specific mitigation measures identified by the U.S. Fish and Wildlife Service and the Division of Wildlife Resources.

32.13C

- **Native Plants / Weeds:** Salt Lake City requests that UDOT make all efforts to help reduce occurrences of noxious weeds and prevent the establishment of new infestations resulting from construction activities by observing best practices. In remediating construction sites, the City asks UDOT to use diverse native plants suitable for supporting endemic plant communities and providing necessary forage and habitat for wildlife. Further, the City requests UDOT actively monitor and maintain the remediation until the desired vegetation is fully established.

32.13C

- **Water Quality:** There will be impacts on water quality marked by increased sedimentation and degraded water quality. In addition to implementing BMPs, the City asks that in selecting the transportation alternatives UDOT follow the guidelines identified by the Presidential Memorandum in emphasizing avoidance and minimization of impacts to water quality in both direct and indirect effects.

32.12E

*Enhanced Bus*
The Enhanced Bus Alternative converts 15.28 acres for transportation. These comments incorporate the avalanche mitigation wildlife, noxious weed, and water quality comments located above.

See responses above

*Enhanced Bus in Peak-Shoulder Lane*
Enhanced Bus in Peak-Shoulder Lane alternative converts 85.86 acres for transportation representing a more considerable loss of habitat and more significant impacts to water resources. These comments incorporate the avalanche mitigation wildlife, noxious weed, and water quality comments located above.

See responses above

*Gondola A*
The Gondola A alternative converts 12.40 acres for transportation. This acreage includes lands further from the road used as tower footings. These lands used by the gondolas footings would no longer be managed for wildlife or water quality but managed by UDOT for transportation. UDOT will obtain the land either through 23 USC Section 310 or a special use permit. This change in management prescription in areas removed from the road may impact wildlife habitat and ecosystem health not discussed in the chapter. These comments incorporate the avalanche mitigation wildlife, noxious weed, and water quality comments located above.

32.13A
32.28H

- **Wildlife:** In addition to the incorporated comments above, the City notes that construction of the gondola alternatives will rely heavily on helicopters and may

[10] *Id* at 15-17.

adversely impact nearby raptors. Raptors are sensitive to helicopters hovering near nest sites and to high noise levels.[11] Helicopter activity will impact cliff-nesting raptors as identified by UDOT and raptors nesting in trees near the gondola towers. The USFWS recommends spatial buffers for raptors should be 0.25 to 0.5 of a mile depending on species.[12] We want to ensure UDOT takes into account the need for these protections, and thus we have questions. What action will UDOT take should raptor nests be identified within the recommended spatial buffer between the nests and gondola towers? Construction, including helicopter use and blasting, will occur during raptor nesting and breeding season. What actions will UDOT take to mitigate these impacts to raptor populations? Noise associated with the everyday use of the gondolas also stands to impact raptors. What steps will UDOT take to ensure that the noise produced through gondolas' daily use will not negatively impact raptor populations?

32.13A
32.13C

*Gondola B*
The Gondola B alternative converts 28.58 acres for transportation. These comments incorporate the avalanche mitigation wildlife, noxious weed, and water quality comments located above.

See responses above

*Cog Rail*
The Cog Rail alternative converts 126 acres for transportation. These comments incorporate the avalanche mitigation wildlife, noxious weed, and water quality comments located above. In addition, to having four times the impact on acreage as other alternatives, the cog rail also requires two additional snow sheds as well as a three-foot-tall concrete barrier bifurcating S.R. 210 for the entire length of Little Cottonwood Canyon.

32.12E

- **Wildlife:** The combination of five snow sheds and a canyon-long three-foot-tall barrier constitutes a significant barrier to wildlife movement.

32.13F

- **Noise:** UDOT states that cog rail noise levels will be 65 dBA measured from 105 feet from the rail line. No other alternatives included noise levels measured at a distance. Why is the cog rail measured differently? What will the noise levels be when measured at the cog rail? As noted earlier, wildlife, particularly raptor communities, are impacted by noises measured at 45 dBA. The cog rail's noise levels of 65 dBA, from 105 feet away, will significantly impact raptor populations. What is the cumulative noise of 59 dBA roadway and an immediately adjacent cog rail line? As UDOT explains, not just raptors are affected by heightened noise levels. Terrestrial mammals experience increased stress hormone levels and decreased reproductive efficiency at noise levels between 52 and 68 dBA. It's difficult to say for certain as UDOT only offers noise measurement at a distance of 105 feet, but it is likely that within the 105 feet radii noise levels approach, if not exceed 68 dBA. We are concerned the combination of cog rail and roadway is likely

32.13F,
32.11L
32.11K

[11] *Id.* at 9.
[12] *Id.* at 21 – 23.

to exceed these levels. Please describe UDOT's strategy to mitigate the noise impacts whereas not to negatively impact wildlife the canyon's acoustic character.

32.11L

## Chapter 14 – Floodplains

The City appreciates UDOT incorporating floodplains into the analysis. We feel it is important to incorporate the state and local regulatory authority for flood control. The state of Utah mandates authority to Salt Lake County (County) to ensure the conveyance of natural storm and flood waters in the natural channels within Salt Lake County and incorporated municipalities within Salt Lake County (UCA 17-8-5). Further, per Salt Lake County Ordinance Title 17 Chapter 8 Salt Lake County facilities listed in Salt Lake County Ordinance 17.08 are subject to the flood control activities described in the Utah Code Annotated (UCA) Title 17 Chapter 8 (Salt Lake County, 1982).[13] Little Cottonwood Creek is part of the Salt Lake County Flood Control System and is subject to the provisions of Chapter 17.08 relating to such facilities.

32.14A

In addition, we ask UDOT to incorporate the many benefits of floodplains. Floodplains benefit water quality by limiting stream velocity and protecting against flooding, erosion, and impacts to stream turbidity during large-scale storm events. Adequate floodplains reduce expenses resulting from flooding, such as negative impacts to property and infrastructure, adverse effects on water quality and treatment costs, and expenses associated with remediation. Floodplain protection also has benefits for conservation and wildlife.

32.12A

Climate change will result in more intense storms and rainfall increases in the months once dominated by snowfall. Intact and functional floodplains will be necessary to ensure that a changing climate will have limited impacts on water quality and that the expenses associated with water treatment will not significantly increase. For this reason, the City asks UDOT to ensure that floodplains remain intact. Where appropriate, the City urges UDOT to implement BMPs to protect against stream velocity increases within the streambed, floodplain, and inputs such as culverts that contribute to the creek. The City asks UDOT to limit activities that will result in shrinking floodplains, narrowing the creek and riparian corridor, increasing erosion, and leading to issues affecting the City's ability to treat canyon water inexpensively.

32.12A, 32.12P, 32.14A

32.13A, 32.13B

## Chapter 15 – Cultural Resources

The City does not have comments at this time on Chapter 15 – Cultural.

## Chapter 17 – Visual Resources

City comments regarding visual resources are included in other Chapter comments.

See related responses

[13] Salt Lake County (1982). Flood Control and Water Quality. 17. Salt Lake County.

## Chapter 21 – Cumulative Impacts

### Resources not requiring detailed analysis (Section 21.2.3.1)

*Land Uses*
The UDOT analysis does not review cumulative impacts of property acquisition outside the right-of-way of S.R. 210, stating that land uses do not change, and there is no need for analysis. However, as identified in an earlier chapter, significant land-use changes occur where areas currently managed for watershed priorities will be acquired via 23 USC 317 or easements and special use permits. What are the cumulative impacts of changing the management prescription of these lands? 32.21F 32.28H

*Noise*
UDOT states that a cumulative assessment of noise is unnecessary because the addition of 2 dBA is, for the human ear, limited. However, we have questions we feel need to be assessed. Will the 2 dBA increase result in a broader acoustic footprint for noise in the canyon resulting in noise heard at higher elevations or further from the roadways? Will the estimated increase impact sensitive animal species? The noise corridor overlaps with Little Cottonwood Creek, which is an important wildlife corridor. Will the increase in noise deter wildlife from using this critical corridor? 32.12K

### Impacts to Recreation (Section 21.3.1)

*Enhanced Bus Alternatives*
These alternatives will deliver an additional 2,283 skiers to the resorts and backcountry. UDOT foresees that this may lead to a continued, incremental reduction in winter users' recreation experience in upper Little Cottonwood Canyon. Increased backcountry use will likely increase pathogenic pollution as users elect to disperse further from resort facilities to escape what UDOT identifies as a degraded recreational experience. Thus, the City has concerns about the impact on water quality. 32.20C

The City has concerns about the impact on wildlife. Has UDOT assessed the impact of additional winter users on wildlife habitat and population as skiers seeking to escape the reduction in recreation experience by resorting to side and backcountry activities? 32.20C

*Cog Rail*
The cog alternative will have an impact on recreation in Little Cottonwood Canyon. According to UDOT, the alternative results in the destruction of parts of the Alpenbock Loop and nationally recognized boulders popular with the climbing community. We request the impacts to recreation resources be included in the cumulative assessment. 32.4D

### Impacts to Water Resources (Section 21.3.2)
There currently exist 39 acres of impervious surface associated with S.R. 210. Each of the alternatives will result in increases to this acreage amount. One proposed alternative, cog rail, will double the amount of impervious surfaces.

*Gondola Alternatives*
According to UDOT, these alternatives will result in four (4) to ten (10) additional acres of impervious surfaces. The City has questions concerning how UDOT arrived at this number and how much acreage will be temporarily or permanently disturbed for tower footings and access roads. UDOT may not categorize this area as impervious surfaces, but there will be disturbances associated with the alternatives that are of concern nonetheless.

- How does UDOT identify the amount of acreage disturbed for gondola tower footprints?
- How much acreage will be impacted by gondola footings and access roads, for both construction and permanent maintenance access? How much acreage does UDOT anticipate gaining easements for or acquiring via 23 USC 317?
- How much acreage associated with the easements, acquisitions, construction, and access areas will be removed from management for watershed priorities to management for transportation purposes?
- Of the acreage disturbed for the gondola alternatives, how much will UDOT remediate, and how much will remain disturbed for maintenance or access purposes?

32.12A, 32.2.6.5L
32.28H

*Cog Rail*
This alternative results in 39 additional acres of impervious surfaces, double that currently in existence for transportation purposes in Little Cottonwood Canyon. This alternative includes four (4) additional acres at the mouth of the canyon for an operations and maintenance facility. This new impervious surface at the canyon's mouth will function as a base for the cog facility's operations and management. It will likely result in runoff concentrations and pollutant concentrations more significant than that of average highway runoff.

32.12C

**Impacts to Ecosystem Resources**

*Snow Sheds*
In all instances that include snow sheds, UDOT asserts that impediments to wildlife movement will increase. However, the analysis states that wildlife avoids the avalanche shed locations "because of steep slopes and existing roadway." On what basis does UDOT make this assertion? Will UDOT provide the data showing that wildlife movement will not occur, or that occurrences are only limited in the areas where UDOT proposes locating snow sheds?

32.13E

*Gondola Alternative B:*
The City requests the close proximity of the proposed increased parking at La Caille to the intake of the MWDSLS Water Treatment Plant included in the assessment. This proximity increases the potential of pollutants from runoff and cars reaching the creek while limiting the time to respond before entering the treatment plant.

32.12A

*All transportation alternatives*
All transportation alternatives result in more significant habitat fragmentation and increase visitation to Little Cottonwood Canyon. While the analysis states the impacts of fragmentation and use, other than determining effects to acreage, the study does not describe the expected cumulative impacts of such forces on already declining native plant and wildlife populations. Nor does the analysis identify mitigation measures in light of a cumulative assessment. 32.21G

*Cog Rail*
Again, the cog rail alternative shows significantly higher impacts than other transportation options. This alternative also hardens habitat fragmentation by erecting concrete barriers that will impact wildlife movement. 32.13F

**Impacts to Visual Resources (Section 21.3.4)**

*Snow Sheds*
The snow sheds will dominate the landscape and result in a fundamental change to the canyon's character by introducing large built structures to an area defined by and managed for natural and intact landscape character. Such overwhelming visual impacts will negatively affect user experience, degrade interactions with the landscape, and mar the beauty of a canyon globally known for its pristine aesthetic qualities. We are concerned this may result in economic impacts to recreation and tourism spending that counters the perceived economic benefits portrayed as resulting from the efficiency and reliability offered by the snow sheds. 32.17C

*Gondola*
The construction of gondolas for the length of Little Cottonwood Canyon will result in a fundamental change to the canyon's character. The gondola alternatives' overwhelming visual impact will negatively affect user experiences, alter interactions with the landscape, and degrade a canyon known globally for its pristine beauty. The aesthetic impacts from the gondola alternatives' domination of the landscape may result in economic consequences to recreation and tourism spending that counters the economic benefits portrayed as resulting from the efficiency and reliability offered by the snow sheds. The suggested mitigation measure of painting the towers to match the landscape would require a world-class feat of trompe-l'oeil in as much as the towers will be up to 200 feet tall and feature signal lights in compliance with FAA regulations. Further, we anticipate questions regarding how the signal lights will impact wildlife and dark skies. 32.17A 32.6B

*Cog Rail*
The aesthetic impacts of the cog rail will be readily apparent to every canyon visitor as a new parking structure, a new maintenance yard and building, a reconfigured park and ride, and the elimination of nearby world-class rock-climbing bouldering areas will greet visitors at the canyon's entrance. The cog rail alternative further dominates the landscape by requiring larger and longer snow sheds and a cleared geometric right-of-way. As the EIS states, "the management of the byway to protect scenic vistas 32.17D

and intrinsic scenic qualities would be inhibited and the visitor experience would be degraded." The degradation of the visitor experience wrought by the cog alternative may result in economic impacts on recreation and tourism spending and harm the quality of life of City residents who visit the canyon to experience natural beauty.

## Chapter 24 – Permits, Reviews, Clearances, and Approvals

The City does not have comments at this time on Chapter 24 – Permits.

## Chapter 27 – Section 4(f) and Section 6(f) Evaluation

Salt Lake City's proximity to the Wasatch Mountains is one reason individuals and businesses from throughout the world relocate here. Impacts on recreation opportunities in the Wasatch may have implications for our city's economic success and our residents' quality of life. For this reason, Salt Lake City comments on project alternative impacts on 4(f) resources located in Little Cottonwood Canyon.

Section 4(f) applies to significant publicly owned parks and recreation areas open to the public. The area must be officially designated as a park or recreation area.[14] In evaluating whether or not an area is formally designated and whether the area's purpose is recreational, evaluating parties are to review the management plans that govern the property.[15] The City asks UDOT to examine whether public recreation areas such as trails and climbing areas are subject to 4(f) protection. UDOT and the Forest Service should expand the 4(f) analysis beyond the existing study area boundaries in these areas as the impacts will extend beyond the study area boundary and throughout the entirety of the 4(f) properties. Some transportation alternatives examined by UDOT, such as the cog rail line, threaten to eliminate recreation opportunities residents have relied on for decades. The City asks UDOT to conduct a 4(f) analysis of areas in the canyon detailing which resources may qualify for this protection and articulating why or why not this protection is warranted.

32.26J

*Enhanced Bus*

This alternative appears to only result in minor changes to 4(f) identified areas.

*Enhanced Bus with Peak Shoulder*

This alternative has greater impacts, primarily on parking areas for trailheads. However, the alternative does result in consequences to the Alpenbock Trail, loss of the Parking Lot West Boulder, impacts to the Grit Mill area, and temporary impacts to Temple Quarry.

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[14] UDOT, LITTLE COTTONWOOD CANYON, DRAFT ENVIRONMENTAL IMPACT STATEMENT: CHAPTER 27-2 (February 2021).

[15] PROJECT DEVELOPMENT AND ENVIRONMENTAL REVIEW, U.S. DEPT. OF TRANSP. & FED. HIGHWAY ADMIN., SECTION 4(F) POLICY PAPER, 24 (July 20, 2012). *See also Id.* at 26.

*Gondola Alternatives A and B*

The gondola alternatives establish an aerial highway traversing the length of Little Cottonwood Canyon. The impacts of this aerial highway share similarities with traditional highways. The noise levels of the two are equivalent. The aerial highway's visual effects will be unrelenting, with megastructures extending resort-style modern brutalist architecture concepts the length of the canyon.[16] The infrastructure required for both Gondola Alternatives will impact numerous 4(f) designated areas, including Tanners Flat campground, Alpenbock Trail, and the Grit Mill area.

32.26E
32.26G
32.26O

- **Tanners Flat:** The Tanners Flat campground, identified as the entire area's boundaries and not just the campground proper, stands to experience significant impacts resulting from the gondola alternatives.

  - **Noise:** The Gondola will impact 2,300 feet of the Tanners Flat Campground. The gondola will emanate noise over the campground equal to the noise produced by the nearby road. The noise level is so great that UDOT and USFS anticipate this will affect individuals' willingness to camp at Tanners Flat.

32.2.6.5F, 32.26M, 32.4GG

  - **Privacy and Visual Impacts:** The gondola alternatives will result in gondola cars traveling directly over Tanners Flat Campgrounds. The gondola cars, passengers, and infrastructure will create a visual nuisance for campers and destroy solitude. The overhead gondolas will remove any sense of privacy that campers may hope to achieve. Mitigating impacts to the campground will result in moving the large group site away from the aerial highway. Other campsites will remain subject to the visual effects and the noise and privacy intrusions produced by the aerial highway.

32.26G

  - **Actual Use:** According to the Section 4(f) Policy Paper produced by the FHA, Section 4(f) requirements apply to bridging over publicly owned recreation areas. The policy paper states that actual use occurs when "appurtenances are physically located in the Section 4(f) property if piers or other appurtenances are physically located in the Section 4(f) property."[17] Situating gondola towers or other infrastructure within Tanners Flat campground boundary constitutes actual use of the 4(f) property.

32.26K

  - **Constructive Use:** Due to impacts on Tanners Flat, UDOT and USFS should review the gondola alternatives to identify whether a constructive use of the property will occur. A constructive use occurs when:

32.26L

[16] MEGAN DANIELS, SWCA ENVIRONMENTAL CONSULTANTS, SIGNIFICANCE OF SNOWBIRD SKI RESORT: LITTLE COTTONWOOD CANYON SR-210 ENVIRONMENTAL IMPACT STATEMENT, TECHNICAL MEMORANDUM (November 6, 2020).

[17] PROJECT DEVELOPMENT AND ENVIRONMENTAL REVIEW, *supra* note 15, at 59.

> [T]he project's proximity impacts are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the property are substantially diminished.[18]

According to the Section (4) Policy Paper, where a bridge spans the Section 4(f) property entirely, "the proximity impacts of the bridge will result in a constructive use."[19] A constructive use occurs when "[t]he projected noise level increase attributable to the project substantially interferes with the use and enjoyment of a noise-sensitive facility of a property protectable by Section 4(f) such as ...sleeping in the sleeping area of a campground."[20] According to the C.F.R. a constructive use also occurs when the "proximity of the proposed project substantially impairs esthetic features or attributes of a property protected...where such features or attributes are considered important contributing elements to the value of the property."[21] 32.26L

Because the gondola alternatives may require placing gondola towers within Tanners Flat boundaries, there may be the actual use of a 4(f) property. Because the gondola aerial highway spans the entirety of Tanners Flat, produces noise that will impact campers, and substantially impairs the campground's aesthetics, there is a constructive use of the Tanners Flat campground. From the review of the LCC EIS, UDOT did not evaluate the gondola options' actual or constructive use of Tanners Flat according to the requirements of 23 C.F.R. 774.15. UDOT did not assess the constructive use of Tanners Flat as directed by FHA guidance materials. Therefore, a new analysis of the gondola options' actual and constructive uses must occur. 32.26M 32.26L

**Gondola - De Minimis Impact**: In not analyzing the gondola's entire span over the Tanners Flat property as a constructive use, UDOT improperly concluded that the gondola options' have a de minimis impact on Tanners Flat campground. A de minimis impact is a finding that after avoidance, minimization, mitigation, or enhancement measures are taken, results in either a finding of no adverse effect or a determination that the project would not adversely affect the features or attributes of the 4(f) property.[22] From review of the LCC EIS, there are limited means of avoiding, minimizing, or mitigating the noise or aesthetic impacts of the gondola on the 4(f) property at Tanners Flat. We request UDOT and USFS reevaluate the 4(f) analysis of the gondola projects' effect on Tanners Flat campground in light of the previously unevaluated constructive use of the property. 32.26M

[18] 23 C.F.R. § 774.15.
[19] *Supra* note 15, at 59. *See also* 23 C.F.R. 774.15.
[20] 23 C.F.R. 774.15(e)(ii).
[21] 23 C.F.R. 774.15(e)(2).
[22] *Supra* note 15, at 8.

- **Alpenbock Trail:** The gondola alternatives will result in actual uses of the Alpenbock trail and parking. The alternative will impact the parking lot for the Alpenbock resulting in a reduction of 65 parking spaces. The alternative impacts the Alpenbock Trail, resulting in the removal of 460 feet of trail. The 4(f) analysis analyzes these actual uses and finds a de minimis impact. The 4(f) analysis did not review constructive uses of these areas by the gondola as required by 23 C.F.R. 774.15 and as necessary for overhead installations as identified by the Section 4(f) Policy Paper.[23] 32.26E

- **Grit Mill:** The gondola alternatives result in the constructive use of the Grit Mill trailhead and trails. UDOT should undertake a 4(f) analysis of the gondola alternative impacts as required by guidance relative to overhead installations identified by the Section 4(f) Policy Paper.[24] 32.26E

*Cog Rail*

This alternative results in a host of 4(f) impacts within the canyon. The cog line will result in trail loss to nine (9) named trails and about 10,000 feet of informal trails. These trails result from years of cumulated work by recreation and conservation communities, made possible by public-private partnerships, and brought about by volunteer labor and donated resources. Further, the proposal will eliminate or remove access to fourteen (14) different bouldering areas in Lower Cottonwood. These areas have been the subject of conservation actions and graffiti removal efforts using taxpayer dollars and significant citizen volunteer hours.

- **Alpenbock Trail & Grit Mill:** The cog rail results in the removal of 2.75 acres of land located at the park and ride lot. The cog rail alternative will result in significant impacts on the newly constructed Grit Mill. The alternative results in removing 1,700 feet of the Alpenbock Trail Loop and the destruction of boulders relied on by the climbing community for decades. 32.26E

  In addition, UDOT should reevaluate the cog rail option to determine if constructive uses are present. The cog alternative requires a new multilevel facility with lights, diesel storage, and constant noise resulting from the power generation necessary to propel the cog train. UDOT states that cog rail noise levels will be 65 dBA measured from 105 feet from the rail line. This noise level is greater than that of the existing nearby roadway. Hiking and climbing areas are within 105 feet of the road. The addition of a noise source equivalent to that of a busy road may substantially degrade the experiences of those on the nature trail, hiking, or climbing to such an extent that it may constitute a constructive use of these 4(f) areas. UDOT and USFWS should reevaluate the cog rail option to determine whether the 32.26E

[23] *Supra* note 15, at 59
[24] *Id.*

noise resulting from the rail alternative will constitute a constructive use of the Alpenbock Loop Trail, the Grit Mill Trailhead, and the Temple Quarry Nature Trail.

- **Tanners Flat:** Cog rail impacts on Tanners Flat should be reviewed and reevaluated to determine whether this alternative results in a constructive use of the campground due to changes in noise or aesthetics. 32.26N

**Non-Alternative Related Comment**

*Study Area*
UDOT states in 27.1 (Introduction) that "the study area shifts or widens in some locations to accommodate the topography of Little Cottonwood Canyon and the project alternatives." The City asks UDOT to include a map specific to each project alternative and how and where the 100-foot-wide 4(f) study area shifted according to each project. 32.26O

## 3. Conclusion

The City appreciates the collaboration, meetings, and discussions with UDOT throughout the LCC EIS process. In addition to the City's input, please consider the attached comments from MWDSLS. Thank you for your consideration of Salt Lake City's input on the preliminary draft chapters (Group 2) during this comment process. We hope to enhance this process through our participation.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Laura Briefer, MPA
Director of Salt Lake City Public Utilities

CC: Vince Izzo, HDR
Mike Devries, Metropolitan Water District of Salt Lake and Sandy
Rusty Vetter, Salt Lake City Deputy City Attorney
Marian Rice, Salt Lake City Department of Public Utilities
Patrick Nelson, Salt Lake City Department of Public Utilities

Attachment: Metropolitan Water District of Salt Lake and Sandy Comment Matrix

Little Cottonwood Canyon
ENVIRONMENTAL IMPACT STATEMENT
S.R. 210 | Wasatch Blvd. to Alta

**Comment Response Matrix**

| | | | | | |
|---|---|---|---|---|---|
| **Document Title** | Little Cottonwood Canyon Draft EIS, Chapters 2, 3, 10,11,12,13, 14, 15, 17, 21, 24, and 27 | **Preparer** | Eric Sorensen | **Date** | March 2021 |
| **Document Date** | February 2021 | **Organization** | MWDSLS | | |

| Item | Commenter | Old Page | Line | Comment | Response | New Page | QC/ Concurrence |
|---|---|---|---|---|---|---|---|
| 1. | | 2-32 | 17 | 2.2.3.1.2 – The document states that "…the gondola or cog rail could become a tourist attraction for those already traveling to Utah to visit other nearby attractions. This tourist attraction could provide an economic benefit to the tourism industry…". Since these two alternatives have been identified as potential tourist attractions, they should be evaluated for additional impacts related to increased recreational use and development pressure which could have potential negative impacts on water quality. | | | |
| 2. | | 2-37 | 20 | 2.3.4.2 – Design of stormwater drains should be coordinated with water systems. Location of stormwater discharges should be shared to help in response to chemical spills that might enter stormwater drains and get into the creek. | | | |
| 3. | | 2-42, 2-63, 2-68, 2-79, 2-90 | | Chapter 2, 2.6 – There is a big difference in the travel times for transit compared to personal vehicles for the gondola and cog rail options. The gondola and cog rail options also require multiple transfers. The concern is that these factors will dissuade people from using these options and will result in other solutions needing to be implemented later. | | | |

DATE

1 of 4

32.20A,
32.20C

32.12A, 32.12B

32.2.4A, 32.2.6.5J,
32.2.6.5II

## Comment Response Matrix

| | | | |
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| Item | Commenter | Old Page | Line | Comment | Response | New Page | QC/ Concurrence |
|---|---|---|---|---|---|---|---|
| 4. | | 3-8 | | 3.3.2.1.7 – This section mentions that the USFS will work to reduce private vehicle use in the canyons. Reducing private vehicle use should be considered in the evaluation of the alternatives. Reduced private vehicle use is beneficial for water quality because it reduces the number of vehicle accidents that can result in contamination of the creek. | 32.2.4A | | |
| 5. | | | | Chapter 12 should include an analysis of short term impacts to water quality in addition to the long term impacts. This would be helpful for selecting alternatives. Some of the short term impacts may be significant as we have seen with other construction projects. | 32.12A | | |
| 6. | | | | Chlorides are identified as a contaminant of concern in Chapter 12. The modeling results show small increases in chloride concentrations for the different alternatives but MWDSLS regularly sees higher chloride concentrations than what the modeling results show in the spring. We are concerned that the increased levels of chlorides in the spring due to increased application of road salts that can be expected from some of the different alternatives are not adequately represented in the modeling results. If chloride levels increase significantly, this could require addition of expensive treatment processes. There should be further analysis in this chapter on road salting impacts on water quality. | 32.12B | | |

Little Cottonwood Canyon ENVIRONMENTAL IMPACT STATEMENT
S.R. 210 | Wasatch Blvd. to Alta

## Comment Response Matrix

| | | | |
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| Item | Commenter | Old Page | Line | Comment | Response | New Page | QC/ Concurrence |
|---|---|---|---|---|---|---|---|
| 7. | | 12-4 | 41 | 12.2.3 –Non-point sources are mentioned in this section. Traffic, development and recreation are non-point sources that have been identified in the canyon. Increased use of the canyon as a result of the proposed alternatives could change the analysis of whether these sources are controlled or uncontrolled. Uncontrolled sources of pollution require action to attempt to control the source of pollution. This highlights the importance of analyzing impacts to water quality that could be associated with the proposed alternatives | | | |
| 8. | | 12-7 | 1 | 12.2.5 – As previously mentioned, stormwater management is key in LCC because of the importance of LCC as a drinking water source. | | | |
| 9. | | 12-9 | 3 | 12.2.7 – Surface water zones are not defined in this chapter but all of the proposed alternatives impact surface water zone 1 (1/2 mile from the high water mark). | | | |
| 10. | | 12-23 | 6 | 12.4.3.4.1 – This section mentions that snow sheds will not impact water quality. We have concerns about snow sheds leading to additional sediment and debris in the creek especially before vegetation is established. | | | |
| 11. | | 13-25 | 15 | 13.3.2.4 –Riparian habitat is beneficial to water quality. Riparian habitat should be maintained during and after the implementation of any of the proposed alternatives. | | | |

DATE



32.12A, 32.12B, 32.20A, 32.20F

32.1.2F, 32.12A, 32.12B, 32.12C

32.12B

32.12E

32.13A, 32.13B

## Comment Response Matrix

| | | | |
|---|---|---|---|
| Document Title | Little Cottonwood Canyon Draft EIS, Chapters 2, 3, 10,11,12,13, 14, 15, 17, 21, 24, and 27 | Preparer | Eric Sorensen |
| Document Date | February 2021 | Organization | MWDSLS |

| Item | Commenter | Old Page | Line | Comment | Response | New Page | QC/ Concurrence |
|---|---|---|---|---|---|---|---|
| 12. | | 13-26 | 29 | 13.4.1.2- Lists impacts from increased traffic and recreation including disturbed soil and noxious weeds. These impacts, especially disturbed soils, can have adverse effects on water quality. This further highlights the need to expand water quality analysis beyond the impacts from increased impervious surfaces. | | | |
| 13. | | 21.10 | 1 | 21.3.1.2 – Future recreation predictions are that visitation will increase from 2.1 million in 2013 to 3.4 million in 2050. This level of increase, if not managed properly, will have water quality impacts. It seems logical that implementation of the proposed alternatives would increase the amount of recreational use of the canyon. This increase in recreation and its impact on water quality should be analyzed in the document. | | | |

DATE



32.12A
32.12B
32.13C

32.1.2F
32.20A
32.20B
32.20C

ERIN MENDENHALL
*Mayor*

**DEPARTMENT OF PUBLIC UTILITIES**

February 10, 2021

Little Cottonwood EIS
c/o HDR
2825 E. Cottonwood Parkway, Suite 200
Cottonwood Heights, Utah 84121

**Subject:** **Comments for the Little Cottonwood Canyon Environmental Impact Statement preliminary draft resource chapters (Category 1), January 2021.**

To Whomever This May Concern:

This letter transmits comments from the Salt Lake City Department of Public Utilities (Salt Lake City, or the City) in response to the Utah Department of Transportation's (UDOT) *Little Cottonwood Canyon Environmental Impact Statement, S.R. 210 – Wasatch Boulevard to Alta*, preliminary draft resource chapters (Category 1), dated January 2021 (LCC EIS). As a cooperating agency, the City appreciates the opportunity to provide input for the preliminary draft chapters. We understand another round of Resource Chapters will be provided to us on February 15th for review..

**Legal Obligations and Special Expertise**

The Little Cottonwood Canyon watershed provides a significant portion of the City's water supply. The City has legal jurisdiction within Little Cottonwood Canyon related to its water rights, watershed management, and water infrastructure. Therefore, the City has specialized expertise within the LCC EIS study area, which we feel benefits the process.

As noted in previous LCC EIS comments to UDOT, the City is committed to fulfilling its critical duty of providing clean, safe, affordable, and high-quality water for the more than 360,000 Salt Lake Valley residents. Further, federal and state regulations obligate the City to provide clean, safe water to protect public health. This includes the federal Safe Drinking Water Act, the Utah Water Quality Act, and state statutes related to the management and use of public water resources. The City in turn regulates certain activities in order to meet these legal obligations.

In addition to our legal obligations and special expertise, the Salt Lake City Municipal Corporation has divisions and departments that that have service obligations related to transportation, transit, equity, and quality of life, to name a few.

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**Category 1 Resource Chapters**

A. **Chapter 4 – Community and Economic Impacts**
The City believes that Little Cottonwood Creek and its tributaries could reasonably be considered to meet the definition as a Quality of Life resource under Chapter 4.3.2. Little Cottonwood Creek is a primary water supply for more than 360,000 people in the City's water service area, as well as almost 100,000 people in Sandy City's water service area. It also is a source of water for the Town of Alta, Snowbird, and Salt Lake County Service Area #3. It is the most important underpinning of the economic and public health well being of Salt Lake Valley and canyon residents and businesses. This source of drinking water is essential to the region's quality of life and economic prosperity. Hundreds of millions of public dollars have been invested in water rights and infrastructure to acquire, treat, and deliver Little Cottonwood Creek to people's taps.

32.4II

The creek is also a major draw for those recreating in the canyon for fishing and as an aesthetic resource. Chapter 4.4 could then address whether there are impacts that could or could not be mitigated under each of the alternatives.

32.4I

B. **Chapter 5 – Environmental Justice**
Although the UDOT EIS analyzes the environmental justice (EJ) impacts on the communities within the geographic area of the project, it does not analyze the equity and fairness impacts on all communities in which the burden of cost may be borne, including EJ communities. Thus, UDOT's EJ analysis should extend beyond the corridor of immediate impact to include affected communities beyond those immediately located near the ski resorts and sites adjacent to the proposed transportation alternatives. This is important, as the alternatives may impact these communities in several ways.

32.5A

1. **Consideration of Project Costs on the Broader Community:**
**Project Costs:** Per the LCC EIS Purpose and Need, each of the transportation alternatives directly serves the resorts. Thus the alternatives primarily benefit the resorts, the recreational community the resort's serves, and the additional recreationists which the transportation alternatives will allow to visit the resorts due to the transportation proposals. However, it is assumed that a much broader segment of the region's population will be needed to contribute revenues for capital improvements and life-cycle operations. It is unclear if this would be in the form of increases in taxes, increased transit fees, or a decreased capacity of the state and transit agencies to address other state transportation and transit needs. EJ communities may already have greater transportation and transit needs than the general population, and are likely to have less ability to absorb increased taxes, rates, and fees. We realize this is a more complicated analysis, but it is a question that has been raised during public conversations. The City does have a population that would be paying for the project with disproportionate impacts or would be impacted should the alternative necessitate a deferral of other state transportation or transit agency projects.

32.5D

32.1.2B

2

2. **Water Ratepayers:** In the vain of evaluating broader community costs associated with the project alternatives, a specific group that could be impacted are water rate-payers. Alternatives that have a higher risk of long-term impacts on water quality will create a greater likelihood that capital and operational improvements would need to be made to the water system to mitigate those impacts. Also, should any of the alternatives require that water infrastructure be realigned or moved, or that land owned by water utilities must be taken to support the alternative, there will be an impact to rate-payers. The City, Metropolitan Water District of Salt Lake and Sandy (MWDSLS), and Sandy City each have capital improvement plans to rehabilitate and replace aging water infrastructure, which will require water rate increases. Adding financial burden to water utilities through any of these alternatives would result in either foregoing critical aging infrastructure replacement projects to reduce rate impacts to EJ communities or further increasing rates that may not be affordable to members of EJ communities. 32.5D

3. **Region-wide Access:** UDOT's environmental justice analysis should consider EJ populations region-wide who rely on Little Cottonwood Canyon access. Residents from across the valley depend on access to Little Cottonwood for recreation and physical and mental well-being. Therefore, UDOT should extend the environmental justice analysis to include equity and fairness to areas beyond those contained in the current study. 32.5A

4. **Tolls:** The environmental justice analysis should further analyze the impact tolls and the high price of public transportation will have in limiting the access of many communities to Little Cottonwood Canyon, or whether there is a scale that can be applied to tolling to mitigate this. Environmental justice communities, including low-income communities, may very well find that some proposed alternatives effectively bar access to public lands. 32.5A

   UDOT contemplates a vehicle fee of $20 - $30 to travel up Little Cottonwood Canyon. UDOT further proposes limiting the toll to the upper portion of the canyon. This action will have the effect of precluding access of low-income residents to public lands. The impact of such a division of access to the canyon based on economic access may very well incentivize recreation in the lower canyons, increase the density of recreational use, and create issues of water quality, and impair the quality of recreational experience. 32.5A 32.5E

   UDOT's analysis states that the disproportionate impact of a canyon toll on low-income populations is negligible as those populations may avoid the toll by using public transportation. Utah leads ]the nation in average household and family size. An average Utah household consists of nearly four individuals. Currently, a round trip ski bus up Little Cottonwood Canyon costs $9 per person. An average Utah family attempting to avoid the toll would end up paying $36 in public transportation costs at the current rate, thereby exceeding the expense of the toll by $6 - $16 depending on the toll amount. Meanwhile, an individual with a season pass to a resort may have their public transportation partially subsidized by the resort. 32.5A

Whether viewing the toll or the public transportation options offered as an alternative by UDOT, low-income populations and their access to public lands will be disproportionately impacted. We, therefore, encourage a mechanism to incentivize low rate public transportation to allow all residents to access the canyon. 32.5A

5. **Parking:** Each transportation alternative relies on various parking configurations. It would be beneficial if the analysis identifies whether the parking will be free or if it will require payment. If there is a fee, what are the proposed fee and the purpose of the revenue? 32.2.4A

C. **Chapter 6 - Economics**
We believe that the Economics chapter of the EIS document should state that providing drinking water to the arid valley below is a primary purpose of LCC, in addition to other nearby canyons such as Big Cottonwood Canyon (BCC). This purpose predates the other purposes and uses contemplated in this chapter and ignores the purpose of the establishment of the Forest Reserve in the early 1900s to protect the City's water supply, and Congressional actions to protect the LCC canyon watershed in 1934. The City described congressional actions in greater detail in earlier EIS comment submissions. Further, the 2003 Uinta Wasatch Cache National Forest Plan identifies the primary management goal for this area as providing high-quality drinking water. It would be beneficial to provide this information as it contributes important context. Finally, we recommend including in the analysis the economic benefit of high-quality water to the Salt Lake Valley, including in the form of tourism, businesses, and industry. 32.6F

D. **Chapter 7 – Traffic and Transportation**
Given the City's role in canyon management, we are interested in whether the analysis should identify the ongoing responsibility of maintenance for the contemplated trailhead improvements. Additionally, is there a location where the EIS contemplates estimated annual revenue from tolling, and how this revenue could be used to mitigate the impacts from transportation changes? 32.2.6N

The City appreciates UDOTs efforts to develop a heat map of automobile collision locations and identify opportunities to protect against impacts these accidents may have on the water quality and the riparian corridor. The City asks that UDOT further identify opportunities for innovative vegetation buffers between the roadway and stream corridor. 32.12T

E. **Chapter 8 – Joint Development**
The City does not have comments at this time on Chapter 8-Joint Development.

F. **Chapter 9- Pedestrians and Bicycles**
Chapter 9 suggests that the third lane option will not be open for vehicular traffic during the summer season but that the lane may be available to bike and pedestrian traffic. The City asks UDOT to analyze the increase of new recreational opportunities to the watershed and water quality. 32.20V

G. **Chapter 16 – Hazardous Materials and Waste Sites**

UDOT's analysis identifies former smelter sites that the proposed transportation alternatives may impact. The City asks that UDOT coordinate with the City concerning impacts to these sites in addition to the Utah Department of Environmental Quality (DEQ) Division of Emergency Response and Remediation (DERR). 32.16A

H. **Chapter 18 – Energy**
The City appreciates UDOT has incorporated analysis of short and long energy demand of the alternatives. Please refer to the City's comments in other chapters regarding the potential for increased energy demand and operational costs to ratepayers. 32.1.2B, 32.5D

I. **Chapter 19 – Construction Impacts**
The City appreciates UDOT has considered impacts from construction and mitigation measures. We ask that UDOT diligently monitor and maintain the mitigation practices implemented. Further, it is important the remediation performed is monitored and maintained until desired vegetation has been fully established. 32.13C

It should be noted that City Ordinance restricts herbicides in the Little Cottonwood Canyon watershed to a small number of approved products. UDOT must conduct any restoration work resulting from the transportation project in accordance with all requirements protecting against invasive species. The City wants to minimize impacts on the watershed and approve plans involving herbicide application or invasive species patching as the projects form and before on-the-ground actions. Construction equipment needs to be clean and free of dirt, weeds, seeds, etc., before being brought into the canyon. UDOT should analyze soils at construction staging and borrow areas before use. Fill should be certified weed-free. 32.19G

J. **Chapter 20 – Indirect Effects**
The City appreciates UDOT recognized the importance of the watershed as a sourcewater for the Salt Lake Valley. We ask that UDOT further analyze the following indirect impacts.

1. **City Property**-The transportation alternatives include impacts to, and takings of, City property. It should be noted City property has been set aside for purposes of the public good for sourcewater protection and water infrastructure. 32.4S

2. **Increased Recreation Impacts:** UDOT's analysis estimates an increase of 113,000 people recreating in the canyons due to the transportation plan and population growth. This increase will likely result in impacts on water quality. The UDOT analysis does not address the effect that each transportation mode will have on increasing the number of recreationists in the canyons. There should be a more robust review of the impacts on recreation that will accompany each transportation option. Further, each option should include an estimate of the necessary funding required to mitigate these impacts. The City contributes significant resources to accommodate existing uses. UDOT's analysis should include an estimate of future mitigation needs resulting from the transportation plans and possible funding sources. The City hopes that UDOT could consider an expanded analysis beyond the SELDM model to 32.20A, 32.20C 32.20U, 32.12L, 32.12A, 32.12B, 32.2.6.3C, 32.2.6.5G, 32.12K

contemplate the impact of the indirect effects on water quality and the project's impact on ecosystem health,and increased operational and maintenance costs to recreation management. UDOT's analysis does not identify the source of funding to mitigate the impacts of increased recreation, nor does it address the effects of increased recreation outside yet directly adjacent to the project area. These concerns should be analyzed and presented as part of the ongoing EIS process.

32.20A, 32.20C

EIS Chapter 22, "Short Versus Long Term Impacts" states little recreational consequences resulting from the transportation projects. As the narrowly defined project area has allowed for limiting sufficient recreational impact analysis, it is difficult to make this statement with confidence. It would be beneficial for the project's success that UDOT conducts a meaningful recreation analysis to identify the cumulative direct and indirect and short and long-term impacts that proposed transportation changes will have on the canyon's recreation opportunities and user experiences.

32.4A, 32.4B, 32.4G, 32.4P, 32.20A, 32.20C, 32.21D

3. **Parking Opportunities**-Willingness to use public transportation relies heavily on parking opportunities. UDOT's analysis does not include information regarding whether the contemplated parking options will be free or require payment. If payment is required, where will this revenue be used? What options are available to inform the public in real-time parking availability at each of the proposed parking areas?

32.2.4A

K. **Chapter 22 – Short Term Uses versus Long Term Productivity**
The City does not have comments at this time on Chapter 22- Short Term Uses versus Long Term Productivity.

L. **Chapter 23- Irreversible and Irretrievable Commitment of Resources**
Please see previous comments regarding EJ, equity, and fairness concerns. It is possible that there is an irreversible and irretrievable commitment of public resources that would not benefit EJ communities outside the geographic area studied.

See previous responses, 32.5A, 32.1.2B

M. **Chapter 28 – Coordination**
The City does not have comments at this time on Chapter 28-Coordination.

**Conclusion**

The City appreciates the collaboration, meetings, and discussions with UDOT throughout the LCC EIS process. Thank you for your consideration of Salt Lake City's input of the preliminary draft chapters (Category 1) during this comment process. We hope to enhance this process through our participation.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Laura Briefer, MPA
Director of Salt Lake City Public Utilities

ERIN MENDENHALL
*Mayor*

LAURA BRIEFER, DIRECTOR
*Department of Public Utilities*

July 3, 2020

Little Cottonwood EIS
c/o HDR
2825 E. Cottonwood Parkway, Suite 200
Cottonwood Heights, Utah 84121

**Subject:** **Salt Lake City Comments**
**Draft Alternatives Development and Screening Report, Little Cottonwood Canyon Environmental Impact Statement SR 210 – Wasatch Boulevard to Alta, June 8, 2020**

To Whomever this May Concern:

This letter transmits comments from the Salt Lake City Department of Public Utilities (Salt Lake City, or the City) in response to the Utah Department of Transportation's (UDOT) *Draft Alternatives Development and Screening Report, Little Cottonwood Canyon Environmental Impact Statement, S.R. 210 – Wasatch Boulevard to Alta* report dated June 8, 2020 (LCC EIS). Salt Lake City appreciates the opportunity to provide comments for this EIS. The Little Cottonwood Canyon watershed provides a significant portion of the City's water supply. The City has legal jurisdiction within Little Cottonwood Canyon related to its water rights, watershed management, water infrastructure, and provides specialized expertise within the LCC EIS study area.

**SALT LAKE CITY'S COMMITMENT TO PUBLIC HEALTH AND CLEAN WATER**

The canyons of the Central Wasatch Mountains provide an affordable, reliable, high-quality water source for over 360,000 people within the City's service area for its public water supply. The City's service area includes all of Salt Lake City, and portions of Mill Creek, Holladay, Cottonwood Heights, Midvale, Murray, and South Salt Lake. Population growth projections anticipate the need to supply water for another 150,000 residents within our service area the next 40 – 60 years.

That the supply of water from the Wasatch Mountains is affordable, reliable, and of high quality is no accident, but part of a larger legacy of fastidious stewardship dating back to the arrival of the pioneers in 1847. Salt Lake City's Mayor and Council blocked a major mining operation in the Wasatch in 1873, a development which the City feared would lead to unsustainable growth in the watershed and compromise the water quality required by the City and its residents to grow the population and cultivate a thriving economy. Nearly a century and a half later, pressures on the City's water supply remain, though the nature of them have changed. No longer is the greatest threat impacting water quality coming from the creation of the new mining operations. The modern pressures threatening water quality and quantity are profoundly different: development, increasing visitation in both the backcountry and front country, a growing population, and the impacts of climate change. Land use and transportation within these watersheds are profoundly interrelated with these pressures, and decisions stemming from the LCC EIS could further exacerbate threats to the City's drinking water supply.

The City has a legacy of steadfastly protecting the watershed benefits residents, businesses, and the broader economy depend upon within the Salt Lake Valley. The high quality of water rushing from the springs and snowmelt of the Central Wasatch Mountains requires minimal filtration and chemical treatment. This minimal treatment protects public health and results in lower costs to ratepayers. This means residents can be confident that the water from their tap meets all the federal Safe Drinking Water Act requirements, and that families can afford to grow and take root in the Salt Lake Valley and businesses can thrive.

The Salt Lake Valley's success is inextricably linked to the quantity and quality of our water. Congress recognized this link as foundational to decisions in the Central Wasatch as far back as 1914 and 1934 when enacting federal legislation directing the United States Forest Service (USFS) to manage federal lands within the watershed in a manner consistent with the protecting the City's culinary water supply. The current USFS Wasatch Cache Forest Plan continues this century-long effort. The plan prioritizes the primacy of water quality and watershed health in the management of the Central Wasatch Mountains by recognizing "the need to provide long term, high-quality culinary water to the large urban population of the Salt Lake Valley." The City remains firmly committed to public health and protecting water quality and quantity and will, as we have since our inception, protect these interests for the benefit of the public.

**SALT LAKE CITY IS LEGALLY BOUND TO REGULATE THE WATERS QUALITY**

As noted in previous LCC EIS comments to UDOT, the City remains committed to its critical duty of providing clean, safe, affordable, and high-quality water for the residents of the Salt Lake Valley. The City is also legally bound by state and federal regulations that oblige us to provide clean, safe water and to protect the public health and community prosperity.

The City must comply with requirements promulgated through federal and state water quality statutes, including the Safe Drinking Water and Clean Water Acts. As a Public Water System, the City must meet strict regulatory obligations requiring the protection of drinking water sources as critical to safeguarding public health.[1] The City is subject to the state Safe Drinking Water Act requirements and Administrative Rules regulating Public Water Systems. These regulations require the City to protect surface water sources of drinking water, to conduct source water assessments, and engage management strategies protecting the deterioration of water sources.[2][3]

State statute grants the City direct jurisdictional authority for the protection of the Central Wasatch watershed. Section 10-8-15 of the Utah Code gives the City extraterritorial jurisdiction for the construction, operation, and maintenance of waterworks, and to protect from pollution the water that is "used in and necessary for city waterworks." The City's authority to protect against water pollution extends throughout the "entire watershed."[4] Further, state law authorizes the City to "enact ordinances preventing pollution or contamination of the streams or watercourses in which the inhabitants of the cities derive their water supply."[5] The City has enacted watershed ordinances to further protect against the deterioration of the quality of water emanating from the Wasatch Mountains.[6] The City also has joint authority with Salt Lake County Health Department Regulation #14, the purpose of which is to:

> "regulate the use and occupancy of watersheds within Salt Lake County in a manner that will protect and promote the public health, safety, and welfare; prevent damage to property; prevent the spread of disease; prevent the creation of nuisances; prevent air and water pollution; and promote conditions that contribute to the preservation and protection of drinking water quality."[7]

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[1] *Understanding the Safe Drinking Water Act*, EPA. https:www.epa.gov/sites/production/files/2015-04/documents/epa816f04030.pdf

[2] *Drinking Water Laws and* Rules, Utah Department of Environmental Quality. https://deq.utah.gov/drinking-water/laws-and-rules.

[3] Rule R309-605. *Source Protection: Drinking Water Source Protection for Surface Water Source.* https://documents.deq.utah.gov/drinking-water/rules/DDW-2018-003500.pdf.

[4] UTAH CODE ANN. § 10-8-15.

[5] *Id.*

[6] SALT LAKE CITY, UTAH, CITY CODE tit. 17.04 – "Watershed Areas" (2015).

[7] SALT LAKE VALLEY HEALTH DEPARTMENT, Health Regulation #14: "Watershed Regulation" *https://slco.org/uploadedFiles/depot/fHealth/regs/watershed.pdf*.

Additional local guidance, rules and regulations working in coordination to protect the City's water supply are: Salt Lake City Watershed Management Plan; Salt Lake County Canyons Master Plan; Salt Lake County Foothills Canyon Overlay Zone; Salt Lake County Mountain Resort Zone.

The above federal, state, and local efforts are mentioned not only as a recitation of Salt Lake City's legal duty to protect the watershed, but as a way of illustrating to UDOT over a century's worth of legal and policy filters put in place to keep the City's water clean and affordable. As such, the City was named as a Cooperating Agency for the Project. On December 13, 2019, the City submitted comments to the EIS Draft Purpose and Need and Draft Alternatives and Screening Methodology. The City's primary focus was that the Alternatives and Screening Methodology should elevate consideration of the Safe Drinking Water Act and other water related matters to a Level 1 screening criteria. By doing this, UDOT would have been placing the protection of clean water equal to other key considerations for the LCC EIS. UDOT declined to accept the City's comments and responded that it could interfere with some transportation alternatives that might be considered. The City believes that this is a fundamental flaw in UDOT's process in developing the EIS.

**COMMENTS TO THE LCC EIS**

**1. Purpose and Need**

UDOT's stated purpose for the project is to "improve transportation related safety, reliability, and mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210." Since the project's inception in 2018, the City has repeatedly stated that UDOT's adoption of a Purpose and Need statement, which neglects Little Cottonwood's primary role in providing drinking water to the Salt Valley, is insufficient. UDOT's waiting to apply watershed and water quality standards, such as the Safe Drinking Water Act, for which the City is legally obligated, until the secondary screening, risks selecting an efficient transportation model but a substandard model for water quality. Even in circumstances where UDOT identifies a model that meets Level 2 screening requirements, UDOT will still only have selected the best transportation option with acceptable water quality measures. Whereas, had UDOT incorporated watershed and water quality as Level 1 screening requirements from the beginning of this process, the outcome would be both the best solution for our watershed as well as the best option for transportation.

32.1.2F

32.2.2U

The City remains concerned that this project does not fully incorporate a solution to all the transportation challenges in the Cottonwood Canyons. It seems as if there may have been a missed opportunity to incorporate Big Cottonwood Canyon and popular summer season travel in this analysis given the explosive growth of recreational demand year-round. The current pandemic has dramatically highlighted the need for comprehensive year - round transportation and recreation planning in Big and Little Cottonwood Canyons.

32.1.1A

**2. Impacts to the City's Beneficial Use**

UDOT should consider whether alternatives could directly or indirectly impact City water infrastructure, particularly the treatment plants and intakes along Little Cottonwood Creek. Further, UDOT should include the City's land and water rights to ensure that the actions proposed in the EIS do not impact the City's ability to use its water rights. The failure to protect these assets puts at jeopardy the reliable delivery of clean water to 360,000 people and very broad economic investments when compared to the LCC EIS, which appears to be limited to commercial ski resort and skier interests during the winter.

32.12S, 32.12A, 32.12B, 32.12K

**3. Consideration of Climate Change**

UDOT's climate change analysis neglects the many threats posed to the Wasatch Canyons watersheds, including Little Cottonwood Canyon. Recent scientific studies of climate change in the Wasatch Mountains paints a dire picture. Forecasts include climate change impacting snowpack, water quantity, quality, stream temperature, timing of spring

32.2.2E

runoff, fluctuations in high flow events, and the loss of high elevation riparian and wetland habitats further impacting water quantity.[8][9][10]

Climate change studies expect water quantity to "decrease significantly by the 2040s and considerably more by the 2080s."[11] These studies project future snowmelt and spring runoff to occur 1 to 3 weeks earlier. At the same time, winter high flow events, with rising turbidity, are expected to increase as winter temperatures result in more rain and less snow at higher elevations.[12] Decreasing water quantity means that small impacts on water quality, such as pollution and turbidity events that would have been minor in times of higher flow, resulting in times of scarcity, in an outsized impact on overall water quality.

32.2.2E
32.12H

Further compromising water quantity, scientists expect warming temperatures and reduced snowpack to result in fewer high elevation riparian and wetland habitats. In turn, this will result in drier and less productive systems as the ecosystems in more elevated sections of the watershed have little room to escape warming temperatures by moving upslope.[13] Climate change analysis of the Wasatch tells us that dwindling water quantity will affect "the abundance and diversity of biota in riparian zones," which play an essential role in water quality.[14] Dwindling water supply will alter sediment supply and channel shape again, impacting water quality.[15] Scientists expect climate change to result in recreation impacts, which will increase pressure on water quality.

Climate scientists have identified the Central Wasatch as highly vulnerable to "recreation activity that degrades riparian areas, contributes pollution, increases erosion, and can lower water availability …compounded by longer summer seasons that lengthen the amount of recreational activity that may shift into higher elevations."[16] Climate change also poses risks to the springs and seeps, as warming temperatures "increase evapotranspiration and consequently decrease streamflow," thus leading to a higher likelihood of intermittent flows of perennial streams feeding into the waters of Little Cottonwood Creek.[17] Climate projections anticipate that less snowpack may lead to ephemeral streams having "shorter periods of streamflow with flashier patterns of inundation and drying."[18]

The Wasatch watershed can expect a drier future, with reduced streamflow, less productive wetlands, and riparian areas, intermittency of once-reliable perennial streams, and flashier storm events leading to higher turbidity. The most recent analysis of climate change impacts to the Wasatch watershed confirms what we already know: reductions in water quantity result in consequences to water quality, and that "reductions in water quality will lead to increased treatment costs for municipal users, as well as potential losses in biological function."[19]

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[8] J. Halofsky, "Climate Change Vulnerability and Adaptation in the Intermountain Region (Part 1)." United States Department of Agriculture, (April 2018), https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd578946.pdf (last visited June 26, 2020).
[9] J. Halofsky, "Climate Change Vulnerability and Adaptation in the Intermountain Region (Part 2)." United States Department of Agriculture, (April 2018), https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd578945.pdf (last visited June 26, 2020).
[10] J. Rice, "Assessment of Watershed Vulnerability to Climate Change for the Wasatch Cache and Ashley National Forests, Utah." United States Department of Agriculture, (June 2017), https://wwa.colorado.edu/publications/pdfs/2017.01.pdf (last visited June 26, 2020).
[11] J. Halofsky, pg VIII
[12] *Id. 90.*
[13] *Id. 187.*
[14] *Id. 386.*
[15] J. Rice, pg. 46.
[16] *Id. 66.*
[17] *Id. 61.*
[18] *Id. 65.*
[19] J. Halofsky, pg. 386

For the reasons named above, the City requests that UDOT respond to the primary importance of water and its impacts on the residents of the Salt Lake Valley by elevating water resources and adherence to federal, state, and local rules and regulations to a primary, and not a secondary, purpose.

32.1.2F

**4. Road Widening**

UDOT alternatives that include the widening of S.R. 210 need to consider potential impacts on water quality resulting from increasing the number of impervious surfaces located in the canyon. Additionally, road widening will result in decreasing the buffer between the road and the creek. In areas of high slope degree, wide buffers are necessary to trap sediment and pollutants, maintain stream temperature, protect streambanks from erosion, moderate stormwater flows, and provide wildlife habitat, all services which are essential to protecting water quality.[20] [21] [22]

32.12P
32.12B
32.13B
32.12O
32.12T

However, with any proposed modification to the roadway, the City is encouraged with UDOT's ability to consider the right sizing of existing culverts, the addition of guardrails or barriers in key locations to keep crashes out of the creek and the opportunity to update all the stormwater best management tools and facilities in the canyons. As UDOT has pointed out, many of these culverts and drainage issues need repair and updating. The City appreciates UDOT's awareness of the existing issues with stormwater on Highway 210 and the need to incorporate modernization of storm water management both in this LCC EIS process and in their daily operations by their team that works so hard to keep the highway safe and functional.

**5. Trailhead Parking**

UDOT addresses trailhead parking impact on stormwater and Little Cottonwood Creek water quality. In addition to addressing stormwater, UDOT needs to include stormwater Best Management Practices (BMPs) and associated operation and maintenance in perpetuity. The City is concerned that increased parking and the hardening of parking areas will result in more impervious surfaces, which will impact runoff and water quality. "[R]unoff from impervious areas such as parking lots, local roads, and highways can increase storm flows and increase concentrations of sediment, nutrients, deicers, trace elements, and organic constituents in receiving water bodies."[23]

32.2.6.2.4H

Further, worth mentioning is the existing Forest Plan's prohibition on additional parking. The USFS Revised Plan states that the:

32.4P, 32.2.6.2.4A

> Protection of watershed conditions will be a primary factor in managing roads, trails, and access. In the Tri-canyon area (Big and Little Cottonwood Canyons and Mill Creek), parking capacities of canyon parking lots (ski areas, summer use homes, developed and dispersed recreation sites) will not exceed 2000 levels unless modification is needed for watershed protection or to facilitate mass transit.[24]

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[20] Hawkes and Smith. *Riparian Buffer Zones: Functions and Recommended Widths Yale School of Forestry.* http://eightmileriver.org/resources/digital_library/appendicies/09c3_Riparian%20Buffer%20Science_YALE.pdf . (last visited June 27, 2020).

[21] *Riparian Corridor Protection in the Huron River Watershed.* http://www.hrwc.org/wp-content/uploads/2009/11/HuronBufferPaper_Mar08.pdf. (last visited June 24, 2020).

[22] Wenger, S. and L. Fowler. 2000. *Protecting stream and river corridors: creating effective local riparian buffer ordinances.* Athens, GA: Public Policy Research Series, Carl Vinson Institute of Government, University of Georgia. http://www.ohioenvironmentallawblog.com/uploads/file/UGA%20riparian_buffer_guidebook.pdf. (last visited June 24, 2020).

[23] J.C. Risley, *Assessing Potential Effects of Highway Runoff on Receiving-Water Quality at Select Sites in Oregon with the Stochastic Empirical Loading and Dilution Model (SELDM)*, U.S. Geological Survey Scientific Investigations Report 2014–5099, pg. 74 http://dx.doi.org/10.3133/sir20145099. last visited June 24, 2020).

[24] USFS Revised Plan,. 4-160

While the LCC EIS accounts for the USFS moratorium on increased parking numbers and states that new and improved parking areas will not surpass this limit, it is worth reiterating that there does exist a moratorium on parking. UDOT relies on removing roadside parking to avoid exceeding the USFS limit. The City would like more specificity in how this will be enforced, and by whom. Will UDOT take additional infrastructure steps to enforce the ban on roadside parking, and what are the anticipated expenses of administering this ban?

32.4P
32.2.2M

Further, increasing parking in areas such as Lisa Falls (increasing parking from the existing 17 to 65) will result in increased visitation pressures on these areas. This increase in visitation may result in the need for additional amenities and possibly water quality degradation at the sites of parking improvements. To guard against this scenario, UDOT should ensure that any restroom designs comply with Salt Lake County Health Department Ordinances, including setback requirements. Areas with additional trailhead parking should minimize the removal of vegetative buffers and incorporate stormwater solutions to reduce or eliminate any, and all stormwater discharged into Little Cottonwood Creek. Additional trailhead parking promotes the use of personal vehicles and detracts from incentives for mass transit, which ultimately strikes against the stated purpose and need of the EIS.

32.2.6.2.4A
32.4P

The City also requests that UDOT incorporate an operation and maintenance funding component in its impact analysis of the additional restrooms and trailhead parking this project ponders. The City supports collaborative efforts to maintain recreation sites in the interest of protecting water quality. Presently, the City is in a partnership with the Central Wasatch Commission, the Salt Lake Ranger District of the Uinta-Wasatch-Cache National Forest, Snowbird and others to clean restrooms. It is the City's understanding that the baseline funding levels from the US Forest Service do not accommodate day to day cleanings, operations and maintenance of trailhead facilities, let along long-term capital costs. If this project adds additional recreational facilities on the Salt Lake Ranger District, the City requests consideration of cost analysis and associated funding sources to adequately steward these areas. Note that this request does not include the costs associated with the heavily used stream corridor that both the proposed Bridge Trailhead and Lisa Trailhead areas service. These areas are plagued by graffiti issues, multiple non-sanctioned trails that contribute greatly to streamside erosion and sedimentation, etc.

32.6N

**6. Clean Water Act**

The City supports including the protection of wetlands and the CWA Section 404(b)(1) in the Screening Criteria. However, in the context of these watersheds and the importance of water resources, this is too narrow. As such, the City requests expanding the CWA analysis to include other sections of the CWA, including Section 303. Additionally, the City asks the Level 2 Screening Criteria include impacts related to the Utah Water Quality Act. The Screening Criteria needs to contain compliance with UAC R317-2 Standards of Water Quality of the State. This includes, but is not limited to, protection of Category 1 Waters. The Screening Criteria should state the alternatives will be protective of the beneficial uses assigned to the Little Cottonwood Creek, as outlined in UAC R317. This consists of the beneficial use designation of Class 1C: Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water (DDW); Class 2B: Protected for infrequent primary contact recreation; and Class 3A: Protected for cold-water species of game fish and other cold-water aquatic life, including the necessary aquatic organisms in their food chain.

32.1.2F
32.2.2UUU

**7. Built Infrastructure**

In addition to the natural infrastructure of the watershed, it is important to protect the existing built infrastructure. The sewer collection system serves essential public health and water quality purpose. It is essential to protect this infrastructure and ensure any alternative does not inadvertently impact or expose the sewer collection system.

Furthermore, a change in water quality and flow regime could impact the drinking water infrastructure and the ability to treat water. A negative impact on water quality could reduce or even prohibit the Metro Water Treatment Plant (Metro WTP) from treating water to deliver to the public. For example, the Metro WTP would need to stop treating and delivering water should there be a significant increase in turbidity. Also, should there be an increase in pollutants and pathogens, there is a possibility the Metro WTP would need to alter or even wholly upgrade to an enhanced treatment process to accommodate the increase in pollution. This change in the treatment process would be very

32.12A, 32.12B, 32.12K

costly, both in capital costs and ongoing operation and maintenance costs. Furthermore, the ratepayers would bear these costs to accommodate the increased access to winter resort recreation. Therefore, there is a social equity element that needs to be strongly considered for all alternatives.

**8. Snow Sheds**

According to the LCC EIS, likely alternatives require two snow sheds totaling 3,194 feet, the realignment of the road to place snow sheds closer to the mountain, as well as lessening curves in the existing road. Constructing snow sheds and further canalizing S.R. 210 will require significant development, which is a risk to water quality and quantity. The EIS fails to provide any analysis of the impact the snow sheds may have on Little Cottonwood Creek by accelerating avalanche debris over the road and depositing it directly into the creek area. Would this result in more significant debris in the creek? Would this result in more creek flashes and increase turbidity? Would this contribute to localized flooding and streambank erosion? 32.12E

Furthermore, the City requests that UDOT incorporate into its analysis the impact of the deposited avalanche debris and compacted snow on both streamside health, including wetlands and riparian vegetation. UDOT may need to consider further acreages of impacted wetlands in this consideration. Compacted snow and avalanche debris may linger far longer than natural snowpack and reduce the health of the riparian corridor.

As per past conversations with UDOT, the City requests that, if the snow sheds were to be selected as an option moving forward, that the fire suppression system required in these structures have full secondary containment to avoid severe contamination of the creek post-accident. Additionally, the City would like to review any roadway runoff management designs for the snow sheds if they are selected.

**9. Gondola**

The gondola alternative results in the City's following concerns:

- Impacts on water quality, riparian areas, and stream buffers of the development footprint and associated access roads for the twenty pads necessary to host gondola towers. 32.12A, 32.13A
- The gondola alternative requires an angle station which necessitates an independent power source. The City is concerned about the potential impact of the independent power source and associated fuel should a rupture occur impacting the surrounding area and Little Cottonwood Creek. Further, the City is concerned that should such an event occur, there should be a warning system installed to notify the water treatment plant operators of the immediate need to divert incoming water from the creek. 32.12A, 32.12O
- Any supplementary power system that is used as a backup power system should have full secondary containment for fuel and other related liquid spills that could contaminate the water flowing down to the plant intake. This includes diesel generators and other associated fluids. 32.12O
- This alternative requires a high user fee on personal vehicles necessary to incentivize gondola use. The high user fee will negatively impact the ability of low-income households to access public lands. [25] 32.5A
- The gondola alternative, at great expense and with little improvement in travel time, appears to do very little to alleviate canyon traffic congestion. Further, this option does not address traffic conditions for dispersed canyon recreation or travel beyond the winter ski season. The City remains concerned that the LCC EIS does not address the Cottonwood Canyons transportation issues in a holistic fashion, both the travel time analysis for gondola and 32.7B, 32.7C, 32.1.2D

[25] Section 3.1.2.2.4 states that the success of the gondola alternative is dependent upon a higher use fee for vehicles.

the narrow focus on winter seasonality put the project's success at risk. Failure to incorporate the use of the parking nodes and mobility centers by backcountry skiers and the high volume of Big Cottonwood skiers does not accurately consider time gains from the gondola.

- The gondola alternative leaves unanswered questions of ongoing operations and management of infrastructure

32.2.7C

- Noise and privacy impacts on residents, visitors, and those using USFS campsite areas

32.11D, 32.4B, 32.4E

- The City desires more information on the details of both the travel corridor in its relation to the initial project area and the project's purpose and need statement. The gondola's travel corridor seemingly departs the EIS' initial defined project area. The possibility of a gondola in a riparian area, over the creek and the need, like ski lifts and power lines, of both herbicide and vegetation clearing crews introduces a vulnerability to the water supply that presently does not exist. As per Salt Lake County Health Department Regulation #14 and Salt Lake City Watershed Protection Ordinance 17.04, use of herbicides is not legal within 100 feet of the creek. Additionally, the City has concerns about the introduction of invasive species in these corridors with the increased and new disturbance area of a gondola.

32.1.1C, 32.13A 32.12A, 32.19G, 32.13C

- The withdrawal of a new travel corridor, one that is outside the existing highway 210 corridor may also induce the removal of riparian and stream side lands from the management of the Uinta-Wasatch-Cache National Forest. Based on its current understanding of the issue, one that has been formulated through discussions with UDOT's LCC EIS team and representatives from the UWNCF, the City does not support this appropriation of lands given that this will remove these lands from the oversight of the UWCNF forest plan. The plan provides that these riparian corridors and stream side lands remain primarily managed for protection of drinking water supply and not as a travel corridor. These lands were primarily and initially set aside for provision of drinking water and appropriation of lands outside the existing SR 210 corridor and project area undermines over a century of watershed protection.

32.28H

**10. Cost and Benefit**

The City requests that UDOT incorporate a cost analysis of the return on investment in the local economy each option provides correlated to both travel time and the closures of the highway. The City is presently updating all infrastructure, including water treatment plants, wastewater recovery facilities, storm water lines, water lines, pump stations, etc. As an entity beholden to fiscal responsibility to ratepayers, all decisions are analyzed with an eye towards stewarding public fiscal resources, especially considering the ongoing pandemic. It would be helpful for commenting purposes to better understand the return on investment each option that UDOT has presented in cost. While cost is not in the screening criteria or listed within the purpose and need, it seems like a cost analysis would strengthen the EIS's chances for successful analysis to move forward on eliminating the traffic burden and achieving project success.

32.1.2B

The City appreciates the collaboration, meetings, and discussions with UDOT throughout the LCC EIS process. Please do not hesitate to contact us regarding our formal comments to the LCC EIS.

Sincerely,

Laura Briefer
Director

JACQUELINE M. BISKUPSKI
*Mayor*

**DEPARTMENT OF PUBLIC UTILITIES**

December 13, 2019

Little Cottonwood EIS Project Team,
c/o HDR
2825 E. Cottonwood Parkway,
#200 Cottonwood Heights, Utah 84121

John Thomas
UDOT Region 2
2010 South 2760 West
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johnthomas@utah.gov

**Subject: Comments for the Little Cottonwood Canyon EIS Draft Purpose and Need and Draft Alternatives and Screening Methodology**

Dear Mr. Thomas:

This letter transmits comments from Salt Lake City Department of Public Utilities (Salt Lake City, or the City) in response to the Utah Department of Transportation's (UDOT) Little Cottonwood Canyon Environmental Impact Statement (Project or EIS) comment period for two documents: 1. Draft Purpose and Need Chapter; and 2. Draft Alternatives and Screening Methodology and Preliminary Concept Report (both dated October 30, 2019). Salt Lake City appreciates the opportunity to serve as a Cooperating Agency and to provide comments for this EIS. Little Cottonwood Canyon provides a significant portion of Salt Lake City's water supply. The City has statutory and regulatory jurisdiction for Little Cottonwood Canyon related to its water rights and watershed management, significant water infrastructure, and special expertise within the EIS study area.

In addition to the comments below, the City provided comments as a response to the Scoping period in June 2019 that are included as an attachment to this letter. Please consider the City's concerns included in those comments in the record for the EIS. Many of these concerns are not addressed in the two documents mentioned above.

## BACKGROUND AND CONTEXT

Salt Lake City provides drinking water to more than 360,000 residents. For over one hundred years, the mountainous expanse of Little Cottonwood Canyon and the neighboring Big Cottonwood, Parleys, and City Creek Canyons serve as the City's municipal watersheds and are critical sources of water for the City and residents it serves. Because of the need to manage these watersheds to provide clean and reliable water, the City and the state of Utah petitioned the federal government to create the Wasatch Forest Reserve, which was established in the early 1900s. Now called the Uinta-Wasatch-Cache National Forest, the main management goal for



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Little Cottonwood Canyon the other municipal watersheds to this day remains the protection of culinary water supply (see the current Wasatch-Cache Forest Plan, 2003). Federal legislation from 1914 and 1934 directs the United States Forest Service (USFS) to manage the federal lands within these watersheds in a manner consistent with the protection of the City's culinary water supply.

Water resources are collected from several watersheds within the Wasatch Mountains, including Little Cottonwood Canyon. This water is then treated to meet federal and state drinking water standards and conveyed to the public. Salt Lake City's water service area includes all of Salt Lake City and portions of the cities of Cottonwood Heights, Holladay, Midvale, Millcreek, Murray, and South Salt Lake. Sandy City also operates its own distribution system to serve its residents and receives a substantial part of its culinary water supply directly from Little Cottonwood Canyon.

Salt Lake City's water resources emanating from Little Cottonwood Creek are treated at the Little Cottonwood Treatment Plant operated by the Metropolitan Water District of Salt Lake and Sandy (MWDSLS). Water from Little Cottonwood Creek is directly diverted into two intakes that convey water into MWDSLS' treatment plant. The first water intake is located at the Murray Penstock near the Wasatch Resort Community. MWDSLS delivers treated water from Little Cottonwood Creek to Sandy's and Salt Lake City's drinking water distribution systems, ultimately providing water to more than 450,000 residents.

Salt Lake City also collects, treats, and distributes water from other Wasatch streams, including Parleys Creek, City Creek, and Big Cottonwood Creeks. Together with Little Cottonwood Creek, these surface water sources comprise 50-60% of Salt Lake City's water deliveries each year.

As a Cooperating agency in the EIS, the City's intent is to inform UDOT and the Project managers about its jurisdiction, legal authority, and expertise related to its water resources. This includes regulatory mandates, land and water ownership, and more than a century of water management and watershed protection. The City is prepared to provide UDOT with expertise to incorporate water resources into the Purpose and Need and overall evaluation. Given our jurisdiction, legal authority, and expertise, we hope that UDOT will incorporate our previous input provided in June 2019, as well as our comments below.

## COMMENTS TO THE DRAFT PURPOSE AND NEED STATEMENT

Please include the protection of drinking water supply in the Project's Purpose and Need statement. The consistency of this statement aligns with over a century of public land management strategy in Little Cottonwood Canyon, the Wasatch-Cache National Forest Revised Master Plan, the Salt Lake City Watershed Management Plan, the Salt Lake County Wasatch Canyons Master Plans (both from1989 and the present draft) as well as the intent of the MS4 permit that guides UDOT's water quality stewardship in Little Cottonwood Canyon. The City's requests have come in previous comments and in working closely with UDOT project staff. As a Cooperating Agency in this project, the City feels the consideration of water quality lays the groundwork for successful analysis and implementation in solving transportation issues that Little Cottonwood Canyons faces.

32.1.2F

## COMMENTS TO THE DRAFT ALTERNATIVES DEVELOPMENT AND SCREENING METHODOLOGY AND PRELIMINARY CONCEPT REPORT

### 1.0 Suggested Changes to Level 2 Screening Criteria

**a. Consideration/Addition of the Safe Drinking Water Act as a criterion, should be elevated to Level 1 Screening Criteria.**

Pursuant to the authority granted to UDOT through 23 U.S.C. 327 via the Memorandum of Understanding (MOU) dated January 17, 2017, with the Federal Highway Administration, the Safe Drinking Water Act must be included as part of this EIS screening criteria. The EIS Level 1 screening criteria should include protection of drinking water sources and impacts to both the federal Safe Drinking Water Act (SDWA) and the state of Utah Safe Drinking Water Act. Per Utah Administrative Code (UAC) Rules R309--105-7 and R309-605, Public Water Systems like Salt Lake City's are responsible for protecting their sources of drinking water from contamination. As previously stated, Little Cottonwood is a critical part of the surface water supply for both Salt Lake City and Sandy City. They take water from MWDSLS Little Cottonwood Treatment Plant, which has intakes directly from Little Cottonwood Creek. Past roadway accidents, hazardous materials spills, and sedimentation from construction activities have directly impacted these intakes resulting in the temporary loss of the ability to use the Little Cottonwood Creek water for drinking water purposes.

32.1.2F, 32.2.2UUU

**b. Impacts related to the Clean Water Act should be elevated to Level 1 Screening Criteria.**

In the current draft, the Level 2 Screening Criteria includes impacts on the federal Clean Water Act (CWA). In Table 2, the Measure indicates acres and types of wetlands. Section 5.2 references Section 404(b)(1) Guidelines for specification for disposal sites of dredge and fill material. The City supports including the protection of wetlands and the CWA Section 404(b)(1) in the Screening Criteria. However, the City requests the CWA is elevated to the Level 1 Screening Criteria and is expanded to include other sections of the CWA, including Section 303.

32.1.2F, 32.2.2UUU

Additionally, the City requests the Level 1 Screening Criteria include impacts related to the Utah Water Quality Act. The Screening Criteria needs to contain compliance with UAC R317-2 Standards of Water Quality of the State. This includes, but is not limited to, protection of Category 1 Waters. The Screening Criteria should state the alternatives will be protective of the beneficial uses assigned to the Little Cottonwood Creek as outlined in UAC R317. This includes the beneficial use designation of Class 1C: Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water (DDW); Class 2B: Protected for infrequent primary contact recreation; and Class 3A: Protected for cold water species of game fish and other cold water aquatic life, including the necessary aquatic organisms in their food chain.

**c. Local regulations for the protection of drinking water should be in Level 1 Screening Criteria.**

The City requests local water quality related regulations to be included in screening criteria. These include Salt Lake City's watershed ordinance contained in Chapter 17.04 of Salt Lake City's code, and the Salt Lake County Health Department Regulation #14.

32.1.2F, 32.2.2UUU

**d. Salt Lake City's land and water rights should be included in the Level 1 Screening Criteria.**

Salt Lake City holds a significant portion of the water rights associated with Little Cottonwood Creek. Actions proposed by this EIS must not impact the City's ability to use these water rights. Thus, the impact of project alternatives on the City's ability to put its water rights to beneficial use should be included in screening criteria. Salt Lake City also owns land for conservation purposes that may be impacted by alternatives considered. Protection of the City's land is needed to assure that it is not being impacted by unauthorized use. Salt Lake City is prepared to work with UDOT to identify land and water rights that might be impacted by different alternatives.

32.1.2F, 32.2.2UUU

**e. Water infrastructure should be included in the Level 1 Screening Criteria.**

UDOT should consider whether alternatives could impact water infrastructure, especially the treatment plant and the intakes along the creek. This should include direct impacts to the integrity of the water infrastructure, as well as indirect impacts. An example of an indirect impact on water infrastructure is the short and long term degradation of water quality that could occur due to the construction and operation of the transportation alternative, as well as the increased or changed use patterns in the watershed. These short and long term water quality impacts could result in damage to water infrastructure or the need to change water treatment processes. Should infrastructure be impacted due to transportation alternatives, significant public costs would be incurred.

32.1.2F, 32.2.2UUU

**f. Operations and maintenance impacts should be included in the screening criteria.**

Salt Lake City is concerned that transportation alternatives could impact our watershed operations and management by increasing the scale of public access. Salt Lake City funds a watershed operations division in order to protect water resources from pollution and degradation. Salt Lake City's watershed management includes watershed restoration activities, restroom, and trailhead maintenance, and public education. The City often assists and partners with the USFS in watershed management. Increased access and use, and changes in the patterns of recreational use and land use have a significant impact on the City's management capacity and costs. Transportation changes will result in changes in public access. As such, watershed management implications should be a screening criterion for transportation alternatives. As a note, transportation alternatives could also provide benefits to some of the watershed management challenges, and it would be helpful to evaluate them from that perspective.

32.1.2F, 32.2.2UUU
32.2.6H

While the project focus area is predominantly the Highway 210 corridor, the changes in transportation will affect public access to recreational sites. This will affect the Little Cottonwood Canyon watershed outside of the highway corridor. This project should consider the direct, cumulative, and indirect costs and benefits related to specific operational, maintenance, and management costs of canyon usage associated with each transportation alternative. This should include both within and outside of the project area in Little Cottonwood Canyon as part of the Level 2 Screening Criteria.

32.4A, 32.4B, 32.4P
32.20A, 32.20C

Given that the road corridor and mobility allow the movement of people, project screening criterion must also include the indirect and direct costs and impacts as it

proposes alteration of the mobility regimes. This is important due to the strong connection between the roadway and all the recreational amenities that the public heavily uses and impacts year-round.

**g. Tolling should be reconsidered to provide resources for the management of transportation impacts.**

The City requests a reconsideration of the determination of the Table A-1 (Draft Alternatives Development and Screening Methodology and Preliminary Concept Report, Appendix A, page A-4) that "tolling revenue should go back into the canyon" as something that is outside the scope of the EIS. Regardless of mechanisms, the EIS should include an analysis of the feasibility of funding mechanisms associated with each proposed alternative in screening criteria. Given that tolling is a key concept that has been extensively discussed regarding sustaining operations in Little Cottonwood Canyon, it seems that the disconnection of tolling from the EIS minimizes a functional analysis of any sort of funding mechanisms in the canyon.

32.2.4A

Present management budgets remain critically insufficient for existing use and demand on services in Little Cottonwood Canyon. For example, given its limited budget, the Salt Lake Ranger District of the Uinta-Wasatch-Cache National Forest (UWCNF) calls upon its governmental, nonprofit, and other partners to assist with basic maintenance responsibilities in Little Cottonwood Canyon and elsewhere on the Ranger District. In addition, there are capital expenses that need to be considered. The City's contributions to UWCNF operations include (but are not limited to) pumping vault toilets at trailheads, purchasing and installing new vault toilets at trailheads and funding summer maintenance and outreach crews on an annual basis. Not all of these activities are in the project area specific to the roadway. However, they are indicative of the situation in which the agencies become responsible for the management of Little Cottonwood Canyon under the existing levels of mobility and access provided by the road corridor. Additional mobility and access could put additional pressure on these agencies.

32.2.6N

Additionally, the Salt Lake Ranger District (SLRD) unit of the UWCNF lacks an active weeds management crew to perform weed mitigation. Instead, the City takes the lead on many aspects of weed mitigation for SLRD. The nonprofit organization Cottonwood Canyons Foundation takes on this role in Little Cottonwood Canyon, working closely with Salt Lake County and the City. Noxious weeds have a significant impact on the elevation of wildfire risk. Post wildfire impacts on water quality include changed water chemistry, increased sedimentation, and loss of use of the water source.

## 2.0 Suggested Changes to Level 1 Screening Criteria

**Incorporate the impact of Climate Change to winter use peak demand.**

Based on the City's understanding of the intent stated both by the Draft Purpose and Need and staff presentations, this EIS intends to primarily focus on addressing peak winter roadway congestion with a planning horizon to 2050, incorporating population growth of the Valley's population, and correlating increase of use of Little Cottonwood Canyon. Screening criteria should incorporate climate models, which demonstrate a possible rise in the rain and snow elevation and a corresponding rise in minimum

32.2.2E, 32.2.2UUU

snowpack elevations during the project's timeline. With the forecasted upward elevational creep of the rain and snow line, this project must also be scalable and translatable to a summer use format. Existing winter peak strain on travel corridor mobility may experience a downward trend if the market demand diminishes due to less peak demand days.

32.2.2E

## 3.0 Comments on Tools Used

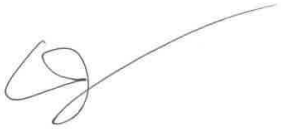
**Section 6.2- GIS Data- Modelling impacts.**
It is important to note that the present quality of water demonstrates that the past century of source water quality protection efforts by the City and its partners, including UDOT, are effective. Any models used to determine impacts to water quality must be recognized as limited and used in an informative rather than determinative manner.

32.12A, 32.12B, 32.12K

Thank you for your consideration of Salt Lake City's input during this comment process. We hope to enhance this process through our participation.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,



Laura Briefer
Director

CC: Brandon Weston, Utah Department of Transportation
Vince Izzo, HDR
Jacki Biskupski, Salt Lake City Mayor
Erin Mendenhall, Salt Lake City Mayor-Elect
Cindy Gust-Jensen, Salt Lake City Council Director
Marian Rice, Salt Lake City Water Quality & Treatment Administrator
Patrick Nelson, Salt Lake City Watershed Program Manager
Rusty Vetter, Salt Lake City Deputy City Attorney
Mike Devries, Metropolitan Water District of Salt Lake and Sandy General Manager
Tom Ward, Sandy City Director of Public Utilities
Ralph Becker, Central Wasatch Commission Executive Director

ATTACHMENTS: Salt Lake City Department of Public Utilities Comments on Notice of Intent to Revise Scope of the Little Cottonwood Canyon EIS (June 14, 2019)

JACQUELINE M. BISKUPSKI
*Mayor*

**DEPARTMENT OF PUBLIC UTILITIES**

June 14, 2019

John Thomas
UDOT Region 2
2010 South 2760 West
Salt Lake City, UT 84104-4592
johnthomas@utah.gov

**Subject: Comments to the Little Cottonwood Canyon EIS Draft Coordination Plan**

Dear Mr. Thomas:

This letter transmits comments from Salt Lake City Department of Public Utilities (Salt Lake City) in response to the Little Cottonwood Canyon EIS Draft Coordination Plan, dated May 31, 2019. Salt Lake City appreciates the opportunity to serve as a Cooperating Agency in the Little Cottonwood Canyon EIS process.

1. **Section 3.2, Public Involvement Development and Screening of Alternatives:** Salt Lake City recommends the third sentence read "UDOT will consider comments submitted by the public, cooperating agencies, and participating agencies as it develops proposed methodologies for alternatives screening and impact analysis."
2. **Table 5:** Projects identified in the ROD will likely need to obtain permits from the Utah Department of Natural Resources, Salt Lake County Health Department, Salt Lake County Planning and Development Services, and Salt Lake City. Salt Lake City recommends including the following approvals to Table 5:
    a. Salt Lake City's Watershed Ordinance § 17.040 and Salt Lake City Surplus Water Permits: Needed where water resources are desired for proposed projects or are otherwise impacted.
    b. Salt Lake County Health Regulation #13: Needed if sanitary facilities are proposed.
    c. Salt Lake County Health Regulation #14: Regulates the use and occupancy of watersheds within Salt Lake County.
    d. Salt Lake County Foothills and Canyons and Overlay Zone (Salt Lake County Ordinance Chapter 19.72) and Mountain Resort Zone (Salt Lake County Ordinance 19.13): Land use approvals would be needed for projects in the unincorporated areas of Big and Little Cottonwood Canyons.
    e. Utah Department of Natural Resources: Administers stream alteration permits.

32.27C

Thank you for your consideration of Salt Lake City's comments on this Coordination Plan. We appreciate the opportunity to serve as a Cooperating Agency, and hope to enhance this process through our participation.

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Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Laura Briefer
Director

cc: Brandon Weston, UDOT
Vince Izzo, HDR
Marian Rice, Salt Lake City
Patrick Nelson, Salt Lake City
Carly Castle, Salt Lake City

JACQUELINE M. BISKUPSKI
*Mayor*

**DEPARTMENT OF PUBLIC UTILITIES**

June 14, 2019

John Thomas
UDOT Region 2
2010 South 2760 West
Salt Lake City, UT 84104-4592
johnthomas@utah.gov

**Subject:** **Salt Lake City Department of Public Utilities Comments on Notice of Intent to Revise Scope of the Little Cottonwood Canyon EIS**

Dear Mr. Thomas:

These comments are from the Salt Lake City Department of Public Utilities (Salt Lake City, or the City) in response to the Federal Highway Administration's Notice of Intent on behalf of the Utah Department of Transportation (UDOT) regarding the revised scope of the Little Cottonwood Canyon environmental impact statement (EIS). Salt Lake City appreciates the opportunity to serve as a cooperating agency for this EIS, as an agency with jurisdiction within the project study area related to protection and management of its water rights and surrounding watershed, significant water infrastructure, and special expertise within the project study area.

Salt Lake City's comments are organized into three parts. The first part contains comments generally applicable to the Little Cottonwood EIS. In this part, Section A introduces a summary of these comments. This is followed by Sections B, C, and D, which provide more specific comments on each of these general comment themes. The second part provides comments that are specific to some of the alternatives and concepts outlined in the NOI. The third part provides an outline of Salt Lake City's regulatory, planning, and infrastructure framework of water resources emanating from Little Cottonwood Canyon.

## I. General Comments to the Little Cottonwood Canyon EIS

### A. Summary of Salt Lake City's General Comments to the EIS

1. **Water Resource Protection:** All environmental impacts, but specifically watershed and water resource protection, should be explicitly included in the project Purpose and Need. Impacts to these resources should be identified for each proposed alternative, and the transportation alternative ultimately selected should maintain a healthy watershed. Additional comments related to water resources can be found below in Section B.

32.1.2F

2. **Process & Scope:** It is challenging to provide feedback at the scoping stage of the Little Cottonwood EIS given that the scope of the Cottonwood Canyons Transportation Action Plan (CCTAP) is still undetermined and only the addition of a third lane is specifically called out as an alternative in the revised scope of the EIS.

32.29TT



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The City has concerns with the sequencing and timing of these two efforts. The CCTAP process and this EIS will significantly influence one another, but the scope and breadth of neither process is defined at this point. NEPA requires that the agencies "[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." 40 C.F.R. § 1502.14(a). Salt Lake City incorporates by reference any relevant comments provided to CCTAP that ultimately fall under the scope of the Little Cottonwood Canyon EIS. Additional comments related to process and scope can be found below in Section C.

32.29TT

3. **Alignment with Other Planning & Management Efforts:** The Little Cottonwood EIS has the potential to have profound impacts on the many agencies and jurisdictions that operate in Little Cottonwood Canyon. Salt Lake City recommends that the Little Cottonwood EIS strive to align its goals and outcomes with those of these jurisdictions. For example, the EIS process should incorporate the tremendous work that was accomplished during Mountain Accord. The Mountain Accord sought to holistically evaluate and collaboratively address transportation, environment, economic, and recreation issues of the Central Wasatch, including the EIS study area. Additional comments related to alignment with other Cottonwood Canyon jurisdictions, Mountain Accord, and other management efforts can be found below in Section D. The eventual project's purpose and need statement should include facilitating the objectives of Mountain Accord.

32.1.1C

B. **Water Resources**

1. Salt Lake City's rights and obligations as a Public Water Supplier should be recognized in this process, and in any recommended projects or alternatives development. Alternatives and projects should be evaluated on a watershed scale as to: (1) whether they introduce risk to Salt Lake City's ability to comply with federal and state Safe Drinking Water Act requirements; and (2) whether they impair Salt Lake City's ability to put its water rights to beneficial use. The Little Cottonwood EIS should identify whether projects or alternatives present risks to water resources that are relied on for drinking water. Salt Lake City, Sandy City, and the Metropolitan Water District of Salt Lake and Sandy—in their role as Public Water Suppliers—will assist in these water resource risk evaluations. When evaluating water resource risks, Salt Lake City will base its determination on whether alternatives or projects—either directly, indirectly, or cumulatively—impact water quality, water availability, and water infrastructure.

32.12A, 32.12B, 32.12C, 32.12D, 32.12K

2. Where a proposed alternative (or construction or operations associated with that alternative) may affect water resources or water infrastructure, the alternatives should incorporate appropriate plans for mitigation, monitoring, assessment, and reporting those effects. Salt Lake City recommends that the Little Cottonwood Canyon EIS analysis rely on the protocols, metrics, and targets already included in programs and policies of the local, state, and federal authorities, so that the interested public has a consistent frame of reference for understanding the water resource discussion. It is recommended that UDOT collaborate with Salt Lake County Watershed Planning and

32.12J, 32.12N 32.12A, 32.12B

Restoration (SLCo WPRP) as they are the local entity who performs water quality monitoring, physical habitat assessment, and stream stability assessment of the Jordan River Watershed and associated sub-watersheds. Furthermore, SLCo WPRP works closely with the Utah Division of Water Quality to ensure coordination of data collection and protocols.

32.12K

3. The recreation and visitor use of Little Cottonwood Canyon from transportation solutions approved, developed, and implemented through this EIS have the potential to significantly impact water resources. This EIS analysis should evaluate the direct, indirect, and cumulative impacts not just of the construction and implementation of new or refined transportation systems, but the impact of subsequent and reasonably foreseeable recreation and economic development, increased recreation use, and changed recreation patterns resulting from the proposed alternatives. Furthermore, the Purpose and Need should include evaluation of alternatives that result in manageable recreation levels in Little Cottonwood Canyon.

32.20A, 32.20C

32.20B

4. This process should include a 4(f) evaluation. This evaluation should include clear identification of 4(f) properties in the project study area, the environmental impacts to those properties for each alternative, and if there is a feasible and prudent avoidance alternative. If no feasible and prudent avoidance alternative exists, the evaluation should include identification of which alternative produces the least overall environmental harm.

See responses to comments in Section 32.26

5. In addition to transportation, transit, recreation, and economic projects and alternatives, there is an opportunity for the EIS to identify and develop environmental restoration projects along the transportation corridor in Little Cottonwood Canyon to produce a net positive result to the watershed.

32.13C

6. Salt Lake City understands that the identified projects related to parking, recreation use, operational improvements, improved transit service, enhancing access and mobility, and changes to roadways are conceptual at this stage. However, any additional infrastructure and construction will likely have water resource impacts within the Cottonwood Canyon watersheds. In general, the following comments apply to those proposed projects:

32.19A

   i. Ground disturbance should be limited and should incorporate stormwater best management practices (BMPs). Also, ensure restoration of disturbed lands is conducted to avoid sedimentation, invasive species introduction, and overall watershed degradation.
   ii. This process should evaluate the impact of different alternatives and projects on invasive species and fire risk.

32.19H

   iii. Please incorporate green infrastructure (GI) and post-construction stormwater BMPs where feasible. Furthermore, ensure there are long-term monitoring and maintenance plans for installed GI and stormwater BMPs to ensure they continue to function and provide associated benefits.
   iv. Where water resources are desired for proposed projects or otherwise impacted, coordinate with Salt Lake City to ensure compliance with Salt Lake

City's Watershed Ordinance § 17.040, as well as with Salt Lake City's surplus water permits.

v. Where sanitary facilities are proposed, coordinate with Salt Lake City and the SLCHD to ensure compliance with Salt Lake County Health Regulation #14 as well as Salt Lake County Health Regulation #13.

C. **EIS Process and Scope**

1. Regarding the sequencing of transportation planning and EIS efforts in the Cottonwood Canyons, it remains unclear how the CCTAP and Little Cottonwood Canyon EIS relate to one another. For example, the City would like to know more about the strategy of conducting a project-specific Little Cottonwood EIS while simultaneously evaluating Little Cottonwood transportation and transit needs in the CCTAP planning process. Additionally, justification regarding why the third lane is being evaluated in the EIS separately from other transit alternatives such as a train, gondola, shuttle, or travel demand management (tolling) systems remains unclear. It is also unclear why the third lane alone was identified as ripe for inclusion in an EIS, while the other options are left to the CCTAP process. As stated before, an agency must "[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated . . . . [and] [i]nclude reasonable alternatives not within the jurisdiction of the lead agency." 40 C.F.R. § 1502.14(a), (c). The City's specific concern with the approach of splitting the third-lane alternative from all other alternatives is that the division of these analyses will prematurely foreclose pursuing potential future transportation improvements or scenarios. Equally concerning is the risk that dividing the analysis will not properly account for all cumulative and indirect environmental impacts of these transportation and transit infrastructure improvements. Because these other actions are presently being evaluated in the CCTAP, they are reasonably foreseeable and should be evaluated.

32.29TT
32.2.1E

32.2.1E

2. This EIS should assess and disclose a fuller range of alternatives, impacts, and actions, including connected, cumulative, and similar actions; and direct, indirect, and cumulative effects from state and federal actions. Of specific concern is whether outcomes from the Cottonwood Canyons Transportation Action Plan are connected, cumulative, or similar actions. Salt Lake City raises the issue at this time because the City wishes to ensure that the EIS's actions, as well as the CCTAP's potential actions and their respective impacts, are identified, categorized, and analyzed appropriately.

32.29TT

3. Before developing transportation, recreation, or transit projects and alternatives, the EIS should contemplate and determine the desired future condition of Little Cottonwood Canyon and should provide justification for why that future condition is desirable, appropriate, and manageable in terms of protecting water resources. This is especially necessary considering that the U.S. Forest Service currently relies on non-profits, private businesses, municipalities, and others to fulfill many basic essential services in Little Cottonwood Canyon. Salt Lake City supports the development of a so-called "visitor capacity" or "threshold" analysis (or similar type of effort) to

32.20B

determine this desired future condition. The City is available to provide water resources expertise for this effort.

4. The transportation needs being discussed focus heavily on the commercial ski industry and winter use of the EIS study area. While Salt Lake City recognizes the significant challenges facing wintertime use, there are many other important economic sectors that rely on various aspects of the study area. Salt Lake City recommends considering the contributions, opportunities, and impacts to other economic drivers, such as dispersed recreation, industry attraction, and ecosystem and watershed services. Additionally, this EIS process should develop and evaluate alternatives that address and serve summer transportation and recreation issues and weigh the prioritization of project funding to reflect this. Most of the trailheads are over capacity in the summer, with cars spilling onto the road shoulder in both directions. It is important to note that summer usage has recently eclipsed winter usage in the Cottonwood Canyons, and that the resorts have also followed with diversifying their business models to include summertime usage.

32.1.2B, 32.1.2C, 32.1.2D, 32.2.7A, 32.7B, 32.7C

5. The EIS should consider the distinction between *managing* demands for recreation, use, and economic development in the EIS Study Area versus *inducing* additional demand for recreation, use, and economic development. These are two distinct scenarios for the future of Little Cottonwood Canyon, with different scales of impact to the environment, watershed, public budgets, and quality of life. "An environmental impact statement must analyze not only the direct impacts of a proposed action, but also the indirect and cumulative impacts of 'past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.'" *Custer Cty. Action Ass'n v. Garvey*, 256 F.3d 1024, 1035 (10th Cir. 2001) (quoting 40 C.F.R. § 1508.7-.8); *see also* 40 C.F.R. §§ 1508.8 (including ecological, aesthetic, historical, cultural, economic, social and health impacts). The NEPA process should evaluate the impacts of both managing and inducing this demand, and all ecological, aesthetic, historical, cultural, economic, social and health impacts.

32.1.2B, 32.1.2D

32.21D, 32.1.5C

6. Salt Lake City recommends that the impacts of climate change on the natural environment and recreational use of the Cottonwood Canyons be analyzed and considered as part of the development of long-term transportation and transit solutions generated from this EIS.

32.2.2E

7. This EIS effort should include an assessment of the economic value of the natural systems of the study area. For example, there are significant economic and social benefits associated with a functioning watershed, and significant economic and social costs to degradation from new or additional development and infrastructure, as well as recreation overuse. This will better inform policymakers, decision makers, and stakeholders of the economic benefits and costs associated with decisions that protect, restore, or degrade the natural environment.

32.1.5M

**D. Alignment with Other Jurisdictions, Mountain Accord, & the Mission of the CWC**

1. The EIS should holistically evaluate and collaboratively address not just transportation issues, but other important problems facing Little Cottonwood Canyon. If these transportation processes fail to consider the interdependent whole, the EIS will miss the opportunity to solve problems with an integrated, holistic approach.

32.1.1C

2. The EIS process should consider local jurisdiction plans and requirements. The EIS process should also incorporate the Wasatch-Cache Revised Forest Plan. This will help avoid or mitigate negative consequences to other government agencies, including Salt Lake City.

32.3F

3. The limited roadway capacity of Little Cottonwood Canyon is an important tool that land managers use to address user capacity in the canyons. Salt Lake City is concerned about the consequences of undercutting this tool without a corresponding strategy to address overuse and limited recreation management funding. Salt Lake City suggests that this EIS process seek to understand and mitigate the direct, indirect, and cumulative recreation-induced environmental impact that this increased capacity—and therefore increased use—will have on water resources.

32.20
32.2.4A,
32.20A, 32.20C

## II. Specific Concept Recommendations

A. **Lisa Falls:** Please ensure that any restroom design complies with State of Utah statutes and regulations, and Salt Lake County Health Department Ordinances, specifically restroom setback requirements from waterways. This location exists within 300 feet of the nearest sewer line. If vault toilets are to be used and approved through the standard regulatory channels, please ensure compliance with the regulatory process concerning connection to sewer lines. Given proximity to the tributary stream, trailhead design should incorporate stormwater solutions to minimize runoff impacts to the stream.

32.2.6.4H

B. **Little Cottonwood Park and Ride:** The proposed parking structure is near Little Cottonwood Creek, and the existing trailhead has vegetative buffer that may be removed with construction of new facility. The structure design should incorporate a suite of stormwater solutions to minimize or eliminate all stormwater discharged into Little Cottonwood Creek as well as include a regular maintenance plan.

32.2.6.2.1C, 32.12O

C. **FHWA Appropriation of National Forest Lands to UDOT:** It is Salt Lake City's understanding that, as part of this EIS process, UDOT and the Uinta-Wasatch-Cache National Forest (UWCNF) are in a dialogue about the perfection of the Highway 210 roadway easement. The City understands that this dialogue also includes the possibility of the easement incorporating lands beyond the highway corridor, including trailheads and parking facilities. Additionally, it is understood that U.S. Forest Service legal counsel has determined that this roadway easement is not subject to the UWCNF Forest Plan and would therefore not be subject to the parking restrictions therein. The parking limitation set out in the Wasatch-Cache National Forest Revised Plan is one way to address user capacity. Salt Lake City is concerned about the consequences of removing that tool without a corresponding strategy to address overuse and limited recreation management funding. This EIS process should understand and mitigate the recreation-induced

32.28H

cumulative, direct, and indirect impacts that the land appropriation will have on water resources, and the City recommends that any new funding streams be designed to favor the upkeep of existing and proposed recreation facilities, along with needed enforcement and capital aspects associated with managing these recreation areas.

D. **Avalanche Sheds:** Salt Lake City is available to work with UDOT during subsequent design processes to help achieve water quality needs for these facilities. At this time, Salt Lake City has the following considerations related to this possible new infrastructure:
   a. Salt Lake City understands that a fire suppression system will be needed for the avalanche sheds, should they be constructed. The City recommends that the water used for this purpose be neither chlorinated nor contaminated. Additionally, Salt Lake City cannot support a fire suppression system that incorporates glycol.
   b. Salt Lake City is concerned with potential discharge from the avalanche sheds contaminating Little Cottonwood Creek. The area of influence should have full containment, so that no material or discharge coming from the sheds (such as water or materials resulting from a fire suppression system test or resulting from a fire) reaches Little Cottonwood Creek. This could be accomplished several ways, such as installing a septic system onsite, or possibly tapping into the sewer system.
   c. The area by the China Wall is close to the creek. Please ensure that construction BMPs are implemented and water quality standards are fully complied with during the construction and maintenance of the avalanche sheds.

32.12D

E. **Third Lane:** The EIS should evaluate and recommend required mitigation and water quality protection measures, as the additional impervious surface and ground disturbance will likely impact Little Cottonwood Creek. Given close proximity to the creek, road design should incorporate solutions to minimize runoff impacts to the stream; and eliminate, to the extent possible, a need to alter or reconfigure the stream. Additionally, construction BMPs should be implemented and water quality standards should be complied with during the construction and maintenance of the lane. Salt Lake City also recommends restoration of disturbed lands is performed to the extent possible to avoid sedimentation, invasive species introduction, and overall watershed degradation.

32.29RR

## III. Overview of Salt Lake City's Regulatory, Planning, & Infrastructure Framework

### A. Legal Jurisdiction and Related Federal, State, and Local Regulation and Policy

Salt Lake City is a Public Water Supplier as defined by state and federal laws. Our water service area encompasses the area of Salt Lake City and numerous cities along the east bench of Salt Lake County, including Mill Creek, Cottonwood Heights, Holladay, and others. Currently Salt Lake City serves more than 350,000 people. Our water supply and demand plans use statewide population projections to consider future growth in the area over the next 40 years.

A large and important portion of Salt Lake City's current and future water supplies emanate from the Little Cottonwood, Big Cottonwood, Parleys, Mill Creek, and City Creek Canyon

watersheds. Salt Lake City invests hundreds of millions of dollars in water treatment facilities and distribution systems to put these water sources to beneficial use, ensuring provision of clean, reliable drinking water to the public.

As a Public Water Supplier, Salt Lake City has strict regulatory obligations to meet federal and state Safe Drinking Water Act requirements. Amendments in 1996 to the federal Safe Drinking Water Act recognized the importance of protecting sources of drinking water as a critical prevention to protect public health (https://www.epa.gov/sites/production/files/2015-04/documents/epa816f04030.pdf).

The state Safe Drinking Water Act and Administrative Rules also regulate Public Water Suppliers, including Salt Lake City (https://deq.utah.gov/drinking-water/laws-and-rules). State Rule 309-605 is specific to requirements that must be met regarding the protection of surface water sources of drinking water, and requires Salt Lake City to conduct source water assessments and employ management strategies to protect drinking water sources from pollution (https://documents.deq.utah.gov/drinking-water/rules/DDW-2018-003500.pdf).

State statute (Section 10-8-15) grants cities the authority to protect water resources from activities that are detrimental to water quality or quantity. Cities may enact ordinances preventing pollution or contamination of the streams or watercourses in which the inhabitants of the cities derive their water supply (https://le.utah.gov/xcode/Title10/Chapter8/10-8-S15.html?v=C10-8-S15_2016051020160510).

Salt Lake City is a First Class City that holds the majority of water rights in the Cottonwood Canyons, and puts these rights to beneficial use throughout its water service area in the Salt Lake Valley. Pursuant to Utah Code 10-8-15, Salt Lake City has enacted watershed ordinances (http://www.sterlingcodifiers.com/codebook/index.php?book_id=672, Chapter 17.04) and has joint authority with the Salt Lake County Health Department Regulation #14 managing for watershed protection (http://slco.org/uploadedFiles/depot/flHealth/regs/watershed.pdf). In addition, Salt Lake City adopted a Watershed Management Plan in 1999, last updated in 2014, and it is currently undergoing a comprehensive update (http://www.slcgov.com/utilities/public-utilities-watershed). The combination of these regulations and management plans guide development and uses in these watersheds to fulfill Salt Lake City's regulatory obligations to comply with the federal and state Safe Drinking Water Acts and to ensure the provision of clean, safe drinking water to the public.

Most of the project area is within the Salt Lake Ranger District of the Uinta-Wasatch-Cache National Forest boundaries (https://www.fs.usda.gov/uwcnf). The underlying premise for the Central Wasatch Management Area in the Wasatch-Cache National Forest Plan is to provide for the long-term supply of high-quality water to the Salt Lake Valley (Revised Forest Plan for the Wasatch-Cache National Forest, p. 4-153 (2003)). Salt Lake City and the United States Forest Service work in cooperation to protect the watersheds and water resources that emanate from within National Forest boundaries.

**B. Existing Local Plans Related to Water Resources**

Numerous local plans exist to guide future decisions and identify public values related to the Wasatch Mountains in Salt Lake County, including the CCTAP study area. These plans were completed over many decades to meet federal, state, and local statutory jurisdictional requirements, and typically cross-reference each other. All these plans include significant public engagement.

1. **Mountain Accord (www.mountainaccord.com):** Mountain Accord is the result of a years-long collaborative process to better manage the Central Wasatch, including the CCTAP study area. A new government entity, the Central Wasatch Commission, was formed in 2017 to implement Mountain Accord actions. Watershed protection is a key element of the agreement across all entities that participated in the process. The goals of Mountain Accord are:
    a. A natural ecosystem that is conserved, protected and restored such that it is healthy, functional, and resilient for current and future generations.
    b. A recreation system that provides a range of settings and accommodates current and increasing demand by encouraging high levels of use at thoughtfully designed locations with convenient access, while protecting solitude, nature, and other backcountry values.
    c. A sustainable, safe, efficient, multi-modal transportation system that provides year-round choices to residents, visitors and employees; connects to the overall regional network; serves a diversity of commercial and dispersed recreation uses; is integrated within the fabric of community values and lifestyle choices; supports and-use objectives; and is compatible with the unique environmental characteristics of the Central Wasatch.
    d. Broadly shared economic prosperity that enhances quality of life and preserves natural and scenic resources and infrastructure that is attractive, sustainable, and provides opportunity for visitors and residents.

32.1.1C

2. **Salt Lake City Watershed Management Plan** (http://www.slcdocs.com/utilities/PDF%20Files/Salt_Lake_City_Watershed_Management_Plan_-_1999_final.pdf)**:** This plan was created pursuant to Salt Lake City's statutory watershed management jurisdiction, and includes vulnerability analyses and policy recommendations for Salt Lake City to implement watershed management strategies to protect and preserve drinking water sources. The Salt Lake City Watershed Management Plan is currently being updated.

32.12A, 32.12B

3. **Salt Lake County Canyons Master Plan** (https://slco.org/planning-transportation/wasatch-canyons-general-plan-update/)**:** This plan was created under Salt Lake County's statutory land use jurisdiction and provides land use and other policy guidelines for Salt Lake County to participate in land use, transportation, watershed protection, economic development, and recreation policies. The Salt Lake County Canyons Master Plan is currently being updated.

32.12A, 32.12B

4. **Salt Lake County Integrated Watershed Plan** (https://slco.org/uploadedFiles/depot/publicWorks/fwatershed/resources/2015SLCoIWP.pdf)**:** This plan was created pursuant to Salt Lake County's Area-Wide Water Quality Planning Authority under Section 208 of the federal Clean Water Act.

32.12A, 32.12B

C. **Water Infrastructure**

Salt Lake City owns and operates significant infrastructure within Big and Little Cottonwood Canyons and the CCTAP study area. Salt Lake City's water infrastructure is directly connected to the streams emanating from Big and Little Cottonwood Canyon, through direct stream intakes at treatment plants at the mouth of each canyon. The treatment and distribution process are efficient due to good source water quality and the topography of the area—it takes less than 7 hours for water at the top of the watershed to arrive at the treatment plant, and less than 24 hours for water at the top of the watershed to arrive at a faucet in the Salt Lake Valley. In this way, any actions that are taken anywhere within the Cottonwood Canyon watersheds can have cumulative, direct, and indirect impacts, resulting in consequences to public health, critical infrastructure, and source water reliability.

32.12A
32.12B
32.12S

Thank you for your consideration of Salt Lake City's comments during this scoping process. We hope to enhance this process through our participation.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Laura Briefer
Director

cc: Brandon Weston, Utah Department of Transportation
Vince Izzo, HDR
Ralph Becker, Central Wasatch Commission
Marian Rice, Salt Lake City
Carly Castle, Salt Lake City
Patrick Nelson, Salt Lake City

**COMMENT #:** 13340
**DATE:** 9/1/21 11:38 AM
**SOURCE:** Email
**NAME:** Chris Cawley

---

**COMMENT:**

Dear Josh,

Attached are comments from the Town of Alta on the UDOT Draft Little Cottonwood Canyon Environmental Impact Statement. The first attachment is a letter providing comments related to the design and operations of the preferred alternatives. The second attachment is a letter from Mayor Sondak providing policy comments.

Thank you for your engagement with the Town of Alta throughout the course of the project. Please contact me or Mayor Sondak if you have questions about our comments.

Best,

Chris Cawley
Assistant Town Administrator
Town of Alta

MAYOR
HARRIS SONDAK

TOWN COUNCIL
CLIFF CURRY
ELISE MORGAN
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August 30, 2019

Josh Van Jura, Project Manager
Utah Department of Transportation

VIA EMAIL

RE: Comments Regarding the Draft Little Cottonwood Canyon Environmental Impact Statement

Dear Mr. Van Jura,

Thank you for the opportunity to provide comments on the Draft Little Cottonwood Canyon Environmental Impact Statement (the DEIS) prepared by the Utah Department of Transportation (UDOT).

In addition to the specific considerations contained in a separate letter with comments from the Town of Alta, I have some more general concerns with both current proposals. While the other letter focused on concerns with the design and operations of the DEIS proposals, this letter focuses on concerns with transportation and visitation policy. These concerns include the magnitude of the investment each proposal would require, the relatively small decreases in congestion that the proposals envision, underlying assumptions about climate change and the future need for the infrastructure these proposals would build, and the risk of delivering too many people into Little Cottonwood Canyon that either proposal entails.

Both proposals are too expensive. On the assumptions that both proposals' costs are about $600 million, and that 30% of 6000 skiers are accommodated on average during each of 120 days per season for 25 years, the per skier-day cost of each proposal is greater than $111. Furthermore, the great majority of the costs are paid upfront while the return is realized only over many years so the real cost will be higher in terms of present dollars. This amount is too high for the expected return to the public in terms of sales tax and other revenues, even including any possible marginal multiplier effect of spending at the ski areas. With climate change certain to shorten our ski seasons in the Wasatch Mountains in the near future, the per skier-day cost of these proposals will be even greater. Finally, in the face of widespread inequality, poorly funded schools, and the need

32.2.7C

32.2.7L

32.2.9E

to protect human life and private property through seismic retrofits and climate impact mitigations, I just don't think that skiers' convenience is a top priority for this magnitude of expenditure.

32.1.2B

Reducing traffic by 30% of 2050's expected level during the ski season is too modest a purpose. Removing many more cars throughout the year should be the target of this effort, on the assumptions that the population of Salt Lake Valley will continue to grow quickly and that there continues to be increasing demand in both summer and winter for travel in Little Cottonwood Canyon. Of course, such a reduction will be even more expensive but if money is going to be spent on improvements to transportation, it must be for year-round infrastructure that removes most of the cars from the Canyon.

32.1.2B

32.1.2C and 32.2.2B

The assumption of year-round growth in demand rests largely on what happens regarding climate change. The DEIS gives too short shrift to this issue. A more complete and updated assessment of both the effects of climate change on the proposals and their effects on climate change should have been conducted as part of UDOT's EIS. Only a few pages of analysis of climate change inform the DEIS, and the effects of climate change are too easily dismissed as irrelevant. The underlying research studies on which this dismissal is based are decades old, and as has recently been noted by the Intergovernmental Panel on Climate Change, climate change predictions are increasingly dire and newer models are better at predicting the actual rate of change. The 2020 annual report for Vail Resorts takes a more sober view than UDOT, for example, and says, "The effect of climate change, including any impact of global warming, could have a material adverse effect on our results of operations as a result of increased weather variability and/or warmer overall temperatures, which would likely adversely affect skier visits and our revenue and profits." Conversely, there is no discussion on skiing's contributions to climate change. How a proposed bus system is fueled and how electricity is generated for a gondola are critical factors for assessing the environmental impacts of the alternatives. More generally, as BlackRock's CEO Larry Fink explains, all business must transform to net zero; sustainability is a standard for BlackRock's investment of more than $7 trillion. How do UDOT's proposals achieve zero emissions? If BlackRock wouldn't invest in a plan without knowing the answer to that question, I do not think that the people of Utah should either.

32.2.2E

32.10A

Finally, UDOT should have included careful analysis about the number of additional people their proposals would deliver to Little Cottonwood Canyon. In particular, it was clear to all parties during planning for the 2002 Winter Olympics that no events should be held in Little Cottonwood Canyon. I cannot support any proposal that increases the likelihood that events would be held in the Canyon if the Olympics return to Utah unless definite and fully reliable prohibitions against holding events there are included in the proposal. Despite current sentiment against holding events in the Canyon, given climate change it is likely that lower elevation resorts soon may not remain viable venues for competitive winter sports and pressure to hold events in Little Cottonwood Canyon may be intense. Furthermore, it is simply not plausible that all increased visitation from the UDOT proposals will remain within the commercial ski areas. Visitor use outside the ski areas and outside the ski season is exploding, with many vehicles parked for miles along the road in all seasons creating traffic hazards. Visitation now clearly exceeds the capacity of the already

32.20A and 32.20C

32.1.5F
32.20A
32.20B
32.20C

inadequate toilet facilities within the canyon. Without understanding how visitor use is to be managed both inside and outside the ski areas, the selection of either proposal is premature.

I suggest, instead of adopting either proposal, that UDOT begin immediately with incremental changes to travel in Little Cottonwood Canyon and monitor results carefully to inform further incremental improvements. These changes could include:

- Immediate implementation of a traction device requirement
- Tolling
- Construction of a dedicated lane for egress from Alta past Snowbird
- Increased bus and van service
- Improved trail-head facilities.

In conjunction with already planned parking changes in Little Cottonwood Canyon – fees, permits, and reservations for parking – I believe it is very worthwhile experimenting with easily implemented and relatively inexpensive innovations.

Do not hesitate to reach out to me or to Town of Alta staff if you would like to discuss our comments. We appreciate the engagement your team has provided us throughout the EIS process.

Sincerely,

Harris Sondak
Mayor



32.29R
32.2.2M
32.2.4A
32.2.9A
32.2.9O

32.29R

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August 30, 2021

Josh Van Jura, Project Manager
Utah Department of Transportation

VIA EMAIL

RE: Comments Regarding the Draft Little Cottonwood Canyon Environmental Impact Statement

Dear Mr. Van Jura,

Thank you for the opportunity to provide comments on the Draft Little Cottonwood Canyon Environmental Impact Statement (the DEIS) prepared by the Utah Department of Transportation (UDOT). The Town of Alta (the Town) provides municipal services, including police and public safety, to our residents and to hundreds of thousands of annual visitors to Alta. State Route (SR) 210 is Alta's sole transportation corridor and route of access from the Salt Lake Valley. The Town has participated diligently in every transportation planning initiative focused on Little Cottonwood Canyon (the Canyon) over the past several decades and the Town is grateful for UDOT's efforts to identify projects to improve safety, reliability, and mobility on SR 210.

This letter was developed by Town of Alta staff members, and it includes general comments, comments regarding inclusion of Town of Alta facilities and community elements in the DEIS, and comments specific to the gondola and bus alternatives.

**General Comments**

The Alta Town Council adopted Resolution 2019-R-14 Supporting a Visitor Growth Management Study Which Evaluates and Plans for the Environmental Impacts from Increased Visitation Resulting from Transportation Improvements in Little Cottonwood Canyon. While the proposed bus and gondola systems would deliver passengers primarily to ski areas, are accompanied in the DEIS by various transportation demand management measures, and would either not operate or be less desirable compared to travel by private vehicle outside of ski season, they nevertheless represent very significant increases to the transportation system capacity in the Canyon. If summer visitation increases to the point where SR 210 becomes congested, and if gondola fares are subsidized in the summer season, the gondola could become more popular than the DEIS predicts

32.20A and 32.20C
32.1.2C
32.2.4A

it will be upon construction and would thus increase summer visitation beyond what the DEIS predicts. If peak period shoulder lanes are opened to private vehicles or if summer transit services are offered in the future, the preferred bus alternative could also lead to increased summer visitation. Without ski area operations taking place during the summer, these increased visitors may tend to seek destinations outside of the ski areas. And without the buffering effect of winter snow cover, these visitors could create environmental impacts not analyzed in the DEIS. For these and other reasons, the Town urges UDOT and USFS to consider impacts to natural resources, visitor experience, and local communities from increasing the transportation system capacity in the Canyon.

32.1.2C
32.2.6.3C

32.20A and 32.20B

The alternatives are focused narrowly on transporting ski area visitors, during ski season because ski season ski area visitation, and the concentration of that visitation during peak travel periods related to ski area opening and closing times, is presumed to be the primary factor leading to traffic congestion in the Canyon. However, the Town is concerned that this narrow focus will disadvantage other Canyon users and may impair future adaptation of the transportation system as trends in seasonal visitation shift. UDOT can mitigate these problems by doing the following:

32.1.2D, 32.1.2C, 32.2.7A, 32.7B, and 32.7C

- partner with local entities to ensure that a bus or gondola station are integrated with local infrastructure and mobility networks
- prioritize multi-modal access and functionality at trailheads throughout the Canyon as designs for trailhead improvements are developed
- rigorously evaluate the capability of each alternative to facilitate egress from and access to the Canyon in the event of an emergency, such as extreme avalanche hazard, wildfire, landslide, or earthquake, and ensure that all user groups, including dispersed recreation visitors, residents, and other persons present in the canyon for purposes other than skiing at Alta Ski Area or Snowbird, are considered in this evaluation

32.2.6P
32.1.2C, 32.2.6.3C, and 32.2.6.3G
32.2.6P

Construction of a bus or gondola-based transit station in Alta could fundamentally change the shape and function of local transportation infrastructure, alter Alta's world-class alpine landscape, create environmental impacts in the headwaters of Little Cottonwood Creek, and generate significant new demand for municipal services, including water, sewer, fire protection, police and public safety, and other services. For all of these and other reasons, UDOT must coordinate directly with the Town of Alta in the event plans for an Alta transit station are developed further.

32.19E

The Town of Alta has long advocated for UDOT to assign road maintenance resources including snowplows and other assets that are essential to maintaining roadway function during snowstorms to a permanent location in upper Little Cottonwood Canyon. The presence of snowplows within the canyon at the onset of a period of high precipitation intensity can be a deciding factor in whether the road surface remains drivable for vehicles in the canyon. The Town recommends UDOT partner with local agencies and private companies in upper Little Cottonwood Canyon to invest in and install local roadway maintenance assets. This will be especially important in the event that UDOT decides to widen SR 210 to add peak period shoulder lanes for busses, as the bus lanes may be susceptible to faster road surface deterioration during snowstorms without the benefit of constant vehicle traffic. The Town also recommends that a full-time traction law be implemented in Little Cottonwood that requires snow tires and four-wheel drive during the winter weather seasons.

32.4BB

32.2.2M

After UDOT installed a high intensity activated crosswalk (HAWK) signal on SR 190 near Cardiff Fork in Big Cottonwood Canyon in summer 2020, SR 190 experienced major down-canyon delays related to afternoon ski area egress that may have been exacerbated by the operation of the signal. If UDOT improves the Lisa Falls Trailhead and installs a HAWK or similar traffic signal, it should consider ways to mitigate the impact of such a traffic signal on the afternoon, down-canyon traffic flow on SR 210, which on many days is already badly congested. 32.2.6.2.4G

**Comments Regarding Acknowledgements of Town of Alta Facilities and Municipal Services in the DEIS**

Various sections of the DEIS fail to account for community facilities in Alta and services provided by the Town of Alta. Chapter 20, 20.4.2.2 States that the proposed bus system would stop only at the ski areas and so would not induce visitation in the Town of Alta. Alta Ski Area is within the Town of Alta, and the Town provides municipal services to Alta Ski Area and all visitors to Alta, including Alta Ski Area's visitors. Anyone arriving in Alta by any mode of transportation would increase demand for Town of Alta drinking water and sewer infrastructure; Town of Alta law enforcement service, firefighting and EMS services paid for by property taxpayers in Alta, and other services provided locally in Alta. 32.20N

Section 4.3.6 Utilities describes utility providers in the study corridor. The Town of Alta is the culinary water and sewer provider in Alta, but that is not acknowledged in Table 4.3-3. Salt Lake County Service Area #3 operates the Town of Alta water system under a contract, and a licensed sewer operator operates the Town sewer system under a contract. All costs to operate and maintain these systems are borne by user fees. UDOT must consult the Town of Alta regarding water and sewer infrastructure in Alta instead of Salt Lake County Service Area #3. 32.4CC

The final tower in the proposed gondola alignment and the Alta station are very close to, if not encroaching upon, two key components of Town of Alta infrastructure. The Town of Alta Park is located on 0.4 acres of National Forest System lands and operated under a USFS special use permit. The Town Park has been in place since 1977 and residents and other community members frequently gather there in summer months to play volleyball and enjoy each other's company. Gondola tower 20 would be situated adjacent to the northwest corner to the park. The tower would dominate views to the north of the park and could create noise impacts from cabins moving over sheave trains and entering the nearby station. UDOT should formally acknowledge the Town of Alta Park in DEIS Table 4.3-1 and must analyze whether the impacts of nearby gondola elements would constitute impacts to a recreation resource under Section 4(f) of the Department of Transportation Act. 32.4DD 32.26Q

Both tower 20 and the footprint of the proposed Alta station appear to encroach on a segment of the Town of Alta sewer line between the Alta Lodge and the Rustler Lodge. Relocating this sewer alignment to the south of its present location could be environmentally challenging and expensive, as wetlands associated with Little Cottonwood Creek are located just to the south of the current sewer alignment. 32.4DD

Table 4.3-2 and Figure 4.3-6 describe various types of community facilities along SR 210, and a few key community facilities in Alta are not represented on these exhibits. The Alta Medical Clinic, located inside the Goldminer's Daughter Lodge next to the Alta School, is a small, 32.4EE

independent urgent care-type facility that provides a variety of medical services to Alta locals and visitors. Our Lady of the Snows is a Catholic chapel located at 10189 East, SR 210, where in-person mass is conducted during ski season. It is also the most heavily used indoor community gathering space in Alta. UDOT should acknowledge these facilities throughout DEIS Chapter 4 "Community and Property Impacts" and consider impacts to these facilities from the preferred alternatives.

32.4EE

**Comments on Gondola Alternative**

The proposed gondola system could provide a reliable alternative to SR 210 during inclement weather, avalanche hazard, and other conditions or events that compromise the viability of SR 210. But this alternative raises several concerns.

According to various plan-view renderings contained in the DEIS, the Alta gondola station is situated to the southwest of the "Rustler Mine Dump" parking area, in the runout of several large avalanche paths, including Flagstaff Shoulder, Main Flagstaff, and Binx's Folly. The Town recently completed an architectural feasibility study of a new community center facility on a parcel just upslope from the location of the proposed gondola station, on the north side of SR-210. Town of Alta Code requires building permit applications include certification that a proposed structure is designed to protect human life from a 100-year avalanche. As part of that study, therefore, consultants to the Town evaluated the potential impact pressure, velocity, flow height, and areal extent of a 100-year avalanche event along the avalanche paths and runout area that affect the community center site. This analysis concluded that both the community center site, and the location of the proposed gondola station, are subject to avalanche debris with substantial impact pressure, velocity, flow height, and aerial extent from 100-year avalanche events. For these reasons, UDOT must seriously consider the technical feasibility of, and likely construction costs associated with, building a gondola station in the proposed location, as well as whether it is technically feasible to locate the final span of gondola cables at elevations that may be subject to flowing avalanche debris from paths that affect the site.

32.2.6.5K, 32.2.6.5DD

Evacuation of the gondola would be an extremely complex procedure given the length of the alignment, the number of cabins, and the hazards present within Little Cottonwood Canyon. Evacuation during periods of high avalanche hazard would be especially challenging because passengers would disembark from cabins into stations, and then potentially be required to remain within those stations until avalanche hazard has been mitigated. In designing each of the three stations planned in the Canyon, including the Alta Station, the Snowbird Station, and the Tanners Flat Angle Station, UDOT should contemplate the capacity of the stations to function as emergency shelters for large numbers of people that can withstand the impacts of avalanches that affect the location of each station.

32.2.6.5H and 32.2.6.5K

Chapter 17, Visual Resources, describes the selection of 25 *Key Observation Points* (KOPs) by UDOT "that would have views of the project elements and that represent the most critical viewpoints." The only KOP selected in Alta is near the Catherine Pass Trailhead in upper Albion Basin. There are numerous additional locations in Alta that would represent a common point of observation for the DEIS action alternatives that are even more popular with motorists, recreation visitors, and Alta residents than the Catherine Pass Trailhead. For instance, either of the two major Alta Ski Area parking lots are much more popular recreation access points, and they are adjacent

32.17F

to a much higher volume transportation corridor than the Catherine Pass Trailhead, which is only accessible by vehicle from roughly July 1st to November 1st each year via the Albion Basin Summer Road (ABSR). Another example is the eastern terminus of SR 210, where the ABSR begins and provides winter access to Grizzly Gulch, Twin Lakes Pass, and Catherine Pass, among other destinations. This is widely considered one of the most popular winter-season access points for non-ski area recreation in the Cottonwood Canyons, and it is also extremely popular in the summer season as part of the route to access upper Albion Basin.

32.17F

Additionally, the final four towers and associated cable spans of the gondola alignment will prominently affect the view down Little Cottonwood Canyon from nearly any viewpoint along the floor of the upper canyon. Tower 17 will be placed on Peruvian Ridge in a location where it appears that it will disrupt the horizon line. These and other elements of the gondola will be visible from most residential areas and overnight lodging properties in Alta. Numerous Alta residents and community members have expressed concerns with these potential impacts.

UDOT acknowledges noise impacts from the preferred alternatives in DEIS Chapter 11. UDOT's analysis of noise impacts from the gondola seems to find that noise created by gondola towers and stations would be within the noise impacts already created by SR 210. For some Alta residential areas, commercial properties, and common public gathering spaces, the gondola will be closer than SR 210, which could cause gondola-related noise to exceed noise emanating from SR 210. Additionally, SR 210 only creates noise impacts when vehicles are travelling on the roadway. The gondola will be operating continuously throughout its daily operational period, so any periods of silence that take place when no vehicles are travelling on SR 210 would be disrupted by constant gondola noise. This would be especially impactful to residential areas along the Alta-Snowbird Bypass Road and commercial properties including the Rustler Lodge, the Alta Lodge, and the Goldminers Daughter Lodge.

32.11N

**Bus Comments**

Whereas the gondola alternatives include simple plans for upcanyon stations at Snowbird and in Alta, neither of the bus-based alternatives include any indication of where a high-capacity bus station in Alta would be situated. The location of such a facility could be a critical aspect of the functionality and popularity of a bus system, and local traffic and vehicular circulation would need to be coordinated with the arrival and departure of busses every five minutes. Like a future gondola station, a bus station would need to be designed with avalanche hazard in mind. UDOT will need to coordinate with the Town of Alta to provide water and sewer service to the facility, and to understand the implications of the facility for local law enforcement and shelter-in-place capabilities.

32.4DD

The speed limit on SR 210 through Alta is 25 miles per hour, but due to the very wide nature of the paved corridor through Alta, it is already common for vehicles to exceed the speed limit. It seems likely that peak period shoulder lanes along most of SR 210, which would not bear any vehicular traffic in the summer, would create greater visual clearance on the roadway and induce even faster vehicle speeds. UDOT must consider design elements to mitigate increased vehicle speeds if it

32.2.6.3S

chooses to widen SR 210 in the lower and mid canyon segments of the roadway. If design elements to mitigate increased vehicle speeds are not installed, and if speed limit enforcement is not widely effective, any improvement in safety for cyclists, pedestrians, and others could be undermined by the hazards associated with faster vehicle speeds.

Widening SR 210 to add peak period shoulder lanes for the proposed enhanced bus service will dramatically alter the experience of driving on the Little Cottonwood Canyon Scenic Byway. Much of the roadway through the canyon is a narrow, winding, 2 lane road. Widening the road will entail massive new cut and fill slopes along the length of the roadway particularly in the lower canyon, where presently the roadway corridor is narrowest. UDOT should consider all possible measures of the mitigating the visual impact of these project elements. 32.17B

UDOT must ensure it provides adequate road maintenance resources on SR 210 if it installs peak period shoulder lanes. These roadway segments could be susceptible to more rapid road surface deterioration during snowstorms, since they will not benefit from constant vehicle traffic, which can mitigate the buildup of snow and ice on the road surface in some conditions. 32.2.6.3P

Do not hesitate to reach out to me or to Town of Alta staff if you would like to discuss our comments.

Sincerely,

Harris Sondak
Mayor

Chris Cawley
Assistant Town Administrator

**COMMENT #:** 13341
**DATE:** 9/2/21 8:57 AM
**SOURCE:** Website
**NAME:** Maureen Petit, Project Manager

---

**COMMENT:**

The Utah Department of Environmental Quality (UDEQ) Division of Environmental Response and Remediation (DERR) has reviewed the Little Cottonwood Canyon Environmental Impact Statement (EIS) made public on June 25, 2021 and has the following comments.

1. Please note that Sites deleted from the National Priority List (NPL) or listed as No Further Remedial Action Planned (NFRAP) may contain contaminated material and future construction activities associated with this project may encounter hazardous substances. This includes the Davenport and Flagstaff Smelter, Jones and Pardee Smelter, and North Star Smelter. Additionally, there may be historical mining features within the canyon that have not been investigated by DERR that may impact the Alternatives listed in the EIS. Please notify the DERR before the aforementioned sites are disturbed and if other historical mining features are encountered to coordinate appropriate measures to protect human health and the environment. **(32.16B)**

2. Section 16.3.2.3 - Superfund (CERCLA) Sites and Voluntary Cleanup Programs. Please note that the Jones and Pardee Smelter and North Star Smelter are not National Priorities List (NPL) sites under CERCLA (Superfund). These Smelter Sites were investigated under CERCLA authority in coordination with the EPA. Preliminary Assessments were conducted at both smelter sites and it was determined at that time that the threat to human health and/or the environment was not sufficient for further CERCLA consideration such as conducting a CERCLA Site Investigation or proposal for inclusion on the EPA's National Priorities List. Despite this determination, there may still be mining wastes at these sites, that if disturbed, would need to be managed in a protective manner. **(32.16C)**

3. Section 16.3.2.3 - Superfund (CERCLA) Sites and Voluntary Cleanup Programs. Please note that the Davenport and Flagstaff Smelters are considered a single site under the EPA's National Priorities List (NPL) designation. A portion of the CERCLA designated Davenport and Flagstaff Smelters NPL site, prior to EPA's NPL listing, had been in the state's Voluntary Cleanup Program (VCP). That portion of the combined NPL listed site was terminated from the VCP once the collective smelter sites were placed on the NPL in 2003. The main driver for NPL listing was lead and arsenic contamination. Contaminated soil was removed throughout most of the site to a depth of 18 inches and capped with clean fill; however, waste remains in place at depth and is managed through institutional controls and is subject to the Salt Lake County Soil Ordinance (Title 9.50.060). **(32.16D)**

4. Section 16.4.6.2 S.R. 210 ‚Äì North Little Cottonwood Road to Alta. The land on the La Caille Restaurant property is part of the Davenport and Flagstaff Smelters NPL "Superfund" Site and proceeding with Gondola Alternative B could encounter a "high probability of contamination." Please include coordinating with DERR and the EPA in the alternative if construction is planned on the Davenport and Flagstaff Smelter Site footprint. **(32.16E)**

5. Section 24.2.6 Approval of Remediation Work Plan (UDEQ or EPA). Gondola Alternative B involves construction on the Davenport and Flagstaff Smelters NPL Site and falls under the Salt Lake County municipal code (Chapter 9.50 Institutional Controls). This is an is an institutional control (IC) applied to the completed remedial action at the Davenport and Flagstaff Smelters NPL site. In addition to the County, please include coordinating with DERR and the EPA so we can ensure that the requirements of the IC are appropriately considered and incorporated into the preparation of this alternative. **(32.24A)**

**COMMENT #:** 13342
**DATE:** 9/2/21 11:10 AM
**SOURCE:** Email
**NAME:** Britney Ward

---

**COMMENT:**

Sandy City Engineering Comments
Good morning Josh-

The time you have spent with us each month to review the LCC EIS study progress and to address any questions we have has been appreciated, and the importance given to maintain our involvement is welcome. Thank you for suggesting the more important chapters to review, it was very helpful. Like I said in our last meeting, the study is well put together. It made a careful effort to discuss many of the concerns expressed through the process. It is detailed, logical, and easy to read. I was impressed by the level of detail put into the concept drawings and operations, mobility hub needs, travel impacts, and costs. Due to the reports extensive content, it was wise to avoid repeating text and instead state that conditions are the same as the previous alternative. Amid the educational purposes of the document, here are a few comments I wanted to bring to your attention. These comments do not represent Sandy City as a whole, rather they are only from our Engineering team. You will likely be getting additional comments from the other divisions within Sandy.

Appendix 2G p.20

Why is there so much cog rail discussion on this page? This section is to discuss the Gondola Alternative B. **(32.2.9AA)**

Appendix 2G p.20

The gondola is adding impervious area: deep foundations, angle stations. The amount of disturbance when building towers will also be high, with possible permanent damage to soils. **(32.12A, 32.13B, 32.19A, and 32.2.6.5L)**

Appendix 2G p.21

I only see 5 sub alternatives, not 9. **(32.2.9BB)**

Chapter 7 p.3

Why was SR-209 not mentioned as another road of importance? It directly feeds into LCC, and is closer than any "of the three other roads mentioned. **(32.7H)**

Chapter 7 p.7

The document states that during the 30th highest hour in 2018, traffic backed up on SR-210 from the intersection with SR-209 is about 2,775' and on SR-209 backups were about 50'. This is not correct, based on our experience. 50' is less than 3 vehicles. We frequently witness, and get complaints of back-ups on SR-209 much longer than this. They will frequently extend past Wasatch Blvd. It is also mentioned earlier on this same page that traffic in the morning becomes congested at this intersection, causing substantial traffic backups that can extend for miles on both roads. We did discuss this in our last monthly meeting, and you mentioned that the 50' queueing was based on the traffic modeling only. Perhaps the modeling determined the short back up length because the intersection is not a signal, rather it consists of an eastbound merge lane? It would be beneficial to do in-person observations on

SR-209, and to review UDOT's ATSPM data at the SR-209 Wasatch Blvd signal. This will help determine actual experienced queueing lengths, rather than a modeled estimate. **(32.7I)**

Chapter 7 p.7

Reading between the lines...Is the EIS saying that the 30th highest hour is an hour that doesn't have any avalanche closures, and therefore no congestion on SR-209? So, only during and after avalanche closures is when traffic backs up on SR-209 to Highland Dr? I'm really trying to understand how the study identifies no back-ups on SR-209. **(32.7I)**

Chapter 7 p.15

7.4.2.2 section should clarify that the decreases are in year 2050. **(32.7J)**

Chapter 7 p.15

7.4.2.2 the fourth paragraph of this section mentions the need to drive to the gondola base station. This option is actually to discuss enhanced bus, not gondola. **(32.7J)**

Chapter 7 p.15

The placement of Table 7.4-7 is strange here. The document has only discussed the No Action and the Enhanced Bus alternatives thus far. The same could be said about Figure 7.4.1. A better place for these images would be at the end of the chapter. **(32.7J)**

Chapter 11 p.13

The last paragraph states that LOS C was used to represent the worst-case noise conditions while traffic was un-congested. As UDOT's design goal is LOS D, using a LOS D in the noise study could be more justifiable. Accordingly, LOS D is also the worst-case LOS desired for the 30th highest hour. However, we did discuss this comment with you at our most recent monthly meeting. To the effect of what was explained in our meeting, I suggest adding clarification that using LOS C is more conservative because higher noise is experienced at this level. **(32.11M)**

Chapter 20 p.19

In the Gondola Alternative B section, the first paragraph states that development would be induced. But then in the last paragraph on this page, it states that development would not be induced. Text clarification is needed. **(32.20J)**

General comments:

For each of the alternatives, the 9400 S Highland Dr mobility hub is conferred. While the document stated that there would be an increase in trips to the hub on both 9400 S and Highland Dr, and that there would be no traffic increases to the bordering neighborhood, I didn't see further adjacent traffic impacts discussion on the matter. Will the study be doing a traffic study on the roadway impacts from the structure? Or will this be done at a later time when plans are submitted through our development review process? **(32.7B)**

Looking at the big picture, all alternatives seem at least somewhat helpful, which the study did a good job of explaining. I look forward to continued collaboration with UDOT through this and future studies and projects to determine the specific impacts to SR-209, Highland Dr, and Wasatch Blvd in Sandy City.. The LCC EIS will provide the foundation for future development and roadway projects in our city, and will guide us in determining future expectations of the area. We intend to add to that with the

Highland Dr EIS and the SR-209 specific study.  We look forward to supporting UDOT as the identified best alternatives and phasing's are implemented, particularly regarding the 9400 S Highland Dr mobility hub and SR-209 improvements.  See you next month.

**COMMENT #:** 13343
**DATE:** 9/2/21 2:14 PM
**SOURCE:** Email
**NAME:** Mike Johnson

---

**COMMENT:**

Josh and EIS project team members:
On behalf of the Mayor, City Council, and city staff, please accept the attached letter as the city's official public comment regarding the EIS and the Preferred Alternatives.

Sincerely,

Mike Johnson
Community & Economic Development Director
Cottonwood Heights

Cottonwood Heights
City between the canyons

September 2, 2021

*Delivered Via Email*

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

**Subject: City of Cottonwood Heights Public Comments – Little Cottonwood Canyon EIS Preferred Alternatives**

Dear Project Team Members and Leadership:

On behalf of the Mayor, City Council, and city administrative staff, please accept this letter as official public comment from the City of Cottonwood Heights ("the city") regarding the Draft EIS / Preferred Alternatives phase of the EIS.

## Recommendation

After extensive review of the two preferred alternatives presented by UDOT, **the city supports the 'Enhanced Bus Service in Peak-Period Shoulder Lane' alternative**. While numerous concerns and questions remain, this enhanced bus alternative most closely aligns with the goals and recommendations of the Wasatch Boulevard Master Plan ("WBMP") and has fewer direct negative impacts on Cottonwood Heights. Additionally, the enhanced bus alternative allows phased implementation and future flexibility that has the potential to benefit far more transit and canyon users than just those visiting Little Cottonwood Canyon ski resorts. Detailed rationale for this staff recommendation and conclusion is found below.

32.2.9B

32.2.6.3D

## Review and Analysis of Draft EIS and Preferred Alternatives

The following is a summary of the city's findings after thorough review and analysis of the Draft EIS.

### Corridor Design and Aesthetics

- One of the city's top priorities remains the design speed and aesthetics of the road. The reference to the WBMP and UDOT's Wasatch Boulevard Corridor Aesthetics Plan ("Aesthetics Plan"), plus previous verbal agreement by UDOT to collaborate with city officials is appreciated. Future roadway design should evoke the 'Boulevard' name of the corridor, which can result in a unique and memorable corridor that is safe and appealing for residents, visitors, and tourists alike. However, the city requests additions to the EIS to reaffirm this position;
- The city suggests that the 'Aesthetics' section heading on page 2-53 of the EIS be amended to 'Aesthetics and Design;'
- The city requests that UDOT include enhanced language that provide a commitment to view Wasatch Boulevard as a special character gateway and recommends specific reference in the EIS

32.2.6.2.2F

32.2.6.2.2G

32.2.6.2.2H

2277 East Bengal Blvd. Cottonwood Heights, Utah 84121
City Hall: (801) 944-7000 Fax: (801) 944-7005
www.cottonwoodheights.utah.gov

document that any future sound walls or other corridor improvements all be reviewed under this same procedure to ensure cohesive design and aesthetics;

- The city also requests that the WBMP and Aesthetics Plan be included as appendices to the EIS package. This will ensure that UDOT and the city are committed to collaborating on roadway design and aesthetics regardless of the staff or officials involved; 32.2.6.2.2I
- Cottonwood Heights requests a specific signed agreement/memorandum of understanding with UDOT that the roadway design will be established in a collaborative manner, following the tenets of the WBMP and Aesthetics Plan; 32.2.6.2.2F
- When discussing design speed in Chapter 2 of the EIS (page 2-37), it states that, *"a lower design speed would still have the same cross-section design standards as identified in Section 2.6.2.3, Wasatch Boulevard Alternative, except that the clear zone [i.e., shoulder] could be reduced by 8 feet on the west side of Wasatch Boulevard. The clear zone on the east side would also be reduced by 8 feet, but the overall width needed for the roadway would not change because the area needed for the trail and park strip would still be required."* The city strongly encourages this clear zone reduction be implemented. Although the overall right-of-way width remains the same, the amount of asphalt utilized would be reduced, representing a more balanced implementation of roadway elements that are not vehicular lanes (on-street bike lanes, separated trails, medians, landscaping). 32.2.6.2.2J
- The city requests that a reference be added to this section (2.3.1 – Roadway Design) that UDOT has formally recognized the Wasatch Boulevard Corridor as a special character corridor, which as the city understands will make its design process more unique and flexible than UDOT's standard roadway design policy. This should be clearly acknowledged within the EIS document; 32.2.6.2.2K
- Per the WBMP, future collaborative design of the corridor should prioritize the reduction of any added roadway noise in an effort to maintain or reduce current roadway decibel levels and preserve the quality of life for adjacent neighborhoods; 32.11B
- A speed study of the roadway under current conditions will not yield new results. Roadway design and formal speed studies must be conducted simultaneously. The city requests that UDOT reference the connection between design speed and posted speed. Additionally, UDOT officials previously stated to the City Council in a public meeting that best efforts would be made to reduce corridor speeds. The city fully expects UDOT to continue work toward fulfilling this public commitment; 32.2.6.2.2A
- Definitive language should be included in the EIS document regarding the future widening of Wasatch Boulevard from imbalanced lanes to five lanes. The current EIS states that five-lane widening is triggered at LOS E or F on the corridor. The city requests that trigger requirement be revised strictly to LOS F, which should be determined over a prolonged period prior to implementation of any widening. The city also requests jurisdictional collaboration prior to any widening to ensure the corridor design and aesthetics are not negatively impacted by future work; 32.2.6.2.2L
- The city requests that UDOT revise the terminology addressing Wasatch Boulevard widening. It should be labeled as '5-lane phased approach' to further clarify UDOT's stated intent; 32.2.6.2.2M
- While it is understood that previously proposed traffic speed mitigation measures, such as roundabouts, roadway chicanes, or similar traffic calming measures were eliminated from consideration, the city requests that these design elements be reconsidered and analyzed further, especially when Wasatch Boulevard undergoes roadway design. These mitigation techniques are specifically referenced in the Preferred Scenario of the Wasatch Boulevard Master Plan, and should not be eliminated before detailed roadway design has taken place. 32.2.6.2.2N

## Corridor Mobility and Local Access

- Neighborhood access and safety is critical. A stronger emphasis must be placed on ensuring safe neighborhood ingress and egress, particularly at Kings Hill Drive. The city continues to advocate for a signalized intersection at this location, in addition to ongoing recommendations to reduce roadway speeds through posted speed limit and roadway design elements. Further, the city requests that more detail be provided on how the intended improvements to this intersection will improve the ease and safety of neighborhood access; 32.2.6.2.2A
- In accordance with the Preferred Scenario of the WBMP, the additional south-bound lane should continue to be considered as a flexible lane, or a transit-only lane. Similar to the proposed widening in Little Cottonwood Canyon, further consideration should be given to utilizing this added roadway capacity for peak-period transit and/or HOV purposes, but for recreational and active transportation purposes during non-peak times; 32.2.6.2.2O
- UDOT has previously stated that the shared-use pathway is cut off at the High T due to city property south of that location containing a preservation easement. This is not a legitimate reason to stop the trail, and the city recommends that the shared-use path continue as far south as possible. A recreational trail is feasible and allowable within the preservation easement and can provide pedestrians direct access to a future Bonneville Shoreline Trail location. The gondola alternative and location of a major commercial transit center does impact the preserved and natural quality of the property and creates far more concerns than the shared-use path. Regardless of the alternative chosen, the shared-use path should be extended; 32.2.6.2.2P
- The city requests that UDOT revise reference of pedestrian bridges to 'grade-separated crossings,' which allows future flexibility for other options for safely crossing Wasatch Boulevard, such as below-grade crossings, depending on the exact location identified for such features; 32.2.6.2.2Q
- In addition to grade-separated pedestrian crossings, UDOT's design must also implement measures that make at-grade pedestrian crossings at signalized locations much safer. Features such as enhanced crosswalks, pedestrian crossing signals that are more visible to vehicles, pedestrian refuge locations in medians, and other safety measures should all be implemented to provide safety for and increase vehicular awareness of pedestrians; 32.2.6.2.2R
- The proposed shared-use path should be designed to connect to other pedestrian amenities in the area, including neighborhood sidewalks, surrounding trail systems (i.e. Big Cottonwood Canyon Trail) private developments (i.e., gravel pit site), and transit stops. UDOT should also consider in its design process a wayfinding signage system, so the shared-use path becomes both a recreational amenity but also a substantial piece of active transportation infrastructure; 32.2.6.2.2S
- Traffic studies that serve as the baseline analysis for the EIS are not current. The city requests that UDOT complete a current traffic analysis of the project area. An updated analysis will ensure the most accurate and updated data are used as a basis for decision making. Acknowledgement of the short-term and long-term impacts of the COVID-19 pandemic on traffic patterns should also be included. 32.2.6.2.2T

## Enhanced Bus Advantages & Recommendations

- As part of the enhanced bus service alternative, UDOT should disincentivize personal vehicle travel, especially during peak traffic periods. Tolling is one method, which is already included in the EIS. Other suggestions include opening resorts earlier to transit riders, discounted lift ticket prices for transit users, and additional fees for parking at the resort locations. Creative approaches and public- 32.2.4A and 32.2.2K

private partnerships will be required to properly incentivize bus use. The gondola alternative provides numerous details on public-private partnerships, and the enhanced bus alternative should be looked at with the same level of creativity to make sure the alternative is as effective and appealing as possible;

32.2.6.3T

- Anticipated enhanced bus travel time is shorter than vehicular travel time. With avalanche sheds leading to fewer canyon closures and additional bus-only capacity in the canyon, the enhanced bus alternative seems to be the most effective and efficient solution to reduce vehicular traffic and travel time in the canyons. It is acknowledged that canyon closures will impact bus travel time if there is traffic back-up on Wasatch Boulevard. However, such closures will also impact travel time for gondola users by delaying travel time to the gondola station;

32.2.9B, 32.7B

- The enhanced bus alternative provides much more long-term flexibility. It provides a legitimate transit option for skiers, as well as recreation stops to trailheads in the Canyon. It also allows future transit solutions in Big Cottonwood Canyon as well as north-bound commuting to destinations such as downtown Salt Lake City, Research Park, and the University of Utah. The enhanced bus alternative may be implemented in a phased, scaled approach. The gondola alternative is much more of an all-or-nothing option;

32.2.6.3C, 32.1.2C, 32.2.6.3D, 32.29R, and 32.2.6.5A

- While costs are high for both alternatives and there are additional ongoing costs for the enhanced bus solution, there is much greater flexibility in terms of bus scheduling and service and potential for year-round use, future service to Big Cottonwood Canyon, bus stops at popular trail locations in both canyons, and other non-resort destinations. The gondola option does not provide these opportunities. In that sense, the enhanced bus alternative also furthers the goals in the Central Wasatch Commission's Pillars document. Specifically, the option for transit flexibility both in and out of Little Cottonwood Canyon encourages year-round transit use and caters to more canyon users.

32.1.2C
32.2.6.3C

- UDOT should plan on a phased approach with improvements to accommodate demand and need over time. The bus alternative provides greater flexibility to do this and make any course corrections needed over the course of implementation;

32.1.2C

- The city cautions UDOT against removal of the peak-period shoulder lane. Without it, transit incentives are decreased and the same traffic bottlenecking issues that are experienced today will persist. The additional lanes' non-peak use as a trail and bike lane helps offset the impact of such added capacity in the canyon. As stated previously, a similar approach should be taken with added capacity on Wasatch Boulevard;

32.2.6.3D
32.2.9B
32.2.6.2.2O

- The large mobility hub, coupled with flexible enhanced bus service, also provides future benefit to Big Cottonwood Canyon as well as other commuter traffic in the region (e.g., north-bound transit lines to Research Park, or a direct connection from the gravel pit hub to TRAX lines become more appealing and feasible).

32.20D
32.2.6.2.1I

### Gondola Alternative Concerns & Disadvantages

- The Gondola station is incompatible with the WBMP. The plan identifies the gravel pit as the preferred location for a major transit hub, as this location will allow vehicles to park prior to entering the Wasatch Boulevard corridor. Locating the gondola at the end of the corridor does not resolve major traffic issues on high-traffic days. Additionally, the WBMP recommends limiting major redevelopment projects along the corridor and envisions land use along the corridor to remain residential and recreational. A major commercial gondola center conflicts with this;

32.2.6.5E

32.3E

- The mobility hub at the gravel pit is likely to become an underutilized surface parking lot with 600 stalls under the gondola alternative. This conflicts with the Wasatch Boulevard Master Plan, which recommends structured public parking integrated into a high-density mixed-use development. A creative and collaborative approach to a large transit hub, through public-private partnership with future site developers, will ensure a sustainable long-term development that provides a public benefit. A smaller surface lot does not have the same potential;
- The isolated and residential location of the gondola station parking structure is more likely to result in underutilization of the public parking at non-peak hours and in spring/summer months than a major mobility hub at the gravel pit surrounded by high-density mixed-use development;
- The gondola alternative requires major investment that only directly benefits two locations – Snowbird and Alta. There is very limited flexibility in this option for other types of transit users interested in visiting Big Cottonwood Canyon, access trails, or commuting;
- The city has seen preliminary designs for the gondola station that require encroachment on the city's 26-acre open space preservation property for the use of bus stops/bus pull-out areas. This type of encroachment is problematic and conflicts with the recreational purpose of the perpetual open space easement recorded against the property;
- When comparing anticipated travel times, the gondola alternative takes much longer to travel up the canyon than the bus alternative. The gondola travel time is also substantially longer than vehicular travel time, which provides little incentive to use the gondola;
- The gondola alternative fails to remove any canyon traffic (transit and vehicular) from Wasatch Boulevard. The larger mobility hub identified in the enhanced bus alternative ensures that all transit users will park and board transit before entering the corridor. Additionally, the location of the gondola station will have a tangible impact on the city-owned portion of Wasatch Boulevard from gondola traffic coming from the south and west. This roadway already operates near capacity and the city does not intend to widen that road in the immediate future.

## Conclusion

After reviewing the draft alternatives and other project documents, comparing recommendations in the Draft EIS to the city's Wasatch Boulevard Master Plan (and UDOT's Corridor Aesthetics Plan), and meeting with EIS project officials and stakeholders numerous times, **the city of Cottonwood Heights supports the enhanced bus with peak-period shoulder lane alternative over the gondola alternative.** To further support the city's findings and analysis in this letter, attached is a document with key supporting references to the Wasatch Boulevard Master Plan and to UDOT's Corridor Aesthetics Plan.

Sincerely,

Michael J Peterson
Mayor
Cottonwood Heights

**Attachment – Wasatch Boulevard Master Plan & Wasatch Boulevard Corridor Aesthetics Plan – Notable References**

32.2.6.2.1J

32.2.6.2.1K
32.1.1A, 32.20D,
32.1.2B, 32.1.2D,
32.2.7A and 32.7C
32.2.6.5HH

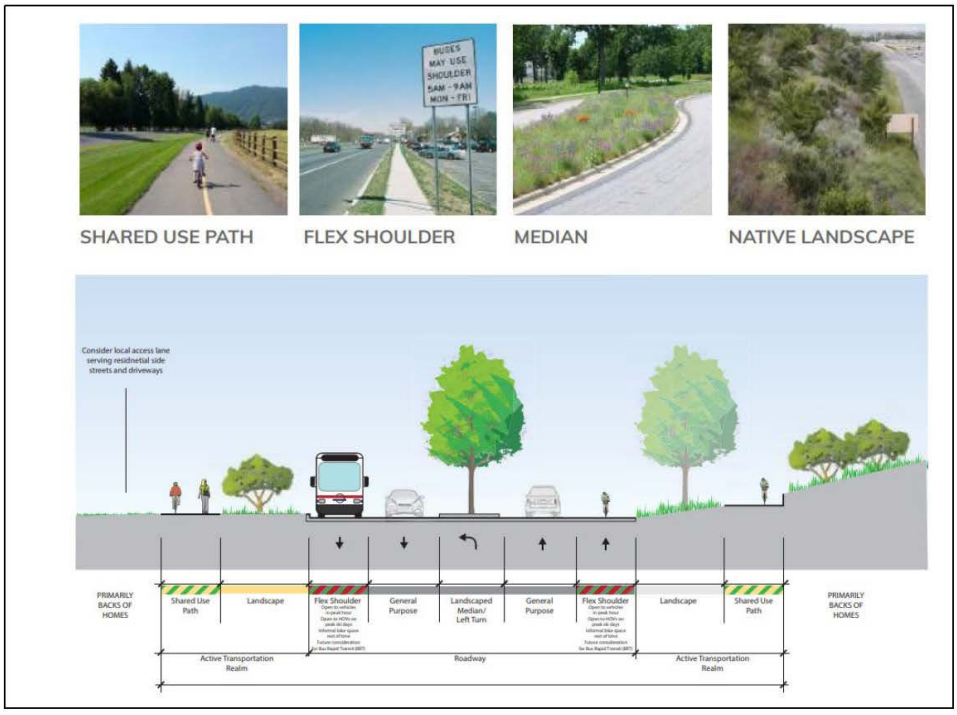
32.2.4A

32.2.6.5E

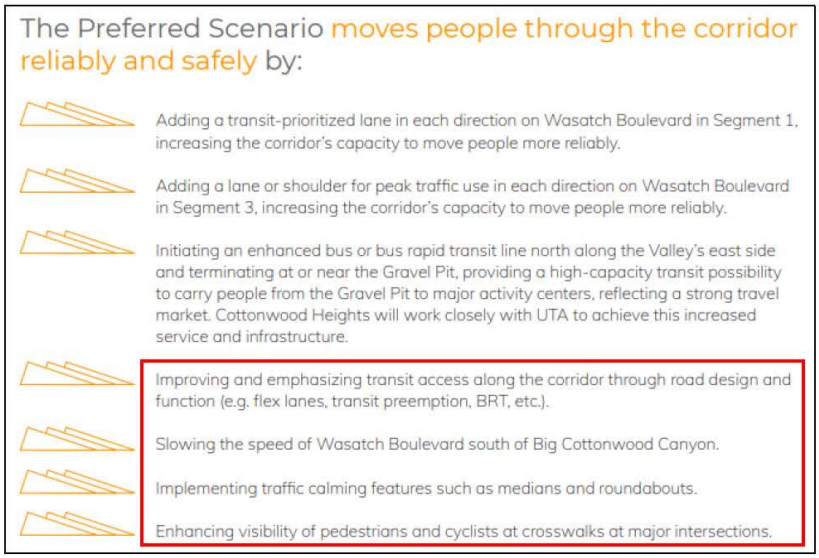
# Wasatch Boulevard Master Plan & Wasatch Boulevard Corridor Aesthetics Plan Reference Sheet

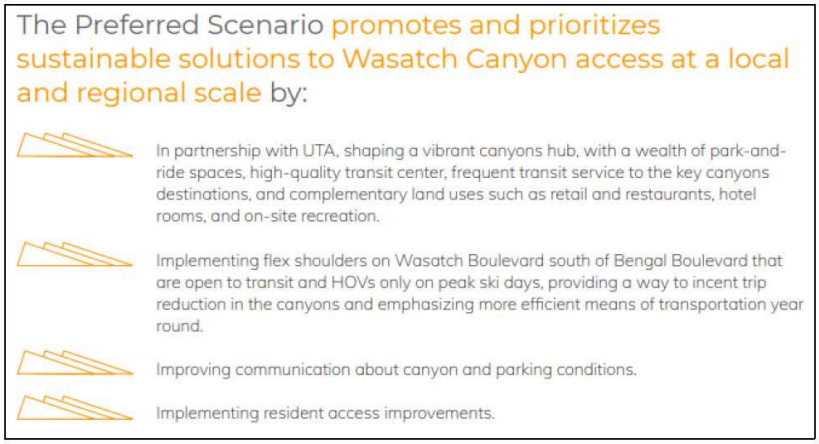
## Wasatch Boulevard Master Plan (link to full plan)

- Preferred Scenario (page 4)
  - 'Consider roundabouts with pedestrian crossings to calm traffic and allowing neighborhood access at key points'
  - 'Reduction of speed limit on Wasatch Boulevard'
- Preferred Scenario Cross Section (page 5)
  - 'Flex Shoulder – open to vehicles in peak hour, open to HOVs on peak ski days, informal bike space rest of time, Future consideration for Bus Rapid Transit (BRT)'



- **Preferred Scenario Analysis (pages 6-9)**



## The Preferred Scenario preserves and enhances the character and livability of existing residential neighborhoods by:

- Focusing new development focused on Gravel Pit area, preserving character of existing corridor neighborhoods.
- Linking neighborhoods together through shared use pathways and trails along Wasatch Boulevard.
- Reducing the barrier of Wasatch Boulevard with improved pedestrian and bicycle crossings.
- Minimizing the pavement width of Wasatch Boulevard roadway as much as possible, despite the additional lane capacity.
- Improving resident access onto Wasatch Boulevard through a slower street, features such as roundabouts, and warnings for canyon traffic not to block the intersections.
- Creating a proactive, assertive development review process that will provide residents with a chance to shape the development of key parcels within neighborhoods.
- Lowering the speed of Wasatch Boulevard through a new design and a lower posted speed.

- **Corridor Design and Aesthetics References**

### Native Wasatch foothill landscaping

Another key element of a Wasatch Boulevard parkway would be continuation and enhancement of native Wasatch foothill landscape.




The design approach respects the mountain setting. A stylized design approach is used to create a roadway that embraces the natural hillside, creating a fully-realized parkway appropriate for the challenging setting. The result is a corridor that merges nature/mountain with home/yard/park.

## Shared use pathways on Wasatch Boulevard

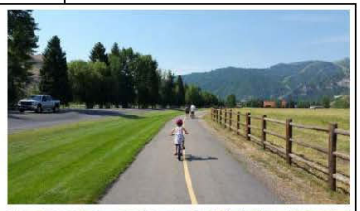
The "trunk" of this network should be connected shared use pathways and crossings running the length of the corridor, on one or both sides, depending on location and spacing of crossings and neighborhood accesses.

## Wasatch Boulevard crossings

The largest challenge of this objective is likely finding the best way for people to cross Wasatch Boulevard, whether at-grade or grade-separated crossings. Slowing down the speed would help this.

## Leverage existing trails and paths

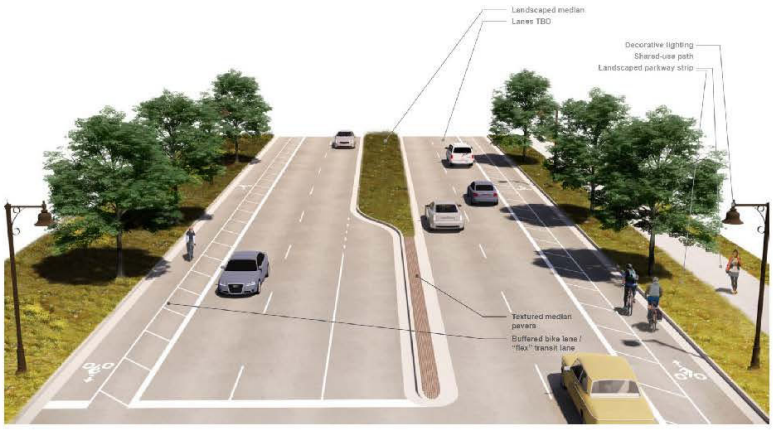
Two major existing and planned trail corridors connect to the Wasatch Boulevard corridor - the Big Cottonwood Creek pathway running northwest from the mouth of Big Cottonwood Canyon; and the planned Bonneville Shoreline Trail east of the developed neighborhoods on the east side of Wasatch Boulevard, which is part of a regional trail corridor along the eastern edge of the Salt Lake Valley. These can be integrated into the pathway network recommended by this plan, and to connect it to neighboring communities.



*Images depicting elements of a pathway network for the Wasatch Boulevard corridor.*

## Wasatch Boulevard Corridor Aesthetics Plan (Prepared by UDOT)

The following are several graphics from UDOT's plan, presented to the public and to the Mayor and Council, that show various aesthetics and design elements that improve safety for all modes of transportation, reduce design speed of the roadway, and evoke the aesthetic of a true canyon gateway corridor:


Landscaped median
Lanes TBD
Decorative lighting
Shared-use path
Landscaped parkway strip
Textured median pavers
Buffered bike lane / "flex" transit lane


Street trees
Decorative streetlights
Buffered bike lane
Naturalized landscape
Branding
Public art
Decorative fencing
Seating
Textured banding
Manicured lawn
ADA truncated domes
Enhanced crosswalk

**COMMENT #:** 13344
**DATE:** 9/3/21 7:55 AM
**SOURCE:** Email
**NAME:** Nicole Fresard

---

**COMMENT:**

Please find attached our response to your request for comments on the draft EIS, Chapter 13: Ecosystem Resources. The project is located between the intersection of SR-210 and SR-190 in Cottonwood Heights to the terminus of SR-210 in the town of Alta, Salt Lake County, Utah.

Our comments provided in this letter are intended to address DA Regulatory Program requirements. Please see the letter for complete information.

Please refer to identification number SPK-2018-00270 in any correspondence concerning this project.

This document was provided on behalf of Ms. Nicole Fresard, Senior Project Manager, Regulatory Division, Sacramento District, U.S. Army Corps of Engineers. If you have any questions, please contact her at 533 West 2600 South, Suite 150, Bountiful, Utah 84010, by email at [redacted]

**DEPARTMENT OF THE ARMY**
U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT
1325 J STREET
SACRAMENTO CA 95814-2922

September 3, 2021

Regulatory Division (SPK-2018-00270-IN)

Utah Department of Transportation
Attn: Mr. Brandon Weston
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Post Office Box 148450
Salt Lake City, Utah 84114-8450
brandonweston@utah.gov

Dear Mr. Weston:

As a cooperating agency on the preparation of an Environmental Impact Statement (EIS) for the Little Cottonwood Canyon (State Route 210) project, we are responding to your request for comments on the draft EIS, Chapter 13: Ecosystem Resources. The project is located between the intersection of SR-210 and SR-190 in Cottonwood Heights to the terminus of SR-210 in the town of Alta, Salt Lake County, Utah.

As indicated in Chapter 13, the project would result in the discharge of dredged or fill material in waters of the United States (waters) and would, therefore, require Department of the Army (DA) authorization. The comments provided in this letter are intended to address DA Regulatory Program requirements.

Based on information in this chapter, field surveys have been conducted in the areas within 125 feet on either side of SR-210 in addition to some areas encompassing specific proposed alternatives. The survey area is referred to as the *field survey area* which identified forty-five aquatic resource features including 13 palustrine wetlands that total 0.84 acre, 4,989 linear feet (2.80 acres) of perennial stream segments (including Little Cottonwood Creek and two unnamed perennial streams), 2,820 linear feet (0.44 acre) of intermittent streams, two seeps that total 0.01 acre, and 2,129 linear feet (0.25 acre) of ephemeral streams.

Section 13.3.2.3 summarizes all aquatic resources identified within the project area and section 13.3.2.3.4 discusses the jurisdictional status of waters. Note that only the Corps of Engineers has the authority to determine the jurisdictional status of waters through the jurisdictional determination process. At this time, a jurisdictional determination has not been requested for this project. Therefore, the sections that discuss impacts to waters must be modified to exclude language regarding jurisdictional status. Should a jurisdictional determination be requested, a report prepared in accordance with the "Sacramento District's Minimum Standards for Delineation of Waters of the United States" (enclosure 1) will be required for review and approval. A formal determination would refine any over/under estimations and omissions for aquatic resources located within the project site.

32.13H

A description of alternatives indicates that the following alternatives would result in a discharge of dredged or fill material in potential waters.

- Enhanced Bus Service Alternative would result in 0.03–0.17 acres of stream impacts.
- Enhanced Bus Service in Peak-period Shoulder Lane Alternative would result in 0.32–0.46 acres of stream impacts.
- Gondola Alternative A would result in 0.03–0.17 acres of streams impacts.
- Gondola Alternative B would result in 0.03–0.17 acres of stream impacts.
- Cog Rail Alternative would result in 0.35–0.49 acres of stream impacts.

The alternatives resulting in a discharge of dredged or fill material in waters would require review and approval form the Corps of Engineers. Unavoidable losses of waters in excess of 0.1 acre will require compensatory mitigation in accordance with 33 Code of Federal Regulations Part 332.

The Corps of Engineers would like to reiterate concerns with the potential for indirect impacts to waters. Indirect impacts are defined as impairments or losses of aquatic resources that occur at a different time or location than the placement of the fill. Indirect impacts could be reduced or eliminated through the mitigation measures, including implementation of best management practices (BMPs). While BMPs have been demonstrated to be effective means at reducing impacts, such BMPs are not 100% effective and adverse construction effects are well-established. Although BMPs should be required per mitigation requirements, indirect impacts to water aquatic ecosystems adjacent to the project area should be included in the scope of effects.

32.13I, 32.13G

We appreciate the opportunity to provide our comments on the draft EIS. Please refer to identification number SPK-2018-00270 in any correspondence concerning this project. If you have any questions, please contact me at 533 West 2600 South, Suite 150, Bountiful, Utah 84010, by email at Nicole.D.Fresard@usace.army.mil, or telephone at (801) 295-8380 ext. 8321. For more information regarding our program, please visit our website at www.spk.usace.army.mil/Missions/Regulatory.aspx.

Sincerely,

Jennifer C. Thomason

for Nicole Fresard
Senior Project Manager
Nevada-Utah Section

cc: Mr. Joshua Van Jura (jvanjura@utah.gov)
Ms. Carol Snead (carol.snead@hdrinc.com)
Mr. Vincent Izzo (Vincent.Izzo@hdrinc.com)

# MINIMUM STANDARDS FOR ACCEPTANCE OF AQUATIC RESOURCES DELINEATION REPORTS

**U.S. ARMY CORPS OF ENGINEERS** BUILDING STRONG®

**January 2016**

The U.S Army Corps of Engineers, through its Regulatory Program, regulates certain activities in waters of the United States. Waters of the U.S. are defined under 33 CFR Part 328. In order for the Corps to determine the amount and extent of waters of the United States at a site, aquatic resources must first be delineated in accordance with established regulatory standards, guidance and protocol, such as the 1987 Corps of Engineers Wetlands Delineation Manual and appropriate regional supplements. Before making any permit decision, the Corps is responsible for conducting or verifying the delineation and determining which of the aquatic resources have the potential to fall under federal jurisdiction.

Due to limited staffing and resources, the Corps' Sacramento District recommends permit applicants employ the services of individuals experienced in delineating aquatic resources. Permit applicants are further encouraged early in the project planning stages to submit the delineation, along with a request for a preliminary or approved jurisdictional determination, and engage in a pre-application consultation with their local District office. Early consultation may help identify potential concerns and result in a quicker permit decision.

The District has established minimum standards for delineation reports to insure consistency and accuracy in the delineation of aquatic resources, which will minimize potential delays. The standards are based on years of experience conducting and verifying delineations, as well as the best practices of environmental consultants. Delineations submitted for verification must follow the standards, unless determined to not be practical on a case-by-case basis. Situations where adherence to the standards may not be practical include activities with small permanent or temporary impacts to aquatic resources (under 0.10 acre), applicants with limited financial resources, and emergencies. The District will notify the requestor for delineation submittals that do not contain sufficient information to accurately identify the limits of waters of the U.S.

Aquatic resources delineation reports submitted to the District must include the following:

☐ A cover letter requesting a jurisdictional determination. The letter must specify whether a preliminary or approved jurisdiction determination is requested.

☐ A signed statement from the property owner(s) allowing Corps personnel to enter the property and to collect samples during normal business hours. If the property is land-locked, the owner or proponent must obtain permission from the adjacent property owner(s) to provide access for Corps personnel.

☐ A statement that the delineation has been conducted in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and appropriate regional supplement(s). The regional supplement(s) used must be identified. For ordinary high water mark (OHWM) delineations, a statement indentifying the use of the OHWM field guide must be included.

**Enclosure 1**

☐ Directions to the survey area.

☐ Contact information for the applicant(s), property owner(s), and agent(s).

☐ A narrative describing all aquatic resources at the site and an explanation for the mapped boundaries, especially for resources containing complex transition zones. If the site contains resources that meet one or two wetland criteria or do not exhibit a clear OHWM, describe the rationale for not delineating these features. Examples include erosional features, upland swales, and other upland areas that appear "wet" on satellite or aerial imagery.

☐ The total acreage of the survey area.

☐ Date(s) field work was completed.

☐ A table listing all aquatic resources. The table will include the name of each aquatic resource, its Cowardin type, acreage, and location (latitude/longitude). For linear features, the table must show both acreage and linear feet.

☐ A description of existing field conditions. The field condition description may include current land use, flood/drought conditions, irrigation practices, modifications to the site, and any characteristics considered atypical.

☐ A discussion of the hydrology at the site, including all known surface or subsurface sources, drainage gradients, surface water connections to the nearest traditional navigable waterway or interstate water, and any potential influence for manmade water sources, such as irrigation. The discussion should also identify the nearest "blue-line" waterway or other feature found on the most recent USGS map.

☐ If remote sensing was used in the delineation, provide an explanation of how it was used and include the name, date and source of the tools used and copies of applicable maps/photographs.

☐ A discussion of plant communities and habitat types present at the site and a list of the scientific name, common name, and wetland indicator status of all plants.

☐ Soil descriptions, soil map(s), and a discussion of hydric soils or soils with hydric inclusions at the site.

☐ Any observed or documented interstate or foreign commerce associated with aquatic resources found on the site, specifically recreation or other use by interstate or foreign travelers, sale of fish or shellfish in interstate or foreign commerce, and use by industries operating in interstate or foreign commerce.

☐ A site location map on a 7.5-minute USGS quadrangle. The map must provide the name of the USGS quadrangle, Section, Township, Range, the UTM or latitude and longitude.

☐ A completed copy of the *Aquatic Resources Excel* spreadsheet must be submitted. The current version of the spreadsheet can be found at the following website: *www.spk.usace.army.mil/Missions/Regulatory/JurisdictionWetlandDelineations.aspx*

☐ A map of all delineated aquatic resources ("Aquatic Resouces Delineation Map") in accordance with the *Final Map and Drawing Standards for the South Pacific Division Regulatory Program* (Mapping Standards) and showing the following:

- ☐ All aquatic resources delineated must be clearly shown on the map. Because only the Corps determines the regulatory status of each aquatic resource, the map must not include any labeling about jurisdiction. If the requestor believes one or more aquatic resources are not jurisdictional, the rationale should be included in the delineation report and the resource(s) should be identified on the map.
- ☐ At least one set of paired data points, documented in data forms, for each aquatic resource or complex. The paired data points must be located close to the delineated boundary. Additional data points may be necessary, and should be shown on the map, depending on various factors including the size and shape of the aquatic resource, changes in vegetation communities, and slope.
- ☐ A reference block that identifies the site or project name, individual(s) who conducted the delineation, date of the map, and date(s) of any revisions.

☐ Completed data forms including all essential information to make a decision.

☐ A description of the methods used to survey the aquatic resource boundaries. For most delineations, the Sacramento District requires GPS equipment for the collection of data. At a minimum the GPS equipment must have the capability of sub-meter (<=1 meter) level accuracy. If other methods are used, the report must contain a rationale for this deviation.

☐ Digital data for the site, aquatic resource boundaries, and data point locations must be provided in a geographic information system (GIS) format, with ESRI Shape-files being the preferred format. Each GIS data file must be accompanied by a metadata file containing the appropriate geographic coordinate system, projection, and datum. If GIS data is unavailable or otherwise cannot be produced and the Corps determines a site visit is necessary, the aquatic resource boundaries must be physically marked with numbered flags or stakes before the Sacramento District can complete a delineation verification.

Often, additional information can expedite the verification of a delineation. Particularly helpful data includes site specific topographic maps, National Wetland Inventory (NWI), Light Detection and Ranging (LIDAR), satellite, aerial and ground photographs, floodplain maps, and related reports.

The Corps' Sacramento District developed a suggested format for aquatic resources delineation reports, which is attached to this document. This format is not required but rather is intended to assist requestors with the preparation of a delineation report in accordance with these minimum standards.

More information regarding aquatic resource delineations, including reference materials, the *Aquatic Resources Excel* spreadsheet, and the suggested format for the aquatic resources delineation report can be found on our website at: www.spk.usace.army.mil/Missions/Regulatory/JurisdictionWetlandDelineations.aspx.

# DRAFT/FINAL AQUATIC RESOURCE DELINEATION REPORT

**Survey Name**
**Date**

**Prepared By:**

Author's Name, Title
Consulting Company /Region/Cooperating Agency Name
Address
Phone Number
email

**Prepared For:**

Name (Role)
Company
Address
Phone Number
email

## Executive Summary

Provide the following information:

- A statement that the delineation has been conducted in accordance with the 1987 "Corps of Engineers Wetland Delineation Manual" and appropriate regional supplement(s), with the identification of what supplement was used.

AND/OR

- A statement that the delineation has been conducted in accordance with the 2008 "A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States"

- One paragraph summary of aquatic resource findings including:
  - Number and total area of aquatic resources within project area.
  - Total acreage of the survey area
  - Dominant aquatic resource classifications and general condition of aquatic resources.

## Table of Contents



## Tables



## Appendices

## Acronyms and Abbreviations

| | |
|---|---|
| BMP | best management practice |
| cfs | cubic feet per second |
| LIDAR | Light Detection and Ranging |
| LWD | large woody debris |
| MP | Mile Post |
| NRCS | Natural Resources Conservation Service |
| NWI | National Wetland Inventory |
| NWPL | National Wetland Plant List |
| OHWM | ordinary high water mark |
| PEM | palustrine emergent |
| PFO | palustrine forested |
| PSS | palustrine scrub-shrub |
| ROW | right-of-way |
| SR | State Route |
| USACE | U.S. Army Corps of Engineers |
| USFWS | U.S. Fish and Wildlife Service |
| UTM | Universal Transverse Mercator coordinate system |
| WRIA | Water Resource Inventory Area |

[add or delete acronyms and abbreviations as needed]

## Chapter 1. Introduction

- Identify contact information for the applicant(s), property owner(s), and agent(s).
- Survey area description
- The purpose of this report is to identify and describe aquatic resources and, to identify known possible sensitive plant, fish, wildlife species, and cultural/historic properties in the survey area. This report facilitates efforts to:
    1. Avoid or minimize impacts to aquatic resources during the design process.
    2. Document aquatic resource boundary determinations for review by regulatory authorities.
    3. Provide early indications of known sensitive species and historic/cultural properties within the survey area.
    4. Provide background information.

## Chapter 2. Location

Identify the county and state where the project is located. Also include nearest town, as well as the street address or nearest intersection, and the Section, Township and Range the UTM or latitude and longitude. Provide driving directions to the survey area.

## Chapter 3. Methods

- Describe all methods used to delineate and survey aquatic resources.
- Include any deviations from standard methods. Make sure methods comply with appropriate U.S. Army Corps of Engineers Guidelines.
- If remote sensing tools were used to aid in delineation, list what tools were used and provide a copy of the maps if possible.

## Chapter 4. Existing Conditions

### 4.1 Landscape Setting

Describe in 1-2 paragraphs the topography, geological features, major water bodies, surface water flow, community types, existing vegetation, current land use, and major recent or historical disturbances – such as logging, mining, and farming.

Include:

- The total acreage of the survey area.
- A description of existing field conditions including current land use, time of season the site visit(s) were conducted, flood/drought conditions, irrigation practices, modifications to the site, and any characteristics considered atypical.
- A discussion of whether the entire survey area was field verified. If entire survey area was not visited, identify which areas were visited and a rationale for why the entire site was not visited.

**4.2 Aquatic Resources**

**4.2.1 Overview**

**Provide brief overview of the existing aquatic resource conditions:**

Include the following information:

- Describe all aquatic resources depicted on the Aquatic Resources Delineation Map within the survey site (Appendix A). Provide an explanation for the mapped boundaries, especially for resources containing complex transition zones. If the site contains resources that meet one or two wetland criteria or do not exhibit a clear OHWM, describe the rationale for not delineating these features. Examples include erosional features, upland swales, and other upland areas that appear "wet" on satellite or aerial imagery.
- Provide a table listing all Aquatic Resources (Table 1). The table will include the name of each aquatic resource, its Cowardin type, acreage and location (latitude/longitude). For linear features, such as stream channels and ditches, the table must show both acreage and linear feet.
- Discuss site hydrology, including any surface or subsurface sources, drainage gradients, surface water connections to the nearest traditional navigable waterway or interstate water, and any potential influence for manmade water sources, such as irrigation. The discussion should also identify the nearest "blue-line" waterway or other feature found on the most recent USGS map.
- Describe soils including a discussion of hydric soils and soils with hydric inclusions (Appendix B).
- Provide a general discussion of plant communities and habitat types, including both scientific and common names, and the wetland indicator status of all plants (Appendix D).
- Describe any observed or documented interstate or foreign commerce associated with aquatic resources found on the site, specifically recreation or other use by

interstate or foreign travelers, sale of fish or shellfish in interstate or foreign commerce, and use by industries operating in interstate or foreign commerce.

**Table 1. Aquatic Resources within the Survey Area**

| Aquatic Resource Name | Aquatic Resources Classification | | Aquatic Resource Size (acre) Required for all resources | Aquatic Resource Size (linear feet) Required for only stream channels |
|---|---|---|---|---|
| | Cowardin | Location (lat/long) | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| Total | | | | |

## Chapter 5. References

Books, Journal Articles, Reports: [Author(s). YEAR. Title. Publisher/Source. Volume: Page begin-Page end].

Correspondence: [Author(s). Date. Subject. Agency/Company. Pp. (pages)].

Phone: [Contact Name. Date. Subject. Agency/Company. Phone Number. Result/Action].

E-mail: [Contact Name. Date. Subject. Agency/Company. E-mail address. Result/Action].

## Appendix A - Aquatic Resource Delineation Maps

A map of all delineated aquatic resources ("Aquatic Resources Delineation Map") in accordance with the *Final Map and Drawing Standards for the South Pacific Division Regulatory Program* (Mapping Standards) and showing the following:

- All aquatic resources delineated must be clearly shown on the map. Because only the Corps determines the regulatory status of each aquatic resource, the map must not include any labeling about jurisdiction. If the requestor believes one or more aquatic resources are not jurisdictional, the rationale should be included in the delineation report and the resource(s) should be identified on the map.
- Location of all data and photo points.
- A reference block that identifies the site or project name, individual(s) who conducted the delineation, date of the map, and date(s) of any revisions.

## Appendix B - Supporting Maps

This appendix must include a 7.5 USGS quadrangle location map and a soil survey map. Other helpful data should be included, such as a NWI map, site specific topographic maps, LIDAR map, satellite/aerial/ground photographs, floodplain maps, and other related maps. The survey area should be identified on all maps.

## Appendix C - Photographs

All photographs should be referenced with the location and the direction the photograph was taken, along with identifying the resources present within the photograph.

## Appendix D - Plant List

**Plant species found within the survey area.**

Use USDA Plants Database and National Wetland Plant List for the most up-to-date scientific name and Wetland Indicator Status.

| Genus | Species | Common Name | WIS* |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

* Wetland Indicator Status (WIS):

| | | |
|---|---|---|
| OBL | = | occurs in aquatic resources > 99% of time |
| FACW | = | occurs in aquatic resources 67-99% of time |
| FAC | = | occurs in aquatic resources 34-66% of time |
| FACU | = | occurs in aquatic resources 1-33% of time |
| UPL | = | occurs in uplands > 99% of time |
| NI | = | indicator status not known in this region |
| ~ | = | unsure as to FAC or FACU |

## Appendix E - Wetland Data Sheets

This appendix must contain at least one set of paired data points, documented in data forms, for each aquatic resource or complex. The paired data points must be located close to the delineated boundary. Additional data points may be necessary, and should be shown on the map, depending on various factors including the size and shape of the aquatic resource, changes in vegetation communities, and slope.

Data forms may be modified from the Corps' standard form but must contain all essential information to make a decision.

## Appendix F - OHWM Data Sheets

This appendix includes the OHWM data sheets. Please insure to include a map identifying the location of the data points. Data forms may be modified from the Corps' standard form but must contain all essential information to make a decision.

## Appendix G - A signed statement from the property owner(s) allowing access

This appendix must contain a signed statement from the property owner(s) allowing Corps personnel to enter the property and collect samples during normal business hours. If the property is land-locked, the owner or proponent must obtain permission from the adjacent property owner(s) in order to provide access.

## Appendix H — Aquatic Resource Excel Sheet

The completion and submittal of the *Aquatic Resources Excel* spreadsheet is a required component to Sacramento District's Minimum Standards for Acceptance of Aquatic Resources Delineation Reports. This spreadsheet will assist the Corps' in efficient and accurate data entry of the aquatic resources into the Corps' database. The current version of the spreadsheet can be found at the following website:
*www.spk.usace.army.mil/Missions/Regulatory/Jurisdiction/WetlandDelineations.aspx*

The *Aquatic Resources Excel* spreadsheet contains a validation tool to ensure accuracy of the data. To run the validation tool, first enter all data in the appropriate columns and tabs. Once you have completed entering the data and have saved the document in a .csv format, click the gold shield at the top of the workbook window. The tool has a tooltip showing "Validate Worksheets." After clicking this button, validation of data is performed and any possible errors are added to the Validation tab. This tab is opened after the process is complete to allow the user to see the output. The validation output includes the tab (data type), column, and cell for where the possible error was found and a brief explanation of the issue.

## Appendix I — Aquatic Resource Functional Assessment Forms (If Applicable)

If a functional assessment was completed, this appendix includes the aquatic resources functional assessment form of each aquatic resource delineated along with a description of the results of the assessment.

**COMMENT #:** 13345
**DATE:** 9/3/21 8:14 AM
**SOURCE:** Email
**NAME:** Helen Peters

---

**COMMENT:**

Hello,

Attached is Salt Lake County's comment letter on the June 2021 DEIS.

Please contact me if you have any questions or need more information.

Helen

**Jennifer Wilson**
Mayor

**Jim Bradley**
Salt Lake County Councilmember

September 1, 2021

Utah Department of Transportation (UDOT)
c/o of HDR Engineering
2825 E Cottonwood Parkway
Suite 200
Cottonwood Heights, Utah 84121
cc: via email
littlecottonwoodeis@utah.gov

**Re: Little Cottonwood Canyon Environmental Impact Statement (EIS) Preferred Alternatives S.R. 210 – Wasatch Boulevard to Alta**

Dear UDOT Project Team:

Thank you for providing Salt Lake County the opportunity to act as a Participating Agency in the EIS process. As representatives to the Central Wasatch Commission for Salt Lake County, the undersigned (Mayor Jenny Wilson and Councilman Jim Bradley) have spent over two years studying and analyzing this complex subject matter. We now further appreciate the opportunity to offer the following comments to the Draft EIS that was issued on June 25, 2021 (DEIS), including an assessment of the two preferred alternatives, i.e., the Enhanced Bus Service in Peak-Period Shoulder Lane Alternative (Enhanced Bus/Shoulder Lane Alternative) and the Gondola Alternative B from the La Caille base station (Gondola Alternative)[1].

Based on our analysis, we have significant concerns about the exorbitant cost to the taxpayers presented by both of the DEIS's proposed preferred alternatives and their impacts on Little Cottonwood Canyon (LCC).

***Of the two alternatives, however, our distinct preference is for the Enhanced Bus/Shoulder Lane Alternative, but with a phased implementation approach (Phased Approach) that entails a delay of the road construction while other initial techniques are implemented that support the reduction of cars in LCC but are less costly and environmentally harmful.***

32.2.9B and 32.29R

[1] This letter reflects the opinions of Mayor Wilson and Councilman Bradley, and not necessarily the opinions of other County elected officials.

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This Phased Approach will provide an opportunity to measure the effectiveness of these initial techniques over a two to three-year period[2], with the understanding that UDOT would only then move forward with the road expansion if sufficient gains had not been made during such time period.

Phased Approach Investments/Techniques

32.29R

- Construction of mobility hubs at the Gravel Pit and 9400 South/Highland Drive locations.
- Investment in the enhanced bus system described in the DEIS.
- Travel Demand Management (TDM) strategies such as tolling and carpooling (see further detail in Appendix A).
- Technology, such as "real time" travel information channels to assist travelers in mode choices (e.g., parking availability).

The Phased Approach will serve to inform policy makers prior to investing significant resources in a *permanent* infrastructure mode, and it will also allow for a broader assessment of issues related to the entirety of the central Wasatch Mountains.[3] The remainder of this letter provides an overview of the considerations that led to these conclusions.

Additionally, we oppose the implementation of any transportation system without the corresponding passage of federal legislation (the Central Wasatch National Conservation and Recreation Area Act). As noted in the "Pillars Document" recently issued by the Central Wasatch Commission, this coupling of federal legislation to transportation is appropriate given the important tenets of the Mountain Accord agreement.

32.29F

**Recognition of the Original "Problem"**

The "Project Purpose" of the EIS has been defined as the provision of "an integrated transportation system that improves the reliability, mobility and safety for all users on S.R. 210 from Fort Union Boulevard through the Town of Alta." With that definition in mind, we ask UDOT to reflect upon the underlying circumstances that originally led to the need for the EIS. In our opinion, the primary reason was to solve what is essentially a traffic congestion problem. In an effort to solve that "problem," the DEIS has analyzed the various alternatives in light of how well they meet the Purpose and Need elements of "mobility, reliability and safety," with the goal in mind of achieving a "stable flow of traffic" by 2050. It is important to remember that the main goal of the EIS has never been to remove all (or even most) of the vehicular traffic off the road. Rather, the target has been to remove roughly 30% of projected traffic by the year 2050. *With that perspective in mind, the Enhanced Bus/Shoulder Lane Alternative stands out as the more "practical" approach given its ability to easily meet the 30% threshold, while providing additional benefits beyond merely ski traffic transportation and avoiding potential pitfalls posed by the Gondola Alternative.*

32.2.9B

32.2.9E

[2] We recommend a 2–3-year period, with the understanding that it may take a year or so for tolling to be fully operational given the need to address "equity" concerns by providing travelers an affordable option to access the portions of LCC above the toll gate (e.g., through an expanded fleet of buses and the construction of the mobility hubs).

[3] We note that UDOT's 'Project Overview and Draft EIS Alternatives Summary" contemplates the consideration of "Phased Implementation."

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**Cost and Flexibility**

The Enhanced Bus/Shoulder Lane Alternative has a lower construction/start-up cost ($510M) than the Gondola Alternative ($592M) (for a total cost differential of $82M). Although, the lower operational cost of the Gondola Alternative results in a roughly equivalent "life cycle" cost for the two alternatives, we believe the significant upfront savings (particularly when present value considerations are taken into account) warrant a preference for the Enhanced Bus/Shoulder Lane Alternative. Another advantage of the Enhanced Bus/Shoulder Lane Alternative is that it allows greater flexibility and the ability to *"pivot"* as circumstances change, including the possibility that projections for future increase in visitors to the canyon prove incorrect due to changing conditions and demand (e.g., changes due to climate issues or otherwise). The "fixed" nature of the Gondola does not provide that flexibility. Additionally, the Gondola infrastructure is an approximately 50-year asset, versus buses that will be improved over time and can scale appropriately. Based on that analysis, we encourage UDOT to conclude that the Enhanced Bus/Shoulder Lane Alternative is the more cost-effective option.

32.2.6.3D

32.2.6.5A

**Cost/Benefit Analysis**

Both of the preferred alternatives require a massive expenditure of public funds. As with any public project, it is critically important to consider the resulting "public benefits" in order to justify the costs. On this issue, the Enhanced Bus/Shoulder Lane Alternative prevails based on the following factors:

- The Enhanced Bus/Shoulder Lane Alternative provides *"year-round" transportation benefits,* particularly for cyclists and pedestrians who will be able to use the shoulder lanes, thereby increasing safety, active transportation opportunities and the visitor experience during non-winter months. In addition, although the DEIS does not contemplate expanded bus service to dispersed recreation sites (e.g., trailheads), the Enhanced Bus/Shoulder Lane Alternative could conceivably be expanded to include stops at additional locations in the canyon, *and we encourage UDOT to further explore the viability of additional dispersed recreation sites.* The Gondola Alternative does not have the same flexibility given that it only travels to two ski resorts (and cannot reasonably be modified to include additional stops).
- There is also a larger *"social equity"* concern related to the cost of the two alternatives. The Gondola Alternative serves a limited population – visitors to the resorts in LCC. This begs the question of: *"What do our residents-- including non-skiers and residents from all areas of the valley -- get for this enormous public investment?"* In contrast, although the geographic scope of the DEIS is limited to S.R. 210 and portions of Wasatch Boulevard, one can easily envision the Enhanced Bus/Shoulder Lane Alternative becoming part of a larger, *integrated* transportation system that benefits other areas of Salt Lake County. With that possibility in mind, we ask UDOT to explore the idea of *"micro mobility hubs"* at regionally dispersed sites throughout the valley. This type of system could entail an investment in the broader community by expanding ridership (and economic development opportunities) to other areas. An expanded hub system could also further incentivize transit by locating hubs in closer proximity to where people live. *The bottom line is that a hugely expensive transportation system that only benefits a limited number of users and a narrow population is difficult to defend based on a cost/public benefit analysis.*

32.9A

32.1.2C and 32.2.6.3C

32.2.6.5G

32.1.2B, 32.1.2D, 32.2.7A, 32.7B, and 32.7C

32.2.2I

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**Potential to Overload the Canyon**

An uncontrolled increase in the volume of visitors to LCC could result in a scenario where the canyon becomes *"overloaded."* The Gondola Alternative poses this risk due to its ability to "scale up" to an increased capacity. UDOT has based its DEIS assessment of the Gondola Alternative on the assumption of 1,050 visitors per hour during peak periods. The Gondola Alternative, however, could conceivably expand to accommodate as many as 4,000 visitors per hour[4]. The Enhanced Bus/Shoulder Lane Alternative does not pose that same risk given its inherent capacity limitations[5]. Currently the capacity of the canyon is naturally limited by the number of parking spaces available in the canyon, particularly at (and around) the resorts and trailheads. *A high-capacity transportation system could lead to overuse given its ability to pack more visitors up the canyon at a dramatically increased pace. This, in turn, could potentially result in degradation of the canyon's fragile ecosystems, as well threaten the quality of the visitor experience[6].*

32.2.6.5N

**Transit Incentives**

An underlying goal of the EIS process has been to incentivize transit as a means to obtain a *"stable flow of traffic."* We believe that the Enhanced Bus/Shoulder Lane Alternative, coupled with TDM strategies (such as tolling), will incent transit more effectively than the Gondola Alternative for the following reasons:

32.2.4A

- The DEIS favors the Enhanced Bus/Shoulder Lane Alternative on the subject of "mobility" for an obvious reason: ***It transports riders by as much as 19-23 minutes faster.*** Speed of travel and the assurance that a bus will be available approximately every 5 minutes (coupled with disincentives such as tolling) will provide a strong motivator for riders to opt for transit.
- The number of required transfers is also a critical consideration when assessing a rider's willingness to take transit. In all instances, the Enhanced Bus/Shoulder Lane Alternative will require a single transfer (i.e., one transfer from a vehicle to a bus). In contrast, the Gondola Alternative will require two transfers when passengers park at either of the mobility hubs. This is due to the fact that, in order to meet the goal of a "stable traffic flow" through the year 2050, approximately 1,000 vehicles will need to be removed from the road and parked at one of the mobility hubs[7]. This means that the passengers in approximately 1,000 vehicles will be required to transfer first to a bus and then to the Gondola. *The inconvenience caused by multiple*

32.2.6.5J

[4] It should be noted that, in order for the Gondola system to increase capacity to something like 4,000 visitors per hour, the additional riders would need to find a place to park other than the Gondola base parking garage given the capacity limitations of that structure.
[5] Utah Transportation Agency (UTA) has indicated that the bus alternative cannot reasonably be expanded beyond the capacity currently contemplated by the DEIS on account of the inability to decrease the "headway" timing (currently assumed to be 5-minute headways).
[6] We encourage UDOT to further consider this risk of overuse, particularly in light of the NEPA requirement to consider "cumulative impacts" of the alternatives, i.e., impacts on the environment resulting from incremental impact of the alternative when added to other past, present, and reasonably foreseeable future actions.
[7] This is due to the limited capacity of the Gondola base station parking structure at 1,500 stalls.

*transfers could very well be a deterrent for riders, particularly for young families and first-time skiers*[8].

**The Existing Road *and* Buses Will Remain Part of the Gondola Alternative**

There appears to be a misconception within some stakeholder circles regarding the expectation that the Gondola Alternative (as contemplated by the DEIS) will remove all (or even a significant amount of) vehicles off the existing LCC road. That is simply not the case. The DEIS only contemplates removing roughly 30% of vehicles off the road as of 2050. *That means that a significant number of travelers will continue to use the road under the Gondola Alternative scenario -- everyone from skiers who are willing to pay a toll, to back-country skiers, hikers, and others headed to locations other than the two ski resorts.*

32.2.6.5D
32.1.2D

It should also be noted that buses will continue to be a necessary part of the Gondola Alternative given that there is limited parking at the Gondola base parking structure. With only 1,500 parking spots available in that garage, those spots will likely fill quickly and require another 1,000 or so Gondola travelers to first take a bus to get to the Gondola boarding station. We find it interesting that some Gondola proponents appear to be dismissive of a "bus option" by suggesting that "people don't like to ride buses." That point of view misses the point that the Gondola Alternative *will require buses in order to be successful*. The view also assumes that the buses that will be utilized in the ultimate transportation solution will look and feel like "today's version" of a bus. With both preferred alternatives, however, there should be an incentive to employ a "better version" of a bus, i.e., one that is smaller, more comfortable, offers wi-fi and has dependable frequency. *With that in mind, we ask the question of why not invest more fully in "better" buses, and send those improved buses up the canyon, rather than building an expensive Gondola system on an entirely new transportation corridor that does not eliminate the need for travel on the existing road?*

32.2.6.5J

32.2.6.3F and
32.2.6.3E

**Environmental Protection: Critical to NEPA**

As with any NEPA process, a thorough analysis of environmental issues – such as air quality, watershed, visual and noise impacts – is critically important.

- Air Quality.

  The DEIS currently contemplates the use of diesel buses, while the Gondola system will be run by electric power. Although the Gondola Alternative appears to be a better option from an air quality perspective on "day one," it is our understanding that electric bus technology (or a different non-emitting source), that is capable of operating on steep canyon terrain, may be available within a relatively short amount of time (and it is possible that the technology already exists). As a result, UTA could incorporate more sustainable buses into its fleet as technology evolves, *and we encourage UDOT to continue to explore whether electric buses are a viable option for LCC.* Given the real possibility that non-emitting source buses are (or will be) an option, we do not believe there is a significant difference between the two alternatives

32.10A
32.2.6.3F
32.10G

[8] It should also be noted that the DEIS contemplates that there will be a charge to park at the La Caille base station parking structure, while the two mobility hub parking areas will be free. Although that arrangement might provide an incentive for people to choose to park at the mobility hubs as opposed to the La Caille location, this raises yet another "social equity" question for us in that provides an optic that the convenience of the La Caille station is intended for those who "can afford it." This fee structure is different than other "fee for parking" policies that resorts like Solitude have experimented with recently, i.e., everyone pays the same amount to park.

regarding the impact on air quality, particularly given that vehicles (perhaps as many as 70% of the traffic load) will remain on the road with both alternatives.

- Watershed.

  Watershed impact is a critically important issue given the highly dependent nature of a large portion of our valley on the canyon's water resources for drinking water supply. To be clear, both alternatives pose risks to the Little Cottonwood Creek watershed and water resources. However, with this issue, there has been a difference of opinion among various stakeholders regarding which alternative poses the greater watershed risk. Although some stakeholders emphasize the risks posed by the expanded road, particularly given its construction footprint, impervious surface and its proximity to riparian areas, other stakeholders, including Salt Lake City Public Utilities, are equally (if not more) concerned with risks posed by the increase of unmanaged crowds on account of a second transportation corridor in the canyon that includes a high-capacity system like the Gondola Alternative. This is especially the case given that the Gondola Alternative will be *additive* to the road for recreational access.

  At this point, we support the water experts who consider the risk of overuse as the more significant threat to the long-term protection of the canyon's watershed, which in turn presents a risk to the drinking water supply to more than 450,000 people. *As a result, we encourage UDOT to continue to explore these types of "indirect" risks to our watershed (particularly given NEPA's requirement to consider "indirect" as well as "direct" impacts).*

- Visual.

  ***The number and height of the Gondola towers is perhaps the most problematic aspect of the Gondola Alternative.*** The DEIS contemplates as many as 21 towers, each measuring anywhere between 131-262 feet. *As a point of comparison, a tower the height of 215 feet would be as tall as the Salt Lake City Hotel Monaco, with attached wires interrupting the pristine vistas up and down the canyon.* It is also our understanding that Federal Aviation Administration (FAA) rules may require *flashing lights* to be installed on any tower taller than 200 feet in order to mitigate against air traffic collision[9]. S.R. 210 is designated as a State Scenic Byway. *It is our sincere hope that UDOT will elect to respect that designation and honor LCC's intrinsic aesthetic value by eliminating the alternative that creates the more significant negative visual impact.*

- Noise.

  The overall difference in noise impacts between the two alternatives is relatively small (a total of 3 fewer instances of noise impacts out of a total of approximately 230 impacts). As a result, we do not find noise levels to be a significant distinction between the two alternatives.

**Human Impact**

We have also focused attention on the human impacts of the two alternatives.

- Impact to Neighboring Communities. The La Caille base station will result in a significant level of traffic continuing to travel on Wasatch Boulevard and S.R. 210 in densely populated residential portions of Cottonwood Heights, Sandy, and Unincorporated Salt Lake County areas at the base of the canyon. There is also the possibility of increased "commercialization" of this residential community, particularly given that the La Caille base station/parking structure might not be

[9] It being understood that such lights would only flash when the system senses an approaching low flying aircraft.

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32.12A
32.12B
32.2.6.5N
32.20C
32.20A
32.20C
32.17A
32.17
32.11A
32.11D

subject to local zoning authority if it were to become a state-owned asset. We acknowledge the legitimate concerns articulated by many of the local residents (including those who live in the LCC "Triangle" area) regarding the risk of excessive business development in what is now primarily a single family home residential setting. *The potential loss of local zoning authority only heightens the risk of those residents losing their "voice" regarding the future development of their immediate community.*

- Historic and Recreational Resources. We also sympathize with concerns articulated by residents and visitors regarding potential damage the Gondola Alternative could cause to historic and recreational resources that lie at the base of (and within) the canyon.

**Reliability/Wildlife**

Much has been said about the higher reliability factor of the Gondola Alternative on account of the Gondola's ability to operate during snow events, while the Enhanced Bus/Shoulder Lane Alternative is more susceptible to travel delays on account of vehicle slides or accidents. However, we have concerns regarding the possibility of the Gondola not being able to run on account of severe winter inclement weather, or otherwise being incapacitated on account of mechanical issues. If that were to happen, the entire system could conceivably shut down. In contrast, an issue with a particular bus would not necessarily shut down the entire system, and a single bus that breaks down could be replaced with a back-up bus. *As a result, we encourage UDOT to explore the possibility (and potential frequency) of Gondola service interruptions.*

We also note that, although the DEIS suggests that the road expansion will negatively affect wildlife on account of the risk of animals crossing an expanded road, we encourage UDOT to explore the equally concerning risk of aerial wildlife (e.g., birds) conflicting with the Gondola towers and wires.

**Consideration of Community Goals**

NEPA also requires a consideration of "community goals." As a result, it is important for UDOT to continue to evaluate the proposed alternatives in light of their consistency and compatibility with local and regional plans, including the Wasatch Canyons General Plan (WCGP), the Salt Lake County Resource Management Plan (SLCoRMP) and the State Scenic Byway Plan. In particular, we would like to draw your attention to the following portions of the WCGP and the SLCoRMP that we believe support the Enhanced Bus/Shoulder Lane Alternative.

- **WCGP Provisions**
  - Transportation Vision
    - "Support and prioritize projects for transit, bicycles, pedestrians, and improve mobility, air quality, safety, while connecting to the regional transportation system." (Page 33)
    - "Character: Promote context appropriate transportation modes and projects that are appropriate for each canyon's unique context." (Page 33)
  - Environmental Vision
    - "Promote programs that improve watersheds, air quality, vegetation, wildlife ecosystems, and scenic quality." (Page 31)
    - "Air: Protect and improve air quality for protection of public health, environmental health, and scenic visibility." (Page 31)

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32.2.6.5E
32.4E
32.4M
32.20H
32.3B
32.4B
32.4I

32.2.6.5K
32.2.6.3P

32.13B
32.13A

32.3C

- All Canyon Polices
  - [Support] "increased transit frequency at key locations throughout the Canyons." (Page 129)
  - [Support] "... roadway design that increases mobility." (Page 129)
- Year-Round Transportation
  - [Support an] "...enhanced year-round transit service to and within the Wasatch Canyons."" (Page 129)

- **SLCoRMP Provisions**
  - Recreation and Tourism -- Desired Future State
    - "Salt Lake County desires to provide high-quality recreational experiences for visitors and residents. To accomplish this, the county desires a recreation system that is balanced, sustainable, and provides a range of settings that accommodates for year-round outdoor recreation opportunities...The system should also be capable of providing opportunities for environmental education, backcountry experiences, and cultural resource protection." (Page 78)
  - Visual Resources – Desired Future State
    - "Salt Lake County desires to maintain or improve the visual resources within the county." (Page 90)
    - "Land use goals, decisions and transportation and utility solutions should consider the impacts of development on visual resources and the overall experience the public has on public lands." (Page 90)
    - "Significant vistas and landscapes that have special visual and aesthetic qualities will be preserved and maintained." (Page 91)
    - "Encourage the enhancement of the aesthetic beauty of our built environment." (Page 91)

***Summary***[10]

Both of the preferred alternatives have legitimate "advantages and disadvantages," however, our analysis has revealed that the Enhanced Bus/Shoulder Lane Alternative is the alternative that, *on balance*, presents the better choice to solve the traffic congestion problems that have plagued LCC over the years. As a result, we support an Enhanced Bus/Shoulder Lane Alternative as the more *sensible* solution to the original problem, particularly when you consider the potential unintended consequences posed by the Gondola Alternative on account of it being a high-capacity system with operational challenges that is capable of shuttling massive amounts of people, while still relying on the use of the canyon road. The Enhanced Bus/Shoulder Lane Alternative avoids those potential pitfalls and is simply the "*better fit*" to address this historically complex problem.

32.2.9B
32.2.9E
32.29R

As noted above, however, although we greatly prefer the Enhanced Bus/Shoulder Lane option between the two alternatives, the high cost of the road expansion (and its impacts to the canyon) have led to a recommended Phased Approach with an investment in transit, technology, tolling and other TDM strategies in a first phase of that approach. This Phased Approach will also allow time to obtain and

[10] Although this comment letter focuses on an assessment of the major topic in the DEIS, i.e., the selection of the ultimate Preferred Alternative, we also welcome the opportunity to provide input regarding the sub-alternatives set forth in the DEIS. See Appendix A to this letter for those comments.

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process the "Visitor Use Study" that has been commissioned by the Central Wasatch Commission. By taking this approach, we can learn what works, identify gaps, and then have a more informed basis for making a long-term decision. ***Let's commit to "non-permanent" tools in our toolbox first, before taking a step that could negatively and irreversibly affect this priceless natural resource.***

In summary, thank you for providing us an opportunity to share our thoughts regarding the two preferred alternatives in the DEIS, together with the suggestions regarding the sub-alternatives articulated in Appendix A. We sincerely appreciate your ongoing commitment to this vitally important subject.

Very truly yours,

**Jenny Wilson**
*Salt Lake County Mayor*

**Jim Bradley**
*Salt Lake County Councilmember*

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32.20B
32.2.9CC

**Appendix A – Comments on Sub-alternatives Evaluation**

1. S.R. 210 – Wasatch Boulevard Alternative– (Imbalanced-lane Alternative/Five-line Alternative)
    a. We support the City of Cottonwood Heights' pursuit of its Wasatch Boulevard Master Plan (July 2019). Thus, to the extent the Wasatch Boulevard alternatives is consistent with that Master Plan or any subsequent master plan, we are prepared to support the alternative as well. 32.2.6.2.2A
2. Mobility Hubs Alternative (located at the Gravel Pit and 9400 South/Highland Drive)
    a. We support the location of mobility hubs at the Gravel Pit and the southeast corner of 9400 South/Highland Drive, as contemplated by the DEIS. In addition, we recommend the following concepts for any future planning of such mobility hubs: 32.2.6.2.1C
        i. The hubs should seamlessly integrate different modes of transportation in order to maximize connectivity and access for transit riders.
        ii. The hubs should be amenity rich and focused on "place making." For example, the hubs should provide bike parking, real-time travel information, storage lockers, space for shared mobility services, bike storage and repair facilities, wi-fi service, retail, restaurants, and cafes to create a robust array of options to incentivize transit ridership.
3. Avalanche Mitigation Alternative – Snow Sheds with Realigned Road Alternative
    a. We would prefer that UDOT *eliminate* the Snow Sheds sub-alternative from the final Record of Decision. We are particularly concerned about the sheds' size, visual impacts, and environmental impacts. 32.2.9J and 32.17C
4. Trailhead Parking Alternatives
    a. We support the trailhead parking alternatives set forth in the DEIS. We particularly appreciate the following goals: i) enhanced roadway safety, ii) mitigation of traffic conflicts between motorized and nonmotorized transportation modes at the trailheads, and iii) reduction (or in some cases elimination) of roadside parking to improve safety and operational characteristics of S.R. 210. In general, formalized parking helps to reduce vehicle-pedestrian conflicts, congestion, and crowding, and we support those efforts. 32.2.9O
    b. We also support the alternative of the Trailhead Parking Improvements and S.R. 210 Roadside Parking within ¼ mile of trailheads. We acknowledge that this Sub-alternative will reduce parking in LCC by 17 spaces, from 528 to 511, but the overall refinement of the parking system is appropriate, particularly due to the increased safety measures.
5. No Winter Parking Alternative
    a. We also support the improved safety measure of eliminating winter roadside parking (roughly 230 spaces) adjacent to the ski resorts. This change will improve mobility and reduce friction between parked vehicles and vehicles in the travel lanes. The plan also allows for improved winter snow removal operations since snowplows would not have to navigate around parked cars. It should be noted that parking on the side of the roadway poses a risk of degradation of sensitive resources and watershed, so this measure will also have a positive environmental impact. 32.2.9Q

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***Other Observations***

The following comments include additional thoughts on ways in which the Sub-alternative analysis could be expanded upon.

1. TDM Strategies
    a. We support TDM strategies set forth in the DEIS, including: 32.2.4A
        i. Tolling during winter on-peak use dates when congestion levels are high. Toll gantry should be place placed below Snowbird Entry 1 in an effort to address socio-economic concerns.
        ii. Vehicle Occupancy restrictions, e.g., restricting vehicles to two or more people per car.
        iii. Peak hour restrictions (e.g., limiting vehicle traffic at a particular place or time) - in particular, we support restrictions in LCC in ski season during peak hours (7:00 am to 10:00 am) on busy ski days to encourage the use of transit.
2. We also request UDOT to explore other TDM strategies that could further promote the use of transit and a reduction of single occupant vehicles[i]. Such strategies include: 32.2.2K
    a. Charging motorists for parking at the ski resorts. 32.2.4A
    b. High occupant vehicle (HOV) priority. 32.2.4A
    c. Carpooling programs and rideshare parking. 32.29R
    d. Multi-modal navigation tools, e.g., real time information to assist in making travel mode choices.

[i] We note that the Wasatch Canyons General Plan supports the use of TDM strategies, such as the use of carpools and rideshare programs.

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**COMMENT #:** 13346
**DATE:** 9/3/21 10:48 AM
**SOURCE:** Email
**NAME:** Patti Garver

---

**COMMENT:**

Josh,

Attached please find UTA's comments for the LCC DEIS.

Thanks,

Patti

UTAH TRANSIT AUTHORITY

UTA
669 West 200 South
Salt Lake City, UT 84101

September 3, 2021

Josh Van Jura
Project Manager
Utah Department of Transportation
2010 S 2760 W
Salt Lake City, UT 84104

Re: Comments for the Little Cottonwood Canyon Draft Environmental Impact Statement, dated June 2021

Dear Mr. Van Jura:

The Utah Transit Authority (UTA) understands the difficult task of developing transportation solutions to address the many challenges facing Little Cottonwood Canyon (LCC). We commend UDOT on the technical work and public engagement efforts that have resulted in the alternatives presented in the Draft Environmental Impact Statement (DEIS). We appreciate the LCC EIS team for continuously engaging UTA during this process. As a cooperating agency on the LCC EIS team, we provide the following comments for consideration.

General Comments

Dedicated Revenue Source for UTA Operated Ski Bus Services – As a public transit agency that seeks to better our community, UTA pays special attention to equity and the distribution of our resources across our service area. UTA takes proactive measures to ensure that all new service and major changes are reviewed to ensure that there are no inadvertent negative impacts on low-income and/or minority populations. This is required by Title VI of the Civil Rights Act of 1964. A revenue source independent of the existing UTA capital and operating budgets would be required for the incremental cost for the ski bus service plans proposed in the alternatives if UTA were to operate the service rather than a private vendor. This applies to the Enhanced Bus alternatives as well as the dedicated bus service proposed from the mobility hubs to Gondola or Cog Rail alternatives. It is prudent to acknowledge that the proposed ski bus services would be serving a population that is primarily non-minority and more affluent, as reported annually in the National Ski Areas Association National Demographic Study. Having a dedicated revenue source that provides UTA with adequate capital and operating funds for the specialized ski service will protect necessary transit services within the communities we serve.

32.2.7M

Operation and Maintenance – The operation and maintenance of the canyon transit system could take many forms. UTA does not compete with private businesses. There

may be operating models that are more flexibly and economically provided by another public agency or private business. UTA supports any operating model that creates the most benefit to the public.

Regional Connection – UTA's system-wide planning focuses on maximizing regional connectivity through a connected network of core routes that is designed for convenience and efficiency. During the service planning process, trip generators such as the Canyon Hubs might warrant some adjustments to the regional local bus system to better serve them and connect them to the larger, more frequent system. This adjustment may require additional funding.

32.2.6.2.1F
32.2.6.2.1I

Indirect Impacts – The proposed transit alternatives and associated costs listed in the DEIS are specific to LCC. The DEIS indicated that one of the indirect impacts for tolling S.R. 210 in LCC is a potential to toll S.R. 190 in Big Cottonwood Canyon (BCC). If tolling is implemented in BCC, a transit option similar to the LCC Enhanced Bus alternatives would likely have to be provided. This transit system and facilities (e.g. mode and equipment, parking, maintenance, etc.) would need to be considered and the associated cost programmed. Since BCC is a longer canyon than LCC, the transit system and associated facilities may be larger, and cost may be higher than those determined for LCC for the same type and similar level of service. This indirect impact should be recognized in the LCC EIS. Some of the transit facilities may be shared so design should accommodate this potential need.

32.20D

Comments on Enhanced Bus Alternatives

Resort Transit Station – Congestion at the resort parking lots and conflicts with private buses, private vehicles, and pedestrians are some of the main causes of ski bus delays. The conditions at the existing resort stops can result in delays of 10-20 minutes or more. Essential components for the enhanced bus alternative to function as planned are properly-located and well-designed resort transit stations. It is crucial to have resort transit stations that facilitate safe and fast turn-around so buses could maintain schedule and level of service. The Final EIS should include design concepts for these resort transit stations. Design of the resort transit stations will need to address the following operational needs:

1. A facility adjacent to the roadway with direct access to the road to reduce cycle time and minimize fleet size requirements. Ski resorts should consider using resort shuttles if necessary to transport guests to various locations within their resort.
2. A dedicated or unimpeded means to access travel lanes to ensure prompt ingress and egress of the resort transit station. Conflicts with private vehicles and pedestrians should be minimized. A facility that is not integrated with resort parking is recommended.

32.2.6.3U

3. Space to turn buses around for the reverse trip. Due to safety concerns, the design should allow buses to pull forward instead of requiring buses to backup when leaving the resort transit station.
4. A place for buses to stage and layover. For bus service that includes two bus routes going to a resort each at 10 minute headways, a minimum of four bus bays would be required at each resort transit station.
5. A comfortable place to safely pick up and drop off passengers. This can and is commonly the same location as where layover takes place.
6. Low growing landscaping. Trees and bushes tend to obstruct the line of sight for departing buses.
7. Dedicated driver restrooms are required to ensure reliability of headways. Availability of restroom facilities is especially important for a route that could experience increased variability in travel time caused by winter canyon conditions. In addition, separate restrooms for drivers would not impact the capacity and quality of guest facilities.

32.2.6.3U

These design requirements would provide the infrastructure necessary at the resorts for buses to maintain the desired schedule, and thus, to meet the mobility and reliability goals for this project. UTA will continue to coordinate with UDOT on the design of the resort stations and the mobility hubs (gravel pit, 9400 S Highland Drive, and La Caille gondola base).

Bus Operations in Shoulder Lane – The enhanced bus service is operating at high frequency similar to Bus Rapid Transit (BRT), especially with four enhanced bus routes converging in the canyon. It is necessary that the shoulder lanes be a minimum of 12 feet wide as required in the UTA BRT Design Criteria (UTA 2014) and the UDOT BRT Design Manual (UDOT 2020). These design guides also require a 2-foot buffer between the general traffic lane and the bus lane for safety to accommodate the potential difference in travel speed. Currently, the plans show 11-foot shoulders with the potential to change to 12 feet during final design. It has been UTA's experience that road snow removal causes snow to accumulate on the shoulder areas, which reduces the surface available to operate buses. Additional shoulder width will be necessary to accommodate snow storage. For safety reasons, we recommend following the UTA and UDOT design criteria for dedicated bus lanes. In addition, buses traveling uphill would operate in the shoulder adjacent to terrain with steep slopes, where UTA would recommend adding barriers to protect buses from sliding off the road.

32.2.6.3V

Bus System Capability – As mentioned in the DEIS, the scalability of the bus system is an important factor that makes the system adaptable to future needs making a phase-in approach possible. In addition, ski buses could be included in the overall UTA rolling

stock inventory and used elsewhere in the service area during off-season as special needs arise such as for special events, during bus maintenance, for bus bridges during rail maintenance, or during emergencies. This is a fiscally responsible approach to managing public assets.

32.2.6.3D

If additional ski bus capacity is required, buses could be operated as platoons with multiple buses leaving at the same time or by increasing the service frequency. Expansion of the bus fleet, mobility hubs, resort transit stations, and the bus maintenance storage facility would also be necessary. There is a limit to the capacity of a bus system. In general, an enhanced bus route with an average headway of less than five minutes would be difficult to operate reliably without dedicated lanes.

32.2.9B

Comments on Gondola Alternatives

Reliability of Gondola – The gondola has better reliability over bus because it can continue to operate during road closures. We recommend quantifying this improved reliability if possible. The addition of snow sheds would reduce the current road closures of 10-21 days down to 4-6 days. The anticipated road closures provide a way to quantify the magnitude of improved reliability of the gondola alternatives over the enhanced bus alternatives. This could be used, along with public input and other considerations listed in the DEIS, to help select a preferred alternative.

32.2.6.5H

Conclusion

UTA recognizes the need for mass transit as part of the transportation solution for Little Cottonwood Canyon and highly values the environmental process. Our comments are based on our experience with mass transit and are not an endorsement of a preferred alternative. UTA will support all feasible and practical solutions that meet the purpose and need of the project. We are committed to assisting UDOT by providing insights on technical aspects associated with planning, implementing, and operating mass transit. We look forward to continued collaboration to identify solutions that will benefit our community.

Sincerely,

Patti Garver

Patti Garver, P.E.
Manager of Environmental & Grant Services
Utah Transit Authority

**COMMENT #:** 13347
**DATE:** 9/3/21 11:51 AM
**SOURCE:** Email
**NAME:** Blake Perez (Central Wasatch Commission)

---

**COMMENT:**

Hello Josh, Bri, and the EIS team,

I'm writing to provide comments from the Central Wasatch Commission regarding the Draft EIS. Attached are the CWC's comments.

We want to thank the entire team for their efforts throughout this process. The information provided in the DEIS was very informative and helped fill in a lot of knowledge gaps for the transportation solutions for Little Cottonwood Canyons.

Please let us know if we can be of further assistance or if there are any clarifications needed.

Thanks!

**Central Wasatch Commission**
**Comments to Utah Department of Transportation**
**Little Cottonwood Canyon Draft Environmental Impact Statement**
**September 3, 2021**

This comment document regarding the draft Environmental Impact Statement for Little Cottonwood Canyon (LCC) comes from the Central Wasatch Commission (CWC)[1]. The CWC is comprised of the 10 local jurisdictions in and adjacent to the Central Wasatch Mountains. Core to the CWC mission is to implement the Mountain Accord charter. This 2015 consensus agreement contained actions to achieve agreed upon values, objectives, and specific actions to protect better the Central Wasatch Mountains and address longstanding unresolved issues.

Regarding mountain transportation in the Central Wasatch, the Mountain Accord charter has the following stated goal:

> "A sustainable, safe, efficient, multi-modal transportation system that provides year-round choices to residents, visitors and employees; connects to the overall regional network; serves a diversity of commercial and dispersed recreation uses; is integrated within the fabric of community values and lifestyle choices; supports land-use objectives; and is compatible with the unique environmental characteristics of the Central Wasatch."

Over the past two years, the CWC has been committed to developing a concept for a Mountain Transportation System (MTS) to address the growing year-round transportation demand in the Central Wasatch Canyons. LCC is a critical locus of a regional mountain transportation system. Earlier this year, the CWC released its Pillars of Transportation Solutions in the Central Wasatch Mountains document for UDOT to consider as it chooses a final alternative in the Record of Decision. Our comments here use the Pillars document as a lens through which to consider both alternatives proposed in the Draft EIS.

[1] Please note that some jurisdictional members of the CWC have issued their own official comments to the Draft EIS based on the residents and stakeholders that those jurisdictions represent. This letter is not intended to override any of those comments, and if there are inconsistencies between this letter and the jurisdictional comment letters, the later will take precedent over this letter with respect to the comments made by (and/or attributable to) the respective jurisdiction.

**Visitor Use Capacity:**

Key points from Pillars:

- Transportation improvements have the potential to significantly increase the quantity of visitors.
- Increased visitors resulting from the transportation improvements could pose negative environmental, public safety, and water resource consequences from direct, indirect, and cumulative impacts.
- Over-use and unmanaged crowds could negatively impact the visitor experience for both tourists and locals who seek to enjoy nature and a wide range of opportunities for recreation.
- A corresponding visitor use strategy needs to be identified and implemented to complement any existing management plans.
- The Purpose and Need stated in the DEIS, and UDOT's stated objective, is to seek a reduction in personal vehicle use on S.R. 210 in LCC on a busy ski day during the morning (7:00 – 10:00 am) and afternoon (3:00 – 6:00 pm) peak hours in design year 2050. To achieve 30% reduction, about 1,000 people would need to convert to transit in each peak hour.

32.20A and 32.20C

CWC Comments:

- The CWC is working with the Uinta-Wasatch-Cache National Forest Service and Utah State University on a Visitor Use Study that will be completed by the end of 2022.
- The CWC requests that any alternative chosen be flexible enough to incorporate the findings from the Visitor Use Study.
- If a greater reduction in traffic were achieved through optimizing alternative transportation solutions, what would the direct, indirect, and cumulative impacts be?
- The DEIS does not include in its analysis the negative environmental, watershed, and water resource impacts of increased use of LCC which may be a result of the increased transportation capacity built into both the Gondola Alternative B (from La Caille) and the Enhanced Bus Service in Peak Period Shoulder Lane (PPSL) Alternative. Increased visitation to the LCC's natural resources is a connected action to the two alternatives presented. This limitation in the analysis results in a lack of attention to the direct, indirect, and cumulative consequences of the proposed actions in the DEIS, which, in our opinion, does not fully meet the intent of NEPA.
- We are also concerned that both alternatives presented in the DEIS will ultimately be used for year-round service for developed and dispersed recreation once they are constructed. This is likely a connected action. The DEIS did not fully analyze the environmental impacts of year-round use. The CWC requests that these be analyzed as part of the NEPA process.
- It is our recommendation that the chosen alternatives should not allow for a potential future Olympic game venue to be held up LCC.

32.2.9CC

32.2.1A

32.12A, 32.12B, 32.20A, 32.20C, and 32.20L

32.2.6O

32.1.5F

**Watershed Protection:**

Key points from Pillars:

- Protection of the fragile environmental conditions, and particularly a watershed that serves more than 450,000 residents in the Salt Lake Valley, is a top priority in the Central Wasatch Mountains. Any transportation solution for LCC should minimize and mitigate negative environmental impacts.

CWC comments:

- The CWC very much appreciates the information developed regarding the impacts to riparian areas, streams, and the watershed. However, as stated above, the information presented is missing the connection between the alternatives' roles in increased transportation capacity and the direct, indirect, and cumulative impacts to the watershed and public water resources of the canyon. 32.20L
- The CWC continues to implore the EIS team to further reduce the impacts to these critical resources and to consider the impacts that climate change may have on the watershed. 32.12A, 32.12B, and 32.2.2E

**Travel Demand Management, Parking and Bus (or other Transit) Strategies:**

Key Points from Pillars:

- The Commissioners favor the implementation of Travel Demand Management (TDM) strategies and other efforts to increase the transportation system efficiency for the roads accessing Big Cottonwood Canyon (BCC) and LCC, as well as the roads within these Canyons.
- Canyon TDM strategies could include tolling, limited access for single occupancy vehicles, carpooling programs, and the reduction of on-road parking.
- Appropriate roadway improvements along Wasatch Boulevard and 9400 South should also be considered.

CWC comments:

- Tolling should be included for both LCC and BCC. 32.1.1A
- More information is needed about the impacts of tolling in BCC.
- What TDM strategies are under consideration for BCC? 32.20D
- Will there need to be improved transit in BCC because of the tolling?
- Does there need to be additional NEPA EIS actions for any mobility improvements in BCC? 32.7E
- How much would the costs be for transit and TDM strategies for BCC?
- Are there any proposed roadway improvements for 9400 South? What are the impacts on the Sandy area beyond Highland Drive with increased parking and access to LCC through the alternatives?

- Any Wasatch Boulevard Mobility Improvements that are implemented should be in alignment with the Wasatch Boulevard Master Plan (July 2019). 32.2.6.2.2A

**Integration into the Broader Regional Transportation Network:**

Key points from Pillars:

- A broader, more holistic approach should be used when implementing solutions for traffic issues related to LCC. This approach extends beyond the mouths of BCC and LCC.

CWC comments:

- Neither alternative fully considers the larger, regional transit context and options.
- The UDOT EIS team should evaluate how different alternatives may be impacted by or mitigated through better transit options leading to the mouths of LCC and BCC. 32.1.1C, 32.2.2I 32.1.1I

**Year-Round Transit Service:**

Key points from Pillars:

- Year-round transit service for all users is a central element for transportation to destinations in the Canyons as reflected in the Mountain Accord charter and as evidenced by the work of the CWC on the development of a Mountain Transportation System (MTS).
- This includes providing transit for dispersed recreational users in the Canyons and surrounding areas.

CWC comments:

- As noted above, the CWC prefers a transit solution that operates year-round. The CWC recommends that the UDOT EIS team complete an analysis of year-round operations for the two selected preferred alternatives. Please consider how the alternatives can potentially meet year-round demand, cost of operations and maintenance, and environmental impacts. 32.1.2C

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**Long-Term Protection of Critical Areas Through Federal Legislation:**

Key points from Pillars:

- The ultimate transportation solution should be conditioned upon the passage of the proposed Central Wasatch National Conservation and Recreation Area Act (CWNCRA) through federal legislation. The Mountain Accord charter and the CWC have concluded that passage of lands and resource protection through additional land designations and solving transportation issues are integrally related; they both need to happen to address the needs for users of the Central Wasatch Mountains.

CWC comment:

- The UDOT DEIS recognizes that several amendments are necessary to the current forest plan to accommodate both of the preferred alternatives. The previously proposed CWNCRA called for an updated forest plan and potential changes from UDOT can be accommodated in the bill as highlighted in Chapter 28 of the DEIS. The Federal legislation could help facilitate transportation solutions. 32.29F

**CWC Stakeholders Council:**

In addition to having a 10-member board, the Central Wasatch Commission also has a 35 member Stakeholders Council that serves as an advisory body to the CWC board. The Stakeholders Council represents a wide variety of interests in the Central Wasatch Mountains. The group has continued to take an interest in transportation solutions and provide feedback to the CWC Board.

At a recent meeting, the Stakeholders brainstormed ways to improve each of the alternatives. Here they are:

**Enhanced Bus Alternative**: Support incremental changes such as tolling before taking all steps

- Bus only for high demand days 8-10AM 32.2.2B
- Year-round service 32.1.2C
- Electric buses 32.2.6.3F
- No roadway widening 32.2.2I
- Move parking lot collection points away from base of canyons to dispersed valley locations 32.29R
- Maximize the potential of existing tools before infrastructure development

**Gondola Alternative:**

- Incentivize mass transportation 32.2.4A
- Dispersed recreation can be serviced at White Pine, Grizzly Gulch, and Albion 32.2.6.5G
- Regional bus hubs to deliver riders to gondola base 32.2.2I
- Transit priority on Wasatch Boulevard 32.2.6.2.2A
- Free to ride 32.2.4A
- Tolling at the base of each canyon 32.2.6.5N
- Year-round service for all users 32.2.7A
- Increase the number of passengers per hour
- Make the ski areas pay for Gondola

In closing, the Central Wasatch Commission appreciates the enormous work and research completed on the LCC DEIS to date. The information has been helpful to so many in learning more about the impacts of transportation investments that may be made in LCC.

The CWC continues to urge UDOT to expand the scope of this EIS to include all three canyons along the Central Wasatch Mountains, Big and Little Cottonwood Canyons and Millcreek Canyon, and to consider how the LCC EIS transportation solutions will be integrated into the regional transportation system. These canyons are all connected and each of them have an impact on the other. The CWC also urges UDOT to consider year-round transit options. 32.1.1C 32.1.2C

The CWC wants to reiterate our agency's vision for an MTS that was written and agreed upon in the Mountain Accord charter:

> "A sustainable, safe, efficient, multi-modal transportation system that provides year-round choices to residents, visitors and employees; connects to the overall regional network; serves a diversity of commercial and dispersed recreation uses; is integrated within the fabric of community values and lifestyle choices; supports land-use objectives; and is compatible with the unique environmental characteristics of the Central Wasatch."

The feedback provided in this document is critical to developing a preferred transportation alternative that meets the future needs of the region and solves transportation problems in LCC. The CWC has been committed to providing valuable feedback to the UDOT EIS team throughout the EIS process, looks forward to working to refine alternatives collaboratively, and aims to continue to build consensus around transportation solutions.

Respectfully submitted,

Commissioner Chris Robinson, Chair
Summit County Councilmember

Commissioner Jenny Wilson, Co-Chair
Salt Lake County Mayor

Commissioner Erin Mendenhall
Salt Lake City Mayor

Commissioner Mike Peterson
Cottonwood Heights Mayor

Commissioner Jeff Silvestrini

Commissioner Marci Houseman

Millcreek Mayor

Commissioner Jim Bradley
Salt Lake County Councilmember

Commissioner Harris Sondak
Town of Alta Mayor

Sandy City Councilmember

Commissioner Max Doilney
Park City Councilmember

Commissioner Dan Knopp
Town of Brighton Mayor

**COMMENT #:** 13348
**DATE:** 9/3/21 12:13 PM
**SOURCE:** Email
**NAME:** Julie Smith

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**COMMENT:**

Good day, Josh.

The U.S. Environmental Protection Agency Region 8 NEPA staff reviewed the Draft Environmental Impact Statement (Draft EIS) for the Little Cottonwood Canyon/S.R. 210 Wasatch Boulevard to Alta Project (Project) (CEQ No.20210078) prepared by the Utah Department of Transportation (UDOT). In accordance with our role as a Cooperating Agency, as well as with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and pursuant to Section 309 of the Clean Air Act (CAA), the EPA provides the attached comments on the Draft EIS.

These comments include questions and recommendations that we feel are important for UDOT to consider for the EIS overall. We provide these comments, observations, and minor corrections in our good faith effort to help improve overall consistency between resource analyses in the document and conclusions to be reached by UDOT in the FEIS in support of a Record of Decision. Please do not hesitate to contact me with any questions or points of clarification. Should you need to chat on the phone, the best number to reach me is [redacted]. I look forward to continuing to work with you and UDOT in the preparation of an EIS that supports effective and efficient agency decision making.

I hope you enjoy your holiday weekend and remain safe - Julie

Julie Ann Smith, PhD
Physical Scientist - NEPA Branch
U.S. EPA Region 8 (ORA-N)
159 Wynkoop Street
Denver, CO 80202

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 8**
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**September 3, 2021**

Ref: 8ORA-N

Joshua Van Jura, Project Manager
Utah Department of Transportation
4501 South 2700 West
Salt Lake City, Utah 84114

Dear Mr. Van Jura:

The U.S. Environmental Protection Agency Region 8 NEPA staff reviewed Draft Environmental Impact Statement (Draft EIS) for the *Little Cottonwood Canyon/S.R. 210 Wasatch Boulevard to Alta* Project (Project) (CEQ No.20210078) prepared by the Utah Department of Transportation (UDOT). The Project would provide transportation improvements on State Route (S.R.) 210 in Salt Lake County, Utah. The Draft EIS examines proposed improvements on S.R. 210 from its intersection with S.R. 190/Fort Union Boulevard to its terminus in the town of Alta. Transportation improvements are proposed to improve the safety, mobility, and reliability of S.R. 210 for residents, visitors, and commuters. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and pursuant to Section 309 of the Clean Air Act (CAA), the EPA provides the following comments on the Draft EIS.

The EPA appreciates UDOT's early coordination efforts and is pleased that previous comments and recommendations provided by the EPA during the Planning and Environmental Linkages process, scoping, and through early cooperating agency review have been considered and used by UDOT in the development of the Draft EIS. While most of EPA's substantive comments and recommendations are incorporated in the Draft EIS, we have identified the following key topics that we recommend evaluating in the Final EIS so that potential impacts or benefits from the selected final preferred alternative can be fully understood: (1) aquatic resource impacts; (2) cumulative impacts to surface waters; and (3) CAA transportation conformity.

The EPA's detailed comments are enclosed. We appreciate your continued efforts to fully consider our comments in further developing the impacts analyses in the Final EIS. If further explanation of our comments is desired, please contact me at (303) 312-6441 or Julie Smith, who serves as EPA's point of contact for this project at (303) 312-6736 or smith.julie@epa.gov.

Sincerely,

Philip S. Strobel
Office of the Regional Administrator
Chief, NEPA Division

Enclosure
CC: Vincent Izzo, HDR, Inc.
Jason Gipson, USACE

**Enclosure -EPA Comments**
**Little Cottonwood Canyon Draft EIS**

**(1) Aquatic Resource Impacts and Mitigation**

The EPA recommends that UDOT provide additional information on the direct and indirect impacts associated with converting natural aquatic features to culverts in the Final EIS. Several alternatives that are discussed in the Draft EIS would result in the substantial loss of stream resources when considered on a cumulative basis. For example, one of UDOT's preferred action alternatives - the Enhanced Bus Service in Peak-Period Shoulder Lane Alternative - would convert 0.19 acre (2,120 LF) of intermittent stream, 0.02 acre (100 LF) of perennial stream, and 0.08 acre (1,220 LF) of ephemeral stream habitat to transportation.

32.13G

Streams, regardless of their flow regime, provide many ecological and hydrological functions by moving water, nutrients, and sediment throughout the watershed. They also provide a wide array of ecological functions including forage, cover, nesting and movement corridors for wildlife and resident aquatic species. Given the importance of these streams and this watershed, it is important for the public and decision maker to have a clear understanding of the causal connection between impacts and proposed mitigation measures assumed to avoid and/or minimize impacts. In several places the Draft EIS states that: "The design of this alternative avoids and minimizes impacts to aquatic resources whenever possible while still allowing the alternative to meet the purpose of and need for the project." While the EPA understands that the project has not advanced to final design and engineering, we recommend that that the Final EIS provide additional information on how the actual direct impacts are to be avoided and minimized (e.g., through culvert design).

The Draft EIS includes a broad summary of mitigation measures in Chapter 25. We extend our previous suggestion that the Final EIS provide a stronger basis for decision making with a clearer description of the causal connection between impacts, related mitigation measures and best management practices (BMPs), particularly regarding aquatic resources. Similarly, we recommend that the Final EIS expound on the mitigation and BMPs that will be used to minimize the indirect effects of the project on downstream aquatic resources (e.g., due to sedimentation, flow changes, etc.).

**(2) Cumulative Impacts to Surface Waters**

32.13G

The EPA recommends that impacts to streams be considered for the entire project (i.e., under an individual Clean Water Act Section 404 permit). As noted in previous EPA comments on administrative draft documents of this EIS, discussion of impacts to water resources would be clearer and provide a better basis for understanding if presented within the context of the watershed. While the stream impacts may appear minimal when presented on an acreage basis, because these are headwater tributary streams that are only a few feet wide, the significance of the Project's impacts is more readily apparent when considering the linear feet of stream bed loss. The Draft EIS indicates that UDOT would likely seek nationwide permit authorizations from the U.S. Army Corps of Engineers for the impacts to jurisdictional streams, specifically National Wide Permit 14 for Linear Transportation Projects (NWP 14) (pp. 13-57 and 24-1). While NWP 14 authorizes impacts less than or equal to 0.5 acre on a crossing-by-crossing basis, EPA believes that even though the individual stream impacts would fall under this NWP threshold, there still could be significant cumulative impacts within the watershed because of the direct loss of more than a thousand linear feet of (jurisdictional) high-elevation headwater

streambed resources. These impacts may be more significant in the context of additional (unregulated) losses of ephemeral streams and the water quality impairments in Big Cottonwood Creek and Little Cottonwood Creek. If the Final EIS provides the proper context, comparison between alternatives related to impacts to water resources would be more complete and could ultimately steer alternative design or selection to one that is less environmentally damaging to aquatic resources (e.g., one of UDOT's preferred alternatives – the Gondola B Alternative) while also meeting purpose and need for the Project.

As a general note, Section 13.3.2.3 of the Draft EIS is titled "Waters of the United States," however, it (appropriately) describes all aquatic resources in the project area. EPA recommends renaming this section "Aquatic Resources" since, as pointed out in the Draft EIS, many of the wetlands and ephemeral streams in the project area not "waters of the U.S." under the current definition in the Navigable Water Protection Rule (NWPR). Similarly, the sub-sections in 13.4 Environmental Consequences and Mitigation Measures that are titled "Waters of the U.S." should include impacts to all aquatic resources, regardless of jurisdictional status and for clarity these subsections should be renamed "Aquatic Resource Impacts."

**(3) Clean Air Act**

The EPA acknowledges that we have provided UDOT with official concurrence on the Project of Air Quality Concern designation under the Clean Air Act. During interagency consultation that occurred in 2020 – 2021, the EPA also concurred on the protocol proposed by UDOT for particulate matter (PM) modeling intended to comply with CAA transportation conformity requirements. We have one clarifying comment and suggested edit related to information around conformity Ozone (O3) in section 10.2.2, (p. 10-4) of the Draft EIS. In paragraph 2 on that page the text states:

32.10H

> "Conformity for O3 is met due to the requirement that the RTP and TIP approvals must be based on a **finding that O3 precursor emissions of volatile organic compounds and nitrogen oxides from projects in the RTP and TIP are consistent with the SIP** to bring the area into attainment with the O3 national standard [emphasis added]."

And

> "EPA approved the maintenance plan for the Salt Lake County 1-hour O3 nonattainment area on July 17, 1997 (62 Federal Register [FR] 38213). However, the 1-hour standard was replaced by an 8-hour standard on July 18, 1997 (62 FR 38856). **EPA partially approved the maintenance plan for the Salt Lake County 8-hour O3 standard on September 26, 2013 (78 FR 59242)** […] [emphasis added]."

The subject conformity finding for O3 precursors in the Northern Wasatch Front Regional Transportation Plan (RTP) and Transportation Improvement Plan (TIP) is not based on consistency with an approved SIP and emissions budgets as implied by the statements above. The finding is based on an interim emissions test with projected emissions compared to those of a 2017 base year, all in the context of the 2015 Ozone 8-hr standard. In other words, as written it suggests that Salt Lake County is not an Ozone maintenance area but is marginal nonattainment for the 2015 standard. We propose that clarification in the Final EIS about Salt Lake County's Ozone conformity attainment status would provide a more accurate documentation upon which the decision maker can base its selection of a final preferred alternative for the Project.

**COMMENT #:** 13349
**DATE:** 9/3/21 3:39 PM
**SOURCE:** Email
**NAME:** Ned Hacker

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**COMMENT:**

Josh and Vince:

Attached are WFRC's comments on the Little Cottonwood Canyon (SR 210) Draft Environmental Impact Statement.

Thank you for the opportunity. It has been a pleasure working on this project and I look forward to continuing to work with both of you and the EIS Team.

Thank you,
Ned

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(801) 363-4250
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WASATCH FRONT REGIONAL COUNCIL

September 3, 2021

Josh Van Jura
Little Cottonwood Canyon EIS c/o HDR
2825 E. Cottonwood Parkway, Suite 200
Cottonwood Heights, UT 84121

**RE: UDOT Project Number S-R299(281) /UDOT PIN 16092**
**Little Cottonwood Canyon (SR 210) Environmental Impact Statement**

**Comments on the Little Cottonwood Canyon Draft Environmental Impact Statement**

Mr. Van Jura:

As a Participating Agency to the SR 210 Environmental Impact Statement, the Wasatch Front Regional Council (WFRC) thanks you for the opportunity to comment on the Draft Environmental Impact Statement. Provided below are the collective comments from the Wasatch Front Regional Council Staff.

**Little Cottonwood Canyon Draft Environmental Impact Statement**

We would like to thank the Utah Department of Transportation (UDOT) for their leadership and commitment in addressing the growing transportation needs across the state and particularly along the Wasatch Front. The significant effort dedicated to the Little Cottonwood Canyon (LCC) Environmental Impact Statement (EIS) is further evidence of UDOT's commitment to identify solutions to the transportation-related safety, reliability, and mobility concerns in LCC and on Wasatch Boulevard.

As the Metropolitan Planning Organization (MPO) for the greater Wasatch Front Region, WFRC's role is to plan for an integrated transportation system including roadway, transit, active transportation, and other facility improvements to meet projected travel demand over 30 years, with consideration of land use, air quality, economic development, and other factors relevant to quality of life.

Understanding the focused, defined purpose and need of the LCC EIS, we note that the MPO's goals and responsibilities in planning for long-range transportation, in terms of geography and objectives, are broader. The Regional Transportation Plan takes into consideration transportation, land use, the economy and the relationship between all three. It focuses on accommodating and best serving the needs of all users along the Wasatch Front.

We are not at this point recommending any particular alternative for implementation. Our primary comment is that we believe it would be beneficial to move forward with an approach that maximizes the opportunities for integration with the regional transportation system.

32.2.2I

Recalling the purpose of the LCC EIS is to find solutions in terms of reliability and mobility, both the Gondola B and Enhanced Bus alternatives are relying principally on cars to utilize Wasatch Blvd or other routes to access the Gravel Pit Mobility Hub and the Gondola Base Station parking areas. The gondola alternative recommends 2,100 parking stalls along Wasatch Blvd and the bus alternative 1,500.

When focusing on LCC, as in the EIS, the potential broader regional impacts and benefits of a regional system connection may not fully be considered.

32.1.1C
32.2.6.2.1I

Some parties have raised the possibility of increased bus service and connections as an interim/phased approach. This type of approach could provide for enhanced integration with the regional transportation system, or allow for further consideration of such integration.

32.2.2I
32.2.6.3D

While our comments are directed toward an approach that best integrates with the regional transportation system, we want to emphasize again that we are not advocating any particular alternative. As the MPO, our responsibility is to look more broadly at the regional transportation system.

32.29R

Again, thank you for the opportunity to provide comments and participate in this important study. WFRC looks forward to our continued participation.

Ned E. Hacker
Director of Operations

# LITTLE COTTONWOOD CANYON EIS

## DRAFT EIS
## PUBLIC HEARING
July 13, 2021

ADVANCED REPORTING SOLUTIONS
801-746-5080 | office@advancedrep.com | advancedrep.com
**SALT LAKE** | 159 West Broadway, Broadway Lofts, Suite 100 | Salt Lake City, Utah 84101
**PROVO** | 3507 North University Avenue, Suite 350-D | Provo, Utah 84604
**ST. GEORGE** | 20 North Main Street, Suite 301 | St. George, Utah 84770

REPORTING SOLUTIONS ADVANCED



Little Cottonwood Canyon
Environmental Impact Statement
S.R. 210/Wasatch Boulevard to Alta

Draft EIS Public Hearing

Taken on Tuesday, July 13, 2021
at 6:00 P.M.

At Butler Middle School
7530 South 2700 East
Cottonwood Heights, UT 84121

Reported by: Kellie Peterson, RPR, CSR

Response Section in Chapter 32 ➥

Comment: 13350

32.2.2YY

32.2.6.2.1E

32.2.6.2.1D

32.2.2FF



July 13, 2021 6:30 P.M.

P R O C E E D I N G S

STEVE WOODWARD: Can you hear me? Okay. I wanted to comment upon the Mobility Center in Sandy. I think it's kind of absurd. It's just going to move traffic to what is really a residential area right now. I think the better alternative would be to have that Mobility Center down at the Trax station.

I know I talked to you earlier about it, and you have reasons not to, but I really do believe that would be a better alternative.

I'm a skier, I know something has to be done, but I don't think that's the answer. I think, again, you're just moving a lot of the traffic that's going up to the ski area down to a residential area in Sandy.

And also traffic that normally the bus stops for, for people along the way, are now going to have to come down here, so that's going to create more traffic going down there. And, again, I think the better alternative is just to have that Mobility Center some place else. That's just my opinion.

I wish you could have said more in your presentation as to the next steps too, because I think people would be very interested in -- to know what the funding of this is going to be, whether the ski areas are



Response Section in Chapter 32 ➥

32.2.7A

32.2.7C

Comment: 13351

32.2.6.2.2A

32.2.6.2.2A



going to be required to pay anything for this; is there going to be major benefits of it? But also the timing of it.

I mean, you went as far as with the EIS mentioned. When I talked to you, you said it could be a few years out, but there's no definite plan. I would like to know -- that's my comments.

ERIC CRONE: Thank you. I want to thank everybody in UDOT and the community. This is a long, long process. I'm really happy to see some people out here.

I've been told in the past that traffic is traffic, but not all traffic is truly created equally. Induce the math. Road widening and parking expansion creates car traffic by increasing the supply infrastructure, making it less likely for people to chose alternative modes of transportation on Wasatch Boulevard, which is mostly nonexistent right now.

On signal license or sections along the multilane roads with the sign speeds greater than 35 miles an hour are inherently dangerous to local residents who need to turn left to egress and ingress their residence.

2021 facilities so far are surpassing 2020 totals by a margin greater than 20 percent, and UDOT's

Response Section in Chapter 32 ➥

32.2.6.2.2A

32..2.6.2.2A



goal to reduce fatalities to less than 200 fatalities by 2020 has already been a failure.

The concession that UDOT has expressed to -- in regards of local traffic along Wasatch Boulevard to the local community misses the main concern voice of the community itself.

Speed kills, and UDOT has shown an unwillingness to cooperate with the local community that depends on acts to the urban segment of Wasatch not only impedes ski season but for daily life. This is a concern.

The main concern is not the wide -- I really think that, you know, everybody wants to get to the canyons and enjoy the beautiful nature that we have up there, and we more than welcome that. It is an opportunity for the community to actually grow in a sustainable manner, but that has to be safety prioritized for the people that actually live there, not only during the ski times or for recreation purposes, but for kids to go to school, for cars that actually need to make a left turn on a daily basis.

And if you look at the design of the road, you are creating something that's going to look eventually similar to what's already in front of the gravel pit, right in front of a residential area, with



Response Section in Chapter 32 ➥

32.2.6.2.2A

Comment: 13352



many, many people that are -- have -- do not have any other way of access their neighborhood.

Regarding the trail experience, it will be improved even better if the speed of the road is, again, reduced to 35 miles an hour, and the noise is reduced as well. Thank you.

CHRIS MCCANDLESS: Good evening. My name is Chris McCandless. I'm one of the authors of the original La Caille Base Station plan. It's actually a real pleasure to see all of those who love the canyon here tonight to voice their thoughts. We all love Little Cottonwood Canyon.

Please note, we are not proposing to be the entity to construct the base station. We are only preserving the site from development, if it is chosen by UDOT.

And to clarify some of the social media comments: No, we are not intending to construct four-unit break or apartment buildings or condominiums on our adjacent property.

Our two existing applications show residential single-family homes that equal about two units per acre and meets the existing zoning requirements.

We forwarded to UDOT a land preservation plan

Response Section in Chapter 32 ➥

32.2.9D

32.2.6.3B

32.17A and 32.17B

32.2.6.3B



for the Gondola Base Station because we are certain that the gondola solves all the problems, especially providing dependable canyon access on a daily basis, and especially a secondary emergency access that is so dearly needed.

The bus option requires building a four-lane highway in Little Cottonwood Canyon, which will have significant detrimental impacts. The UDOT Little Cottonwood Road expansion would be to 78 feet, which doubles its current size, and increasing it from two lanes to four lanes.

The only way to do this is to excavate the steep northern slope and install miles of vertical retaining walls ranging in height, based on our calculations, from 20 to 75 feet tall, and eliminates a lot of the spectacular scenery associated with that ride along that northern canyon road.

In the areas where the mountain is blasted into submission, it will require over-excavation in places where the slope is steeper and the mountain less stable. And the over-excavation will penetrate the hillside on a much greater scale in order to protect those constructing and then using the new roads.

It would require for about, in our estimation, 200 vertical feet of excavation to stabilize the unstable rock and other dangerous aspects during



Response Section in Chapter 32 ➥

32.17B

32.13A, 32.13B, 32.17A, and 32.17B

Comment: 13353

32.2.6.5B



construction process, which could take up to eight years. This is massive.

We feel that there are numerous other elements associated with building a highway system of Little Cottonwood Canyon Road, one that will take away significant iconic aspects, including that large boulder that everybody likes so much just above the A gate. It will change the face of the canyon permanently and forever.

By comparison, constructing a gondola would have significantly less environmental impact than the alternative option of an expanded highway. We would like you to consider those when you're making and deliberating this decision. Thank you.

BOB PAXTON: Mr. McCandless, I do appreciate your comments on the widening of the Little Cottonwood Canyon. One of the concerns I have is: Have there been enough sophisticated engineering studies to determine what exactly would happen to that road?

Many of us can remember what happened to the Provo Canyon road with landslides for two decades, and then, ultimately, gunite, which seems like it's halfway up the canyon, and we would all hate to have that up Little Cottonwood Canyon.

I have a comment or two on the -- from the

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32..20A, 32.20B, and 32.20C

32.12A and 32.12B

32.20A and 32.20C



Central Wasatch Commission. They don't seem to agree necessarily with what kind of transportation mode should happen, but I do appreciate their comment on this.

Visitor use capacity: The transportation alternatives being evaluated by the EIS have the potential to significantly increase the quantity -- and I underline "quantity" -- of visitors accessing Little Cottonwood Canyon, and what they do and when they visit.

All of these alternatives pose a risk of overuse of Little Cottonwood Canyon, which could result in negative environmental public safety and water -- and water resource consequences.

Additionally, overuse could negatively impact the visitor experience for both tourists and locals, who seek to enjoy recreation and nature from unmanaged crowds.

You know, this is something that probably has to be dealt with by the businesses, the ski resorts, but it is truly a fact which I think is desperately important.

Another one is -- I think that with all the marketing that goes on, we are marketing more for visitors than we are for residents within the state of Utah, especially along the Wasatch Front. And I foresee the busyness getting so bad that we will not -- we, as



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Comment: 13354

32.2.6.2.2A

32.11B



local people, will not want to access these resorts and will have to go some place else to do this, similarly as we have with many of our national parks in Southern Utah. Thank you.

GAYLYNN BENNION: Hi, I'm GayLynn Bennion, and I represent, at the Utah Legislature, this area. I represent Alta, Brighton and two thirds of Cottonwood Heights, parts of Holladay, Midvale, and Murray.

And I would just like to remind Utah -- UDOT of my constituents' request for a lowered speed limit on Wasatch Boulevard. This is in the Cottonwood Heights Master Plan for Wasatch Boulevard, and it has been there since 2019, so I know it is not news for you. And it is also part of Save Not Pave's grassroots efforts.

There are parts -- it is a state road, but there are parts of Wasatch Boulevard on the other side of Ft. Union Boulevard that do have lower speed limits, so I know that we can have a lower speed limit.

I was concerned to see the plans for sound barriers. To me, what Cottonwood Heights is asking is that Wasatch Boulevard be a boulevard, that it not be a freeway. So when I see the plans for high -- for sound barriers along the road, it just looks like a freeway being planned, which is not what Cottonwood Heights has been asking.

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As I talk with people, even here tonight, I appreciate the great efforts that Utah -- UDOT has made for several years, and also the Central Wasatch Committee -- Commission, and I appreciate their pilars in reminding us that water is our ultimate thing that we want to preserve in the canyons.

32.2.2B

And I think that as I have talked with people here, that there are creative solutions, like what we do at Zion Park, where people sign up for a shuttle; that if we really value the canyon, and we don't want to make

32.2.2E

that kind of road improvement that would degrade the canyon, if we don't want a permanent gondola there where maybe the snow pack won't be there in the couple years the way it is going -- which is not want any of us want.

32.2.2B

Maybe there are creative solutions that are less impactful, like what we have at Zion, where there are shuttles, where there could be metering, where it doesn't have to cost so much money but might solve the problem.

Thanking you -- all of you for being here, and thank you, UDOT.

Comment: 13355

DAVE FIELDS: Good evening, my name is Dave Fields. I'm the general manager of Snowbird. I have spent my life recreating and, now the last 21 years, working in Little Cottonwood Canyon, and I have seen



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firsthand what happens when it snows a lot and that coincides with increased demand.

We put up to 7,000 cars in Little Cottonwood Canyon on a Saturday in the winter. This is not compatible with the steepness and the amount of avalanche paths and how much snow we get in a short period of time in Little Cottonwood Canyon.

32.7C
32.2.6.3P

We believe that cars and buses are not the answer because they get stuck in the canyon, just like the buses get stuck -- even though they have chains, they get stuck just like the cars. I work very closely with the operations team from UDOT, and they are amazing. And in one day, they pulled eight buses up the canyon with an F-350 because they were stuck in the canyon; just on one day. And this is what happens when it snows a lot in Little Cottonwood Canyon.

32.7A

It is the most avalanche-prone highway in North America, and we need to think about a solution that doesn't involve rubber tires on pavement to get people up and down this canyon.

The thousand people per hour is a

32.1.2D

self-induced parameter that UDOT has created. We would like to see more people using alternative transportation, gondolas can move 1,000, 2,000, 3,000 people an hour if you designed that spec. And I would love to see UDOT

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shooting for a much higher target for vehicle elimination in Little Cottonwood Canyon.

Snowbird and Alta currently pay for our season pass holders and our employees to ride mass transit. With a bigger target and more capacity the gondola could provide, our interest and our investment in this operation will go up exponentially.

32.2.4A and 32.2.7A

Snowbird has committed that we will continue to pay for our pass holders to ride mass transit. We would like to write a much bigger check because we do not believe private vehicles are a safe option or a reliable option.

Our data shows that it will take 31 minutes to ride the gondola from the La Caille Base Station to Snowbird, 37 to Alta. And the nice thing about the gondola is that is every day. No matter what is happening on the road, no matter what rental car has slid off the road, no matter how hard it is snowing, the gondola goes up and down. So our guests and our employees can get up and down the canyon and know that it will take 31 to 37 minutes.

32.2.9D

I want to thank UDOT. This is hard work you're doing. But on behalf of all of our employees and our guests, we thank you for what you have taken on.

RANDY SKEEN: Thank you. I was just going to

Comment: 13356



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sneak out, and you called my name.

I would like to echo what has been said to thank you folks. We have lived at the mouth of Little Cottonwood Canyon for about 15 years now, and I think all the residents up there have all had -- lived through horror stories of cars. And where it gets so crowded, we can't get school buses out. We couldn't get an ambulance up there.

32.7B

I personally almost missed my father's funeral because I had to go down to the 7-Eleven and fill up with gas and try to get home. And I had to do that by going to the wrong side of the road, honking. Of course, my honks were reciprocated with gestures and honks, people thinking, I guess, I was trying to ace them out of the resorts.

32.7B

I don't know which is best, but I don't believe that pavement is something that can work. The traffic is bad. I just don't know that having buses is going to make it any better. So that is one concern.

32.7C

The second concern is: Who's going to pay for it? I appreciate the comments from Snowbird, I guess they are going to chip in, but I think the ultimate cost is going to fall somewhere on us. And I would really like to know what that is, and how much, and where it comes from.

32.2.7A

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But, again, thanks for your hard work. This is a terrible problem for the residents. We love having out-of-state people come. We have friends come every winter to ski. And this is the best place in the world, I think, to live, right where I live in the canyon.

So we want to make it better, and if it's a gondola, that's great. If somehow we can eliminate it with the traffic going up, that's great as well, but something does have to be done. Thank you.

AARON DEKEYZER: My name is Aaron Dekeyzer. I'm a candidate for Sandy City Council. I serve our community as the codirector of Save Not Pave, and the chair of the Utah International Dark Sky Association, and chair of the Sandy City Sustainability Focus Group, all of which are following the EIS closely.

Comment: 13357

I'm encouraged by all of the people who have come out tonight to play an active role in our community. Thank you. And thank you, Josh, for all your hard work in this and meetings that you've had with me.

In the certificate course I took from MIT on smart city design, I learned that cities effectively cannot build their way out of a car-centered society. This is an especially important principle when applied to our values geography and clean air challenges. So if we are smart, we will create and develop transit networks

32.2.6.2.2A

32.10A



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that incentivize people and provide options for improved mobility.

32.2.4A

UDOT should reconsider its two alternatives and wait to do anything, other than express bus service, without additional road building, just as Mayor Wilson commented today. It should also be done without additional parking garages, as those will induce demand and are wasteful, when we already have numerous locations already available throughout the valley to be repurposed.

32.2.2I

The two proposed alternatives literally do the opposite of what we need by pointing more vehicles to the mouth of the canyon. Dave Fields mentions getting cars out of the canyon, which I agree with, but it is not fair to push that traffic into our Foothill neighborhoods.

32.1.2D, 32.2.7A, 32.7B, and 32.7C

The public is up in arms about this, and UDOT refuses to collect ZIP code information so we locals know where the comments are coming from. This is, at best, irresponsible, and at worse, deceitful.

32.29P

Audience, please, when you're making your public comments, include your ZIP code. Locals do not want roadening [sic], not on Wasatch Boulevard, not on Sego Lily, not the Highland Drive extension over Dimple Dell or on Vine Street, not on 600 North and so forth.

32.2.6.2.2A

Similar transportation and transit topics are

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being discussed and studied at the highest academic halls across the country. In fact, the University of Utah homes one of the nation's leading transportation experts. I met with him, yet the business interests of this project don't seem to care for the intelligent design ideas or have even bothered to do a capacity study for the canyon.

32.20B

And I should further this point. Really, it is completely unacceptable that this is moving forward without a capacity study.

32.1.4D
32.2.7A

For the fiscally conservative folks in the audience, consider the costs of these projects. Is the benefit of lessened traffic for 20 days a year worth the price tag, especially once you know who the private interests are that stand to make hundreds of millions of dollars?

Something needs to be done, but we cannot have exhausted other options, including timed access, bus priority, carpooling incentives, and a properly enforced sticker system, rental car restrictions, amongst other possibilities like Representative Bennion mentioned.

32.2.4A and 32.2.2M

In closing, it is the design that makes all the difference. If UDOT widens Wasatch Boulevard, they should held to their promise in the Cottonwood Heights City council meeting for 35 miles per hour, and switch

32.2.6.2.2A



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their guiding principle of level of service to safety.

That is what I am hearing as I knock thousands of doors in the city, so I hope UDOT seriously listens to our voice, and has roads that respect residents. Thank you.

Comment: 13358

GEORGE VARGAS: Thanks for having me. I'm George Vargas. I'm also a board member of Wasatch Back Country Alliance. Thanks for hosting this public event so that we can share our thoughts.

I want to reiterate the concept of capacity again. I don't want to beat a dead horse, but knowing what these canyons hold, we are putting another thousand people per hour, which would be 4- or 5,000 people on top of what's there now is a concern. And the gondola could be full, and people -- we don't really believe that people get out of their cars. The disincentives that are listed already, and so we are just going to see that many more people in the canyon on the busiest days.

32.20B
32.1.2B
32.2.4A
32.20C

Regarding tolling, we are not quite certain why tolling isn't implemented now. That's something that could give a different perspective on the amount of cars in the canyon and shared -- rider-share and the like. Directional traffic and coordinating with -- planning in Big Cottonwood are other concerns that we have.

32.2.4A

32.2.2Y

And importantly, there's issues around the

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32.2.6.5K

32.2.2M

32.2.6.5K

32.2.4A
32.2.6.5H

32.2.6.5H



gondola that are a bit of a concern regarding weather. The road has been criticized for its unreliability with regards to tires on the road, but we also don't enforce traction requirements, and tire requirements are quite lax.

Regarding weather and the gondola, lightening -- I don't see lightening mentioned at all. That frequently shuts down lifts. Every time there's a strong frontal passage, lightening usually precedes it and shuts down things for quite a while. Crosswinds, as well as icing events, can affect the gondola quite a bit.

Cost to ride seems to be lacking here; kind of some vague numbers sometimes, but a little more scrutiny towards: What will it cost to ride this gondola? And in addition, artillery fire to control the canyons. The gondola will be closed when artillery is fired to control the avalanche paths.

If snow doesn't come down, the wires and cables and towers need to be inspected for reopening after artillery fire, so the gondola will not be running during those periods of time. We are not sure what it takes to reopen the gondola, and how that safety process works and who's in charge of it.

In addition, interlodge -- if there is an interlodge effect, the gondola will not be running. It's



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32.7C
32.20A
32.20C

Comment: 13359

32.2.6.2.2A



stated clearly, I believe, in winter gondola operations. And in addition, the gondola will act as a tourist attraction inadvertently, and it will contribute to additional congestion in the canyons.

Thank you for much for your time. I appreciate it.

DAN MILLS: Dan Mills, I'm a Cottonwood Heights resident. I'm a member of the planning commission for Cottonwood Heights. I have lived here since the late '70s -- okay. And I have lived here since the late '70s, with a big break in the middle.

I love the canyons. I'm a cyclist, I'm a skier, and I would ask that we honor the 35 mile per hour statement that was made to the city council. And as someone who lived across from the Old Mill, I have alternatives. I can get out of my neighborhood if I have to. There are other ways that I can get there. Many of our residents don't have that option.

And I would also add that if we -- if we're really genuine about this, we need to realize the competing interests here, and that there are certain people that will benefit from certain alternatives.

And I applaud you for reaching out for other stakeholders. I'm sad to see we don't have a larger UTA presence and more creative solutions from UTA.

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32.2.6.2.1C

32.2.6.5E

32.2.4A

32.2.9A

32.16A



I'm also a little surprised that we don't have Doug Shelby, from the Walker Family Trust, who has an interest in where the parking structure would be in the gravel pit, and that those interests and those solutions are going to be critical.

Additionally, if we are going to put the gondola there, we are going to ram traffic right into that -- that parking structure, which means that what we are going to find ten years from now is that the parking situation on those certain days we are talking about really is not going to be appreciably different. It is just going to be a little bit wider.

And, ultimately, in my opinion, the faster way to solve this problem is to incentivize people to get on the bus first, first bus equals first Trax. And if we can get people on those buses quickly, as close as to larger transit area hubs as possible, I think it is possible to solve this problem without widening the roads.

I think it's also important to recognize that if we do widen that road up Little Cottonwood Canyon -- we are talking about over 15 mines that have existed. They really would turn this into a giant Superfund site up and down that road. And the mitigation that it will take, the arsinic and all the other minerals



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32.2.7A
32.1.2D
32.7B
32.7C

32.2.2B

32.2.4A
32.20A



that are involved in trying to disrupt what's that.

Frankly, if we are building houses on that, if this were a planning commission issue, we would have all sorts of concerns about disrupting that. And the fact that it is going into a primary water source, that is a real issue.

So as we look at who's going to benefit from the gondola, I think it's important to recognize, if we are going to get as many people as possible to Alta and to Snowbird, the best way to do that is buses, and lots of them. I recognize that there have been a couple days where there have been slide-offs with the buses, and they do occasionally need some help.

But, ultimately, the buses were discussed at five-minute intervals, and UTA, quietly, has admitted they can do them as fast as three-minute intervals, which would get dramatically more people than what we could ever get from the gondola. Plus, it gives you a flex solution, which means that you can turn it off.

I rode my bike up there this morning. There is no reason, no reason that gondola would be used today. It would have sat there gathering dust, the number of people that were in the canyon, and, frankly, all day long, I don't think you would have had more than a couple dozens riders.

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Comment: 13360

32.2.2X



Let's not memorialize a solution for the 30 worst days of the year. Thank you.

RICHARD SHUT: Thank you for this opportunity and for the work that you guys have put in to getting this, hopefully, off the ground -- or on the ground, whichever you decide to do.

I live in Granite Oaks, which is right on the edge of where all of this is going on. And I start out with one -- my first question. We are backing up on a property owned by the Despain Company. And I haven't had any mention of this at all. Do the current owners of La Caille own that property as well? Have you guys looked into that? And -- because that's where you're showing the parking facility being.

And our concern about that is that that property has an easement through our development, and easements goes with the land, not with the people. So the question that I would like you guys to answer is: Are we going to have traffic coming through our development because that easement exists? And nothing has been addressed as far as we're concerned.

The other question is, there's a lot of money being handled here that's going to be going back and forth. And are you guys putting in for your share, in terms of paying for this project from both the owners of



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32.2.7A

32.2.2B

Comment: 13361

32.1.2B
32.1.2D
32.2.4A



the La Caille, Snowbird, and Alta? Dave said he would be willing to pay more money. He has to be willing to pay for more money because they're going to be making more money. That is not exactly a giveaway.

And one of the things that was mentioned is the paving of Little Cottonwood Canyon Road. While none of these things may be optimum, that seems to be the best alternative, only because as a biker and a former skier, it would be nice to have -- the local people have something to benefit from for this, as was mentioned before.

Because you really -- unless you're really great, biking is not an option at this stage of the game on Little Cottonwood. And it would be wonderful if we had something else that we could use that would benefit the public as a whole.

Thank you very much.

BRIAN ROBERTS: Hello, my name is Brian Roberts. I live in the area, ZIP code 84124. I don't think any of the ideas will help. I think you're just trying to find ways to get more people at the same time up the canyon. As long as you have the same number of people going in the cars, and it doesn't matter which way, I think you would have to solve that with tolling.

In other words, people that go up the canyon

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32.2.2B
32.2.2L

32.2.2B

32.2.9F

32.2.7C

32.2.2I
32.2.7C



only are essential, or they're canyon people. They are hikers and so forth. But they are not allowed at the ski resorts. If the car is found there, and they don't have the pass, they are ticketed.

We could essentially eliminate the parking lots of the ski resorts and have everyone go by mass transit. That would significantly help the canyon. Of course, the residents would be allowed to go up, and they would have a canyon pass, an annual canyon pass.

I'm actually in favor of the train. I know you voted against it. It's the best option. The problem is, is you're comparing apples to oranges. It is approximately $600 million. These others are 600 million. But then it's 400 million more to connect.

But you can't really say it's this much more because you're getting so much more because that route would go all the way, I believe, down 9400 South. Just because you can do something doesn't mean you should do something.

I lived in New Zealand for a number of years, and they have a canyon similar to this called Milford Sound. Very famous in -- (inaudible.) If you do a Google search on transport on Milford Sound, it's on Wikipedia, you will find that they have had several ideas, such as one called Sky Trail, which is a gondola



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32.17A

32.2.6.5C

32.2.6F

32.2.9F

32.2.4A

Comment: 13362



system.

The government was smart and voted against it because it's an eyesore. This is going to be very ugly, this gondola. You have got a 37-minute ride. You have capacity for 20 people up there. You have got no control or a driver of a person on board. We live in a day and age where people get angry. Only 20 people can sit. Others are standing.

People carry guns and are going to be cranky. I wouldn't want to be stuck in the air. It would be terrible. Anyways, the windows are going to be dark. Anyways, my brother carries a gun everywhere. He freaks. I wouldn't want to be up there with him.

The train is the best option. If it can't be the train, then the bus, but it's got to be mass transit. You have got to stop the people going up the canyon unless they are essential or ticket them. Everything mass transit. The train is the best.

BRAD RUTLEDGE: Hello, can you guys hear me? Hey, Josh. Dave, you're here to protect UDOT. I really appreciate that.

My name is Brad Rutledge, by the way. I'm with Wasatch Back Country Alliance. We -- yeah, bring it on. We hosted a podcast series that was a Facebook live event. We had seven episodes, so seven hours of live

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interviews with people like Josh and UDOT, Chris McCandless representing the gondola, UTA, etc.

And I was trying to think about what to talk about with my comment, and I got called up. So thanks for pulling me up. And great comments, by the way.

The one resounding takeaway I came away with, after doing our podcast series -- because it was a deep, deep dive with all of these stakeholders that were really interested in advancing their goal, UDOT, of course, interested in doing what is best for all of us, is a big takeaway of "let's get back to the goal." Right? What are we trying to accomplish?

32.1.2B

And it was concerning a little bit in that if you ask the CWC board what's the goal, what's the purpose, you'd probably, and likely, get different answers. And so when we start with, "What's the goal?" which is where this started, somehow we gotten into all the weeds and the details. We've forgotten about the goal and the purpose.

And so it's not a tourist attraction. Right? It is not an amusement park. It is: How do we improve the traffic mobility going up Little Cottonwood Canyon.

32.1.2B

And I think when we stop and think and remember, that is what we are trying to accomplish. We're getting -- and we can all get on the same page. We're going to elevate



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the conversation.

The other thing that is really concerning is when you take a look at the potential solutions, is the unintended consequences. So capacity has been brought up by a few people, and if we have these systems that can send 1,000 to upwards of several thousand people up Little Cottonwood per hour, and we have it at the beginning of this process to find: How are we going to limit what that current capacity is -- which is, you know, we have a capacity cap today which is parking.

32.20A
32.20B
32.20C
32.20E

Once we started adding more people to it, it's going to ruin the experience. If you're at the resort, you're at the back country, you're on the roads, you're on the gondola, we have to be very careful about what we do. So we need to step back and re-evaluate. What's the purpose for what we are trying to accomplish, and what are those consequences so we don't get into trouble down the road.

Finally, WBA really believes that we haven't given buses a good chance. We have not funded buses and all the kinds of systems that could make going up Little Cottonwood Canyon successful. We have seen it in other areas.

32.2.9A

Dave, I know I'm out of time.

And we have seen this work for events and

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other things. We should give those things a chance before we invest in widening the road or installing a gondola. That is my final comment.

JEFFREY HEATH: My name is Jeffrey Heath. I live on the corner of Wasatch Boulevard, right across from the fire station, and so I'm a resident who has some understanding and is affected by what goes on. It's also a good thing that I'm not running for office, for reasons that will become apparent.

Comment: 13363

Mr. McCandless's comment about the comments of bus construction is correct, and at the same time, an acknowledgment that you make in the course of outlining the prospective benefits of the buses actually demonstrate that the assumptions on which the benefit calculation was made is clearly false.

Any calculation of bus transit type that assumes that a dry road, one simply has to ask how often is the road all the way dry and all the way to Alta during the ski season.

32.2.6.3P

The gondola actually -- if you define your goals as mobility and reliability, the gondola actually meets both, and it is the only one that actually does meet both consistently.

32.2.9D

Now, looking into the future, the passion for everyone in this room is absolutely understandable, but



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the reality is that land for use is not going to go down and the demand is already there. The state's population is a lot higher than it used to be, and it is growing. The country's population is a lot higher than it used to be, and we get more visitors in this state than we used to get.

I think it is going to be difficult to attempt to turn the clock back through regulatory force. The question is how we handle the future reality wisely and prudently, and it's a question of finding the bus tradeoff, because there's no ideal and no perfect solution.

I believe that if we shoot for reducing the number of vehicles in the canyon total, that points to a gondola system. The buses have been negatively impacted on air, water, and noise. Even aside, all the engineering problems of trying to widen the road. And any attempt to increase buses and road without some sort of shoulder is absolutely unrealistic in my view.

32.2.4
32.10A
32.12B
32.11A

The gondola actually has the lowest environmental impact. It may improve the water quality. It will certainly improve the noise quality and reduce emissions within the canyon. And it is the only way that will ultimately allow limiting traffic in the future. We need to learn the lesson from Switzerland.

32.12A
32.13A
32.17A
32.10A

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32.2.6.5G

Comment: 13364

32.1.2D
32.2.7A
32.7B
32.7C



There are people ahead of us, who are years ahead of us, who have figured out the best tradeoffs to resolve these problems. Travel below the Matterhorn and see what they have done, and I assure you from personal experience that they have not destroyed the natural beauty of that place.

I would suggest that if gondolas are adopted, they would consider to stop at Tanner's Flat. I'm running out of time. The resort operators are not going to -- solution by part and how it should be organized to attempt to make it into a profit-making venture, of course, requires a lot of detailed work.

Thank you.

JASON ERICKSON: My name is Jason Erickson of Cottonwood Heights. It's nice to see this data that you have showing a viable alternative without the expansion of the roads or the gondola system. It's a shame that it's not up there right now.

I think we can also learn from Squamish, with the Sea to Sky gondola being caught two years in a row. That is a huge potential flaw that the gondola has been caught back to back years. This would be a large infrastructure project that would bankrupt us. This is being funded by taxpayers for the resorts.

Increasing the bus usage at the same time as



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32.2.4A

32.29D

Comment: 13365

32.20B



the gondola, and it doesn't -- or it solves one of the problems, which is congestion, but the issue is people. We need better education into why to use mass transit, because right now we are looking at the symptoms and not the cause.

People don't want to carpool, people aren't getting together, and how do we change the mentality, to get everyone together in the mass transit in either way, so they are not going to say, "I want to leave when I want, I want to be there when I want, and I want to be able to go when I want."

So I think we need to work on education and alternatives to work with buses, regarding expansion of the roads for the gondola, to keep the current environment safely.

Thank you.

JOHN ADAMS: Thanks. John Adams, Cottonwood Heights. Although safety, mobility, and reliability have been addressed, UDOT has neglected to include other Cottonwood capacity study and the EIS for both the alternatives. I guess you heard that a few times tonight.

UDOT has stated that since SR-210 impedes traffic and people into the jurisdiction of the Forest Service, that is up to the Forest Service to do a

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32.20B

32.1.2B
32.1.2D
32.20E
32.20A
32.20B

32.20A

32.20C



capacity study, if they have the funding and resources to do so. UDOT states the Forest Service said they will not do a capacity study for this project, and further, that UDOT is not concerned with doing their own capacity study. So from what I understand, no capacity study is going to be done as part of the EIS.

I feel this is completely irresponsible and a slap to the face to the future and health and sustainability of Little Cottonwood and our drinking water. Unlike freeway projects that UDOT manages, where freeways continuing to flow in and out of our state for the benefit of all, this project is forever increasing the capacity into a finite box canyon.

Its increasing capacity to move both cars and people with bus option and to increase capacity of people with the gondola option into a box canyon, which has both physical and environmental limitations.

Rushing to build out the permanent and irreversible infrastructure today without understanding and defining the limits of the canyon is a gaping hole in the entirety of the UDOT environmental analysis, regardless of the tolling ideas that have been put out.

With water scarcity already happening today, and the population projected to grow from 3 million to 5.4 million in the next 30, 35 years, how in the world



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32.12B
32.2.4A
32.20A
32.20C
32.20E

32.20B

Comment: 13366



are you able to move forward with this project to increase capacity into the canyon without a true capacity study?

Regardless of how big our state grows, you can't deny that resorts cannot grow unlimited, the vehicles, that's cars and buses, cannot grow in the canyon unlimited, and the amount of people in the canyon at one time cannot grow unlimited. It's time that we see the future of the Wasatch through the lens of how we enable it to thrive versus trying to grow our economy at the expense of this finite resource.

We need a comprehensive capacity study to be completed and accepted to determine if this project should move forward. Growth for the sake of growth can no longer drive our decisions. We already grew, and we need to change the narrative on how we thrive before we blow past our environmental boundaries and have to start taking things away from people, just to enable this area to survive.

Thanks.

DAVID TILLOTSON: My name is David Tillotson. I'm a resident of Little Cottonwood Canyon, just east of La Caille. Many of my comments have been stated tonight already, but all in all, the gondola is a permanent response to an interim problem.

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32.1.4D
32.7B

We are talking about 15 days a year where there's an issue, and I agree. And I bought my house knowing that there will be days that I cannot return to my house if I leave for a two- to three-hour window. Tough, I signed up for that.

32.2.9A

Give buses a chance. Don't widen the roads. Incentivize riders, direct access throughout the Salt Lake Valley, to both Snowbird and Alta and the other Brighton and Solitude Resorts on the Big Cottonwood side.

32.2.2I
32.2.4A

I like the idea of first rider, first Trax. Also incentivize carpools, not just two people in a car. We are talking four or five people in a car.

32.2.7C

Also, on the impact summary, rather than just take UDOT's numbers as facts, I would like to see the exact assumptions that are used in the impact summary, specifically as it relates to operational costs. Bus technology is likely to improve over time.

32.2.7C
32.2.6.3F
32.2.6H

The gondola option is -- you're making a 50-year bet. I would like to see what -- it is not a fixed $11 million every year that the buses are going to be. I see electric buses. I see buses changes over the next 20, 30, 40, 50 years. I also have a big problem with public dollars used for private enterprise.

32.2.7A

If the resorts want the gondola so bad, make them pay for it. Make them pay for the upfront costs,



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not just the riders riding it.

Thank you.

Comment: 13367

RYAN RAMBA: Hello, my name is Ryan Ramba. I'm a software engineer, and I live here in the Salt Lake Valley.

In software, there are certain qualities that are hallmarks of great engineering. Four of those are scalability, extendability, reusability and refactorability. I'm here to point out that on top of other flaws, the gondola meets precisely none of these hallmarks.

Scalability means that as usage grows or shrinks, it should be easy to add or subtract the necessary resources to keep things perforant. The gondola is not scalable. It has a set number of cabins, and therefore, a set capacity. If there are more people, it cannot grow its capacity to accommodate.

32.2.6.5A
32.2.6.5N

And, likewise, if there are only two people, it cannot lower its capacity, and therefore, it will use roughly the same amount of energy and cost the same to run, regardless of usage.

32.2.6.5A

Extendability means that you can easily add additional behaviors as the needs arise. The gondola is not extendable. It will have two stops, and it will only ever have two stops. So if parking becomes untenable,

32.2.6.5G

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which it already does at certain times of year at the White Pine Trailhead or the gate buttress, it is impossible to add stops to address these issues.

It will also always need to be loaded and unloaded at one location. This will be a bottleneck. There's no option for extending the loading to multiple locations out into the valley to distribute the loading process, and you won't be able to extend the gondola to also service Big Cottonwood.

32.2.6.5E

Reusability means that it can serve multiple purposes or the same purpose in multiple locations. The gondola is not reusable. It will perform exactly one function, for one type of user, in one location. You can't take a gondola cabin and use it to help transport people to a Real Salt Lake game, for example, but what's worse is that the gondola is slated to use half a billion taxpayer dollars to service a single type of mountain recreator, the resort skier.

32.1.2B
32.1.2D
32.2.7A
32.7B
32.7C

My use of the Wasatch spreads across multiple activities and through all four seasons. I come to Wasatch to backpack, trail run, bike, climb, hunt and ski, both at resorts and in the back country. The gondola will only ever fully support one of these seven activities.

Refactorability means that if you need to



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change how a task is performed, you can make those changes with minimal effort. The gondola is not leveraging the refactorability of our existing system. We already have a road up the canyon. The work of creating the ability to transport people is already done. All we need to do is adjust how that system accomplishes its task, not put time, money, and effort into building an entirely separate inferior system.

So what solution is a hallmark of great engineering? It is not your other alternative either. We don't need to keep paving paradise by widening roads and creating huge trail-end parking lots. We just need to re-factor our transportation system away from inefficient individual vehicles and towards bulk transportation.

This can be done right now, quickly, and with our existing roadways, by discouraging individual transportation and incentivizing group transportation. Don't allow any vehicles up the canyon during busy times, and provide a well-run, comfortable bus system that people want to use. Without the individual cars on the road, there's not a need for paving a new lane up the canyon.

32.2.4B

32.2.2B

Comment: 13368

Thank you.

TIMOTHY HALBECK: All right. First of all,

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thank you all for all the work you have been doing for the past two to two and a half years. I have been going to these meetings for a long time. To see as many different presentations that you have, as much detail involved in this, I really, really appreciate it, and all the one-and-one conversations that we had earlier tonight. I appreciate it as well.

Building on the previous comments, there is one piece of information that at least four people have mentioned so far that I didn't see as well. We do have solutions, and we have capacity as related to those solutions.

What I have not seen is exactly how many parking spaces are there at each of the different mountain resorts? What is the mountain capacity currently for each of those resorts? And what causes are expected to change over the next five years and over the next ten years?

Because whatever solution we decide on, whether it's the road or the gondola or anything, we need that capacity planning, and the one question I couldn't get a solid answer to from the different people I talked to is: What are exactly those numbers? So if you don't have all the numbers, you can't come up with a pretty good solution in that respect.

32.20A

32.20C

32.20B

32.20A

32.20C



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Let's see, my personal recommendation, I would say, if we are going to do the widening of Wasatch Road to four lanes or five lanes or whichever it is, let's not make the same mistake we made on Highland. I live off of Highland, right next to Creek Road.

32.2.6.2.2A

And as Mr. Eric Crone has spoken earlier, it's been pointed out many times, if you have a clear line of sight and a very wide road, people are going to exceed the speed limit. And the more distance vision you have, the longer -- excuse me, the faster they tend to go.

32.2.6.2.2A

When things are gentle and winding, when your vision is limited, whether it's because of the turning or because you have center trees and that kind of thing, it actually brings the speed down.

So I would hope that when we are doing the expansion on Wasatch, we bear that in mind. There are a couple of place where it's a drag strip, and when we widen it to four lanes there, it's going to get worse.

So let's keep that in mind and figure out what we can do to keep the vision a little bit limited to try to keep those speeds down.

Let's see. Nope, that's it. Everyone has covered everything else, so thank you.

Comment: 13369

BOB BONAR: Hello, my name is Bob Bonar, and

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I'm a long-term Cottonwood Heights resident. And I want to start by thanking UDOT and, really, everyone here tonight and everyone who has given input and feedback into solving this longstanding transportation issue in Little Cottonwood Canyon.

I see it that just that we are studying it and talking about it is a huge win, so I'm very appreciative. Thank you.

I worked in the canyon for 50 years. During much of that time, I was directly involved in avalanche control at the ski resorts and avalanche procedures on State Highway 210 in Little Cottonwood Canyon. For years, I was also a member of the Salt Lake County Volunteer Fire Department at Snowbird, responding to highway and other canyon emergency situations.

32.1.2B

These jobs have given me a unique prospective in dealing with the canyon road, which is often called the most dangerous highway in North America. For example, dealing with 1,500 hungry and tired skiers all night due to the road closure, or what do you do with the poor guy who is having a heart attack while the highway is closed, and it is snowing too hard for a helicopter evacuation. Several times we responded in the middle of the night to a car accident or a slide on the highway, with an increase in avalanche hazard, risking the life of



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everyone involved; very scary stuff, having done it a few times myself.

Based on my experience, the gondola is the only solution that solves these longstanding public safety issues and improves access. The gondola provides safe uphill and downhill transit during natural disasters, such as fire, rock slides, or avalanches.

32.2.9D

The gondola is much less intrusive than adding a third lane to the highway. The gondola will not close every time there is a car, truck, or bus slide off the road or accident in the canyon. And the gondola takes cars off the road and improves air and water quality.

32.2.6.5K

And lastly, the most important thing for this old avalanche control worker is that the gondola provides safe up and down transit during high avalanche hazard. Adding the third lane allows more cars and buses on the road, thereby greatly increasing the avalanche hazard index on our already dangerous highway.

32.2.6.5H

So running out of time. I greatly appreciate the opportunity to go -- to give input here, and look forward to someday seeing a nice improvement in transportation in the canyon.

Thank you.

Comment: 13370

DANIEL KOVACH: Hi, my name is Dan Kovach,

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and I've lived in Cottonwood Heights for a number of years, and including time in the early '80s, before the city was incorporated. I was a season passholder at Snowbird for a bunch of years, and a former employee, lifetime skier.

I've seen a lot of changes in this valley, and while I recognize some things are driven outside of our control, I do believe that choices we make do matter. As a resident in this area, I want to talk about what's important to me, and I hope some of those priorities match most of yours in some way.

I value, in reduced priority, clean air so I can breathe, access to water so I can drink and maybe water some plants, snow because I love the four seasons, especially winter, and scenic beauty because it makes me happy.

You will notice, I didn't say being able to get to Snowbird in under an hour in the morning of a powder day. I didn't because I can be patient and wait my turn to get up there, and I know where to go later in the afternoon to still get my freshies. And if I really need to get up there on a Saturday powder morning when the road is jammed, I know how to bide my time and get up there eventually.

Even on the more miserable traffic days, it's



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still so much faster to get to Snowbird than to get to major ski areas or major metropolitan areas in every other part of this country. Think Denver, San Fran, Seattle, New York City, Boston. What's the problem?

32.1.2B

I do not want to give free handouts to those businesses who would steal the scenic beauty of Little Cottonwood Canyon to enrich their pockets. Those people know how to get rich, lining their pockets, and then taking their millions to other unspoiled areas; areas that are unspoiled because they haven't had a chance to ruin them yet. What does that say? You don't pour, you eat.

32.1.2D
32.2.7A
32.7B
32.7C

So what would I love to see? I would love to see UDOT and Salt Lake county and UTA develop some sort of Zion Canyon style bus service model, employed in both Little and Big Cottonwood Canyon. We've got that one too. Let's get relatively continuous, nonpolluting bus service.

32.2.2I

Remember, we've got the extensibility and we've also got future technology here. With increased parking, going seven days a week, up and down the canyon, 365 days a year, along with tolls on both roads. Let's give folks an option they can count on; convenient bus service, not four runs up and four runs down every once in a while.

32.2.4A

32.2.6.3N

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32.10A

32.12B

Comment: 13371



Let's turn folks' behavior around. Once we can count on buses, we will use them more; not just to canyons but everywhere. We will start enjoying, you know, the benefits of public transportation: Clean air, clean water, snow days again, you know, because we will do something about global warming.

You know, and the buses won't make money right away, but did Amazon make money right away? No. Did Uber make money right away? No. But they will eventually, and we will change, and then we can continue living and enjoying this state.

Thank you.

ELLEN BURRELL: Hi, there. My name is Ellen Burrell, and I live in Cottonwood Heights, and I'm here to talk about transportation as it pertains to Wasatch Boulevard expansion.

And I appreciate UDOT's focus on improving the transportation and the mobility and reliability of the 2.4 miles of Wasatch Boulevard SR-210 through Cottonwood Heights. And I also feel that the focus on a metric of level of service is happening at the expense of the quality of life and the safety of a community that is all residential through that area.

I have come to learn in the last few years that this type of road widening is what is happening



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32.2.2PP

32.2.6.2.2A

32.2.6.2.2A

32.2.6.2.2A



throughout the residential areas of Salt Lake County, and so I want to go on record to state that I think that there are other forms of moving commuters that will be far more efficient and good for the environment, especially in the time of drought.

We do not want to lay down more asphalt unless it is absolutely necessary. So more asphalt and more parking lots both induce demand, and induced demand brings more VMT, vehicle miles traveled. The problem that my organization, Save Not Pave, has with all three of the main elements of the Little Cottonwood Canyon's EIS -- the gondola, and the additional land in Little Cottonwood Canyon, and also the widening of Wasatch Boulevard from its existing state of two to three lanes to a six or seven lane expansion -- because the shoulder lanes are designated for use by express buses.

So anyone who thinks that a three lane in balance sounds pretty benign, you need to look at the Brass tacks. And that is that where it shows a bicycle lane in the diagrams, that will be a shoulder utilized by express buses. So on any given day, there could be three private vehicular lanes of traffic running and two express bus lanes.

Transit only works when drivers are incentivized to use it, and the more we widen the road

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32.2.6.2.2A

32.2.9L

Comment: 13372

32.2.2P

32.2.6.2.2A



throughout Salt Lake County, the less incentive motorists have. If they can drive everywhere they want to go and get to the parking lot where everywhere they want to go, they will not lower their vehicle miles traveled.

We need safe roads that incentivize pedestrians through numerous crosswalks, buffered crosswalks, and buffered bike lanes. And until people can ride transit and active transportation to run errands, they are not going to do it.

Thank you.

RANDY LONG: Yes, I am Randy Long. I'm another long-time resident of Cottonwood Heights, since '59, and I'm a former skier myself and -- (inaudible.) And if I know the problems of Little Cottonwood Canyon, some of them, and Big Cottonwood too, both canyons need more slow lanes back on the uphill side. That's all they need, more slow lanes and more guardrails.

Other than that, Wasatch Boulevard needs to put foot bridges or tunnels under it. Draper City has several tunnels under their major roads, and they work perfect. I mean, foot tunnels work. All the others just are culverts, so therefore, they can't cost too much.

So we need that consideration. That is all. I'm an avid hiker and camper myself and have been for a long time. I have been a long-time member of Wasatch



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32.13D

Comment: 13373

32.1.2B
32.1.2D
32.2.7A
32.7B
32.7C



Mountain Club and several other wilderness organizations, as my badge implies here.

So, again, we need to -- we need to consider that. Wildlife is another problem that has not been addressed tonight, not very much anyway. If we would -- if we do widen Wasatch Boulevard, wildlife will go poof. It will go right out of there. The whole area is critical deer habitat, during the winter months, especially, and for other animals as well.

I have seen squirrels, chipmunks, snakes even, a number of them. So, again, we need to consider that, vacate.

LESLIE KOVACH: Good evening, my name's Leslie Kovach. I've lived in Cottonwood Heights for 36 years. I am here to talk about 592 million of Utah state taxpayer money that is going to support three businesses. Those would be Alta, Snowbird and CW Properties.

This is direct funding of their business models to improve their operations, their profits. And why are we as taxpayers funding the shiny object called the gondola? It is disguised as an environmental solution.

What concerns me as a resident of Cottonwood Heights and a season passholder of Snowbird, is the amount of traffic that will be directed to Wasatch

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32.2.6.5E

32.2.6.2.2A

32.4F

32.2.6.2.2A

32.2.9L



Boulevard to support the profit of these businesses.

In the time that I have lived in my -- in the time that I lived in my home on Wasatch Boulevard, I have watched our homeowners live through ski traffic that has become unruly and rude to the homeowners in the area. Speeds continue to increase on Wasatch Boulevard, endangering bicyclists and pedestrians alike.

In fact, Wasatch Boulevard has become a division of the residents on the east side of Wasatch from the larger Cottonwood community. UDOT's proposed expansion of Wasatch Boulevard to either the three lane imbalance or the five lane preferred, will increase traffic volume and speed and further isolate my community.

I would suggest that in more of a recreation asset, that UDOT use the $51 million cited in any of the alternatives to redesign Wasatch, to make it useful for the people who live there, and make it remain beautiful road -- a beautiful road to our recreational areas.

I do not want the proposed high-speed freeway from Alta to Snowbird, which only benefits tourists and not for residents.

I'm concerned, in addition, that the cities of Granite, Sandy and Draper seem to have let Cottonwood Heights shoulder the burden of the redesign of Wasatch.



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32.2.6.2.2A

32.2.2AA

32.2.6.2.2A

Comment: 13374



Currently, the expansion to the -- (inaudible) -- and 94th could expand further south, allowing more developments, like the proposed Ivory Homes near Pepperwood.

Many of the developments will be allowed where there is no transportation currently, except the use of private vehicles, which encourage wider roads and higher speeds.

I ask UDOT to consider other alternatives, other than expansions, which can be better used for more transit to the people who live on the east side of Salt Lake Valley, to move easily and efficiently to the university areas.

Look at ways toward the people who live along Wasatch, reduced traffic noise, increase accessibility to our city and community. If nothing else, reduce the speed on Wasatch to 35, as it is on the south side of Little Cottonwood Canyon.

So in closing, please, stand up for the citizens who live here. Thank you.

ROBERT JACOBS: My name is Robert Jacobs. I'm am a citizen of Cottonwood Heights. I just wanted to say that I have been to several of these public comment hearings about this particular project. The first one we were told this process was to be a new way of developing

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a project. The community mainly affected by the project was to be involved in the process from the start.

We were offered the possibility of things like beautifully landscaped roadside area, containing things like walking paths, off-road bike paths, lower speeds.

32.2.6.2.2A

What's the rush to travel our two little mile stretch of road? It's 60 seconds, the difference between 35 and 50 miles an hour. I spend way longer than that just to get out onto Wasatch Boulevard. Cottonwood Heights residents overwhelmingly rejected more lanes for Wasatch Boulevard. We want to see it more like the southern part of Wasatch Boulevard, south of 9400 South.

In my opinion, the gondola is the most egregious solution possible. It results in more vehicular traffic to our community, fewer parking spaces at the transportation hubs, which are designed to handle the increased traffic, and 1,500 new stalls in the middle of our community, with limited access and no planning to handle the increased traffic.

32.2.9E

32.2.6.5E

I see no plans to encourage the use of a gondola. According to your statistics, 2 percent of the people currently use the bus. What is being done to incentivize the gondola? Anything that would cause people to use the gondola would more easily allow them to

32.2.4A



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utilize buses.

I would suggest a more phased approach to this whole development, starting out by a toll at the canyons to improve bus service, including reduced fair subsidized by the tolls, at very little cost to the taxpayer, and see how that works before we try to decide whether we need a gondola or additional lanes.

32.2.9A
32.2.4A

The real problem we're trying to address is the slopes are already overcrowded and less enjoyable. These solutions do not to alleviate this real issue. It can only be addressed by limiting the total skiers allowed on the slopes, and not providing ways to exacerbate the real problem, making it possible for even more skiers to reach the slopes.

32.20C

Take a hint from the National Park Service, and see how they attempt to deal with overcrowded national parks. Thank you.

32.2.2I

Comment: 13375

DALE DRAPER: Thank you. Dale Draper.

When I was 10 years old, my family built a cabin up at Alta. And because of that, over the ensuing decades, I have gone up and down that canyon thousands of times. And I have a couple observations on the road.

First I would say, the existing road works probably 99 percent of the time. It works in the spring, the fall. It works in the summer, even at the worst of

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Oktoberfest, or the height of Oktoberfest. There's really only about 40 days a year it doesn't work, and that is when it is powder or a beautiful holiday and a lot of people are trying to get up at once.

32.1.4D

Some people said that was 20 days. I don't know what the real number is. But the funny thing is, that even though on those days, even when it takes 45 minutes to get from 7-Eleven to the mouth of the canyon, once you're in the canyon, the traffic starts to flow. It may take about a mile up the canyon, but at that point, the traffic starts to flow.

32.2.9C

So I think you do not need to add another bus lane in that canyon to get -- if you go to the bus route, to make it work. You'll have -- with tolling, you'll have reduced cars, and the buses can get there faster.

32.2.4A

Now, that is not the case with Wasatch Boulevard. Wasatch Boulevard is a terrible bottleneck, and I don't know how you do it. You need to get some way for those buses to pass the cars on Wasatch Boulevard. I heard someone say that you can ride on the shoulder. I don't know if that is true, but if that's not true, it's absolutely crazy to think you need a dedicated bus lane in the canyon but not on Wasatch Boulevard.

32.2.6.5A

So something needs to be done there. It could be lights that, you know, limit one lane to buses



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only on those certain days or whatever, but that problem has to be solved. So people will ride buses if they are efficient and reliable.

And I have taken the bus myself many times to Solitude. I love the fact that it takes me right to the bottom of the ski lift. I don't have to pay for parking. I don't have to park on the road and walk a mile to get there.

32.2.9A

I think buses can work. I think it's a solution that would solve a problem here, but I think it's also not necessary to have an additional lane in Little Cottonwood Canyon to have the bus solution work.

Thank you.

Comment: 13376

EMILY: Thank you. I don't think people realize how sacred the Cottonwoods are to Salt Lake residents and recreationists.

And to quote from a study of Big, Little and Millcreek Canyon that UDOT actually cited in their EIS, referring to Big and Little Cottonwood Canyon, "These canyons are cherished and many feel a deep, soulful connection to these places. It is also clear that many of visitors do not realize the rich social history and the importance of these canyons as watersheds for the valley below."

We should start with the solution that can be

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32.2.9A
32.2.4A

32.2.9C
32.2.9E

32.17A
32.17B

32.2.2B

Comment: 13377



expanded upon, that impacts the environment and beauty of the canyon the least, and that decreases the traffic problems in the canyons. People have already talked about implementing a toll, as well as increasing the buses. And I too support that, not that it really matters.

The gondola and five-lane highway will be present in the canyon during the non-winter months, and we will regret this forever. Nobody would be suggesting to put a gondola or highway through Zion National Park, yet here we are proposing to do the same in what I might argue is just as beautiful of a place.

They have the solution in Zion, and I'm standing here wondering why we are reinventing the wheel. Earlier, I talked to my legislator. I talked to my legislator, and he told me I was the only person in his district to reach out to him and tell him that I supported an alternative to the alternatives.

So I beg people here who care about Little Cottonwood, to reach out to their representatives and communicate what we want to see, if anything.

And, finally, this is not our land to destroy, it is not UDOT's land to destroy, but it is our responsibility to preserve this canyon. Thank you.

JORDAN TENNEY: Hi, my name is Jordan Tenney.



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32.1.2B
32.7B
32.7C
32.2.6.5E
32.13A
32.17A

32.1.2D
32.2.4A
32.7C
32.2.6.5E

32.2.4A



I'm a long-time Cottonwood Heights resident. I live in Golden Hills Subdivision. And my main purpose is to address the gondola.

My understanding is all of this -- purpose is to solve the traffic problems, but the gondola will not solve that problem. It will also permanently alter and damage the environmental and aesthetic quality of the canyon forever. Finally, it will alter and negatively affect the mouth of the canyon.

So first of all, the gondola does not actually solve traffic, it only shifts it and may actually increase it. The gondola is not capable of handling all of the demand. Additionally, there will still be congestion at the base station, while entering and exiting, and backing up on to the roads and near the neighborhoods. Many people will still be tied to their cars, anyway.

And, finally, a clear argument can be made that traffic will not be reduced at all. If you build it, they will come. With population growth, the same amount of cars will try to enter the canyon and use the gondola. Higher demand will be induced. The traffic problem will not be solved. That is the purpose here.

Additionally, this will all come into the cost of environmental and aesthetic degradation without

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solving traffic, from the bottom to the top of the canyon. It will be blemished and diminished. It is a geological wonder. It should not be ruined in that manner.

32.17A

It will also affect the open space and visual aspect of the canyon. That's undeniable. Additionally, it will affect people's homes and neighborhoods near the bay station. And as far as we know, there may not even be a lot of snow in the future, anyway.

32.4M
32.2.2E

And, finally, the mouth of the canyon, recently Cottonwood Heights and others, protected the 26 acres of open space. The bay station will be directly across the street from that. It will disrupt the views that were meant to be protected there. There will be new commercialism in the area, and this is a great cost to the canyon, which we all hope to protect.

32.4M

I do not believe the gondola is a good solution. I actually think it's a terrible solution. And that's pretty much it. So thank you.

32.2.9E

MICHAEL FINNERTY: My name is Michael Finnerty. I live adjacent to the Park & Ride on 9400 South and 20th East. I'm a lifetime resident of Utah. I lived in Sandy for 35 years now, and I have lived adjacent to that Park & Ride for 20 years.

Comment: 13378

And I'm here to tell you that given the



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current proposal for -- what you're proposing for that mobility hub is not feasibility, and I'm going to tell you why. First of all, you're looking to put a parking garage in there or a parking plaza three stories high. That would become the tallest structure in that area, including the commercial and retail areas.

32.4Q

It becomes -- that becomes the new landmark in that area. And I will bet there's nobody in here that wants to say, "Hey, if you need to find my house, you just go to that parking plaza and hang a left." I don't think anybody wants that. I don't want that.

The other issue is this: The way that you currently have it proposed, you're going to have the buses routing from Highland Drive up 95-10 and then into that parking. And first of all, 95-10 is nothing more than just a little residential street. It does not -- it is not sustainable to be running these buses up and down that at the volume that you want to run it every five minutes.

32.2.6.2.1E

If you -- even if you put 1,000 parking spaces in that parking accommodation area with the plaza, you run the risk of filling up that parking lot, just like it happens on many community events that we have in the area -- and what happens is that everybody starts parking on the interior street in the residential areas,

32.2.6.2.1E

Response Section in Chapter 32 ➥

32.10A

32.29D

Comment: 13379



and it becomes impassable.

The other issue you have is that you're recommending to put six buses staged within feet of the homes that are right there, that are adjacent to that parking garage or that parking lot. The fumes from the diesel and the noise will be insurmountable. I mean, it will be unsustainable.

So what I'm asking is first of all, reconsider what you're doing here with that parking lot. What you have proposed it is not going to work, because then in addition to that, as the buses are leaving and going north to 9400, then up the canyon, what happens is that becomes a thoroughfare for the buses instead of a parking lot.

So I'm asking you to please reconsider that as a mobility hub. Thank you.

JOHN BAKER: I didn't think there was any way I would be speaking tonight, so I don't have my comments prepared.

I'm a landowner in Granite Oaks, which is right adjacent to the proposed bay station of the gondola. I'm a large landowner there. In the process of selling land, some of my land.

Anyway, while the proposed gondola might negatively impact, or the bay station's tall parking



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32.2.9C

32.17B

32.17C

32.2.9D
32.17A



structure might negatively impact my land, I think -- I'm an engineer looking at the canyon. Putting in a highway, you're doubling the lanes up the canyon. Does not make a lot of sense to me.

I have traveled the world. I have driven through many, many snow sheds and they are ugly. I have driven through the Andes, from Chili over to Argentina and snow sheds, they dissolve -- the concrete dissolves. It leaks. It's difficult to maintain -- do the snow maintenance inside and maintain the lanes.

And I think that would be a permanent scar on the canyon. Without the snow sheds, doubling the traffic lanes makes no sense because of the avalanche exposure. So if you're going to do that, you need the snow sheds, and it's an ugly scar.

I'm not qualified to say about capacities, and, you know, are we solving a one-month issue by -- with a 12-month solution? But looking at the alternatives, I know a lot of people are passionate here about "give buses a try."

I think we have been doing that. Maybe it hasn't been done well. But it feels to me like a head-in-the-sand type wishful thinking as opposed to a permanent solution. The gondola makes sense to me. I don't see it scarring or marring the canyon. I think it

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32.2.2I

Comment: 13380

32.2.4A
32.7C

32.1.2B
32.1.2C



preserves the maximum amount of beauty given the options.

And, finally, it's out of the scope of what you're looking at, but I'd encourage to look at trying to solve some of the residents' concerns about widening Wasatch by looking at opportunities to extend the gondola further down into the valley. Maybe to Big Cottonwood Canyon or something where the amount of traffic flow could be handle well, and instead of needing to broaden Wasatch, etc., you take it down further as a second solution

Those are my thoughts. Thank you for your time.

NANCY BOCOLI: It's Nancy Bocoli, rhymes with brocoli, no R. I live in Sandy, 84093.

Every alternative presented includes additional parking in the valley, snow sheds on the road, and more buses. Every alternative requires big changes in the canyon and widening Wasatch Boulevard. But none of the alternatives solves the problems of too many cars in the canyon.

I use the canyon summer and winter, and it's not just the backed-up traffic in the winter. It's the parking lots, up and down both Big and Little Cottonwood Canyon, that are completely full on any summer Saturday and Sunday and often in the week.



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32.2.2B

32.2.6.2.2A

32.2.2B



There is a better alternative. All buses, no cars. If you take the cars out of the equation, you don't need to widen Wasatch. You don't need additional parking lots. You free up the parking lots that Alta and Snowbird pay a lot of money to maintain. They can do something else with them.

How do you take the cars out of the canyon? Simple. They do it in Zion. You have a shuttle system. You don't allow private cars.

Now, obviously, there have to be exceptions. Homeowners in the canyon can apply for permits, just like they get dog permits now. Every ski area should have a limited number of permits it can give out to key employees.

Canyon transport should still be able to drive their vans up there. We don't want people with a lot of luggage on the buses. And, obviously, emergency vehicles should have full access.

The benefits of an all-bus option over any of the proposed options are huge. It's about half the cost of the enhanced bus system with the widened road, because you don't need to widen the roads. You don't need to improve the parking lots at the -- in canyon uses. It would allow -- you would have a bus to Alta, you'd have a bus to Snowbird, and then you would have a local bus that

Response Section in Chapter 32 ➥



stopped at all the places in the canyon where people recreate. And there are many, and those people are ignored by your plan.

It would also be better than the other alternatives because buses, as somebody else mentioned, can always be updated. Technology improves. Easy to improve that technology.

So I suggest that you look at an all bus option. Ban private cars with a few permitted exceptions. And I'm sorry for the people that don't want the garages in their backyards, but they have to be somewhere in the valley if we are going to take the cars out of the canyon. Because as people have noted, we are not going to put less people in the canyon. But buses also allow us to control the number of people because there won't be that private car option.

Thank you.

Comment: 13381

STEVE GLAZER: So my name is Steve Glazer, and I live in Holladay. And one of the things I absolutely love about this area is the balance that we have between the ability to ski at the resort or recreation areas and the ability to get in the wilderness and get in the back country.

And my concern with the gondola solution is that it degrades one of the -- specifically the human



Response Section in Chapter 32 ➥



power of recreation, and -- as we try to solve the transportation issues. And I think that the EIS is very deficient in how it evaluates the impacts on non-resort skiers.

32.4A
32.4B

I could find one sentence where it says, "However, some recreation users may see the gondola as a negative visual impact, reducing the quality of the recreation experience."

32.4I

That's not an adequate summary. How many people would say, "You know, I really don't want to hike in Little Cottonwood Canyon anymore because I don't want to see the flashing lights on the gondola towers"?

And the EIS also does not address whether the gondola cars would have to have those flashing lights on them as well, because they will be above the 200 foot level for -- the FAA requires the lighting system.

32.17A

Also the analysis of the view impacts is very limited. None of the key observation points are on the north side of Little Cottonwood Canyon. None of the key observation points are along the ridge between Big and Little Cottonwood Canyons. There's no analysis of visual impacts of people in wilderness areas.

32.17A

I know that the EIS says that, you know, there's an exemption. You can't say, you know, limited development outside of the wilderness system because it

Response Section in Chapter 32

32.17A

32.4R

Comment: 13382

32.2.7C



would impact the wilderness. But at the same time, we are looking at the visual impacts by everybody who's not in the wilderness system right now. We are looking at them if you're on the road of Little Cottonwood Canyon, if you live in Cottonwood Heights, if you are anywhere else. And so therefore, we ought to also evaluate the visual impacts on people in the wilderness system as well.

And so let's see what a comprehensive evaluation would be. You know, would all of a sudden there be these overwhelming hikers at the S-curve even more because they are leaving Little Cottonwood Canyon? I don't know. But that needs to be considered.

Thank you.

JOSHUA WISE: Hi, Joshua Wise. Thank you for all the effort that went into these proposals.

I live in Sandy, 94th and Highland, just like the gentleman who spoke a few minutes ago, in the neighborhood tucked in directly behind the Park & Ride. And I won't go through all the argument he made. He articulated them very well.

What we got on the table that I see are two proposals that are high dollar, high impact, regardless of which community you live in. And really disappointed that we are not seeing any proposals that are low dollar,



Response Section in Chapter 32

32.4Q

32.2.6.2.1D

32.2.2FF

32.2.6.3D

32.4S



low impact.

We have resources available right now, and I can tell you that the gentleman before -- who spoke before, is correct. A garage at 94th and Highland will ruin our community, our entire neighborhood. It will completely devalue where we live, not only financially but from an aesthetic standpoint.

I don't see any plans for how to deal with any of the traffic related to any of that. And so I think that's a huge concern. It really bothers me that I'm not seeing any suggestions when we've got a Shopko and a Fresh Market that are completely empty. There are never cars at those, ever.

So there are resources available to us now. There are buses available to us now. It would be really nice to see some proposals that are incremental so that we can learn what impacts really are. We could use these parking lots. We could add on buses. We could get data-driven decisions on how the solutions would work.

I would also be interested to hear about a compensatory proposal. If you're going to devalue and ruin my community, I would like to know what you can do to compensate us. I find it very frustrating that there's nothing related to that, related in any of this.

We're talking about half a billion dollars.

Response Section in Chapter 32 ➥

32.1.4D

32.2.7C

Comment: 13383

32.1.4D
32.1.2B



I cannot get my head around that. And as far as the usage numbers that are concerned, to me, it seems like, you know, 15 to 30 days a year where it's really a problem. I know some people suggested other numbers. I don't have an accurate number on that.

But half a billion dollars to deal with an intermittent issue seems like there's a lot left on the table that hasn't been explored yet. And I would really like to see a little bit more about what low dollar, low impact solutions could be proposed.

Thanks very much.

SCOTT STODDARD: Hello, I'm Scott Stoddard, and I'm a video game designer from Murray, Utah.

I love Little Cottonwood Canyon. Over the past year, I have gone there almost every day, through all four seasons; somewhere between 2- and 300 times, I would guess.

It's hard to put into words the powerful feelings when entering the canyon. As the cliffs cascade into view, it washes over you and it never gets old. Of those hundreds of times that I've entered the canyon over the past year, I have encountered traffic problems exactly zero times.

To be fair, I tend to avoid heavy snow days because it interferes with my primary use of the canyon,



Response Section in Chapter 32 ➥

32.1.4D
32.1.2B
32.1.2D
32.2.7A
32.7B
32.7C

32.7C

32.17A
32.17B

32.1.2B

32.17A

32.2.2Y



which is hiking and bouldering. I also tend to go in the afternoon during the colder winter months. This leaves me with the impression that the traffic problems being discussed overwhelmingly affects one kind of canyon user, skiers; and even those, at relatively limited times during the year.

As a game designer, I recognize that every project needs designed pillars that govern decisions. I appreciate the goal of consistent travel times to the resorts, but what about travel times to our beloved and historic boulder areas? What about travel times to the beautiful open views of the canyon?

Those things will be gone. The travel time will be infinite. And it's hard to look at these plans that would destroy those things in order to make travel time to a ski resort a couple times of year a few minutes faster. It seems like a bad tradeoff.

I would like to see UDOT create and publish renderings that accurately portray the gondola system, from popular scenic viewpoint and bouldering areas in the canyon, so that the public could see what it would do.

I really liked, when I listened to the podcast, the tolling system. I think it's really good. It's cheap. You can put it in quickly. It's changeable. You can iterate -- you can learn a lot from it. You can

Response Section in Chapter 32 ➥



do that next year. I don't know how long it takes to creates, but a lot faster than putting in these other systems.

And I mean, try 20 bucks, try 30 bucks, try 200 bucks, one day will be really uncomfortable but a lot less uncomfortable than a permanent gondola system that costs half a billion dollars. 32.2.4A

Let's learn from that quickly with better bussing, and get real proof that these things will actually solve the problem and not just go off of these designs and do these crazy things without more information. Thank you. 32.2.9A

(The meeting was concluded at 8:30 P.M.)





REPORTER'S CERTIFICATE

State of Utah )
)
County of Salt Lake )

I hereby certify that said meeting was taken at the time and place herein named;

That the testimony of said witnesses were reported by me in stenotype and thereafter transcribed into typewritten form.

I further certify that I am not of kin or otherwise associated with any of the parties of said cause of action and that I am not interested in the events thereof.

IN WITNESS WHEREOF, I set my hand this 30th day of July, 2021.

Kellie Peterson, RPR

COTTONWOOD CANYON ENVIRONMENTAL IMPACT

PUBLIC HEARING COMMENTS

July 13, 2021

DEPOMAXMERIT
LITIGATION SERVICES

333 South Rio Grande
Salt Lake City, Utah 84101
www.DepoMaxMerit.com

Toll Free 800-337-6629
Phone 801-328-1188
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LITTLE COTTONWOOD CANYON

ENVIRONMENTAL IMPACT STATEMENT

S.R. 210|WASATCH BOULEVARD TO ALTA

-oOo-

PUBLIC HEARING COMMENTS

July 13, 2021

4:30 p.m. to 8:30 p.m.

Butler Middle School
7530 South 2700 East
Cottonwood Heights, Utah

* * *

Reported by Letitia L. Meredith
Registered Professional Reporter
Certified Shorthand Reporter CA



Letitia L. Meredith, RPR
DepomaxMerit Litigation Services

I N D E X





**Response Section in Chapter 32** ➥

**Comment: 13384**

**32.2.4A**

**32.2.4A**



P U B L I C C O M M E N T S

TOM GALLIE: Tom Gallie, 7058 South [redacted]

First comment, make upper S.R. 210 an automated toll road during ski season. Neither the bus proposal nor the gondola proposal will be successful unless either of these public transportation options is made more attractive than private transportation.

Any public transportation option will be underutilized because users will continue to drive their cars up the canyon no matter what the parking situation unless UTA creates resistance to this behavior. Make private transportation less attractive by putting a significant price on winter access.

The EIS mentions that tolls are under study. Make automated tolls a pillar of the proposal so that whatever plan is selected can produce the desired result. Place the automated toll above White Pine Trial Head parking lot so that low impact rock and ice climbers, south side, back country skiers are not impacted.

Point number two, chose electricity, parentheses, the gondola, rather than fossil fuels,

Response Section in Chapter 32 ➥

32.18A

32.2.6.5P

32.10A

Comment: 13385

32.29CC



parentheses, buses. We are nearing a climate emergency, and time for action is running out. We must not select a 20th century solution to a 21st century problem.

The EIS states that the price of both systems is roughly equivalent over 30 years, so there is no built-in green premium to selecting the gondola. Rocky Mountain Power is moving, albeit slowly, towards a green grid, eventually making the gondola carbon free.

However, for a minor premium, UTA can purchase renewable energy offsets from Rocky Mountain Power today, making the gondola carbon free from day one, thomgallie@gmail.com.

* * * *

ROB KERTESZ: Rob Kertesz, K-e-r-t-e-s-z, and my comment is, in this process, the public is not going to be able to review the written comments that have been submitted until after the public comment period is completed, and I don't think that's right. I think that needs to be revisited; and that those comments -- in live time, not summarized -- should be available for the public to see, part of the public record.

* * * *



Response Section in Chapter 32 ➥

Comment: 13386

32.2.9L

32.2.6.2.2A

32.2.2B

32.2.2L

Comment: 13387



MELONIE SYNDER: Melonie Snyder, I just want to say I'm against widening Wasatch Boulevard. I don't think that's any solution to bring more cars into the area. They need to work with what they've got. Building a tram is an interesting idea, but I think maybe we should start by just requiring everyone to take the bus, you know, then you're not going to build -- I don't know how many billions of dollars the thing is going to cost. But let's do that first. Let's start with the minimum. Just cut off the road cars and require everyone to take the bus -- simple. That's my thoughts. Probably unrealistic but --

* * * *

JOYCE WALKER: I'm Joyce Walker. I reside at 2486 East Sego Lily Drive. I've lived there for 27 years, have been very active in my community. I am a member of the Dimple Dell Preservation Community, the Dimple Dell Regional Park is my backyard.

So the outdoors and the impact and enjoyment of our canyons are very high on my priority list. I am a user of the outdoor spaces around me. Looking at the options and having done reading and studying for probably five or six months, I would

Response Section in Chapter 32 ➥

32.2.9D

32.2.2K

32.2.6.5H

32.29F



like to see the gondola system go into place. I think that, environmentally, the gondola has the least environmental impact on the canyon.

I see some advantages to the gondola in the fact that it probably could operate at times when the road might be closed due to heavy snowfall. I suspect it would make transportation of the employees to the ski resorts more viable. Their cars will be taken out of the impact picture for parking.

I would think that supplies, food, et cetera, could go up and down the canyon even in conditions when the road might be blocked. I also think it might have advantage for emergency situations. If there was a seriously injured skier and the canyon was congested, I believe it would probably be a more efficient method to transport people down.

And I especially like the idea that, if the gondola system is put into place, that the ski resort owners have committed to take a lot of their acreage that's already approved for development and put it into a protected -- what's the word? -- environmentally protected, non- -- a preservation easement. So those are the advantages I see there.



Response Section in Chapter 32 ➥

32.2.9M

32.2.9K

32.17C

32.10A
32.2.6.3F

Comment: 13388

32.2.9N



I don't like the cog rail concept because I think it would involve a great deal of excavation and change to the canyon walls, and the overpass concept is really unsightly. I don't object to the snow sheds in the fact that they offer safety, but I don't like the idea that snow sheds would be blocking so much of the beautiful visual as people are driving up and down the canyon.

And I think the buses are very inefficient with the amount of smog and pollution that they put out going up and down the canyon. And personally, having been a skier for many years and going up in the safety of my four-wheel drive vehicles, I really don't know that I want to be on a great big bus that would have the ability to slide off the canyon road into the river.

* * * *

MICHAEL MARTIN: Michael Martin. I have two concerns, one, in talking to our neighbors, this is pretty much already a done deal. He said that the environmental impact statement says no more public comments are allowed -- or to be taken unless they're environmental. That's what he said UDOT environment statement says, so that was one concern.

And number two was, again, in talking to

**Response Section in Chapter 32** ➥

**32.2.6.2.2A**



our neighbors -- we're trying to get information squared away -- that this issue of widening Wasatch was being bundled with the issue of access to the Snowbird and Alta and it was going to be bundled as one issue to get the Wasatch through and not kept a separate issue, and that was a concern for us too.

* * * *

(End of public comments, 8:30 p.m.)





C E R T I F I C A T E

STATE OF UTAH )
)
COUNTY OF UTAH )

THIS IS TO CERTIFY that the foregoing public comments were taken before me, Letitia L. Meredith, Registered Professional Reporter and Notary Public in and for the State of Utah and State of California.

That the public comments were reported by me in Stenotype, and thereafter transcribed by computer under my supervision, and that a full, true, and correct transcription is set forth in the foregoing pages.

I further certify that I am not of kin or otherwise associated with any of the parties to said cause of action, and that I am not interested in the event thereof's.

WITNESS MY HAND and official seal at Spanish Fork, Utah, this 27th day of July 2021.

Letitia L. Meredith, CSR, RPR

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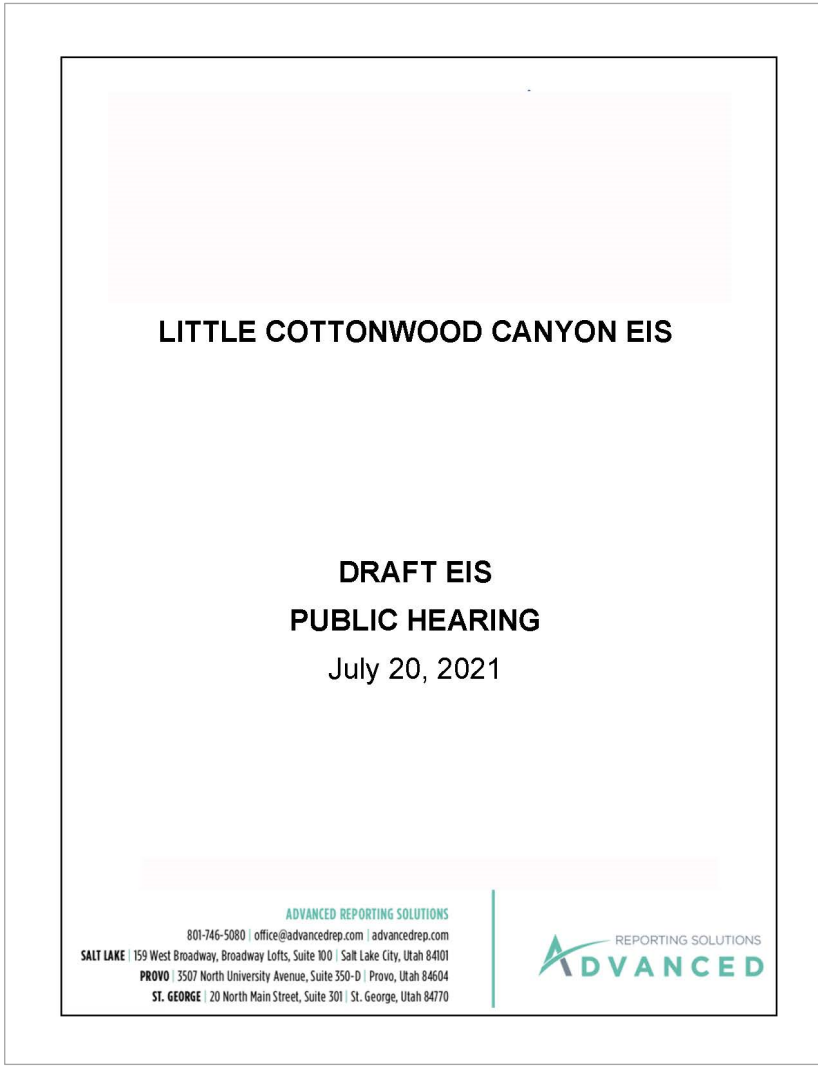

Little Cottonwood Canyon
Environmental Impact Statement
S.R. 210/Wasatch Boulevard to Alta

Draft EIS Public Hearing

Taken on Tuesday, July 20, 2021
at 6:00 P.M.

Taken through Zoom

Reported by: Kellie Peterson, RPR, CSR



**Response Section in Chapter 3**
**2**

**Comment: 13389**



July 20, 2021 6:30 P.M.

P R O C E E D I N G S

CHRISTOPHER ROBINSON: Thank you. I'm Chris Robinson. I'm here as the chair of the Central Wasatch Commission, and with me is executive director Ralph Becker. We represent seven towns and cities in and around the central Wasatch, as well as two counties; Summit and Salt Lake, and UTA as an ex officio member.

We have spent the last couple of years working hard to try to analyze a mountain transportation system for the central Wasatch and have been unable to come up with consensus on a mode. But on the 7th of June, we arrived at consensus on a -- what we call a pillars document.

And the pillars consist of six points: Visitor use capacity; watershed protection; traffic demand management, parking, and bus or other transit strategies; integration into the broader regional transportation network; year round transit service; and long-term protection of critical areas through federal legislation. And these pillars can be found at cwc.utah.gov under transportation on our website.

I wanted to briefly discuss those. The first one on visitor use, the concern is a risk of overuse, that some of these modes could result in a lot more

Response Section in Chapter 32

32.20A
32.20B
32.20C
32.20E
32.12A
32.12B
32.1.2B
32.1.2D
32.2.4A
32.2.6.3C
32.2.2I



people visiting the canyon, which would have negative environmental safety, water resource and visitor use consequences. And so whichever mode it should -- is chosen, we think that an appropriate visitor use strategy should be included in the management plans.

The next one is watershed protection. We know that 450,000 Salt Lake County and other residents depend on this for water and watershed. And it's probably, among our members, the single most important one, and strategy should be used to mitigate and minimize impact on that.

The traffic demand management and parking of bus and other transit strategy, what we mean by that is both the roadways leading to the canyons, as well as the canyons themselves, should have strategies employed using bus and parking and transit to provide also access to dispersed locations.

I'm moving fast because I can see the clicker.

Integration into the broader regional transportation network: It's one thing to just look at the roadways -- the Little Cottonwood Canyon and from the gravel pit and the mouth of Big, but we think attention to the valley-wise transit should be important.

And under year round transit service, what we



Response Section in Chapter 32

32.1.2C
32.29F

Comment: 13390



mean by that is basically that there should be transit service to other areas in the -- within the canyon.

And, finally, perhaps most importantly, we think that coupled with the transit chosen or the mode chosen, there should be federal protections, like the Central Wasatch National Conservation and Recreation Area Act to provide appropriate land protections and natural resource protections.

So, Josh, I see my time is up. You have heard all of this before. You can get the full text of our pillars, and unfortunately, we weren't able to come to a census on a mode, but we are going to continue, as a commission, to study what happens and to try to seek consensus.

Our members may have differing opinions on modes and things, but this is as far as we can go.

And I'm sorry that I didn't have any time for Ralph. That was a quick three minutes, unless Ralph has a parting comment.

SUSIE ALBERTSON: I've been working on the traffic congestion for -- I think it's been seven, eight years now. And I live right on 210 in Little Cottonwood Canyon, so I'm aware daily of what the problems are.

And I -- first when analyzing, I started speaking to the police officers, and they said that the

Response Section in Chapter 32



problem is most of the ski resort employees are driving by themselves in their car. So for years and years, I kept recommending that the ski resorts get their people in buses or at least carpooling.

32.2.4A

Since they have done that, the traffic problems up this canyon have now -- have been reduced to only ten -- ten days a year for a few hours. It used to be 20 days a year for a few hours. So cut it in half just by -- just by them starting to carpool.

32.1.4D

If most of those employees were on buses, we wouldn't need to be destroying the canyon with a four-lane highway. I mean, that's outrageous. And we all know that once we start expanding roads, that never ends.

32.2.6.3B
32.2.9C

And I'm not thrilled with the gondola either, but out of the two, it's better than the road expansion of a highway. And it's interesting that it's just referred to with these benign -- you know, it's a buffer lane or something, instead of what it is. It's a four-lane highway.

32.2.9E

I think the tolling, the snow sheds, and if most of the ski resort employees got in buses, that this would eliminate most of the problem. And especially on avalanche days, because they are called at 5 in the morning and told to line up in the canyon, and so that is

32.2.6.3B



Response Section in Chapter 32



the ski traffic on those days.

And no one has ever been able to argue against that because it's the truth, and once those things are solved, those things are taken care of first, then we can go look at something -- you know, maybe a gondola or something else later on down the road.

But these other problems -- these other things, the toll lane, the -- and resort employees in buses is -- and the snow sheds will help eliminate a lot of it. Like I said, this problem is only ten days a year for a few hours. We shouldn't destroy the canyon for that. And that's it.

Thank you.

Comment: 13391

PATRICK SHEA: Thank you for the opportunity to make my observations. I have five. We need to look at the future, not be stranded by the past and the financial avenues and favors that seem to have dictated much of the road building in Utah.

No. 2, it is imperative that there be a comment period after the final EIS and before the ROD. Having worked on many EISs, both as a government agency and as a private individual, I find it highly unusual, on a half a billion dollar project, that there is no period for comments after the final EIS.

32.2.9V

If you look at the dollars, the snow sheds

Response Section in Chapter 32 ➥

32.2.7C

32.29D or 32.2.2D

32.2.4A 32.2.2Y

32.1.5B

32.2.2E



are $86 million, that will give you four to five more days a year without problems. The road alignment of $183 million does not make sense, when most of the highway now, that is SR-210, is three lanes.

Those areas where it narrows down to two lanes, they have a semaphore both going up and coming down 100 yards before. When a bus arrives there, the semaphore would go down. The bus would merge into the traffic, and as soon as it was three lanes again, the bus would exit on to the third lane for buses.

We need to start immediately tolling. And it is important not to have that money siphoned off to things outside the canyon, but as within Millcreek and the tolling there, it should be kept in the canyon, for the benefit of maintaining the canyon, its environment and its ecosystem.

The gondola, in my judgment, is simply a trojan horse for an interconnect. I would imagine that if UDOT comes up with the gondola as their alternative choice, that within a few years, there will be a clamoring, both by the mayor of Brighton and by the legislative individuals who were going to profit from the La Caille location of the gondola, to say, "Hey, let's just move it on to Brighton and on to Park City. And then even with climate change, we will still have plenty



Response Section in Chapter 32 ➥

32.12A
32.12B
32.13A
32.13B

Comment: 13392

32.2.9E
32.2.6.5A



of areas to ski in."

So I just hope that we would not spend $368 million, when, for $142 [sic], we could make the necessary change to avoid the congestion and keep the ecosystem and the watershed in very good shape.

Thank you.

LEO BALITSKIY: Thank you for this opportunity to express my opinion. Thank you, Josh, for the hard work in selecting those final -- final lists. However, I'm still seeing there are a few items that were missing specifically to the system flexibility and the liquidation for each of the systems and experience risks with each of the systems.

So there are two types of mistakes that could be -- could happen with such a complex project. Some of them are reversible, some of them are irreversible. In my opinion, gondola could be the huge, irreversible mistake that could happen with our canyon, which will permanently turn the canyon into an amusement park.

And, again, this is -- that will be the permanent -- permanent catastrophe. It was very -- I was surprised to see that even the gondola actually went into the final list -- into the list of finalists.

Gondola is technically a fixed structure. I hope everyone understands this. It cannot be -- you

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32.2.6.5N

32.2.6.5BB

32.2.6.5K



cannot do much after it's built. Parking structure, any auxiliary businesses, all must resolve around those fixed points of entrance and exit, and you cannot change after that. Once you spent money, with a gondola, there is no -- no changes, no upgrades. The capacity is limited, and it will be nearly to impossible to do any changes after it's built.

And since it is also unique and custom tailored to this -- to this specific canyon, there will be no improvement -- no room for the improvement. Since it's a novelty, and I don't think Utah Department of Transportation has enough experience how to deal with the cable -- with the cable routes rather than bus systems. It's like known probably for decades, and how to lay the roads. We know how to deal with for hundreds of years.

It also will be -- with a gondola, it will be a long balance -- a long period of system balancing and removing any bugs and quirks. Some of them might be serious that cannot be -- can only be discovered after a couple of years of operations, like you can discover that some towers overloaded, some under-loaded.

There were some small issues like lines spilling on the roadways and posing any other issues which could be serious in the future. So don't do this irreversible mistake.



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Comment: 13393

32.2.4A

32.2.4A

32.2.6.5E



THERESA HEINRICH: My name is Theresa Heinrich, and I have lived at the mouth of Little Cottonwood Canyon for 25 years. My house is right across the street from the Park & Ride. I worked at Snowbird for 30 years, and I took the bus most of the time.

I feel that I have a grasp of the demographics of the skiers and the snowboarders who use Little Cottonwood Canyon. They are mostly locals. I can look out my front window every day of the week and see the cars in the wintertime. Usually, there's one person in every car.

There are a lot of people who drive up Little Cottonwood Canyon and ski every day. How can UDOT incentivize these people to take the bus? Did UDOT think about sending a survey to all the passholders at Snowbird and Alta? Ask them if they would ride the gondola every time they go to ski.

I don't think the majority of the skiers will take the gondola. First of all, it takes too long. For instance, if they live in Sugar House, they get on the freeway, they inch their way up Wasatch Boulevard in bumper-to-bumper traffic, park, ride the gondola. How long does that actually take? UDOT says it takes about 59 minutes.

Now, what about the tourists? If there's a

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32.2.4A

32.2.4A

32.2.9L

32.20H



family of four staying at a downtown hotel, they might think it's a novelty to take the gondola, but if they are on vacation for a week, are they going to take a gondola every day? Probably not. It's too expensive, time consuming and inconvenient.

Which brings up the point, how can the public decide if they really want a gondola, if UDOT hasn't really come up with a price? I realize Snowbird says they will subsidize employees and season passholders when they ride the gondola, but it would be nice if we know about somewhere how much the ticket would cost.

I don't think we need to widen Wasatch Boulevard either. I was at a meeting on July 13th at Butler Middle School, and I listened to all the public comments. One of the comments was from a person who owns the land at the gondola site. He stated that he is preserving the site at La Caille from development.

Now how is building a gondola and a parking garage that accommodates 1,500 cars preserving the site at the development? If that property is developed with homes instead of a gondola, I think that's much better use of the land. We can implement bus travel right away.

Lastly, Little Cottonwood Canyon has incredible views everywhere. Everywhere you look. It is described at the most striking glacial surroundings in



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32.17A
32.17B

Comment: 13394

32.2.6F

32.2.6.2.1F

32.2.4A



the Wasatch Range. Why should we install permanent towers and gondolas and destroy the beauty of the canyon for the few days that are needed?

We only have one Little Cottonwood Canyon. Let's keep the majestic beauty of it for the generations to come. Thank you.

ISAAC STEWART: Thanks for inviting me for my comments. I wanted to propose an alternative to having an expanded Park & Ride set at 9400 South and Highland. Some of my and my neighbors' concerns of having an expansion there is that -- the increased traffic.

A couple years ago, we had several hundred unit apartment complexes installed there that's added to the traffic. We already have a panhandling problem. And I've spoken to the Sandy City Police, and Trax and basically the bus have spreaded [sic] the panhandling problem across the valley.

Another issue is that the 20 to $30 million used to expand that location will only be used during the winter.

And, lastly, which I think is the biggest issue, is that expanding the 9400 South and Highland location will not serve ski tourists from out of state, as there are no hotels in the area. It's hard to imagine a tourist who pays over $100 for a rental car per day, to

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32.2.6.2.1D

32.2.2ZZ



drive their rental car to the hotel and then drive their rental car --

(Technological difficulties.)

-- canyon. So, again, I think this is one of the biggest concerns besides my personal -- my neighbors' concerns, the growth and the impact of traffic there. As an alternative, I would like to propose a bus hub, if you're going to do the bus option, at 106 South and State, in or around the South Town Mall.

I have actually spoken to the management at South Town Mall, and they said they'd be more than happy to dialogue with UDOT and the state about their location being part of the solution for this canyon transportation.

A couple nice advantages of having the bus station there is that there's 12 hotels in the area. Out-of-state skiers could take an express UTA bus from Salt Lake Airport to their hotel in the area. They could wake up in the morning, get on the bus that goes straight to the resorts. They can take the bus back to their hotel, walk across the street, and go out to eat and shop.

This option allows out-of-state skiers not to have to rent a car. They can take a bus, like I said, or an Uber. And this option would reduce traffic in not



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32.2.6.2.1E

32.2.6.2.1F

32.1.2B

32.29BB

Comment: 13395



only my neighborhood but all the other neighborhoods. This option is more environmentally friendly, as it results in less cars not only in the canyon but just in our general streets, because, again, these out-of-state tourists could just not have to rent a car.

The other big thing is that this station can be dual purposed. It can be used by I-15 commuters during all time -- all periods, whereas that other option at 9400 South and Highland is pretty much going to be used during the winter.

And this thing -- I mean, I-15 is a huge -- is a huge traffic issue, and it is only going to get worse. If you're going to spend a half billion dollars, you really need to include something just besides solving the canyon issue.

Getting it to the out-of-state skiers, you know, UDOT really needs to find out how many -- what percentage of the traffic in the canyon is due to out of state, because I've read articles in the Salt Lake Tribune that up to 30 percent of the cars in the ski parking lot are rentals.

BRIAN KISSMER: This will be quick, sorry. I got a lot here.

Hi, my name is Brian Kissmer. I am a doctoral student studying ecology and computational

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genomics at Utah State University. I'm here to explain why the proposed gondola project will not effectively reduce traffic to the ski resorts, while providing a more economically and ecologically sustainable alternative.

So according to the law of induced demand, access to a supply of a commodity increases, here being access to local ski resorts, if there is still sufficient demand, then more of that commodity will be consumed overall.

32.2.4A

32.20E

In other words, the cars that are removed from the road by the gondola will simply be replaced by more cars. To get to the demand to get into the canyon is especially high that more people will capitalize on the increased capacity.

32.20E

The draft EIS does not account for the increase in demand to drive up the canyon after the perceived increase in roadway capacity following the construction of the gondola, providing that a similar lack of traction enforcement is in place after the gondola's installment, traffic will likely return to its original levels due to congestion and ill-prepared drivers.

32.20E

So my proposed alternative is similar to the method used by Zion National Park which sees over 6 million visitors per year. I'm suggesting a construction



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of a parking garage at the gravel lot, with an all electric bus fleet, shuttling skiers to the ski resort, without the option of driving up themselves during peak hours.

32.2.2B

32.2.2L

So the Proterra Catalyst leads to an all electric chartered bus that has been shown that it can compete in both diesel and EV competitors for symmetric, including maximum tail grade, climb, speed and mete of cost. It has the world record for the largest single drive in an electric bus for a single charge and has a recharge rate of about six hours.

32.2.6.3F

The cost of a single bus is about $750,000, which is higher than that of a diesel bus, which is $500,000, but the maintenance cost for the Proterra are, on average, 30 percent cheaper than the cost of a diesel bus. The average lifetime maintenance costs of an ecologic bus is 60 cents a mile versus 85 cents a mile for the average diesel bus.

The cost of 30 Proterra Catalyst E2 buses totals about $22.5 million. Additional charging ports costs about $50,000 each, for a total cost of 1.5 million. Total operational and maintenance cost for 30 buses over a lifespan of 250,000 miles, or 12 years, is approximately 4.5 million.

Closing the road to private vehicles during

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32.2.2B

32.2.7A



peak hours will remove the apparent necessity to increase the number of lanes within the canyon, cutting down on renovation costs. It will also prevent a handful of ill-prepared drivers from slowing down the entire chain of commuters in the event of inclement weather.

The combined efforts of our current bus and the additional ecological buses would sufficiently cover the amount of commuters to the resorts. And the reduction of traffic congestion through closing the road would increase the turnaround rates for buses as they return to the parking area to pick up more passengers.

Finally, if the gravel lot does not provide enough parking for drivers that would normally drive themselves during peak hours, high estimates for the construction of the parking garage give a cost of about $28,000 per space, $14.2 million for the garage and 500 parking spaces.

Building a parking garage will reduce the amount of square footage required to house the cars and passengers and remove the necessity for developing within the canyon. Doing the bus fleet and the parking garage with a liberal estimate would add up to about to 42.7 million or 7.21 percent of the $592 million price tag of the gondola system.

If the bus fleet is completely replaced after



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32.2.2B

Comment: 13396

32.2.9D



12 years, the cost would be about 71.2 million, or 11 percent of the gondola project. Furthermore, this project could be extended easily or scaled, if my estimates are too low to accommodate the amount of commuters without ever coming close to the price of the proposed gondola project.

Thank you.

ONNO WIERINGA: Thank you very much. My computer is about ready to die. This is perfect timing. Thank you very much.

I'm Onno Wieringa. I spent 44 years in Little Cottonwood Canyon working for the Alta Ski Lift Company, and I'm here today representing the Leitner-Poma lift company out of Grand Junction, Colorado. Leitner-Poma builds gondolas all over the world and works with cities all over the world that use gondolas and air space to help solve traffic problems when they run out of space on the ground. So we obviously think the gondola is a great choice.

Josh did a great job of laying out the pros and cons of both, and there's pros and cons to both these alternatives. We're responding to what UDOT asked, to give comment on -- based on their purpose and need for improving reliability, mobility, and safety.

Gondola B uses air space that has distinct

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advantages of adding variety to the modes that UDOT uses and to -- using a space that isn't impacted by snow; you know, maybe enough snow on some days, but realistically isn't affected by snow. And as we know, snow and road conditions in Little Cottonwood Canyon is a huge thing.

Gondola wouldn't interfere with UDOT's maintenance or avalanche control work, or gondola, again, doesn't have to deal with accumulating snow, which is a huge deal. And gondola only provides however many people per hour of delivery that UDOT wants it to. It is a very specific capacity designed and build and paid for by UDOT, so very good.

32.2.6.5K

A really important measure is gondolas have the best safety record of anything, by any measure, that you can have for providing a safe experience for residents and visitors to go up and down Little Cottonwood Canyon. We will provide the numbers that we think are rock solid about it, and the car safety for cars and buses.

And that's before you even factor in the reality that Little Cottonwood Canyon has the highest avalanche hazard index of any highway in North America. And to use a space that doesn't add more lane miles to travel through the avalanche zones would be huge.

Beyond that, it would be a great ride for



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people to go take a scenic ride up and down the canyon. And a gondola doesn't use more salt as lane miles would or anything else.

So congratulations to you, UDOT. Nice process. Thank you very much.

CHRISTOPHER HACON: Perfect. Thank you for the opportunity. So I think this issue really affects me negatively as a taxpayer, a skier, a hiker, a climber, and a nature lover.

Comment: 13397

I really think it's irresponsible to spend this much money on a project that's just going to mainly benefit two skiing resorts at the expense of so many others. It's going to harm all of those groups that I mentioned above, and it's just going to encourage more development of the canyon.

32.1.2D
32.2.7A
32.7B
32.7C
32.20F

And we really need to protect the beautiful environment of this canyon, and the nature for future generations. It will be a real shame to destroy this canyon.

32.13A
32.13B
32.17A
32.17B

I agree with lots of the negative comments that have been made so far, but I would like to also mention how it will impact negatively the climbing community.

32.4A
32.4B

In Salt Lake, we have a world-class climbing community, including Olympic athletes, and people come

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from all the world to climb here. And you may not know, but Little Cottonwood Canyon is peppered with boulders that have some world-famous climbs on them, and several of these will surely be destroyed in this construction process.

This will be noticed internationally, and it has negative effects on us, especially in terms of the outdoor recreation industry, when we act irresponsible towards the environment, it gets noticed around the country and in the world.

32.6D

And it does have a negative economic benefit, amongst other things. I will leave it at that. Thank you very much.

Comment: 13398

HENRY HARTZLER: Hello, my name is Henry Hartzler. I'm a resident of Midvale. I'm also an active skier and climber in our community, as well as a 4th grade teacher at Midvale Elementary.

I would first just like to echo the thoughts of the Salt Lake Climbers Alliance, and that the SLCA proposes that before any permanent changes are made to Little Cottonwood Canyon that would forever alter the landscape, a new alternative, based on expanded bus service, coupled with tolling and other traffic mitigation strategies, be analyzed. That includes first recreation transit needs. Alternatives that physically

32.4A
32.4B
32.4P
32.2.9A
32.2.4A



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and permanently alter Little Cottonwood Canyon should only be considered after less impactful options have been implemented and shown not to be effective.

As I stated before, I'm a regular user of Little Cottonwood Canyon. After work, almost every day, on the fall and spring days, I'm up in Little Cottonwood Canyon bouldering. The boulders next to the side of the road are some of, like Christopher said, the most well-known lines from around the world, including first ascent by people who have traveled as far as United Kingdom and other countries.

To permanently destroy these problems is destroying climbing history, and does not allow for our community to access it for the expense of the ski resorts and the skiing community.

32.4A
32.4B
32.2.7A

Now as a user of both groups, I do see the benefits of that side, but I would please encourage UDOT to consider the enhanced bus alternative that does not widen the road, coupled with tolling, traffic mitigation strategies, and as Brian stated before, a bus service patterned after the use of Zion National Park, which I have frequented as well.

32.2.9A
32.2.4A

These are nonpermanent strategies that we can then assess to see what changes we do need to make in the future. But once we destroy these climbs, these

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boulders, there's no going back. They are gone forever. Future generations cannot use them.

I recently saw world champions that were brought in from the World Cup Championships that we hosted two in Salt Lake early this summer, and I saw world-class champions climbing side by side with me on these roadside boulders in Little Cottonwood Canyon. To destroy this, we can't take it back.

So I, again, just want to reiterate, we should try less evasive strategies first that are nonpermanent, and we can go from there. Thank you. I yield the rest of my time.

Comment: 13399

COLE FOX: So I just wanted to kind of address this. I don't think either of these solutions are really going to fix the problem here, because I don't think we are looking at the right problem. I think the problem -- you know, it's not that, you know, there's too many cars in the canyon at once.

32.1.2B
32.2.4A

We have got, theoretically, the entire valley who wants a very finite number of parking spaces. And so before we go and spend, you know, half a billion dollars on trying to immediately solve this problem, let's identify what we are actually trying to do here.

32.1.2B

You know, the gondola for example, the gondola is just going to push traffic west of the canyon,



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32.2.6.5E

32.2.4A

32.2.6.5J

32.1.2D
32.2.7A
32.7B
32.7C

32.2.2K
32.2.4A



because let's assume that it's got the capacity to move more people up the canyon than even the road was, which I have seen conflicting numbers, yes and no.

You know, I don't know that anyone besides tourists and people that think it's a shiny new toy are going to use it. Because it's not faster, it's probably not cheaper for the average person to ride. And, you know, depending on who you are, it may or may not be more convenient.

So you have to go -- you have to go to the mobility hub, wait in line, hop on a bus, take the bus to the gondola base camp. You know, we have been through that whole thing, and I don't think it's realistic to assume people are going to do that.

The other thing too is that I think that there's a lot more to the canyon than just the ski resorts. And we are kind of hastily fixing the ski resorts' problem at the expense of the rest of the canyon.

So the guy just spoke before me made a really good point. I think we should try some less impactful options first. You know, maybe a shuttle system or maybe reservations. Snowbird did that last year, and it definitely needed to be fine-tuned a bit, but I think reservations could be a huge help because if you have a

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reservation, you know you have parking. If you don't have a reservation, all of a sudden the bus becomes very convenient because you're not going to be driving around the parking lot for a half hour trying to find a spot.

And so I think there's a few, you know, less impactful solutions that are also a lot cheaper that we can try implementing before, you know, throwing the Hail Mary and doing either a gondola or, you know, widening the canyon road.

32.29R

And I think that in the end, that would be a lot better for all of us, not just, you know, those that use the canyons a lot, but also the people that live at the base, people that live down 94th or on Wasatch, because, ultimately, all that traffic is going to get backed up toward those mobility hubs, where people are still racing for that finite number of parking spaces.

32.2.6.2.1D

So yeah, thank you.

Comment: 13400

CHRIS MITCHELL: So thanks for your time. I appreciate all the hard work in listening to all of the comments. You know, I definitely appreciate the professionalism, all the angles that, you know, you guys and UDOT and everybody is bringing this, including a lot of guests. So I will just keep mine real simple.

I moved here 16 years ago. My home is right at the mouth of Big Cottonwood. I also go up Little



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Cottonwood quite a bit. Just the thought of -- I mean, let's be honest. It would turn Little Cottonwood into something that we would see at Lagoon or any other amusement park.

32.2.9E
32.17A

I mean, look, this echos a lot of the sentiment that we've heard. There's room for a lot of, you know, analysis, but this is our state. This is our home. This is our canyon. We all love it. For different reasons, we all love it.

The notion of tearing up Little Cottonwood Canyon to install a gondola for solving problems that we haven't tried to solve other ways is, to me, just unbelievable. I can't even believe that the proposition has made it this far, that we wouldn't have tried buses.

I love the other speakers talking about the electric bus options. I mean, clearly, we need more parking up there. Clearly, the last speaker talking about the parking problems at Snowbird is right. There are other things that we need to look at.

32.2.6.3F

32.2.2K

But at the end of the day, after all is said and done, we really need to preserve this canyon and do everything that we can, exhaust every other alternative, before we go in and start, you know, ripping up the canyon and putting a giant Disneyland ride in our canyon. It's just -- you know, as you can tell, it's -- to be

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honest with you, the prospect of it actually is just even -- I would say it is upsetting to me, but the thought of it is just ridiculous.

32.2.9A

So please, let's look at buses. Let's look at additional parking structures. Let's look at everything we can before we go and tear out Little Cottonwood Canyon. All right. That's it. Thanks.

Comment: 13401

ELIZABETH EVE KING: Hi, can you see me? Okay. You can hear me. I will try and -- sorry, Elizabeth Eve King. Thank you for this opportunity to speak.

I have to agree with everyone who's spoken almost, in we can't destroy this canyon. It is kind of unbelievable. And it is not just an issue for the residents or skiers. It's a global issue at this point.

Over a billion sea creatures died in the last three weeks, and it's not even front page news. All up and down the coast of Canada and the Pacific northwest, they just cooked in their shells, which of course will affect sea birds. It's a continual environmental change, and to just keep building bigger roads and bigger parking garages and gondolas is not the answer.

32.10A

We need to combat CO2, not make things that will produce more CO2. I mean, all over there's fires, and people are saying, "Well, when there's really a



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climate emergency, we will know." So it is a climate emergency.

Also, I will comment on a few things. Right. On the buses going up the canyon, yeah, but they have to be electric. There's no point in having a lot of CO2-producing buses. I personally -- they've already enlarged the road right outside my house, where I can't go outside my door except in a car.

32.2.6.3F

32.10A

And I've never lived anywhere in the world like that. I've lived in cities all over; always was able to just walk out of my door, use a bike, walk. We are building to make that so dangerous that nobody will use it.

32.2.6.2.2 A

So electric buses, maybe some electric bikes up the canyon for rent in the summer, and make it bike friendly. We proposed a few things, a lot of things, including tunnelling, including having overpasses that were grown with vines, including medians that were planted with shrubbery, including trees lining the road.

32.2.6.3F

32.2.2D

This is shown to absorb CO2, also provide a bit of sound barrier, and, of course, mostly just slow down. If you have to, you know, wait five minutes to go skiing, I don't think that's the end of the world, but if we keep pouring all these poisons, it will be the end of the world.

32.2.6.2.2 A

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Comment: 13402



Thank you. Well, my time's up, so there's, like, 40 seconds.

MIKE BECK: Hi, thanks for having us and allowing us to have this opportunity to speak about this really important issue.

I have been a climber. I started in 1986, and I'm now an attorney, but I work with a lot of climbing companies and athletes and so forth, and I know all of them love Little Cottonwood and what it has and the climbing it has in there. It's a very historic climbing area and has -- is also very cutting edge. Some of the Olympians have been doing things up there, just in this last year, that are cutting edge climbs.

I was one of the founders of the Salt Lake Climbers Alliance when the LDS Church was pouring in the canyon in 1999. And in listening to Josh speak, I felt like the overlying theme was getting people up skiing faster and safer.

And while I agree that that is something that is important, it seems like these two alternatives that have been put forward are only really good for Snowbird and Alta and not for many other users in the canyon, and not even for many of the local skiers, who I'm sure would like less skiers up the canyon than more skiers up the canyon.

32.1.2B
32.1.2D
32.1.2D
32.2.7A
32.7B
32.7C



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One thing I did -- that stuck out to me was that the lower canyon and using the lower canyon seems to have been barely addressed by these alternatives. There's a lot of use in the lower part of Little Cottonwood because it's unique, even of the canyons along the Wasatch Front.

It's the main climbing area in Utah, both historically and currently, and the glacial formation of it and U-shape make it so that there's a recreating area on the base of the canyon that -- it doesn't exist in some of the river-shaped canyons, like Big Cottonwood for example. You can take a trail all the way from the bottom of Little Cottonwood up to the top. And this area down here is really a multiuse area. I climb there hundreds of days a year.

You see climbers, hikers, boulders, bikers, people looking at birds, people finding wild mushrooms, plant picking, in addition to the residents that live down there and the vault owners and employees that work at those vaults for the LDS Church and the other private vaults.

Both of the alternatives that have been proposed will significantly adversely affect the climbing resources. We don't need a ride in Little Cottonwood. People are going to Little Cottonwood to amuse themselves

32.1.2D
32.4A
32.4B
32.4A
32.4B

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32.4G
32.4I

32.4A
32.4N
32.4P

Comment: 13403

32.2.2MM



in nature, and we should promote that because Utah -- our biggest -- our biggest resource is tourism and it's not just ski tourism. There's year round resources and tourism and recreation resources in Little Cottonwood.

The expanded bus service would -- with the expanded roadway, would destroy boulders, LDS Church quarrying historical significant remnants from the building of the temple, access to trailheads and parks.

BILL JAMES: I know you guys don't know what J-Pods are, but you will in the same way you'll learn what hyper loops are, is we are going to digitize mobility the same as we digitize communications.

And so I'm an infantry veteran and West Point graduate, and we started looking at how we end oil wars back in 1998. And the solution is to combine the 400 ton mile per gallon efficiency of freight railroads with the on-demand service to have internet.

So instead of gondolas that are suspended from a cable, J-Pods are these little -- here's a scale model we have for our stem programs for students. These are suspended from a guideway, and they can switch so that they can go anywhere in a network that we need them to go.

The primary market would be, for Salt Lake City itself, to remove traffic out of Salt Lake City, but



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Comment: 13404

32.2.2A



it is practical to possibly put a J-Pod network up the valley or up the canyon without disrupting the current boulder structure of anything. Because these only require a pier about every -- periodically, and that would have to be worked out with the climbers so that they get what they want.

But the real objective that I have and why I wanted to talk about it, if we build these in Salt Lake City, you can start testing what the alternatives are to widening the road.

That's it. I appreciate it.

JERRY ROANE: All right. Along with Bill James, which I know, by the way, we -- I'm Jerry Roane, president/CEO of TriTrack Motors, and we make monorail/electric cars that would be able to go in the canyon without destroying the canyon.

The vehicle goes 180 miles an hour, and it's -- it still modes, so it drives on the street, and it converts and goes up on the guideway. And when it's on the guideway, of course, it's all electric, and it's very low powered compared to any other electric vehicle, especially an electric bus, which has a lot of dead weight.

We would be able to do this project for $12 million, cost, and the 2 million per year in operating

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maintenance costs, and -- which is significantly lower. And the main thing is the ride to the end of the track would be four minutes. And so we significantly beat the performance of what is presently called the "preferred alternative."

So just wanted to let you know that TriTrack is out there. We would be significantly cheaper. We are doing things around the world. We also move water, so we'd be able to bring water and sewage back so that the canyon doesn't have to deal with that flow from the people.

32.2.2A

And, of course, there's no salt. We can go in the snow. We have a triangular guideway, which this is a slice of it. So it's very petite, and it kind of hides in the sky. And we can put it down the hill from the highway so that it doesn't make any more scar on the land and the highway that's already there. We could possibly go down the center stripe of the highway, and not take any more right-of-way.

So we would be -- we would like to talk to UDOT about it, if they're interested. I'm not sure how they got to the finalists that they ended up with, because it sounds like they had a lot of interest in -- Bill James being one of them. So I think it would be good to look at more modern alternatives, especially



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on a bus.

Like, a bus -- a city transit bus uses 4,242 BTUs per passenger mile and we're at 124 BTUs per passenger mile. So that's TriTrack. Thanks.

DAN BARRELL: Thank you for the opportunity to take my feedback. I'm a native Utahn, and, you know, the Wasatch is one of my favorite places on earth. I'm also grateful for the community to come together to work on solutions, to address the traffic in the canyons.

And really, my big takeaway and what I want to express here tonight is my adamant opposition of the gondola, and I want to convey my support for the enhanced bussing option. As a taxpayer who will be helping to fund the project, it's important that we move forward with the solution that best mitigates the traffic problem.

32.2.9E

32.2.9A

And from my analysis, the gondola will not sufficiently address the traffic problems in the canyon. And the reasons -- the problem with the gondola, you know, really the biggest one, which has already been said, is the travel time. It will almost take an hour from the Cottonwood Heights' parking lot, which will also still involve a bus ride.

32.7C

32.2.4A

The gondola will not remove people from cars because people don't want to have -- you know, be

32.2.6.5J

32.2.4A

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in -- take so long to get up to the resorts. And so the transportation wouldn't be convenient enough to incentivize usage. And having two trips just wouldn't result -- wouldn't really address the problem.

32.1.2B

32.1.4D

The biggest advantage of the gondola is it can operate during times of inclement weather, you know, winter storms after avalanches. It only happens like 8 to 12 times a year, which is essentially 3 percent of the days of the year.

In addition, the traffic is backed up at Little Cottonwood Canyon, so in that event, the cars wouldn't be able to access the gondola garage. So really, the gondola would still have issues when there is avalanche back up.

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The buses -- you know, the gondola really don't have any option to serve the trailhead where the buses could be, you know, enabled to do so in the future. And, really, a really big concern I have too is the gondola would ruin the character of Little Cottonwood Canyon for the future, and permanently scar the sacred and wild use of the glacial-formed canyon.

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32.17A

I mean, just seeing the renderings made me really sad, and just -- like, that I could use something sacred to me.

I also have a concern that the ski resorts



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and Ski Utah are strongly advocating for this approach, to create a foundation to extend into Big Cottonwood Canyon and Park City, and essentially move forward with the ski link opposition that was very -- ski link option that was opposed by the public.

32.1.5B

And I think a lot of these stakeholders think of how they can market Utah to outsiders rather than creating the most viable solution for local Utahns. You know, we're talking about spending a half billion dollars, and we don't want to exclusively benefit the ski resorts, while, you know, not considering the access to public lands.

32.1.2D
32.2.7A
32.7B
32.7C

Enhanced bussing is by far the best solution. You know, we should use electric buses, as has been said. These are just significantly faster travel time with much more usage.

32.2.9A
32.2.6.3F

The gondola is, you know, kind of a novelty that people would not want to ride in the summer due to the long travel time. The buses have higher capacity to move people out of cars and would be able to operate out of singular large hub out of Cottonwood Heights.

32.20A

The buses would be able to be carbon neutral with electric buses, and aside from the 3 percent of the days of the year, the buses would be the far better option to serve Wasatch recreationalists. So thank you

32.10A

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32.4I

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32.2.6.5G

32.13B

32.4A



for the opportunity to speak.

KYLE DALY: Thank you so much for this opportunity to speak. My name is Kyle Daly. I'm a climber and skier in Salt Lake City, and I recreate in Little Cottonwood Canyon year round, probably over 200 days a year.

Moving forward, I hope we can consider the year round impact of these transportation solutions, and how they will affect the visitor experience of Little Cottonwood Canyon. I believe that a gondola will only be a viable transportation solution during the winter season, and it's only going to serve to shuttle more people up to our already overloaded ski resorts. Unless this gondola is running year round, with additional stations at popular trailheads, it will remain a vacant eyesore throughout our summer months.

Additionally, the solution of widening the road will have a severe impact on the remaining wilderness of Little Cottonwood Canyon and will threaten the existence of as many as 29 climbing boulders, as noted by the Salt Lake Climbers Alliance.

I believe that before we make such dramatic alterations to our landscape, less destructive transportation solutions must be explored. Why not increase the bus frequency to every few minutes and



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32.2.9A
32.2.4A

32.2.9A
32.2.9K
32.2.4A

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32.2.9F



require all visitors to ride the bus up the canyon, less they pay a significant toll during the peak travel times.

Little Cottonwood Canyon has the opportunity to be a model for mass transit solutions in our growing world. I think that rather than jump right to the most destructive solutions, let us first attempt to work with what we have. Increasing bus service, building snow sheds, adding tolling, etc.

Let's try to preserve what remains of the wild nature of this special place. Thank you so much for your time.

JEFF EDWARDS: Thanks for accommodating me. I was in an economic development corporation for about 15 years and was also a founding board member of U-Care, where we helped try to bring air quality to the forefront of this discussion in this state. I'm also a lifetime skier in Little Cottonwood Canyon, and so I have a lot of interest in this.

I spent a lot of time in Europe and have seen how cog trains operate in Europe, and I've been a proponent of that idea and is an excellent solution for this site, and I was sorry to see that option didn't make it into the final two choices. However, I believe that the proposed gondola has many of the same advantages of the train without some of the environmental impacts, as

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well as cost.

I also served on the original Mountain Core Team that later became the Central Wasatch Commission. And you've heard already today from Chris Robinson and Ralph Becker, who navigated an incredibly difficult task to get all the different stakeholders together on that project.

I was also the leader of one of the economic system teams, along with Natalie Goeckner, and our team made it very clear that issues like congestion and air quality are really at their core of economics. And if they don't get solved, there will be serious, negative impact to our economy, whether that's through poor air quality of the degradation of the quality of life, which impacts one big thing, and that is the acquisition of talent.

Talent is the essential natural -- the essential ingredient in Utah's success as a state. And recruiting and retaining talent in our state is crucial to all of our future to have a vibrant economy. Places of high-value outdoor recreation, like Little Cottonwood Canyon, are an essential part of that process. Doing nothing is not the right answer, and relying on congestion to manage visitation of the canyon is a very poor solution and a just outright ineffective solution.

32.10A

32.6A



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Before UDOT makes a decision, however, there needs to be a clear statement of the firm pricing for users. Many people in this meeting today have talked about whether users would use this, and besides the time of transit, cost is certainly a big factor, especially for the families that we want to attract, to continue to recreate in the canyon.

There also needs to be a tolling operation, and Pat Shea explained that very articulately at the beginning of this night. I would like to see that implemented right away.

And along with Chris Robinson and Ralph Becker having some kind of a visitor mitigation plan is absolutely essential, regardless of which option is chosen, as it will help us to avoid loving this beautiful place to death, which is happening already in a terribly uncontrolled way.

I commend UDOT for their lengthy, difficult EIS process here, and I urge them to find the right solution with this, which I happen to think is the gondola solution. Thanks for listening.

CAROL: Hi, my name is Carol. I live on Little Cottonwood Canyon Road. I am not quite one mile West of Wasatch Boulevard. I bought my house in '99. I have been impacted by the traffic ever since I have lived

32.2.4A

32.2.4A

32.2.2Y

32.20B

32.2.9D

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32.7B

32.2.6.2.2A

32.2.4A
32.20E

32.2.4A

32.2.6.2.2A

32.2.9E

32.17A



here.

The bus -- I watched that entire presentation this morning on YouTube. Anyway, you put expanded bus services. I can't get across my street half the time, just to get out to walk my dog. On heavy snow days, I have been prevented getting home from a 12-hour ICU trauma shift because the cars are all the way down to the 7-Eleven.

The speed limit here is supposed to be 40. People go over that all the time. So regardless of whether it is 2400 or Wasatch Boulevard, if you do any widening, it's just going to be more cars are going to go faster. I don't want to see the canyon destroyed. That's how I would relax after what I had to do at work.

And if you widen any of those roads, it's not going to be just buses as it is now. People try to pass buses on that road. That's just going to give them more room. Trying to ride my bike north on Wasatch is dangerous, because the speed limit is so high, to make it wider, it's going to be even worse.

I just think it's sad that they want to put a gondola -- which I used to think was a pretty good idea until I started seeing how it would change the landscape, and this canyon is just gorgeous, and I would like to see it stay that way.



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32.2.9C
32.2.6.3B
32.12B
32.13B
32.17B

32.2.6.3B

32.2.6.5K



And, you know, I can't really say much more than what everybody else has already said already. So thank you.

MATT WALTHIUS: I get three minutes. First off, I know Josh personally, and I am eased at mind to know he's on this project. He puts in more miles in the Wasatch back country in a day than I put in, in an entire season. So it is really comforting to know that somebody that cares about the Wasatch is on this project. It's not just an import from California, jumping in to put a highway in or whatever.

I'm not a huge fan of the bus option. Due to previous comments, I've heard about Provo Canyon and how that project got completely changed, and it turned it into a highway, basically. And there were big impacts to the environment on that one.

And, also, I think people are going to be cutting in the bus lane. It's just going to turn Little Cottonwood into a crazy highway. I love the tram idea. The video on YouTube is beautiful. It's really cool. But how -- I mean, on a bluebird day, it works. Right? But on a 70-mile-an-hour wind day, it is not going to run, and those are the big days we need it to run.

And then same thing; if there is, like, an avalanche over the road and Snowbird is interlodged,

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32.2.6.5H

32.1.2D
32.2.7A
32.7B
32.7C

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nobody is going up there either. So the tram is an awesome idea. I think it's gorgeous. The ride up will be fun. But how practical is it?

And then who also benefits from it? It's the resorts. Like, everybody taking the tram wants lift service. So 99.99 percent of the benefit of the tram is going to come to the lift, to Snowbird and Alta. Snowbird and Alta should front 99.9 percent of the bill.

And that's my thoughts. Thank you.

LILAH ROSENFIELD: Hi, I'm Lilah Rosenfield. I'm a graduate with a degree in urban and regional studies from Cornell University. I currently work for a mountain resort planning firm, although I'm here on my own behalf and not on behalf of my employer or any clients.

I want to start by thanking UDOT, the United States Forest Service, and all the other organizations who helped work on this EIS. I know from experience how much work goes into these projects, and it's honestly a really remarkable job you all have done.

I want to start by saying that I think we all can agree that the canyons need to change. The traffic is bad. It's a problem. However, how canyons need to change is what's known in planning literature sometimes as a wicked problem. That is, what solutions we want,

32.1.2B



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determine the problem we identify, and the questions we ask.

It's clear from the EIS that UDOT wants to ensure that many drivers are still able to take their cars up the canyon, i.e., to take the minimum number of people up the canyon on transit, while still relieving traffic.

This solution led to the determination of the problem or the scope: Mobility and reliability versus other problems that might be identified, such as limiting the number of people, which is what many of the people who talked about -- who talked about -- you know, worried about induced demand, or protecting the climate and maximizing the reduction of car traffic, which is what I personally care about.

The determination of the solutions that led to the problem identified is apparent in Section 25 of the 2020 draft EIS frequently asked questions.

Ultimately, climate change will lead to catastrophic shifts, and that's not even to begin with the problem of smog in the Salt Lake Valley. It would be better if we identified a way to eliminate cars from Little Cottonwood Canyon entirely. It is clear through the study, see Section 28 of the 2020 draft EIS fact of the so-called "Zion option," which several other people

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32.2.2L

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32.2.2L

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32.2.2B



have brought up, is infeasible with buses due to turnaround time.

We are fortunate to see that despite the decision to de-prioritize consideration of car traffic, climate change and the inherent problems of car, including safety, an alternative that could nevertheless accommodate all or nearly all the traffic that might desire using the canyon. And importantly, could be scaled up far more that the buses. See Section 11 of that same draft EIS frequently asked questions.

32.2.9D

I speak, of course, of the gondola. I support the gondola plan as existing, but would more strongly support a reanalysis of the gondola approach

32.2.2L

that would consider the possibility of closing the canyon to most personal vehicles, plus a Zion-style local shuttle for all non-resort users.

Both the EIS and several commenters have spoken up about the scalability of buses, but buses have a clear cap on how much they can scale up. UTA standards

32.2.2B

allow a minimum of roughly five-minute's headway. While this minimum capital outlay of gondola is far higher, the cap on gondola capacity, that is the capacity to which the gondola can scale, is also far higher.

Again, given the scope of the project as written, I support the gondola, but more importantly,



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32.1.2D

Comment: 13412



given the expanded scope of the -- to incorporates its demand to minimize the hazardous air pollutants and threat to human safety in the hands of both incurrable combustion engine and electric car motor vehicles, the gondola is clearly the only way forward. Thank you.

STUART WILLICK: Hi, thank you. I also would like to thank everybody who has been involved in this big task, and I appreciate everybody's comments on all sides.

I would like to make two quick points. One is, options like the gondola or railway, or one of the other new high-tech things that people brought up, do improve access for lower canyon users, back country skiers, hikers, climbers, by taking cars off the roads, the access to all the trailheads is easier.

The other comment I would like to make is, it is clearly a complex problem. Complex problems usually need complex or multimodel solutions. It's probably not one solution that is going to -- or one option that's going to fix it. You probably need to consider more than one.

Thank you.

MARVIN LORCIA: Great. So I'm Marvin Lorica. I'm from out of state, who travels to ski and uses the Trax and bus to get up to the Cottonwoods. I also ski in other resorts in the West, and I primarily come to Salt

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Lake because of the closeness the resorts have to the valley and not having to rent a car. It is also more affordable than staying next to a resort.

My initial thoughts were that the gondola would be the most appealing option for me since -- so that I could count on not having my trips disrupted by avalanche and road closures. However, after listening to the presentation last week and tonight, I see that most residents are opposed to the gondola, leaving the bus as the most acceptable option.

32.2.9B

I'm not sure why UDOT did not study how much traffic and time can be alleviated if traffic were limited to only the buses, along with some other exceptions for canyon residents or emergency vehicles, etc., to go up. I feel like it would have fewer cars and fewer accidents from cars that have inadequate tires during a bad condition.

32.2.2B

32.2.2L

I feel like this could be tested, like, as soon as the next ski season, at least for weekends or holidays and powder days. You can even limit the restriction to just mornings. Then you'd have -- then you could have additional buses that could be added during these times, when you have a bus usage that's lower elsewhere in the city.

32.29R

From my experience, the buses are very



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popular, based on how crowded it gets after picking up people at the Park & Ride near the canyon mouth last week. Some people complained about building a parking garage for the gondola. But someone mentioned that there's vacant -- a vacant Shopko along 9400 South, where the mobility hub would be.

32.2.2FF

Utilizing shopping centers as hubs could have some appeal to businesses, such as ski shops and restaurants. Adding additional routes from similar starting points. Earlier, someone mentioned the mall. That could also increase bus usage. This way, buses from the -- the ones that I ride are from Sandy and Midvale stations, they can continue on to the resorts without having to stop at Park & Rides near the canyon mouth, packing the buses so full of people standing and equipment all over the place.

32.2.2I

If adding the snow sheds would significantly reduce road closures, I believe the bus option, with limited private vehicle traffic, would be the best option to try right now, before considering other larger capital projects. Snow sheds are used in my other scenic places, including national parks, and hopefully be done with minimal impact.

32.7A

32.2.2K

As a non-local, I can't speak to the traffic on Wasatch Boulevard, but I suggest that there be some

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32.2.6.2.2A

Comment: 13413

32.2.6.2.2A

32.1.2B



compromise between the residents and UDOT, considering that there needs to be a solution to the overall traffic challenges up to the mountains, hopefully with implementing bus-only traffic that would alleviate much of the congestion at the canyon now. Thank you.

SCOTT KLEPPER: Thank you for the opportunity to speak. I will be quick. I worked with UDOT about four to five years ago to take an existing crosswalk across Interstate 900 East, where traffic is posted at 40, 45, and regularly does 60, and to spend $100,000 to get flashing blinkers took two years.

So like other people, I'm blown away that out of a 124 -- that in two years, 124 options were whittled down to two that we now have. I think both fail in multiple ways, especially the gondola. But widen Big Cottonwood -- or widening Wasatch is not an alternative. It will just lead to increased traffic.

The answer -- and I go back to what Lilah said. The answer is in how you view the problem. It seems that you're trying to jam more traffic into a limited resource canyon, and that, in and of itself, is the wrong way to view the problem. Resource management is the key here.

In the EIS, less than -- I think it was 1.89, if memory serves, people per car. I'm in the canyon.



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32.2.7A

32.2.2K
32.2.4A



For two decades now, every weekend, 52 weeks a year, we carpool every single time we go up the canyon, whether it is Big or Little, and -- except for during the pandemic. We are back to carpooling.

The no friends on a powder day attitude is the problem, and this is for two private for-profit businesses. There has been no mention of what they're contributing to the kitty here.

There are three ways to grow a business: Cut cost, which is a short-term limited solution. You either have to grow your marketplace, or you have to raise your prices and that's the problem. The problem is the traffic in the canyon and the cost of skiing has come down, due to the passes.

When I moved here 23 years ago, break even was 23 ski days a year or more meant you bought a pass. Now it's six to eight. So naturally, everybody comes up the canyon, especially on those powder days. They don't ski from 9 do 4 like we used to, to get our money's worth. And that's the problem.

The resorts need to raise prices or -- and not be allowed to take control of the canyon, because as we've heard from other speakers, there are plenty of other non-resort users in the canyon that will be harmed by both of these solutions.

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32.1.2B

32.20C



And I just am flabbergasted that UDOT was not able to come up with better solutions of 124 to the two that we have now. Thank you.

JOHN MLETSCHNIG: Thanks everybody for putting all this together. Much appreciated.

A bit of my background, I've worked in the snow sports industry and recreation my whole adult life, from a ski patroller in the Wasatch here to an avalanche forecaster working internationally in New Zealand to owning a local guide service as of current.

And to me, you know -- well, first, I feel like I have, you know, an idea of what good skiing is, for one, and I know that we are losing resource due to overcrowding. And this has been addressed, but, you know, I don't know that UDOT is seemingly noting the problem. We are trying to increase capacity. Right?

And this is what ski areas have done over the years around here, adding high-speed chair lifts, all that. All it does is sacrifice the product, and potentially at some point, there's a tipping point where it compromises safety, etc. So the question is: At what point is that tipping point happening. Right?

Like, this is -- this can't go in indefinitely. We increase our capacity, then at some point -- you know, if we fill all that new capacity up,



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32.20B

32.20A
32.20C

32.2.7A

32.2.2K

Comment: 13415

32.4B



then the problem just perpetuates and we now have even more people. So I think finding a way to limit capacity is critical. And, you know, I want to be up there as much as anybody, but we've got to address that.

And I understand it is complicated. We have businesses trying to make ends meet, etc., but solutions like the gondola are force-feeding customers to two particular entities, which seems very skewed that the general population should be paying for that, let alone it's compromising everybody else's experience in the canyon.

So where are we at. Right? I think that we need to take a big step back and put it back to square one, and we need to limit capacity and find a way to do it.

And I yield the rest of my time.

ANDY AGARDY: I just have a couple comments -- or a couple questions, really, concerning the EIS. And one of them is -- it might have been addressed. I have been in and out of the room. But the Salt Lake Climbers Alliance did an analysis to say that -- Josh made the point that the gondola would perhaps not affect the boulders, although the Salt Lake Climbers Alliance has come up with a statement saying that it will actually impact more boulders than the road expansion.

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And so I'd just kind of, like, maybe an explanation on that, and I can put that in my comments I I'm going to submit as well.

32.2.2K

And the other question that I have, or comment, and maybe someone's mentioned it, but it seems like since these passes have been instigated in the last year, the Icon and the Mountain Collective and the Epic Pass, that's when this whole traffic mess has really exploded. And has that been addressed in the EIS? Because I don't see anything about it, about perhaps the resorts limiting that kind of access.

And that's pretty much what I have. I don't have three minutes to talk, but I just wanted to put that out there.

Comment: 13416

STEVE PRUITT: I'm one of the original Glacial Subdivision residents that will be most impacted by any solutions. And guys like Jeff Edwards and Ralphy [sic] Becker and others that will experience no real impact and have no idea should have no input, as most of the input provided comes from people who experience no personal impact, other than drive time and others with tinfoil hat solutions.

32.2.9A

First obligation of government is to do no harm. With the exception to leaving things status quo with enhanced bus service, all other options do harm.



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Most particularly, your preferred gondola alternative B, lobbied by Niederhauser and La Caille, presumably where the name of the bay station originated.

Just curious to know if La Caille is paying for the free national advertising this option would bring, as none of their property is being impacted or used for the project.

32.2.2X

In particular, gondola B is the worse option for a number of reasons that include: Except for the status quo option, the proposed changes does nothing more than benefit the private business at the top of the canyon and those lobbying to capitalize on commercial options at the tram terminus.

32.2.9E

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Except for status quo option, all other options are tantamount to burning down a barn to kill a rat, and the neat solution only provides relief for those few days each winter season, less than 3 percent when the conditions limit vehicular traffic, most of which can be mitigated through snow sheds at the historical slide points.

32.1.4D

Gondola B forces all tram traffic coming down from south onto Wasatch Boulevard, making Wasatch Boulevard worse than it already is, and forcing this traffic into a left turn at the intersection has no ability to handle such an increase.

32.2.6.5E

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32.2.6.5E

32.17A

32.4M
32.4E

32.13A

32.13A

32.29D

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Gondola B will create significant traffic jams, parking structure at its entry and exit point, forcing us to have no alternative into our houses. Gondola B indicates that you will be -- have been willfully negligent in your depiction of the visual damage that this option would inflict, having provided no drawings and sections depicting the visual plight a 30-story tram tower inflicts on us.

You have indicated that gondola B would have no impact on wildlife, yet having lived in the proposed path of the tram for 30 years, I enjoy the daily soaring of eagles and hawks who regularly visit the large trees in my backyard along 210.

You've provided no study, with no respect to the impact on these birds of prey, from the tram towers, cables, cars, movement and noise. I believe that it is the most -- that these are the most probably protected under state and federal laws, for which this alternative would be in violation.

According to 40 percent of winter traffic on Wasatch Boulevard and 209, you have provided no other alternates that would address these alternate accesses to the canyon. I'm also aware that UDOT has lost cases in the Utah --

LIZ HAIGH: Hi. Hey, thanks for taking



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32.2.4A

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32.2.9D

32.10A

32.2.6.5P



my -- whatever, my feedback, and thanks to everybody else.

So my comments are really based on my experience of using the free gondola in Telluride over the course of many years. You know, as some folks know, they have a gondola that links Mountain Village, so the upper ski area village, and town. It is a free gondola, which I think is something that should be in consideration, relative to a gondola option in Little Cottonwood.

I would like to say at the outset, I'm anti-change, and I think all of the options basically, sort of, suck. But given my concerns, which is primarily, on some level, about climate change and also about the integrity of wildlife in the canyon, I feel like the gondola actually is the most ecologically appropriate option.

The Telluride gondola is powered by clean energy. They have a bunch of solar panels outside of town that provide a lot of the power for that gondola, and so it is a green option for them. And I think our gondola could be a green option for us if it's something that is researched and employed.

Additionally, riding that Telluride gondola, over the course of 20 years, at the bluegrass festival,

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which it is crammed with people at that time, it moves a lot of people really effectively. And while we are on that gondola, you are quietly moving across the landscape, in the air above ground. And there are elk, deer, bear, marmots, birds, and a whole bunch of other critters there that are relatively undisturbed.

32.13B

I -- traveling up both Big and Little Cottonwood, I'm pretty appalled by the amount of wildlife road kill that happens in those area, and, you know, this is an ongoing problem. I also feel like, you know, having a transportation in the air bypasses a lot of the problem that happen with snow.

My husband likes to say, "It only takes one," and that is in reference to accidents in Little Cottonwood that destroy access for everyone.

My other thing on the buses is the last time I took a bus on a powder day, I sat on the bus for over

32.2.9C

two hours, and I had to go to the bathroom like you could not believe. And it was a miserable experience, and I don't ride the bus on a powder day anymore because of that.

That is a small aside, but I think that does represent some of the challenges that bus service can present to people who are trying to get up the canyon with families. The bus can be a hardship when you're



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standing for two hours. It's not a perfect solution. Nothing is a perfect solution. But in the end, I think the ecological solution is one that requires serious thought.

Thanks a lot.

Comment: 13418

BLAKE QUINTON: So first, I'm a back country skier, a trail runner, a mountain biker, an inbound skier and a hiker with my family. We ride the buses up these canyons multiple times every winter, although this last winter was a bit of a crap show for everyone.

I want to first note that this is a

32.1.2B

resort-caused problem, and it doesn't have to be solved. When the Utah Jazz, 30 years ago, came and said, "We want to build a new stadium," they didn't go to the Utah public. The Utah public has never before accepted

32.1.2D
32.2.7A
32.7B
32.7C

donations to large corporations. And this is a -- we call it a half billion. This is a $1 billion donation to a public corporation -- well, to two of them. This is an optional expense we do not have to blow our money on.

In regards to the EIS specifically, I would

32.2.2E

like to make sure that we have noted how long the planned ski season is per year over the 50-year project lifetime of these two projects, and that that ski season is shortened over time so those expected feature paybacks are decreased. Because as is well noted, our climate

Response Section in Chapter 32



here is changing rapidly, and our number of ski days available are changing rapidly.

Regarding these two specific options, for me, doing enhanced bus service, where we limit private vehicles for several hours per morning, because that's when we have a primary issue. We cover the avalanche paths with an avalanche shed, and then we use switchable lanes for the buses, so that in the morning, they can go up quickly and down. They just move in the single lane for traffic, and then the afternoon, they come down quickly, and move uphill in the single lane for traffic. It should work.

As far as payment, the ski resorts must explicitly say their tickets will include 100 percent of the cost of either of these options. There should be no private tickets bought for the gondola, specifically for the bus. At least I can ride up to my back country destination and have the option to pay for that.

Now, water analysis regarding the destruction of forests, I don't know that that really was accomplished within the EIS. It has been known since John Neer that a forest creates water. We have that in a very limited supply in this area.

We need to evaluate how much cutting down our forest we are willing to tolerate and how much we are

32.2.2B
32.2.9K
32.2.2D
32.2.4A
32.12A
32.12B
32.13A
32.13B



Response Section in Chapter 32

Comment: 13419



willing to limit our water, to have more super wealthy skiers go up the mountains. Thank you.

JOHN PIKUS: So first off, I would like to thank Josh and Breanna for allowing the public to provide input on this, and it's been really great to hear how passionate so many people are about Little Cottonwood Canyon.

So, so many people have shared great thoughts, and I just wanted to share a couple points that I have heard some people mention but maybe have been overlooked.

And so first, I think John Mletschnig covered this one very well, but I think the most important thing to so many people who visit Little Cottonwood is the user experience. And I really do believe that cramming more people up into the canyon is just going to decrease the user experience for everyone.

This includes ski resort visitors who are going to see much more crowding at the resorts. It is going to decrease the experience for lower canyon users and hikers and climbers, who might have gondola towers blocking boulders and inhibiting views. So I think this really should be prioritized, and the only solution to this, I think, is a capacity limit on the canyon, which I think the best options for implementing that would be

32.20A
32.20B
32.20C
32.1.2D
32.7C
32.4I
32.20B

Response Section in Chapter 32 ➥

32.2.2L
32.2.2B
32.1.4D
32.4A
32.4B



bank private vehicles and implementing some sort of Zion solution.

So another point I wanted to make is that I think right now, this traffic is only a problem maybe between 25 and 35 days of the year. So I think we should not alter the entire nature of the canyon just for a problem that exists on these 25 to 35 days.

And perhaps the shuttle system would only have to be implemented on those days, and most of the year, 330 days, things can just stay the way they always have been.

And third, I know I'm a rock climber myself. I know Salt Lake City has an extremely passionate rock climbing community, and I think it's pretty devastating to hear about the destruction to the roadside boulders that could occur with either of these options.

I really -- it pains me to think about some of the boulders that are potentially going to be bulldozed, and I know there are so many more people out there that feel a lot more passionate than me about this. And I really think this needs to be strongly considered.

It's an amazing cultural resource. There's so much climbing history there, and it can never be undone. And really, I just urge UDOT to strongly consider this and talk to the public and find a solution



Response Section in Chapter 32 ➥



that can preserve this. Because I think it is one of the really, really special things about Little Cottonwood, and it's important to so many people who live here.

Thanks again.

(The meeting was concluded at 8:30 P.M.)

REPORTER'S CERTIFICATE

State of Utah )
)
County of Salt Lake )

I hereby certify that the said meeting was taken at the time and place herein named;

That the testimony of said witnesses was reported by me in stenotype and thereafter transcribed into typewritten form.

I further certify that I am not of kin or otherwise associated with any of the parties of said cause of action and that I am not interested in the events thereof.

IN WITNESS WHEREOF, I set my hand this 31st day of July, 2021.

Kellie Peterson, RPR



*This space is intentionally left blank.*

**COMMENT #:** 13420
**DATE:** 9/2/21 14:59
**SOURCE:** Email
**NAME:** Sarah Malyn

---

**COMMENT:**

Dear Utah Department of Transportation,

Before spending more than half a billion dollars to tear up LCC to construct unproven solutions like a gondola or roadway widening, I am advocating that we first adequately fund programs and resources that leverage the existing infrastructure LCC has in place today in an effort to address the traffic and congestion problems. Some of these proven systems and programs could include:

- Tolling to incentivize use of public transportation **(32.2.4A)**
- Tolling to manage canyon capacity **(32.2.2Y and 32.2.4A)**
- Reduced or free bus ticket prices on busy weekends **(32.2.4A)**
- Increased funding to support more buses **(32.2.9A and 32.29R)**
- Increased funding to create/operate express bus routes from locations all across the Wasatch Front — instead of bringing all traffic to Wasatch Blvd, bring Express Bus routes to key neighborhood hubs to avoid the crush of people on Wasatch Blvd **(32.2.2I)**
- Shuttles vans to transport dispersed recreation users to trailheads **(32.1.2C and 32.2.6.3C)**
- Express bus and shuttle routes that deliver people directly to their destination **(32.2.6.3N)**
- Optimized ski resort navigation to reduce resort congestion **(32.29R)**
- Traffic controls **(32.2.4A and 32.29R)**
- Double stacking **(32.2.2EE)**
- Managed- and reversible-lane alternatives **(32.2.2D)**

Furthermore, any efforts that intentionally or unintentionally increase capacity beyond the current capacity limit (as defined by current parking spots) are unacceptable. **(32.20A, 32.20B, and 32.20C)** I am concerned that without a plan in place now to manage canyon capacity, LCC will become even more crowded, which will negatively impact the beauty of the canyon, the watershed and the recreational user experience. **(32.17A, 32.17B, 32.12A, 32.12B, 32.4I, 32.20A, 32.20B, and 32.20C)** Increased capacity will also inevitably lead to increased ski resort expansion pressures. **(32.20C)** I am against any future ski resort expansion outside of their current footprints.

Sincerely,
Sarah Malyn
Salt Lake Cty, UT

**COMMENT #:** 13421
**DATE:** 9/2/21 20:47
**SOURCE:** Email
**NAME:** Nancy Simpson

---

**COMMENT:**

Hello UDOT,
We are submitting the attached comments with regard to the Little Cottonwood Canyon Draft EIS.
Thank you for your consideration.

Sincerely,
Nancy and Alan Simpson

**Alan and Nancy Simpson**

August 30, 2021

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

Dear UDOT:

These comments are submitted with regard to the two proposed transportation options meant to address the winter traffic issues in Little Cottonwood Canyon. We are Michigan residents who spend about 2 months each winter in SLC. We have regularly skied Alta and Snowbird for over 30 years. We have been season's pass holders at Alta for 14 years. We have also traveled to SLC during the summer and hiked in Little Cottonwood Canyon. We dearly love the canyon and Alta, to the point that we had contemplated having our cremated ashes spread there if that were legal.

We are strongly opposed to both the gondola and dedicated bus lane final proposals. We have listened to both of the public comment meetings and read many of the public's comments in the newspaper and on the Facebook and Instagram sites. We have noted very little support for either proposal other than from those who have an economic interest. We have read and reviewed portions of the EIS report and information on the UDOT website with regard to the proposals. Throughout this process we have learned a lot.

32.2.9E, 32.2.9C

The canyon and the ski resorts only have so much capacity. When that capacity is exceeded, it diminishes the experience for the visitors and can have adverse effects on safety and the environment. Speaking from years of experience, the capacity at Alta has been exceeded since Alta joined the Icon Pass. Neither the gondola nor the bus option address the capacity issue, which is at the root of the problem. Both proposals are likely to further intensify this problem. We do not need more people traveling to these resorts.

32.20A, 32.20B, 32.20C

We are very distressed about the permanent changes either of the proposals would cause to the priceless natural beauty of Little Cottonwood Canyon. We do not need or want a 4 lane highway or a Disneyland like gondola constructed. There are a multitude of other options which should first be exhausted that cost far less and may be more effective. These would include limiting auto traffic during certain hours on powder days or on weekends/holidays, tolling, incentives to carpool, increasing bus service, enforcing traction laws all winter, etc. The resorts could implement a reservation system as is done at other ski resorts to limit capacity. The gondola and dedicated bus lanes serve only the resorts and not the other users of the canyon and thus, if either were to be implemented,

32.17A, 32.17B
32.6.5.3B
32.29R
32.2.2B, 32.2.4A, 32.2.9A, 32.2.2M
32.2.2K
32.1.2D

construction and operating costs should be paid for solely by the resorts and not the taxpayers.

32.2.7A

As we educated ourselves on these proposals, we learned much about the other users of the canyon, particularly the rock climbers. We had no idea that the canyon and its boulders are known internationally and draw climbers from around the world. We have learned that both proposals would adversely impact these boulders, which we feel must be preserved.

32.4A, 32.4B

We have given thought as to what it would take to incentivize us to ride a bus or gondola to the resorts. Our vehicle serves as our locker in which we carry extra skies, gear, clothing, lunch, etc. Even if implemented, we do not believe sufficient numbers of skiers will abandon their cars for a bus or gondola. Frankly, we laughed at the simulation video showing the 2 young people riding the gondola and then strolling to the lift wearing their ski boots and carrying only their skies and poles on a lovely, sunny, windless day. Imagine trying to corral a family of young children and all of their gear from the car to a bus and then to a gondola, while standing in line to board the bus and gondola. Or an elderly couple trying to navigate these distances carrying their boot bag containing boots, gear, lunch, in addition to skies and poles. Those traveling to Alta must make yet another gondola transfer to reach their destination.

32.2.3A
32.2.4A

32.2.6.5J

The travel time from parking one's car to arriving at the resort is also a great disincentive. Standing in line to load on a bus is not appealing. Our friend tried the bus option in the winter of 2020 and attempting to manage his gear while standing and being jostled about was not something he wishes to experience again. The proposed travel times to the resorts for the bus seem unrealistic when considering the snowy days. It is hard to believe that a bus in a dedicated lane would be safely traveling faster than SUV's and trucks. The gondola travel time is much too long for use on a regular basis. When exiting the gondola at Alta, are we expected to take the tow rope with our gear to get to the Albion Basin/Sunnyside base? By the time we arrived, everything would be skied out worse than it already is.

32.2.6.3P

In summary, we think the canyon would need to be closed to all traffic for us to regularly ride a bus or gondola to the resorts. And in that case we would likely ski elsewhere.

While we appreciate all of the hard work that has gone into these proposals, we implore you to please go back to the drawing board. The gondola and 4 lane highway are irreversible once built. There are simpler, less intrusive and less expensive solutions which must be explored, implemented and evaluated before permanent changes are made to the natural treasurer that is Little Cottonwood Canyon.

Sincerely,

Alan L. Simpson

Nancy R. Simpson

**COMMENT #:** 13422
**DATE:** 9/3/21 12:37
**SOURCE:** Email
**NAME:** Steph Christensen

---

**COMMENT:**

Dear Utah Department of Transportation,

Before spending more than half a billion dollars to tear up LCC to construct unproven solutions like a gondola or roadway widening, I am advocating that we first adequately fund programs and resources that leverage the existing infrastructure LCC has in place today in an effort to address the traffic and congestion problems. Some of these proven systems and programs could include:

- Tolling to incentivize use of public transportation **(32.2.4A)**
- Tolling to manage canyon capacity **(32.2.2Y and 32.2.4A)**
- Reduced or free bus ticket prices on busy weekends **(32.2.4A)**
- Increased funding to support more buses **(32.2.9A and 32.29R)**
- Increased funding to create/operate express bus routes from locations all across the Wasatch Front — instead of bringing all traffic to Wasatch Blvd, bring Express Bus routes to key neighborhood hubs to avoid the crush of people on Wasatch Blvd **(32.2.2I)**
- Shuttles vans to transport dispersed recreation users to trailheads **(32.1.2C and 32.2.6.3C)**
- Express bus and shuttle routes that deliver people directly to their destination **(32.2.6.3N)**
- Optimized ski resort navigation to reduce resort congestion **(32.29R)**
- Traffic controls **(32.2.4A and 32.29R)**
- Double stacking **(32.2.2EE)**
- Managed- and reversible-lane alternatives **(32.2.2D)**

Furthermore, any efforts that intentionally or unintentionally increase capacity beyond the current capacity limit (as defined by current parking spots) are unacceptable. **(32.20A, 32.20B, and 32.20C)** I am concerned that without a plan in place now to manage canyon capacity, LCC will become even more crowded, which will negatively impact the beauty of the canyon, the watershed and the recreational user experience. **(32.17A, 32.17B, 32.12A, 32.12B, 32.4I, 32.20A, 32.20B, and 32.20C)** Increased capacity will also inevitably lead to increased ski resort expansion pressures. **(32.20C)** I am against any future ski resort expansion outside of their current footprints.

Sincerely,
Steph Christensen
North Ogden, UT

**COMMENT #:** 13423
**DATE:** 9/3/21 16:18
**SOURCE:** Email
**NAME:** Clanci Hawkes

---

**COMMENT:**

Attention Utah Department of Transportation and HDR:

Please see the attached letter in regards to the above-referenced EIS. For additional information or clarification, please contact Sandy Wingert, Upper Provo and Jordan River Coordinator, at [redacted] or Jodi Gardberg, Manager, Watershed Protection Section, at [redacted].

Thank you,

State of Utah
SPENCER J. COX
*Governor*

DEIDRE HENDERSON
*Lieutenant Governor*

Department of
Environmental Quality

Kimberly D. Shelley
*Executive Director*

DIVISION OF WATER QUALITY
Erica Brown Gaddis, PhD
*Director*

September 3, 2021

**VIA EMAIL**
**READ RECEIPT REQUESTED**

Little Cottonwood Canyon
EISc/o HDR2825 E
Cottonwood Parkway, Suite 200
Cottonwood Heights, UT 84121

Subject: **Comments on the Draft Environmental Impact Statement Regarding Little Cottonwood Canyon**

Utah Department of Transportation and HDR:

The Utah Department of Environmental Quality, Division of Water Quality (DWQ), appreciates the opportunity to provide the following comments on the Draft Environmental Impact Statement for Little Cottonwood Canyon specifically on the Utah Department of Transportation's (UDOT) two preferred alternatives.

DWQ protects, maintains, and enhances the quality of Utah's surface waters and groundwater to protect beneficial uses and public health. The Division oversees the classification, protection, and remediation of the waters of the state (Clean Water Act §304 and Utah Code §19-5-110). Responsibilities include development of water quality standards, water quality monitoring and assessment, development of total maximum daily load plans (TMDLs) to restore impaired waters to their designated beneficial uses, issuance of discharge permits and 401 certifications for U.S. Army Corps of Engineers (USACE) 404 permits, and the implementation of nonpoint source projects to improve water quality.

Collaboration and coordination with DWQ and other water quality/watershed agencies during the Little Cottonwood EIS process is critical to addressing water quality issues associated with the two preferred alternatives identified in the Draft EIS, enhanced bus service in peak-period shoulder lane and the gondola. Stormwater management through stormwater permits that include best management practices (BMPs), mitigation of nonpoint source pollution, and erosion control should be considered when evaluating the watershed impacts of each alternative.

32.12A, 32.12B, 32.12J, 32.12K

195 North 1950 West • Salt Lake City, UT
Mailing Address: P.O. Box 144870 • Salt Lake City, UT 84114-4870
Telephone (801) 536-4300 • Fax (801) 536-4301 TDD (801) 536-4284
*www.deq.utah.gov*

Stormwater management for the enhanced bus serviced in peak-period shoulder lanes on S.R. 210 is managed under the provisions contained in Permit No. UTS000003 UPDES Permit for Discharges from Utah Department of Transportation Municipal Separate Storm Sewer System (MS4). Best management practices (BMPs) will be identified and implemented to control stormwater runoff from these construction sites. Trailhead parking improvements and reduced/eliminated roadside parking could decrease current erosion issues and improve trailside conditions by increasing vegetative cover. Design and construction of new parking stalls should consider the water quality benefits of using porous surfaces, such as gravel rather than impervious surfaces such as asphalt that can increase runoff. Parking should be engineered so runoff drains away from the creek and into structural stormwater BMPs that will attenuate pollution concentrations.

32.12J, 32.12O

32.12Q

The 2018/2020 Integrated Report identified Lower Little Cottonwood Creek as a high priority for TMDL development by 2022 for *E. coli*. This finding indicates that *E. coli* contamination is already an issue for Little Cottonwood Creek, and additional inputs could exacerbate current problems with pathogens in this drinking water source. Adequate bathroom facilities at the trailhead with parking improvements could reduce the levels of fecal contamination due to trail/backcountry usage. Pit toilet siting may be challenging given the lack of appropriate locations that meet demand without creating potential contamination. Increased visitation due to increased parking could reduce pit toilet life depending on volume, number of users, soil permeability, and groundwater level. Overflowing pit toilets could lead to an increase in fecal contamination near trails, streams, or tributaries as recreationists find other locations in the canyon in which to defecate.

32.12J, 32.20A, 32.20F, 32.20U

Thank you again for the opportunity to provide comments on the Little Cottonwood Draft EIS. For additional information or clarification, please contact Sandy Wingert, Upper Provo and Jordan River Coordinator, at swingert@utah.gov or Jodi Gardberg, Manager, Watershed Protection Section, at jgardberg@utah.gov.

Sincerely,

John K. Mackey

John K. Mackey
Acting Director, Division of Water Quality

SW:cjh

DWQ-2021-017864

**COMMENT #:** 13424-13426
**DATE:** 9/3/21 19:00
**SOURCE:** Phone Comment
**NAME:** Phone Comments

---

**COMMENT:**

13424_Doug Black
13425_Ryan King
13426_Elario Serrano

# Little Cottonwood Canyon EIS Public Hearing

## AUDIO
## TRANSCRIPTION

July 13, 2021

ADVANCED REPORTING SOLUTIONS
801-746-5080 | office@advancedrep.com | advancedrep.com
**SALT LAKE** | 159 West Broadway, Broadway Lofts, Suite 100 | Salt Lake City, Utah 84101
**PROVO** | 3507 North University Avenue, Suite 350-D | Provo, Utah 84604
**ST. GEORGE** | 20 North Main Street, Suite 301 | St. George, Utah 84770

REPORTING SOLUTIONS ADVANCED

**OFFICIAL TRANSCRIPTION**

Little Cottonwood Canyon EIS

Public Hearing and the July 13th, 2021

Reported by: Amber R. Fraass, RPR, CSR

P R O C E E D I N G S

-OOO-

DOUG BLACK: Hi. My name's Doug Black. I live in paper Draper, Utah. My phone number is 801-509-3684.

I was watching a report on KUTV today about the Little Cottonwood possibly putting in another lane for busses. My comment would be put the other lane in, keep the busses out of the canyon. And have two lanes up in the morning and two lanes down at night. I'm sure you guys have thought about this, but I don't know what the logistics would be at the top of the canyon dispensing the two lanes.

But anyway, just my thoughts. Thought I'd pass it along. My dad used to tell me, You can't harvest the crop unless you go out and plant the seed. And I think there's a lot of truth to that.

Anyway, thanks.

(End of voicemail.)

RYAN KING: Hey. My nickname is Ryan King and I'm a big skier that frequents Cottonwood Canyon. And I tried to leave a comment online, but -- it usually gives me a receipt thing that it was received, and it



COMMENT: 13424

32.2.2D

COMMENT: 13425

didn't. So I thought I would just cover my bases and leave a comment here.

I am a big proponent and a big fan of the gondola option to alleviate the traffic in the canyon. And I think one of the biggest reasons why is that during inclement weather, two-wheel drive cars seem to frequent the canyon. There's slide offs. There are busses that slide off. All sorts of vehicles. And as you know, a gondola can operate in inclement weather.

So I thought, I guess, it would be the best option to -- to really give people peace of mind that they would be able to get up the canyon and visit ski resorts, and -- and get down safely. So out of the two proposed options, I am strongly on team gondola. Thank you.

(End of voicemail.)

ELARIO SERRANO: Hello, my name's Elario Serrano. I'm a realtor with Keller Williams and I have some questions about trying to get, like, a map of where the gondola is going to be built. I have a client interested in purchasing -- or in building a home in that area, and we're wanting to see, like, where it's going to be built, how it's going to affect things.

If you could give me a call back, my number

32.2.9D

32.2.6.5H
32.2.6.3P

COMMENT: 13426

32.2.6J

is [redacted]. Again, [redacted]. Thanks so much. Bye, bye.

(End of voicemail.)

* * * * *

TRANSCRIBER'S CERTIFICATE

STATE OF UTAH )

) ss

COUNTY OF SALT LAKE )

I, Amber R. Fraass, a Utah Certified Court Reporter and Registered Professional Reporter, do hereby certify:

That I listened to the recorded voicemails and took down in shorthand the foregoing on July 23rd, 2021.

That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcript of said conversation is a complete, true and accurate transcription of my said shorthand notes taken down at said time, to the best of my ability to hear and understand the audio file.

I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor a person financially interested in said action.

IN WITNESS WHEREOF, I hereby certify this transcript in the County of Utah, State of Utah, this ^ day of ^, 2021.

Amber R. Fraass

Amber R. Fraass, RPR, CSR

**COMMENT #:** 13427-13438
**DATE:** 9/3/21 19:01
**SOURCE:** Phone Comment
**NAME:** Phone Comments

---

**COMMENT:**

13427_Anonymous Caller
13428_Pricilla Nath
13429_Bill Jensen
13430_Richard Mendel
13431_Gail Anderson
13432_Ann Sealy
13433_Steve Romanowski
13434_Steve Romanowski
13435_Steve Romanowski
13436_Steve Romanowski
13437_Patrick Lynch
13438_Caller Jennifer

# Little Cottonwood Canyon EIS Public Hearing 2021

## AUDIO
## TRANSCRIPTION

ADVANCED REPORTING SOLUTIONS
801-746-5080 | office@advancedrep.com | advancedrep.com
**SALT LAKE** | 159 West Broadway, Broadway Lofts, Suite 100 | Salt Lake City, Utah 84101
**PROVO** | 3507 North University Avenue, Suite 350-D | Provo, Utah 84604
**ST. GEORGE** | 20 North Main Street, Suite 301 | St. George, Utah 84770

REPORTING SOLUTIONS
ADVANCED

**OFFICIAL TRANSCRIPTION**

Little Cottonwood Canyon EIS

Public Hearing 2021

Reported by: Amber R. Fraass, RPR, CSR

Advanced Reporting Solutions
801-746-5080

P R O C E E D I N G S

-OOO-

ANONYMOUS CALLER: Comment for the proposal regarding either gondola or road expansion.

I don't want any of my tax dollars supporting Alta, a private business, that does not allow snowboarders on their mountain. They choose to discriminate based on whether you go down the mountain faced forward or sideways.

I have family members that do not ski, that only snowboard exclusively, have never learned, and as such, we are not welcome at Alta. Cannot go. Cannot use their mountain. Cannot use their equipment. I don't want to use my tax dollars to subsidize or support a business that discriminates against me.

They create divisiveness in the community. They are very much against inclusiveness in opening it to everybody. If tax dollars are being used to support private businesses, they need to be used to support businesses that are open to business to anybody in the Salt Lake Valley, not limit it and discriminate against people that don't go down a hill forward versus sideways.

I 100 percent do not support or want any of my tax dollars supporting a private business that will



COMMENT 13427

32.2.9C, 32.2.9E, 32.29I

32.29I

32.1.2D, 32.2.7A, 32.7B, 32.7C

not allow me to utilize their facilities.

(End of voicemail.)

* * * * *

PRICILLA NATH: Hi. My name is Pricilla Nath, and I am with the law office of Kirton McConkie. I'm trying to figure out how to mail information to UDOT on the Little Cottonwood Canyon EIS -- or it's regarding that. I was wondering if somebody could give me a call back about the correct address that I need to use.

My phone number is [redacted]. And again it's Pricilla, and I just need an address, you know, what their -- the attention line, department, office number, all that information. That would be great. Thank you. Bye.

(End of voicemail.)

* * * * *

BILL JENSON: Hello, this is Bill Jensen. Please call me at [redacted]. My questions center around the EIS project as it impacts traffic between State Road 190 and 2300 East, and State Road 190 Wasatch Boulevard. Please call me at [redacted]. Thank you.

(End of voicemail.)

* * * * *

COMMENT 13428

32.29D

COMMENT 13429

32.29D

RICHARD MENDEL: Yes, my name's Richard Mendel from Cottonwood Heights. [redacted].

I would like to see the study that got to the conclusion of 70 tons of carbon from canyon traffic -- I'd like to see the analysis. I'd like to understand what timeframe that covers. You know, is that days? Weeks? Months? Basically, I'd like to see how you got to the number.

It -- it -- it's a pretty powerful number that underscores how important it is for us to mitigate the air pollution challenge we face throughout the Wasatch Front. But it's a particularly dramatic number I'd like to know more of what underlies (sic) it. And I'm at [redacted]. And thank you very much for your help, as well as all your efforts on this project.

(End of voicemail.)

* * * * *

GAIL ANDERSON: Yes, thank you. This is Gail Anderson, and I just wanted to leave a comment about the Cottonwood Canyon transportation.

Use busses, not the gondola. The buses you can use the big ones or the small ones, and they can be the natural gas powered or electric, whatever, but

COMMENT 13430

32.10A

32.10A

COMMENT 13431

32.2.9A, 32.2.9E, 32.2.6.3E, 32.2.6.3F

they're more versatile. Please do not put a gondola in. I think it's a visual pollution for one thing, and I don't think they will work as well as the busses.

So thanks for what you do. Uh-huh, bye.

(End of voicemail.)

* * * * *

ANN SEALY: Hi, I'm Ann Sealy. And I helped out with weather measurements for a while with Utah State, and I -- I just feel like if our weather is changing, which it seems to be, we might be just a rainy climate or a dry climate, and I don't think we should put all that money into something that might not even have a ski -- impact for skiing, so I'm saying no on the gondola. Thank you.

(End of voicemail.)

* * * * *

STEVE ROMANOWSKI: Hi. Thanks for receiving voicemails regarding this serious situation with Little Cottonwood Canyon. My name's Steve Romanowski, and I have attended many of the meetings and written letters and made comments.

And it would appear that about 22 days of the year the canyon is a major problem for congestion. It

32.17A

COMMENT 13432

32.2.2E, 32.2.9E

COMMENT 13433

32.1.4D

depends on the snow, depends on the day. Regarding the people that are living at the mouth of the canyon, well, that's development and it -- it would appear that it's getting too populated for the road and for skiers all at the same time.

That said, I don't think that the gondola is a viable option because people still drive up. And a train obviously is over a billion dollars and -- and is feasible, but my main concern is the environmental impact.

32.2.9E, 32.2.4A
32.2.9M

So I am a skier. I -- I buy a season pass. I have an inside scoop. I've worked at a ski area for many years and understand avalanche mitigation procedures and how -- how Little Cottonwood can -- can be dangerous. But that is part of the experience. So there's a lot to be said about this.

In one of my letters I did include some of the things I'm going to state. For vehicles, local vehicles should be pre-inspected. Obviously, they need to have all-wheel drive and snow tires.

32.2.2M

But more than that, the locals that ski up there should have all the safety equipment associated with winter driving conditions and avalanche conditions. Transceiver in the car, shovel, probe, winter weather emergency gear and be educated about winter driving and

32.2.2M

the safe places for people to -- to be stopped in -- in -- in the event that they are blocked by an avalanche in one of the many avalanche paths in the canyon.

Also, with the education regarding winter driving and the canyon itself is understanding the weather observations and paying attention to weather. That's more difficult for the tourists, but the locals, everybody seems to be pretty savvy about everything, why not know a little more --

(End of voicemail.)

* * * * *

STEVE ROMANOWSKI: Hi, this is Steve. This would be part two of my comment -- voicemail comment. I believe I was cut off -- I was discussing education for local drivers in the canyon.

I think that's super important. A social media app for locals and carpooling from the UTA lots that exist currently, and where millions of dollars could be -- or hundreds of thousands of dollars could be used to develop those areas in the valley, not in the canyon.

Three-person minimums per vehicle on powder days and enforcement by an -- a state employee or a canyon employee, not -- not police. Because obviously the -- the police have been ineffective in inspecting

32.7B

COMMENT 13434

32.2.4A
32.2.2KK

32.2.4A, 32.2.2KK

every car going in the canyon, and -- and those -- those guys have better things to do, I think.

So three-people minimum on powder days. Planning ahead. Enforcement. Rental cars, there should be a rental car company that rents cars just for skiers. People coming to ski at Snowbird and Alta in particular are paying thousands of dollars a day. They can afford to rent a high-end car that has snow tires, all-wheel drive, all the safety equipment required, you know, for winter driving.

32.2.4A
32.2.2M

So moving along with the highway, I don't think that snow sheds are an environmentally -- way to go. Overall, if there were 22 days of bad days of driving over the course of a year in the canyon, it's my opinion, and many of my friends' opinions and other skiers that the -- the way the canyon is now is beautiful.

32.2.9J
32.7A
32.1.4D

And snow sheds, like on Rogers Pass, connect the -- the east and west sides of Canada. And this is a nine-mile highway. So I think that the allure of Little Cottonwood is partially of the experience of Little Cottonwood, and avalanche closures and avalanche mitigation procedures is part of that experience. And that is -- that commodity that -- it's amazing.

32.17C

(End of voicemail.)

* * * * *

STEVE ROMANOWSKI: Hi, this is Steve again. Part three of my voicemail comments. I was talking about snow sheds and how I disagree to have snow sheds in the canyon.

COMMENT 13435

32.2.9J

And I was stating that in -- for example, in Rogers Pass, it connects the nation of Canada, and for people to go skiing -- I mean, avalanche control work and avalanche mitigation procedures are in place to maintain safety on the canyon highway.

And having that being part of the experience for people, I think it should stay the way it is. I know it's dangerous work, and it's a dangerous highway, but that is the -- the beauty of Little Cottonwood Canyon, and it's so rare in our society to have something like that and experience that. And I think the tourists should be aware of what they're getting into by ski areas.

32.17C

So less cars, obviously, would mitigate the hazard of likelihood of -- of an accident or an avalanche involving vehicles on the highway. That said, there's so many miles of scenic roads in Utah. And in the middle of winter, it just doesn't seem appropriate for tourists, local or otherwise, if they're not skiing, to drive up

32.2.4A

the canyon to go for a drive.

And I do realize that this is about -- about tax dollars, but public safety is -- should be a big concern, too. And in an effort for conservation and less infrastructure in the canyons, Little Cottonwood in particular, if you just limit the cars, simply put, then you limit the need for more infrastructure.

32.1.2B
32.2.4A
32.2.2L
32.2.2K

So with social media and technology, a text alert could be used -- utilized for awareness for people approaching the canyon in the wintertime. And it could notify them about permitting or highway conditions and vehicle requirements, safety requirements to drive in the canyon, simply put.

32.2.2M

Reservations for skiing, reservations for parking. The ski areas are such a small area for skiing, there's no reason why there should be, really, at Snowbird, more than 5,500 or 6,000 skiers.

32.2.2K

(End of voicemail.)

* * * * *

STEVE ROMANOWSKI: Hi, Steve again. Part four. I was talking about text alerts.

COMMENT 13436

So using modern technology, information can be spread to people so that they're informed when they're

32.2.2M

approaching the canyon about road conditions and permitted vehicles in the wintertime. The ski areas can sell this experience.

If -- if they have reservations and limit the amount of people that ski at their ski area on any given day, and charge more money for skiing, especially for people that come in from out of town, I mean, simply put, then they could keep the tax revenue high and sell the experience so that there's not 8- or 9,000 people skiing at Snowbird.

There's only a certain amount of parking spaces in the canyon, so I feel from a conservation standpoint, that it should just stay that way. 1,200 parking spaces at the bottom of the canyon to accommodate this gondola would -- would be terrible, I think. I mean, most of the time I'm on that road, it's not busy at all. I know skiing's a different day, but.

Moving forward, there could be a nexus lane for moving traffic quicker for pre-approved vehicles, like locals. Three-passenger minimums on -- on powder days or weekends. In the mornings, specifically. Midday avalanche mitigation, more of that.

And then with the ski areas, if -- if -- if the UTA lots were to have busses going up and down just to the UTA lots back and forth and that's it, then

32.2.2M

32.2.2K, 32.2.2K
32.2.4A

32.2.9E

32.1.4D

32.2.2M

32.2.9A

families would -- could utilize it if the ski areas built day lockers for people because people's vehicles are their lockers. Even for one person, it's -- it's a big deal. I've walked from my house with all of my gear. I live near the swamp lot, and it's a hassle, obviously, to go skiing without a car.

32.2.3A

More taxes should be paid by tourists for -- for the revenue -- like, for Octoberfest there should be more taxes for beer sales and auto use. Local busses could be utilized, like I said, to go back and forth to the different UTA lots that should be developed for parking and meet up places.

32.29Z

(End of voicemail.)

* * * * *

PATRICK LYNCH: Hello, my name is Pat Lynch. My wife and I own Perpetual Storage in Little Cottonwood Canyon. We have not been asked our opinion on this, so I did submit a written comment through your website, Little Cottonwood EIS dot UDOT dot Utah.gov.

COMMENT 13437

UDOT tried to contact Mr. Lynch twice on 9/3/2021 by the number he left on the voice mail and sent a text.

It said, Are you a robot? I clicked, you know, no. I am not a robot, and -- but it didn't show up that it was a -- a -- check marked. So I'm not sure if my written comments were actually accepted by UDOT.

So, again, my name is Patrick Lynch. I would

like to have a call back at [redacted], which is the business number for Perpetual Storage, or on my cell phone, [redacted]. My comments are many, and I -- I think that they should be considered.

I am in concert with the LDS church faults as to what our opinions are of this whole thing. We are not for the gondola. We may be persuaded on expanded bus lanes. We have many other comments.

So if someone could call me back, I'd really appreciate it because it -- it doesn't -- I -- I'm worried that my written comments were not accepted. So again, Patrick Lynch, [redacted] or my cell phone [redacted]. Thank you very much. Bye.

(End of voicemail.)

* * * * *

CALLER JENNIFER: Hello, my name is Jennifer. I just wanted to comment on the Little Cottonwood Canyon.

I -- my comment is to please -- do not build a gondola in Little Cottonwood Canyon or any of our canyons. The canyons are beautiful mountains of wilderness that are irreplaceable. The gondola will make the canyon feel like an amusement park, not, I'm out in the wilderness. Thank you, bye.

32.2.9B

COMMENT 13438

32.2.9E
32.17A
32.4I

(End of voicemail.)

* * * * *

TRANSCRIBER'S CERTIFICATE

STATE OF UTAH )

) ss

COUNTY OF SALT LAKE )

I, Amber R. Fraass, a Utah Certified Court Reporter and Registered Professional Reporter, do hereby certify:

That I listened to the recorded voicemails and took down in shorthand the foregoing on September 15th, 2021.

That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcript of said conversation is a complete, true and accurate transcription of my said shorthand notes taken down at said time, to the best of my ability to hear and understand the audio file.

I further certify that I am not a relative or employee of an attorney or counsel involved in said action, nor a person financially interested in said action.

IN WITNESS WHEREOF, I hereby certify this transcript in the County of Utah, State of Utah, this 15th day of September, 2021.

Amber R. Fraass

Amber R. Fraass, RPR, CSR

**COMMENT #:** 13439-13443
**DATE:** 9/3/21 7:02 PM
**SOURCE:** Phone Comment
**NAME:** Phone Comments

---

**COMMENT:**

13439_Alexandra Benning
13440_Julie Bagley
13441_Steve Fitzwater
13442_Brieona Pappas
13443_Steve

# LITTLE COTTONWOOD EIS VOICEMAILS 3

## AUDIO
## TRANSCRIPTION

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LITTLE COTTONWOOD EIS VOICEMAILS 3

AUDIO TRANSCRIPTION

Reported by: Abigail D.W. Johnson, RPR, CRR, CRC

Alexandra_Voicemail_20210701

Hi, this is Alexandra Benning wanting to comment on the EIS for Little Cottonwood Canyon. I just wanted to highlight the fact that the gondola option is not truly a public transit option. And it's not in the best interest for the taxpayers as it only going to private corporations, Alta and Snowbird, and is not trying to limit any skiers or people in the canyon.

Also, I think that if we are using taxpayer funds to create so-called "public transportation," that public transportation should be running year round.

I am aware that Alta and Snowbird, you know, do not have the same occupancy year round. However, that's why a gondola should not happen, and that a bus system would be a much more feasible option. This would allow travelers to be in the same area. Sorry, I just lost my train of thought.

Yeah, I mean, I think the -- gondola poles are a nuisance visually to the Cottonwood Canyons. I think there's a lot of things that happen in Little Cottonwood that do not just include skiing in the winter and this -- and having a bus for those options would be must better.



**COMMENT 13439**

32.2.9E, 32.1.2B, 32.1.2D, 32.2.7A, 32.7B, 32.7C, 32.20A, and 32.20C

32.1.2C

32.2.9A

32.17A

32.2.9A

Where the associated costs with running a bus in the long term are higher, but that is also -- that a gondola is not running year round. So it seems like a skewed maintenance thing.

32.2.7C
32.2.6.5F

Yeah, I mean, honestly, it -- the Gondola really just shouldn't be an option. Or if it is an option, then you should have multiple stations to stop at for various back country trailheads, climbing trailheads, hiking trailheads and not just serve two private corporations. Thank you.

32.2.6.5G

Bagley_Voicemail_20210715

**COMMENT 13440**

Hi, my name is Julie Bagley. I have lived in Utah much of my life and used all three canyons that are close to my home in East Millcreek. My vote is for Plan B in the Little Cottonwood area, the gondola and trail system. Thank you very much.

32.2.9D

Fitzwater_Voicemail_20210707

**COMMENT 13441**

Hey, Sierra, this is Steve Fitzwater. I just wanted to maybe leave a message of my concerns, but I don't know if I'm totally onboard with putting a gondola in the canyon or not. But, you know, ten years back, or so, there was a mountain biking trail going down the canyon. And the forest service shut us down,

32.2.9E

basically, said water shed issues. But now your gondola is pretty much going to -- the platforms are going to go in the same place the bike trail was. So how does that work?

And also, if the gondola does go in, maybe we can put the mountain bike trail back and have that for a fun thing to do in the summertime. But you know, I'm a back country skier, mountain biker. And I just don't know how I feel about spending my tax money on helping out Snowbird and Alta when I would rather just get rid of Snowbird and Alta and everybody can just hike the mountains themselves. Do you know what I mean?

Kind of maybe my own selfish opinion, but I don't know how that's going to work for the back country community, but let's maybe consider everybody instead of just the two big corporations in the canyon. I'd appreciate that.

Maybe you can pass my message along. I would come to your guys' meeting, but I -- I work, and that's just not possible for me, but I appreciate ya and everything you guys are doing.

I know it's not easy. So, I guess, hopefully we can make the right decision, what's best for the community. So have a good afternoon and a good

32.29D

32.2.6.5I

32.2.7A

32.1.2D, 32.2.7A, 32.7B, and 32.7C

rest of your week. Thank you very much.

Pappas_Voicemail_[redacted]_20210716

Hi, my name is Brieona Pappas. I am calling about this project. My client owns one of the centers where you are planning to do some parking. And we're just curious on -- we just want to get on the phone with somebody.

If you could please give me a call back. You can reach me [redacted], again, Brieona Pappas, [redacted]. Thanks, bye.

**COMMENT 13442**

32.29D

Steve_Voicemail_[redacted]_20210712

Hey, this is Steve. I was just wanting to make a comment on the proposed tram idea going into Little Cottonwood Canyon. You know, it is right where the old mountain biking trail used to be, basically.

So I was just thinking that if you put in the tram, we should be able to get the mountain biking trail reestablished down the canyon. It could be fun for everyone, and it might even bring some summer use to your tram.

And also, I was wondering about, you know -- about the ones who share the tram with the snowboarders that are going to Snowbird might cause

**COMMENT 13443**

32.2.6.5I

conflict. I personally think the mountains should just be for everybody. That's their choice. But I would like to see it open up to snowboarders. 32.29I

And just also wondering, you know, if Snowbird and Alta are going to pay for this project, seeing how a lot of people don't even -- well, snowboarders can't even go to Alta. So why should they have to pay for it? And, you know, on their taxes and a lot of people in the community don't even ski. 32.2.7A

So I, personally, feel like Snowbird and Alta should pay for the majority of the project. So I appreciate your time and everything you guys are doing. God bless you and have a good day.

(End of audios.)

-o0o-

TRANSCRIBER'S CERTIFICATE

STATE OF UTAH )
) SS
)

I, Abigail D.W. Johnson, a Register Professional Reporter, do hereby certify:

That I listened to the recorded audio and took down in shorthand the foregoing on November 5, 2021.

That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcript of said audio is a complete, true and accurate transcriptions of my said shorthand notes taken down at said time, to the best of my ability to hear and understand the audio file.

I further Certify that I am not a relative or employee of an attorney or counsel involved in said action, nor a person financially interested in said action.

IN WITNESS WHEREOF, I hereby certify this transcript in the County of Utah, State of Utah, this 9th day of November, 2021.

Abigail D.W. Johnson

Abigail D.W. Johnson, RPR, CRR, CRC
Certified Court Reporter
for the State of Utah