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

Comments on the Final Environmental Impact Statement

Little Cottonwood Canyon
S.R. 210 | Wasatch Boulevard to Alta
in Cottonwood Heights, Sandy, the Town of Alta, and Salt Lake County, Utah

Volume 3: **Email Attachments**

Utah Department of Transportation

UDOT Project No. S-R299(281)

Submitted pursuant to

42 USC 4332(2)(c) and 49 USC 303

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being or have been carried out by UDOT pursuant to 23 USC 327 and a Memorandum of Understanding dated May 26, 2022, and executed by FHWA and UDOT.

UDOT Keeping Utah Moving

November 2022

As of the publication of this document, UDOT has not reviewed, in detail, all of the comments received on the Final EIS. Comments are essentially verbatim with personal information and rude or vulgar language redacted or removed. Be aware that some inappropriate language could have been missed. In addition, UDOT did not verify the safety or security of any hyperlinks that were included in the comments; please use caution if clicking on any of these links.

The comments are separated into four volumes:

Volume 1 contains a comment identification (ID) number for all comments received during the Final EIS public review and comment period. Volume 1 also contains the majority of the comments that were submitted through the project website, emailed, texted, or received via voicemail.

Volume 2 contains some of the longer comments that were automatically truncated due to cell character limits in the Volume 1 comment table. These longer comments are presented in their entirety in Volume 2.

Volume 3 contains comments that were received as attachments to an email. These comments contain the comment ID found in Volume 1. Many of these comments are also found in Volumes 1 and 2.

Volume 4 contains the comments that were mailed to UDOT. These comments also contain the comment ID found in Volume 1 along with the text "mailed comment" in the comment column.

ID 27858

9:39

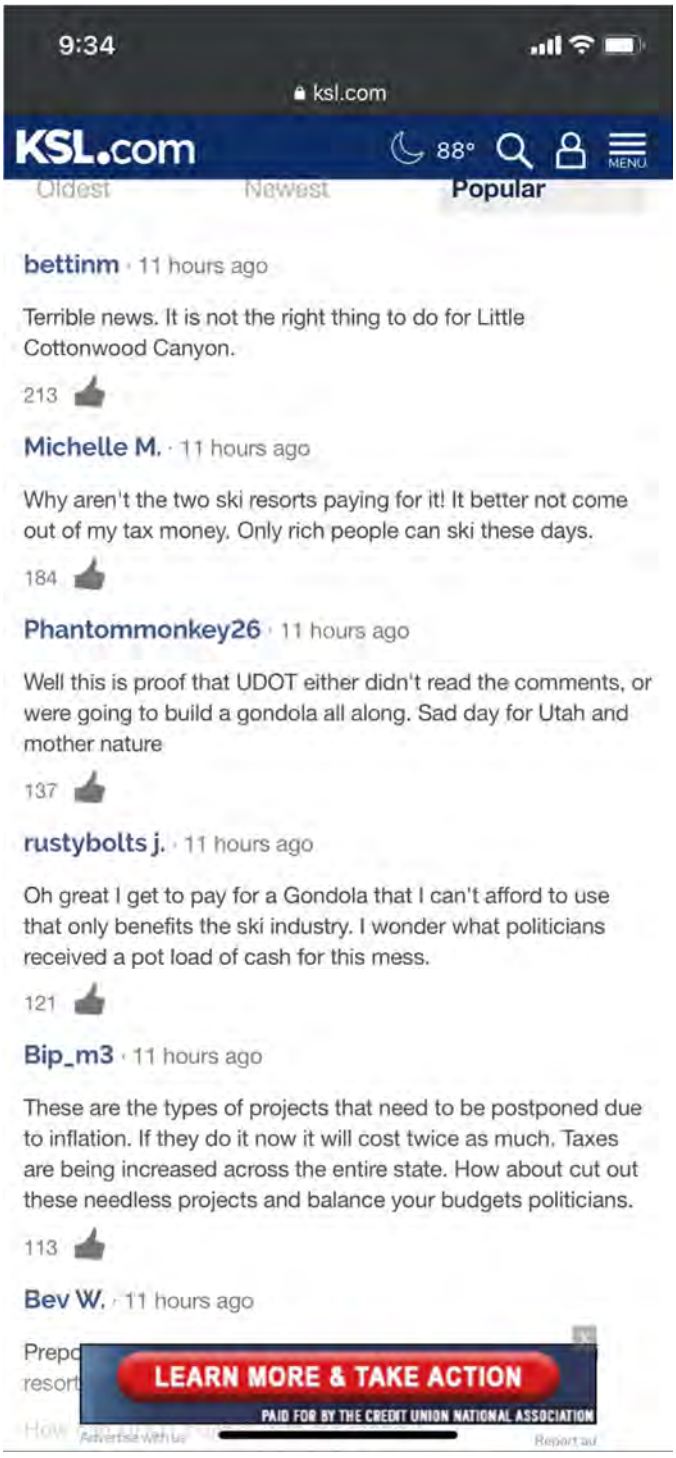
deseret.com

A sign opposed to a gondola is pictured in a yard near the mouth of Little Cottonwood Canyon in Cottonwood Heights on Tuesday, Dec. 7, 2021. | Scott G Winterton, Deseret News | Purchase Photo

A gondola has certainly caught attention as a possible new way to lift skiers up to some of Utah's most popular ski resorts — but most locals favor another solution.

Instead, most Utahns want an enhanced bus system to transport skiers, snowboarders and others looking to recreate up Little Cottonwood Canyon, which on powder days has been plagued with traffic that often spills over into the neighborhoods of Sandy and Cottonwood Heights.

That's according to a new Deseret News/Hinckley Institute of Politics poll, for which 60% of respondents picked an enhanced bus system as their first choice, while 20% said they prefer the gondola.



9:34

ksl.com

KSL.com 88° MENU

Oldest Newest Popular

bettinm · 11 hours ago

Terrible news. It is not the right thing to do for Little Cottonwood Canyon.

213

Michelle M. · 11 hours ago

Why aren't the two ski resorts paying for it! It better not come out of my tax money. Only rich people can ski these days.

184

Phantommonkey26 · 11 hours ago

Well this is proof that UDOT either didn't read the comments, or were going to build a gondola all along. Sad day for Utah and mother nature

137

rustybolts j. · 11 hours ago

Oh great I get to pay for a Gondola that I can't afford to use that only benefits the ski industry. I wonder what politicians received a pot load of cash for this mess.

121

Bip_m3 · 11 hours ago

These are the types of projects that need to be postponed due to inflation. If they do it now it will cost twice as much. Taxes are being increased across the entire state. How about cut out these needless projects and balance your budgets politicians.

113

Bev W. · 11 hours ago

ID 28166


108+00
110+00
112+00
114+00
116+00
CUT
MATCH LINE 107+00
SEE XXXXXX
MATCH LINE 117+00
SEE BELOW

ID 28926

August 9, 2022

Carlos Braceras
Executive Director
Utah Department of Transportation

Dear Director Braceras,

The Salt Lake City Council and Mayor of Salt Lake City appreciate the working relationship between UDOT and the City. We are proud of the connection and transportation options we provide residents through our collaboration.

We write to express our opposition to the proposed gondola from Wasatch Boulevard to Alta. The wellbeing of our residents is our priority as leaders. We have a responsibility to protect and preserve our natural resources, especially water.

Little Cottonwood Creek is one of our main sources of drinking water in the city and across the valley. Because of this, we cannot support the proposed gondola project.

We have concerns about the potential impact on residents, as detailed in the official comments from Salt Lake City over the course of the canyon transportation study and alternatives development so far.

We would like to emphasize our commitment to expanding bus service in the Canyon. Bus service will serve the needs of seasonal Canyon-goers with minimal environmental impact. This versatile approach allows for growth while preserving the Canyon's beauty and resources.

Sincerely,

Dan Dugan
Chair, Salt Lake City Council Member

DD/vl

cc: Salt Lake City Council Members

OFFICE OF THE CITY COUNCIL
451 SOUTH STATE STREET, ROOM 304
PO BOX 145476, SALT LAKE CITY UT 84114-5476

WWW.SLCCOUNCIL.COM
TEL 801-535-7600 FAX 801-535-7651
EMAIL: COUNCIL.COMMENTS@SLCGOV.COM

ID 29146

SEECLICKFIX ID
13375210

PRIORITY
Normal

REQUEST TYPE
Other

ADDRESS
[redacted]

ASSIGNEE

SLA EXPIRES

REPORTED
September 07, 2022 21:13

SECONDARY QUESTIONS

LOCATION


SUMMARY & DESCRIPTION
Gondola

The gondola will harm the environment and add unnecessary financial strain to Utah citizens, many of whom are unable to afford to ski at resorts like Snowbird and Alta. The business deals behind the land ownership are also seedy, and lead to further public mistrust in the project. The bus from the parking structure to the gondola stop will disuade tourists from using the gondola as well- why not just start on the bus up the canyon instead of transferring? This will also take much more time than being stuck in traffic. Stop the gondola now. This is not beneficial to the state of Utah.

Reported by: Utah Dept. of Transportation (UDOT Click 'N Fix) Neighbor 09/07/2022 - 09:13PM

MEDIA
No images available.

Forget the Gondola or a Widened Road; Instead, Choose This Far Superior "Matterhorn" Style Solution

Since both of the proposed solutions to the present winter access problems to Alta and Snowbird ski resorts have serious, scenic, environmental, etc. flaws, why not consider one of the Swiss government's far better solutions to deal with transportation problems similar to ours. Especially impressive is the way they have dealt with providing a superior way to move increasingly almost overwhelmingly large numbers of vacationers not only in winter months but throughout the entire year from flatter northern areas to the mountainous southern part of Switzerland with minimal damage to both scenery and the environment. Thus, instead of building steep, winding, and hazardous (especially in winter months) mountain roads, they constructed high speed passenger and amazing auto/train tunnels as a much better solution to the problem of deciding how to best transport large numbers of both summer as well as winter vacationers swiftly, safely, and dependably in an environmentally friendly way, to their destinations. This is especially important in dealing with the massive number of visitors irresistibly drawn to such internationally prized "bucket list" sites as Zermatt at the base of the world-famous Matterhorn.

Thus, as we now face a similar of type of human transportation problem in our increasingly internationally famous Wasatch Front ski resorts, it would be wise to examine how the Swiss have come up with a superior solution to a similar problem before adopting either of the two vastly inferior choices now being considered that, despite costing an enormous amount of taxpayer money, will only provide a relatively small percentage reduction in the traffic flow up and down this canyon, a percentage reduction that will become increasingly smaller in future years given the projected rapid growth rate of the Salt Lake metropolitan area.

In particular, let us examine how Zermatt, a small Swiss Village located in its narrow scenic valley beneath the towering Matterhorn solved its own "bucket list" transportation problem. Thus, instead of building ever wider roads and expanding

the number of parking lots or garages to accommodate the vehicles of the ever-increasing numbers of both winter and summer vacationers, they decided to make their village car-free. Its pedestrian-friendly main street instead of being clogged with traffic jams and parking lots is instead lined with boutique shops, hotels, restaurants, street musicians, food carts, etc., enabling it to have a lively apres-ski scene. Also, there are public outdoor rinks for ice-skating and curling. Now, in sharp contrast, using Google Maps, pull up the satellite image of Snowbird to see the enormous amount of scarce canyon acreage that is being devoted to ever-expanding parking lots.

What was the Swiss secret in accomplishing this? How were they able to move ever-increasing numbers of tourists from airports and cities in the relatively flatter part of northern Switzerland past many intervening mountain ranges to such higher location world-famous vacation spots as Zermatt and its Matterhorn swiftly, safely, in a much less environmentally destructive way than we have done in our own beloved canyons?

The answer is quickly found in their decision to not forget or reject, as we have now done as a society, several key advantages trains and railroad tunnels still have over cars and trucks. For example, if we would adopt a similar Swiss- style-train-tunnel solution to moving large numbers of both humans and goods past mountain barriers to higher elevations especially during winter months, much less precious canyon acreage would need to be utilized for vehicle parking.

This is not to say that we have completely abandoned construction of tunnels as a solution to many of our modern road construction challenges, but almost always most of these are designed for the passage of cars and trucks rather than passengers inside traditional passenger trains. In fact, as Peter Daulberg in his 7/31/22 letter ("Tunnel to Alta should have been one of UDOT's Little Cottonwood Options") to the editor of the Salt Lake Tribune, criticizes the UDOT for its "bit disingenuous" rejection of a tunnel transportation alternative from the Salt Lake Valley to Alta and Snowbird. He then goes on to write:

> A great alternative to building the little Cottonwood Canyon gondola is a vehicle tunnel. A vehicle tunnel could be built in a straight

alignment from the gravel pit at the mouth of Big Cottonwood Canyon to the Alta by-pass Road, a distance of 8.7 miles. A vehicle tunnel would allow the canyon to retain its natural beauty (as opposed to constructing 22 gondola towers that are up to 262 feet tall).

But many such tunnels, especially the longer ones, often have many serious problems here in America and elsewhere when such tunnels are built to accommodate two-way car and truck traffic. For example, visitors to Zion National Park frequently experience long delays in getting through the famous 1-mile Zion National Park tunnel as oversized vehicles are being escorted one way through the tunnel. And many of us remember the human-caused errors that claimed the life of England's Princess Diana. And since all of us have experienced long delays caused by one or more vehicles ahead of us running out of gas, experiencing mechanical breakdown, or being involved in an accident, consider how much more serious this is when it happens in the middle of a confined tunnel. Also, the problem of providing adequate ventilation would be a serious concern in the extremely long, deeply underground, tunnel that Daulberg proposes unless we would adopt an extremely expensive Swiss-style car/train system that would have the further disadvantage of being unable to transport extremely large numbers of vehicles quickly during the rush-hour periods of the day.

One strong point of his proposal though, is moving the parking area for the cars of skiers from the mouth of Little Cottonwood Canyon to the gravel pit at the mouth of Big Cottonwood Canyon. This would greatly please the residents of Sandy who dread the massive increase in car traffic on the narrow roads that lead to Little Cottonwood Canyon that would occur if either of the two proposals now being considered is adopted. However, there would still remain the problem of increased transfer-bus traffic from such a parking lot on narrow roads to the mouth of Little Cottonwood Canyon.

To solve this additional problem that is not being addressed by either of the two proposals now being considered as well as other serious remaining problems with either of the current proposals, perhaps it is time to consider the following much different “Matterhorn-type” solution using important clues from the time a

Park City mining company in 1916 completed the construction of the 14,500-foot Snake Creek Tunnel. The primary purpose of this tunnel was to drain water from the mountain that was preventing work in the lower levels of the mines on the mountain and as described in 1912:

> The tunnel itself was concrete lined. It was egg-shaped with the narrow point down. It was double tracked, nine and one half feet wide, seven feet above rail level, with a water channel below rail level four feet by four-foot two-inches. *(Engineering Record, May 25, 1912, Volume 65, Number 21, page 564)*

And with slightly changed dimensions as described in 1917:

> The tunnel is eight and one half feet in width, six and one half feet in height above the rails and has a water channel three and one half by four feet. It has a fall of 3 inches to 100 feet and the water flow at the time it reached Judge ground was 8,626 gallons a minute. *(Salt Lake Mining Review, January 15, 1917)*

And it was not lost to the builders of this tunnel that it could also be used to transport vacationers to a scenic viewpoint high on a mountain overlooking the upper end of Big Cottonwood Canyon.

Thus, why don't we consider constructing a similar high speed passenger but now electrified railroad tunnel to Alta and Snowbird using our existing Trax and Front Runner technology and equipment? And why not use the bottom section of the Snake Creek Tunnel to also create an electrified passenger train connection to the head of Big Cottonwood Canyon that would be possible if we changed the location of the base station for such a high-speed passenger train from the east side of Salt Lake County to a Park City location with parking lots or garages for cars and buses somewhere on the west side of Highway 189 just south of the I- 80 exit. And why not from a location at or near the east side entrance to the Snake Creek Tunnel also create a new train/tunnel to the head of Little Cottonwood Canyon and on to Alta and Snowbird?

Turn-around train facilities at the base main station would not be needed or those in the canyons if as in Switzerland and elsewhere where locomotives are

located not only on the front of the train but also on the rear end facing the opposite direction.

From the main station heading south about an estimated 10 miles along the west side of Highway 189 there would be four parallel tracks, two for each canyon. Reaching River Road to Midway the parallel tracks would be on the northside of River Road to the Dutch Hollow area where it appears that it could avoid crossing too many intersections as it went westward across the Midway area if it stayed quite north until it connected with the W Snake Creek Road and then continue alongside this road until they reached the entrance to the presently existing tunnel. At this point the four rail lines would split, two going to the Big Cottonwood Canyon tunnel and two to the Little Cottonwood Canyon one.

Why would it be desirable to have two rail lines going to each Canyon instead of just one each? One obvious reason is that it is always desirable to have a backup line in case something goes wrong with a train or the rails on one of the two. This would also make it possible to choose one of the lines to transport food and other needed supplies not only to the resorts but also to other canyon residents and on the return trip bring back garbage and all other sorts of trash that would eliminate the need for trash removal trucks to come up and down the canyons. Also, during the peak morning hours both lines could be used for passengers, thus greatly reducing the wait time for anxious skiers.

This main Park City station in addition to serving as a connecting point between arriving cars and buses and the electric trains going to either of the two canyons would also serve as a central bus hub for those individuals needing transportation to downtown Park City, the individual ski resorts, or wishing to visit other places in nearby locations e.g., Utah Valley University Wasatch or such seasonal attractions as the Midway Ice Castles and its annual Swiss days.

This creation of a world class winter and summer transportation hub would surely elevate us as a travel destination in the “bucket lists” of many international winter athletes and vacationers. This would also greatly enhance Salt Lake City's position over other locations in future year competitions to be chosen as the host Winter Olympics city. And a further enhancement would be the much safer and

more dependable winter access to Alta and Snowbird provided by I-80 rather than by the current Little Cottonwood and Big Cottonwood Canyon roads.

No longer will there be a need for increased parking lots or garages at the mouth of either canyon. In fact, the present parking areas could be entirely eliminated. This, then would allow for an unlimited number of valley locations often near parking lots or garages where buses bound for Alta and Snowbird and Solitude could originate e.g., the Salt Lake airport, downtown hotels, the University Utah, a parking lot or garage in the gravel pit area near I-215, the Trax stations in Sandy, the former prison site, and even cities north and south of the Salt Lake Valley.

A key part of this proposal should be to stop any further expansion of daily car traffic not only into Little Cottonwood Canyon but also into its neighboring Big Cottonwood Canyon where in the summertime trailhead parking lots are quickly filled to capacity early in the day forcing late comers to park illegally on the shoulders of the road approaching the trail head or even on right side of the road itself causing both environmental damage or at times partial road blocking. I have especially noticed this problem in summer months at the parking lots for Donut Falls, Lake Blanche, Lake Mary, Cecret Lake, and Silver Lake and it will only continue to get worse for the foreseeable future given the continuing explosive population growth of both Salt Lake and Utah counties.

The strength of this proposal is that there would be no need for any of the ski resorts in either Canyon to ever expand or even maintain their existing parking lots for winter sports vacationers. Instead, this would allow them, now that we have created our own “Matterhorn” style International “Bucket List” vacation destination, to use the land now occupied for parking cars as Matterhorn’s village of Zermatt did when it decided to ban cars from its main street instead lining it with boutique shops, hotels, restaurants, and food carts as well as public outdoor rinks for ice-skating and curling. And for those that don't want to walk everywhere or have trouble walking there are electric vehicles and horse drawn cabs.

The summer parking overload at trail head parking lots will need another solution but here is one proposal that can be considered. Those trailheads that are located within an easy walk from the new rail line will no longer need to have any

additional parking expansion for increased visitor access. Instead, for those still wishing to drive their own car up one of the two canyons, a reservation system perhaps on a daily or weekly or monthly basis should be set up for one of the now existing parking spaces at any particular trailhead parking lot. A small fee, perhaps five or ten dollars should be charged that can be refunded if a cancellation is turned in at least one day earlier than the scheduled visit so that another individual could now apply for the opening. Each permit holder would be required to submit the license number of the vehicle he or she would be using so that anyone parking illegally at a trailhead without a permit would have her or his vehicle towed away as would any vehicle parked illegally along the road near the trail head.

For those extremely popular trailheads farther away from the new rail line perhaps an electric shuttle system similar to that used in Zion National Park could transport summer vacationers to such down the canyon popular trailheads as those at Donut Falls and Lake Blanche and would have to go no farther than the notorious S-curve. Finally, the total ban on buses coming up the canyon and the reduction in the number of upcoming cars would greatly reduce the amount of smog-producing fumes emerging from vehicle tail pipes, polluting the air in both canyons during the day and unfortunately then being carried downwind by canyon breezes in the evenings thus adding this toxic mix to the horrible air we are forced to breathe during one of our often long winter air inversions.

And at some time in the future, it would be possible to further expand the Trax line that now goes from the airport to the University of Utah to continue along a subway under Foothill Drive to Parleys Canyon and up I-80, passing through another tunnel under Parleys Summit, to complete the link all the way from the airport to all of the ski resorts in both Canyons and Park City. This final link, as a further possible option, in the transportation chain from the airport to the canyon resorts and other types of mountain recreation would eliminate or greatly reduce any winter weather problems that often still occur on I 80 between Salt Lake and Park city. No other city in the world would then ever be able to match Salt Lake City's ski experience in variety and convenience. Also possible would be the construction of other Trax or Front Runner lines possibly alongside of I-215 from

such locations as the suggested Big Cottonwood Canyon gravel pit location. Such a line combined with a subway under Foothill Drive could also help greatly reduce the already maddening rush-hour traffic jams on Foothill Drive since in addition to lines going up to the Park City station there could be another nonstop line going from the gravel pit area to the University of Utah, the medical centers, businesses, etc.. I am convinced that such an alternative way to get to the University of Utah area would become a transportation option that many of the faculty, students, hospital workers/patients, business people, etc. coming from the southeast area of our county would choose over the horrendous traffic jams now occurring on Foothill Drive that will become increasingly more serious in the not too distant future.

Larry R. Stucki, Ph.D.

August 30, 2022

Background information

Since my retirement from a long college and university teaching career, I finally had time for several visits to Switzerland to find and visit the small community where my grandfather, the last surviving member of the handcart pioneers to Utah, was born. And while there, staying in nearby Thun, after having accomplished this primary goal we still had time for additional sightseeing opportunities in this amazingly scenic country and on my wife's “bucket list” was to see the Matterhorn but unfortunately on the first trip it was so completely covered by clouds on the day we went, we failed to ever see it but on our second trip to Switzerland we were finally able to clearly see it in all its glory. And especially impressive on these trips was the incredibly quiet, extremely fast speed we were able to travel in an extremely long tunnel underneath the massive mountains that lay between the south shore of Lake Thun and the valleys to the south.

ID 31152

October 5, 2022

UDOT EIS Comment

Re: Faulty date relating to SOC USU Study

Dear Mr. Van Jura,

The definition of dispersed Little Cottonwood Canyon (LCC) recreationists used and promoted by Save Our Canyons (SOC) and others is vague and incorrect as presented in materials by those in opposition to the UDOT EIS preferred transportation alternative being the gondola.

Their attempt to provide information that states 70% of all LCC visitors are dispersed recreationists that do not use the Snowbird or Alta facilities. This comment will point out why SOC and others using this study to influence LCC visitors is misleading and has an undue influence on the gondola's acceptance and as such, the lack of support from their support groups should be discounted.

In part, the first of two Utah State University studies (attached) is a five-page report called *An Estimation of Visitor Use in LCC, BCC and Millcreek Canyons* (the "Visitor Use Study") and uses a visitation formula with **12-month vehicle count** compared to only **six months of skier visits** that defines the number of skiers utilized vehicles. The Visitor Use Study is skewed as it defines that all visitors in LCC who did not purchase a lift ticket are people who do not go to Alta and Snowbird. As detailed below, this prejudices the results by ignoring the non-skier visitors who use the resorts such as those attending Octoberfest, staying at the hotel, eating dinner, hiking to Albion Basin to see the wildflowers, etc.

These identified dispersed LCC visitors, as inferred by the USU study and the gondola opponents state they are not using resorts assets (including the parking) are false as there is simply not enough room along the canyon road to facilitate parking that many vehicles below

Snowbird's entry one and above Alta. Because they are using the resorts parking above Entry One through to Alta, the dispersed visitors could then be served by the gondola.

The second USU study (attached) is titled the Central Wasatch Visitor Use Study (CWVUS). The CWVUS results are prejudiced against the resort users further because **they did not interview anyone at Snowbird** (see page 3 in the CWVUS)? Of the ten reported sites where they collected visitor use data in LCC, only one location at Alta was used and that location accounted for only .8% of the studies respondents. It appears the reports desired outcomes were pre-determined and as such the report is then fatally flawed. This is in part due to only five of the 200 USU coordinated interviews being conducted within the ski areas!

By stark contrast to the two USU study's conclusions, Alta Ski Area had Streetlight Data (see Note One) conduct a three-year analysis (attached) of the LCC canyon visitors' destination. From 2018-2020, the total average year-round daily vehicle count arriving from the mouth of LCC and then arriving at either Snowbird or Alta was 87%! UDOT had similar findings in their draft EIS which is why you recommend that the final two preferred transportation options only stop at Alta and Snowbird. It's not because UDOT wants to subsidize the commercial venues, it's because it's the destination for the vast majority of LCC visitors!

Further, on a single day (2/12/2022) we counted 124 vehicles parked below Snowbird Entry One. Everything above that location can be managed by the two preferred UDOT alternatives. With an estimated 4,300 vehicles parked at and around the Alta and Snowbird resorts, the dispersed recreationalists were 2.95% of the canyon visitors. Further, the number of vehicles at the White Pine trailhead, including parked cars on Highway 210 was 82. As mentioned by Snowbird management, with slight modifications to the Snowbird transportation and mountain systems, they could manage the White Pine dispersed visitor's transportation needs. Therefore, If the 82 vehicles were deducted from those not able to be assisted in the future by mass transit, then on that day, the dispersed recreationists represented only .9%, not the 70% of the LCC visitors as promoted by USU SOC and others.

Additionally, the Gondola opponents are throwing numbers around like "70% of the canyon users are dispersed recreationists" *(see Figure 3 Visitor Use Study – page 5).* They state that

"there are 783,013 non-resort users' vehicles in the canyon annually" *(Page 2 -Estimation of Visitor Use in LCC, BCC and Millcreek).* If the opponents' claims are correct, and their claim that the UDOT preferred alternative (the gondola) *disproportionately* favor the resorts, and if you divide the estimated visitors' vehicles by 365 days in the year, the average number of dispersed visitor vehicles in LCC are 2,145 cars per day. One needs to ask the question: *With only a few hundred available visitor parking spots along the LCC road and at trailheads (outside of the Snowbird and Alta parking), where are all these dispersed users parking – every day?*

We believe that, in the future that most canyon visitors can have better access to LCC through the proposed UDOT preferred alternative and that access as planned is presently balanced and proportionally accounted for in the Draft EIS.

As a state and community, we need to support solutions that solve all the challenges in the canyon, not the imaginary problems created by rhetoric and public clamor. We applaud UDOT for their work and are confidant the you have come to the conclusion based upon science based factual information, without undue influence as UDOT should not be subject to public clamor, misinformation, and exaggerated rhetoric.

Sincerely,

CW Management Corporation

Chris McCandless, President

Note One: *Streetlight Data harnesses smartphones as sensors to measure vehicle, transit, bike, and foot traffic virtually anywhere. Using their software to get counts, O-D, and other transportation metrics — for any road, area or time period.*

An Estimation of Visitor Use in Little Cottonwood, Big Cottonwood, and Millcreek Canyons

Prepared by:
Chase C. Lamborn M.S.
Steven W. Burr Ph.D.

Institute of Outdoor Recreation and Tourism
Utah State University
Logan, UT

February 29, 2016

Introduction

The following presents an estimation of annual visitor use in the Tri-Canyon area—Little Cottonwood, Big Cottonwood, and Millcreek Canyons—of the Central Wasatch Mountains. The methodology is also presented to show how the annual visitor use estimates were calculated. The materials used to generate the annual visitor use are as follows: vehicle traffic counts from the Utah Division of Transportation (UDOT), the average number of people per vehicle from the Central Wasatch Visitor Use Study, and ski area visitation numbers. Table 1 below presents the average number of people per vehicle by area.

Table 1: Average Number of People Per Vehicle by Area

Area	Average People Per Vehicle
Dispersed	
Little Cottonwood Dispersed	1.81
Big Cottonwood Dispersed	2.05
Millcreek Canyon Dispersed	1.71
Wasatch Back Dispersed	1.44
Resorts	
Brighton Ski Resort	2.79
Solitude Ski Resort	2.97
Alta Ski Resort	2.57
Snowbird Ski Resort	2.31

N = 2794

It is important to keep in mind that we were unable to accurately exclude non-recreational visitors from the dispersed use estimates in Little Cottonwood Canyon and Big Cottonwood Canyon. Therefore, the estimates for these two areas include non-recreational users. All other use estimates should closely represent the actual amount of use those areas receive.

Little Cottonwood Canyon Visitor Use Estimate

UDOT reports an average of 5,560 vehicles traveling up and down Little Cottonwood Canyon (LCC) per day in 2013. This number was divided by two to get the number of vehicles traveling in one direction. It was then multiplied by 365 to get the total number of vehicles entering LCC a year:

> (5,560 vehicles traveling up and down LCC / 2) = 2,780 vehicles entering LCC per day * 365 = 1,014,700 vehicles entering LCC in 2013

The Central Wasatch Visitor Use Study (CWVUS) found the average number of people per vehicle for non-resort users in LCC was 1.81, and the average number of people per vehicle for Alta Ski Resort was 2.57, and the average number of people per vehicle for Snowbird Ski Resort was 2.31. In addition, the CWVUS found that 69% of Alta visitors rode in a personal vehicle, and 74% of Snowbird visitors rode in a personal vehicle. In 2011/2012, Alta reported 364,090 skier days and Snowbird reported 418,100 skier days, which totals 782,190 skier days over the 2011/2012 season in LCC. With this information, we calculated the number of vehicles used to travel to the ski resorts:

> (364,090 skier days for Alta * .69 traveled in a personal vehicle) = 251,222 people drove to Alta to ski / 2.57 people per vehicle = 97,751 vehicles used to access Alta

(418,100 skier days for Snowbird * .74 traveled in a personal vehicle) = 309,394 people drove to Snowbird / 2.31 people per vehicle = 133,936 vehicles used to access Snowbird

97,751 vehicles used to access Alta + 133,936 vehicles used to access Snowbird = 231,687 vehicles used to access the LCC ski resorts

The number of vehicles used to access the LCC ski resorts was subtracted from the total number of vehicles entering LCC over a year:

1,014,700 vehicles entering LCC per year - 231,687 vehicles used to access LCC ski resorts = 783,013 non-resort user vehicles

The number of non-resort vehicles was then multiplied by the average number of people per vehicle to get the number of non-resort visitors:

783,013 non-resort user vehicles * 1.81 people per vehicle = 1,417,253 non-resort visitors in LCC per year

The number of resort visitors was then added to the number of non-resort visitors which given an approximation of the total number of people visiting LCC per year:

782,190 resort visitors + 1,417,253 non-resort visitors = 2,199,443 LCC visitors per year

This number does not account for the residents of Alta (approximate population of 400), ski resort personnel, and service vehicles that travel in and out of LCC. These people should be excluded from the recreational use estimate. A high estimate for non-recreational users in LCC would be around 200,000, which when subtracted from the use estimate calculated above equals around two million recreational visitors a year.

Big Cottonwood Canyon Visitor Use Estimate

UDOT reports 4,170 vehicles going into and coming out of Big Cottonwood Canyon (BCC) per day in 2013. This number was divided by two to get the number of vehicles entering BCC. It was then multiplied by 365 to get the number of vehicles entering BCC per year.

(4,170 vehicles traveling up and down BCC / 2) = 2,085 vehicles entering BCC per day * 365 = 761,025 vehicles entering BCC per year

The Central Wasatch Visitor Use Study found the average number of non-resort skier per vehicle was 2.05. The average number of people per vehicle traveling to Brighton Ski Resort was 2.79, and the average number of people per vehicle traveling to Solitude Ski Resort was 2.97. The CWVUS also found that 87% of both Brighton and Solitude users rode in a personal vehicle to access the ski resorts. Over the 2011/2012 ski season, Brighton reported 392,882 skier day and Solitude reported 180,103 skier days. The number of skier days was multiplied by the percent of people who rode in personal vehicles to access the resorts to get the number of people who drove to the resorts. The number of people who drove to the resorts was then divided by the average number of people per vehicle to get the number of vehicles traveling to the resorts.

(392,882 skier days for Brighton * .87 traveled in a personal vehicle) = 341,807 people drove to Brighton / 2.79 people per vehicle = 122,511 vehicles used to access Brighton

(180,103 skier days for Solitude * .87 traveled in a personal vehicle) = 156,689 people drove to Solitude / 2.97 people per vehicle = 52,757 vehicles used to access Solitude

122,511 vehicles used to access Brighton + 52,757 vehicles used to access Solitude = 175,268 vehicles used to access BCC ski resorts

The number of vehicles used to access the BCC ski resorts was subtracted from the total number of vehicles entering BCC over a year.

761,025 vehicles entering BCC per year - 175,268 vehicles used to access BCC ski resorts = 585,757 non-resort user vehicles

The number of non-resort user vehicles was then multiplied by the average number of people per vehicle for non-resort users.

585,757 non-resort user vehicles * 2.05 people per vehicle = 1,200,801 non-resort visitors in BCC per year

The number of non-resort visitors per year in BCC is then added to the number of ski resort visitors to get the total number of visitors is BCC per year.

1,200,801 non-resort visitors in BCC + 392,882 Brighton users + 180,103 Solitude users = 1,773,786 BCC visitors per year

Again, this number does not exclude ski resort personnel and people accessing home, unless those homes are “recreational properties” such as cabins.

Millcreek Canyon Visitor Use Estimate

UDOT does not collect traffic data in Millcreek Canyon. To get these data, a request to place a temporary traffic counter in the canyon was submitted by the District Ranger of the Salt Lake Ranger District, Catherine Kahlow. From this request, UDOT provided hourly traffic counts from 1/29/2015-3/2/2015 and 3/30/2015-5/28/2015, and with these counts we calculated an average of 852 cars entering Millcreek Canyon per day.

The data from the Central Wasatch Visitor Use Study showed the average number of people per vehicle for Millcreek Canyon was 1.71. With these two numbers, we calculated the number of people visiting Millcreek Canyon per day, and then multiplied that number by 365 to estimate annual use.

(852 vehicles enter MCC per day * 1.71 people per vehicle) = 1,456.92 people per day visiting MCC * 365 = 531,775 MCC visitors per year

Total use for Little Cottonwood Canyon, Big Cottonwood Canyon, and Millcreek Canyon

<u>Little Cottonwood Canyon Total Use</u>

1,417,253 non-resort visitors + 782,190 resort visitors = 2,199,443 LCC visitors per year

Big Cottonwood Canyon Total Use

1,200,801 non-resort visitors + 572,985 resort visitors = 1,773,786 BCC visitors per year

Millcreek Canyon Total Use

(852 vehicles enter MCC per day * 1.71 people per vehicle) = 1,456.92 people per day visiting MCC * 365 = 531,775 MCC visitors per year

Total Dispersed and Resort Use

1,417,253 non-resort visitors in LCC + 1,200,801 non-resort visitors in BCC + 531,775 MCC visitors = 3,149,829 dispersed users

782,190 LCC resort visitors + 572,985 BCC resort visitors = 1,335,175 resort users

Total Overall Use

2,199,443 LCC visitors per year + 1,773,786 BCC visitors per year + 531,775 MCC visitors per year = 4,505,004 total use for LCC, BCC, and MCC

Use Figures

Figure 1: Summary of Tri-Canyon Usage

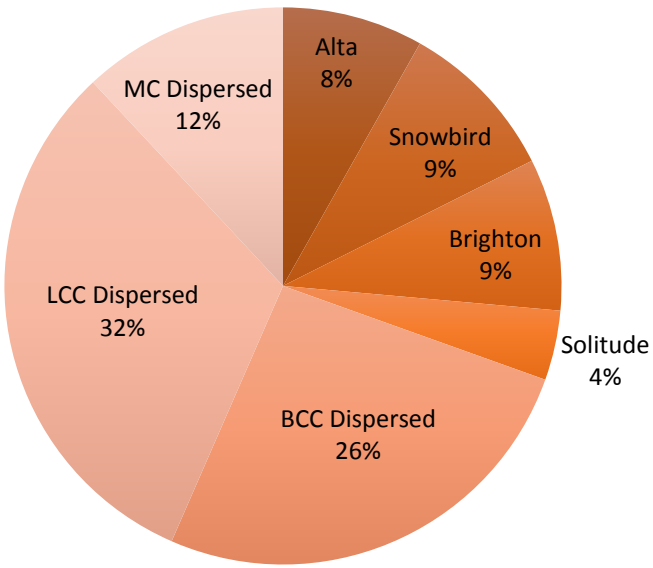


Figure 2: Percentage of Use by Canyon

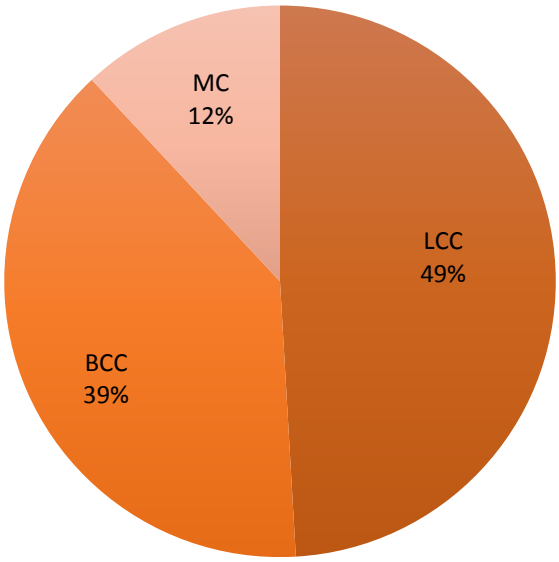
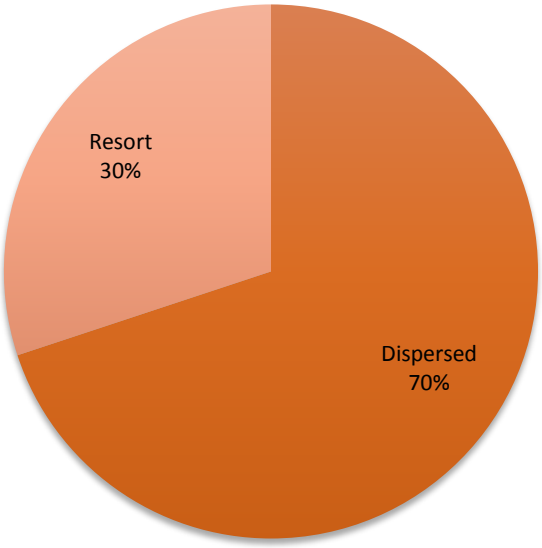
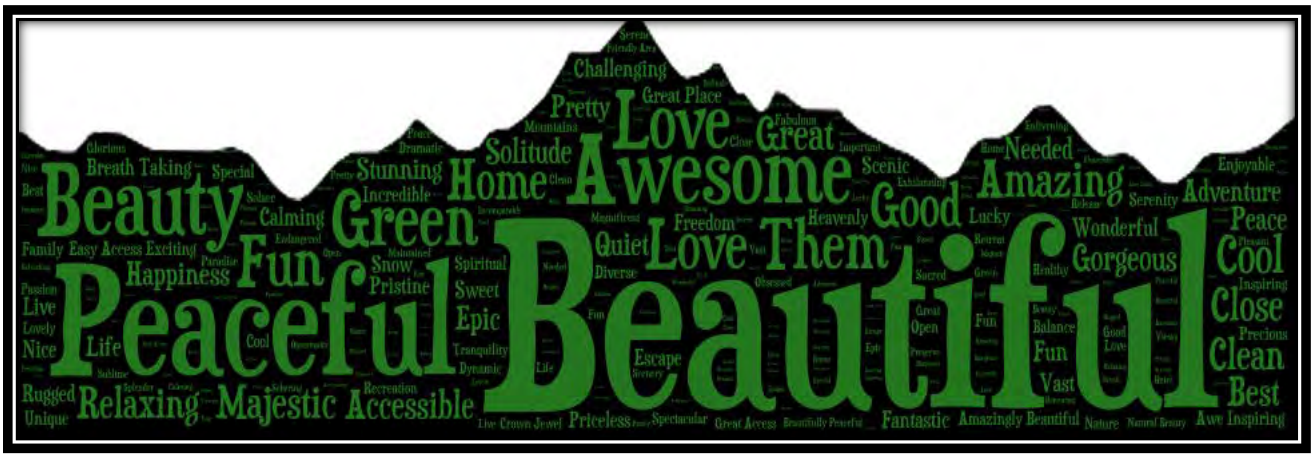


Figure 3: Percent of Dispersed and Resort Use



2014-2015 Central Wasatch Visitor Use Study: A Visitor Survey on the Salt Lake Ranger District and Surrounding Public Lands

WINTER QUARTERLY REPORT



Prepared for:

Save Our Canyons, Salt Lake City, and the Salt Lake Ranger District
of the Uinta-Wasatch-Cache National Forest

Prepared by:

Chase C. Lamborn
Steven W. Burr
Bradley Kessler

Institute for Outdoor Recreation and Tourism
Utah State University
Logan, UT

April 2014

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Report Summary

The Winter Report presents the data collected in the Central Wasatch Mountains (CWM) during the months of December, January, and February. The two previous quarterly reports—summer and fall—presented nearly identical data. This showed that the study is producing consistent results, and it also showed that little changed in *who* was recreating in the CWM, and *how* they were recreating in the CWM. One explanation for why there were so few difference could be placed on the unusually warm, dry fall season, which continued throughout the winter. The effects of the warmest and least snowy winter on record have undoubtedly affected the use patterns in the CWM, but to what extent, at this time, is unknown.

There are more differences in the data presented in this report than seen between the summer and fall reports; however, many variables are still nearly identical. For example, the people using the CWM during the winter are still mostly *locals*, with 82.6% living within 40 miles of Brighton Ski Resort. The time visitors spent recreating did not change, with the majority still only spending a few hours when they visit. Levels of visitor satisfaction were still outstandingly high, with 82.6% being "very satisfied" with their visit to the CWM, and the majority of respondents still said the people they met recreating positively enhanced their experience.

One large difference in the winter data was the types of recreation taking place. Hiking was still the most common activity participated in by visitors, but the number of visitors hiking decreased from 53% in the fall to 29%. There was a large increase in winter activities like backcountry skiing, snowshoeing, and cross-country skiing, but warm weather and little snow may account for why hiking was still the most common activity. There was also an overall decrease in the diversity of recreational activities taking place during the winter.

There was a slight shift in the demographics of CWM visitors over the winter. For example, the proportion of people with advanced degrees (i.e., Master's and/or PhDs) exceeded the number of people with Bachelor's degree, and the proportion of winter visitors that had a household income of over $150,000 increased. The proportion of white males recreating in the CWM also increased.

Even though it was a record-breaking warm winter, it still seemed to deter family activities. There was a 50% decline in the number of visitors under 16 years old, and the motivation of "do something with family" as a reason for visiting decreased. As also seen in the fall, there was another decrease in the number of visitors with disabilities—a decrease to 1.7%.

The number of out-group encounters decreased again to a median of seven (mean = 10.7), which shows a decrease in overall visitation during the winter months. And lastly, an increased number of visitors used their personal vehicles to reach their destinations in the CWM—96% drove personal vehicles.

Many of these changes were expected with the colder, less favorable winter conditions, in addition to access being more difficult, conditions being more dangerous, and an increase in activities that require more expensive and technical equipment (e.g., backcountry skiing). If this

winter were more comparable to past winters, these changes would have most likely been even stronger.

Introduction

The purpose of this research project is to collect visitor use data (both dispersed use and overall use) on the Salt Lake Ranger District of the Uinta-Wasatch-Cache National Forest, by conducting visitor intercept surveys (on-site interviews) at recreational sites, areas, and trailheads in the Tri-Canyons area (Little Cottonwood, Big Cottonwood, and Mill Creek Canyons), Parley's Canyon, and the Park City—Wasatch Back (private land and resort access). Additionally, for those respondents agreeing to participate, a more-detailed, on-line e-survey will be administered. The data collected and subsequent analysis will be useful for the National Forest, Salt Lake City, and Mountain Accord, a multi-phase initiative that seeks to make critical decisions regarding the future of the Central Wasatch Mountains, made up of a collaboration of public and private interests, including state and local governments, federal agencies, and businesses and grassroots organizations. The research project is being funded through Save Our Canyons, a non-profit organization dedicated to protecting the beauty and wildness of the Wasatch mountains, canyons, and foothills.

This report outlines the data gathered from the intercept survey during the **2014-2015 winter quarter (December, January, and February)** of this twelve-month project. The intercept survey is designed to gather the following information: visitor demographics including group size and make-up; local and non-local use; visitor use patterns; minority use; forms of transportation utilized for access; sites/areas recreated in and activities in which engaged; motivations for recreation participation and personal values/benefits sought; issues of solitude and perceived crowding; and awareness of protected watersheds and designated Wilderness Areas.

Methods

Intercept surveys were administered by volunteers from Save Our Canyons and other stakeholder groups. These volunteers were trained and managed by a USU Institute for Outdoor Recreation and Tourism (IORT) Project Manager, working in conjunction with a Project Field Coordinator who was hired by the Salt Lake Ranger District, Uinta-Wasatch-Cache National Forest. The sampling design, location of sampling sites, and sampling schedule were developed in consultation with the Salt Lake Ranger District, Save Our Canyons, and other stakeholder groups. The target number of surveys by the end of the twelve months is approximately 2000-2500.

Data collected were compiled and entered into SPSS data analysis software, with subsequent analysis. This is the third quarterly report provided by Utah State University's Institute for Outdoor Recreation and Tourism research scientists, and will be incorporated into the final report.

Results

With the third quarter complete, we are now entering the final quarter of the scheduled data collection period for the Central Wasatch Visitor Use Study. Over the third quarter, 612 visitor intercept surveys were completed, which totals 2,003 surveys that have been completed over the duration of this project.

Forty sites were scheduled each month—ten sites from each area within the Central Wasatch Mountains: Little Cottonwood Canyon, Big Cottonwood Canyon, Millcreek Canyon, and the Wasatch Back. Approximately 62% of the scheduled sites were surveyed, which is lower than last quarter's 77%. Cold, winter weather and the holidays can be attributed to why fewer sites were surveyed this quarter than the previous two. Because of these factors, it was harder to find volunteers to donate their time. Since the weather has been warming, the rate at which volunteers have been signing up to cover sites has increased. Table 1 presents the number of surveys completed at each survey location over the winter quarter.

Table 1: Number of surveys completed by site

	Surveys	(Percent of Surveys Completed)
Little Cottonwood Canyon		
White/Red Pine	68	(11.1)
Lisa Falls	16	(2.6)
Grizzly Gulch	66	(10.8)
Wildcat Base of Alta Ski Area	5	(.8)
West Gate	4	(.7)
Bell's Canyon/Lightning Ridge	41	(6.7)
Big Cottonwood Canyon		
Mill B South/North	26	(4.2)
Butler Fork	16	(2.6)
Cardiff Fork/Mill D South/Donut Falls	19	(3.1)
Guardsman's Pass TH	13	(2.1)
Spruces	26	(4.2)
Mineral Fork	4	(.7)
Silver Lake	4	(.7)
Mill D North Fork TH	5	(.8)
Millcreek Canyon		
Mill Creek Winter Gate	108	(17.6)
Porter Fork	22	(3.6)
Church Fork	17	(2.8)
Rattlesnake Gulch	5	(.8)
Thayne's Canyon TH	16	(2.6)
Neff's Canyon TH	69	(11.3)
Mount Olympus TH	16	(2.6)
Park City/Wasatch Back/Parley's Canyon		
Lamb's Canyon	12	(2)
Rob's	15	(2.5)
Road to WOS	7	(1.1)
Unknown	12	(2)
Total	612	(100.0)

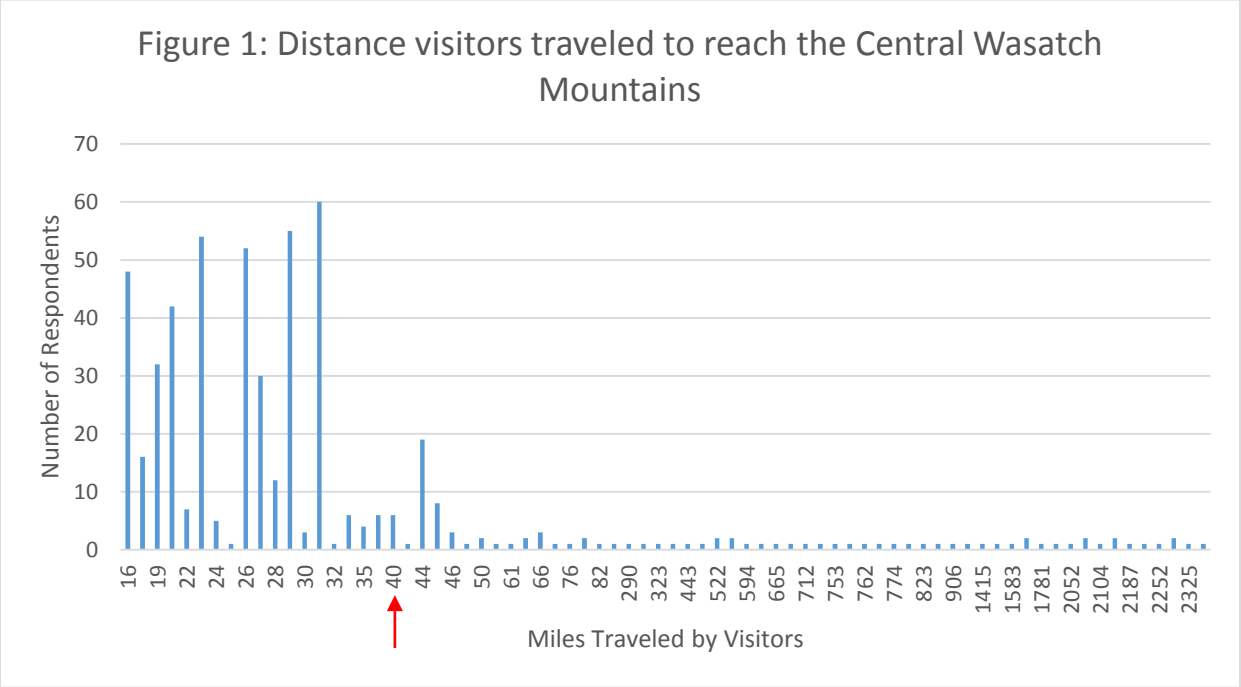
This section follows the format of the intercept survey. Each question on the intercept survey is presented in italics, and is followed by tables, graphs, and interpretations of the data.

Are you a resident of the United States?

☐Yes If Yes, what is your Home Zip Code? _____

☐No If No, what Country are you from? _____

The question above was used to identify how far visitors are traveling to reach the Central Wasatch Mountains (CWM). This analysis was done by calculating the distance each zip code was from a central location (i.e., Brighton Ski Resort) in the Wasatch Mountains. As seen in Figure 1, the overwhelming majority of visitors live fewer than 40 miles from Brighton Ski Resort. The median distance traveled by visitors was 27 miles (median distance for the summer quarter was 25, and the median for the fall was 26 miles), and the mean distance was 131 miles (mean for the summer quarter was 110, and fall was 133 miles). The large discrepancy between the median and mean illustrates the heavily right-skewed distribution of the histogram below. The maximum distance traveled by U.S. residents to reach the Central Wasatch Mountains during the third quarter was 2,361 miles. Over the winter quarter, only one respondent was from outside of the county—this individual was from Mexico. These data show that 82.6% of CWM visitors live fewer than 40 miles from Brighton Ski Resort (summer = 84.2%; fall = 82.4%). These date are near identical to the first and second quarters. This is indicative of two things: first, the sampling methods are producing consistent results; and second, little change has occurred in the distance visitors are traveling to reach the CWM during all seasons of the year.



How long are you going to be recreating on this trip?

☐Short trip under three hours
☐About half the day
☐The majority of the day
☐Overnight
☐Multiple days – <u>If so</u>, how many? _____days

The question above is used to gauge how long respondents are spending in the CWM during their recreational visit. The majority (66.7%) of respondents spent fewer than three hours recreating during their visit, and 20.7% spent about half the day. Only 8.3% spent the whole day recreating, and 0.5% spent the night. Twenty-three (3.8%) individuals said they were spending multiple days, which ranged from two to 150 days. Table 2 presents the amount of time respondents are recreating during their visit, and Table 3 present the number of days respondents spent recreating for those who spent multiple days in the CWM.

Table 2: Respondents' Trip Duration

	Number	Percent
Short trip under three hours	400	66.7
About half the day	124	20.7
The majority of the day	50	8.3
Overnight	3	0.5
Multiple days	23	3.8
Total	600	100

Table 3: Number of days respondents spent recreating on their trip

	Number	Percent
Two days	3	16.7
Three days	1	5.6
Four days	2	11.1
Five days	2	11.1
Six days	1	5.6
Seven days	3	16.7
Fourteen days	2	11.1
Fifty days	1	5.6
One hundred and ten	1	5.6
One hundred and twenty	1	5.6
One hundred and fifty	1	5.6
Missing	5	Not included
Total	18	100

On this trip, are you planning on visiting any other sites besides this one? ☐Yes ☐No

If Yes, how many other sites are you going to visit? _____ sites

Respondents were asked if they plan on visiting more than one site during their trip to the CWM. The majority (84.8%) of respondents only visited one site during their trip to the CWM. Of the 15.2% that did visit multiple sites during their recreational visit, 32 respondents visited two sites, 24 visited three sites, nine visited four sites, and four visited five sites. Table 4 presents the proportion of respondents who visited one site and the respondents who visited more than one site. Table 5 presents the number of sites visited by respondents who visited more than one site.

Table 4: Respondents visiting more than one site per visit

Visited more than one site	Number of respondents	Percent
No	508	84.8
Yes	91	15.2
Total	599	100

Table 5: Number of sites visited by respondents who visited more than one site

Total number of sites visited	Number of respondents	Percent
2	32	41.6
3	24	31.2
4	9	11.7
5	4	5.2
6	2	2.6
8	1	1.3
10	2	2.6
12	1	1.3
Missing	2	.2.6
Total	84	100

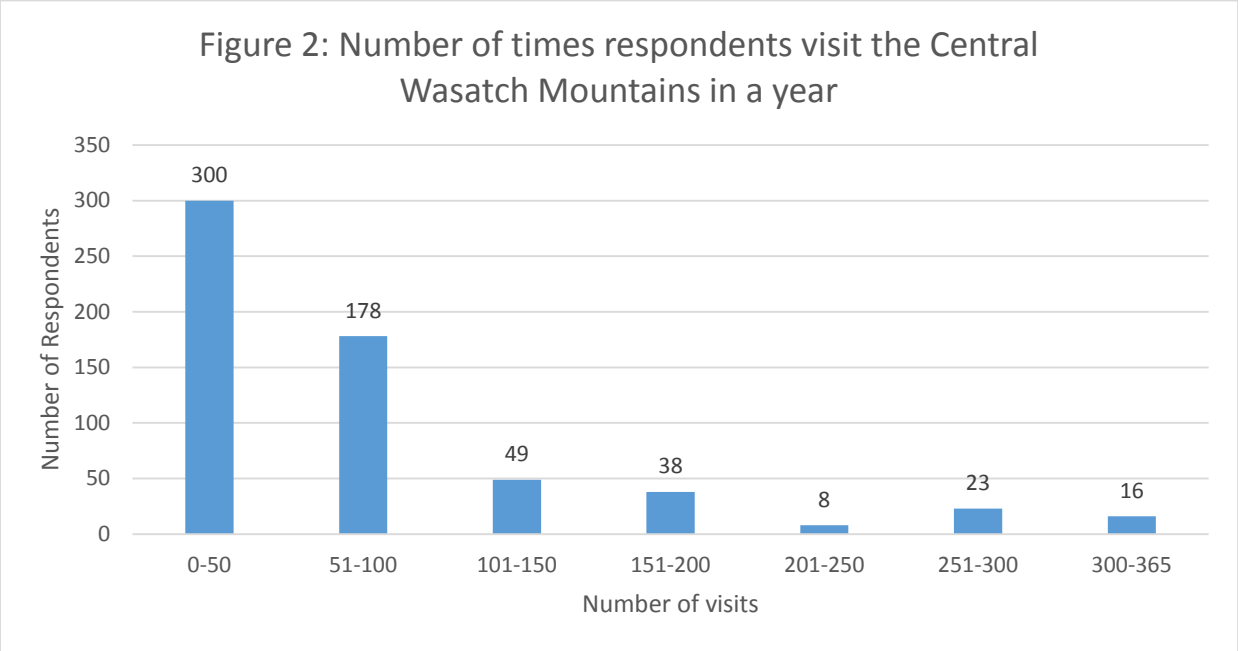
On average, how many times per year do you visit the National Forest here in the Central Wasatch Mountains? _____ times per year

Respondents were asked, on average, how many times they visit the CWM in a year. The median number of times respondents visit the CWM was 50 times, and the mean was 84.4 times. Table 6 presents the mean, median, standard deviation, and range of days respondents visit the CWM in a year.

Figure 2 shows the wide range, but heavily left skewed distribution of the number of times respondents visit the CWM per year.

Table 6: Number of times respondents visit the Central Wasatch Mountains in a year

	Visits
Mean	84.8
Median	50
Std. Deviation	85.6
Minimum	1
Maximum	365



What types of areas do you use most often when recreating here in the Central Wasatch Mountains?

- ☐ ***Developed areas, such as developed campgrounds, picnic areas, ski resorts, etc.***
- ☐ ***Undeveloped areas, such as trails, dirt roads, rivers and lakes, dispersed camping, wilderness, etc.***
- ☐ ***I use both developed and undeveloped areas equally.***

Half (50.6%) of the respondents reporting using both developed and undeveloped areas equally, and 42.8% said they mostly use undeveloped areas while recreating in the CWM (Table 7). Only 6.5% of respondents said they use developed sites most often.

Because this study is mostly focused on dispersed and backcountry use, it has been suspected that the results are skewed toward the visitation habits of the people who use dispersed and backcountry areas more often. Therefore, over the winter quarter we started surveying four ski resorts in the Central Wasatch: Brighton, Solitude, Alta, and Snowbird.

When comparing the two datasets—**dispersed/backcountry users** and **ski area users**—we can see that approximately half of both dispersed/backcountry users and ski area users use both developed and undeveloped areas equally. However, when we compare the two datasets on the proportion of people who use developed areas most often and undeveloped areas most often, we see there is a large difference: *dispersed/backcountry users* use *undeveloped areas* much more frequently than ski area users, and *ski area users* use *developed areas* more frequently.

There are two explanations for these differences: first, the ski area dataset is composed of many visitors who traveled long distances to reach the CWM, and if they traveled to the CWM to ski at the resorts, then it would make sense that they visit developed areas more often because the developed areas are what brought them; second ski area users—both those who live close and those who live far away—tend to use developed sites more often when recreating in the CWM. This is just one brief example of how the two datasets differ. There are many areas where comparisons can be made between these two datasets, but there are limited resources. Both datasets have the ability to be extremely useful for future decision making; however, direct and thoughtful questions will need to be asked to ensure quality analysis and outputs are produced to answer those questions.

Table 7 presents the types of areas both dispersed and backcountry users and ski area users use when recreating in the Central Wasatch Mountains.

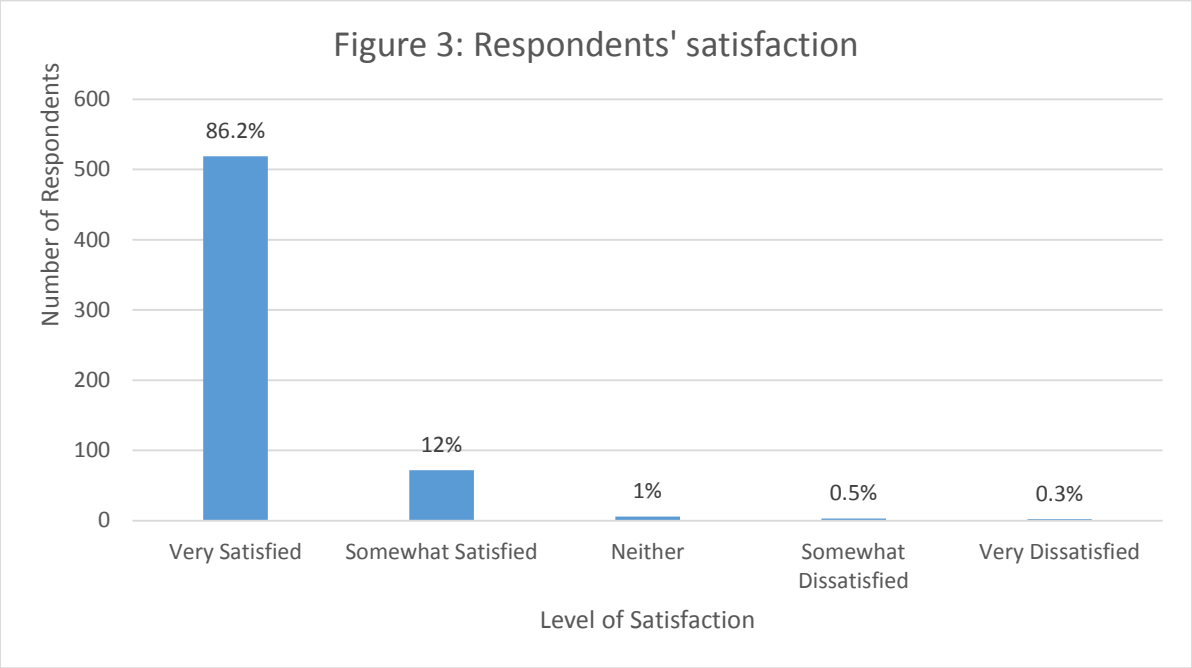
Table 7: Proportion of respondents who use developed and undeveloped areas

	Number	Percent
Dispersed/Backcountry Users		
Developed	39	6.5
Undeveloped	258	42.8
Both	305	50.8
Total	602	100
Ski Area Users		
Developed	214	48.4
Undeveloped	18	4.1
Both	210	47.5
Total	442	100

Overall, how satisfied or dissatisfied are you with your visit to the Central Wasatch Mountains today?

- ☐ ***Very satisfied***
- ☐ ***Somewhat satisfied***
- ☐ ***Neither satisfied or dissatisfied***
- ☐ ***Somewhat dissatisfied***
- ☐ ***Very dissatisfied***

The majority of respondents (86.2%) were "very satisfied" with their visit to the CWM, and 12% were "somewhat satisfied." Less than two percent were "neither satisfied or dissatisfied," or "Somewhat dissatisfied/very dissatisfied" (Figure 3).



For TODAY, please check "✓" all of the Recreation Activities you have participated in (or will participate in). Then, Circle your MAIN activity or purpose for visiting the Central Wasatch Mountains TODAY.

✓	RECREATION ACTIVITIES
	NON-MOTORIZED ACTIVITIES
	Walking
	Hiking
	Horseback riding
	Road cycling
	Mountain biking
	Non-motorized water travel (canoe, kayak, raft, sail)
	Rock climbing
	Ice climbing
	Downhill skiing (Resort)
	Snowboarding (Resort)
	Cross-country skiing
	Backcountry skiing
	Backcountry snowboarding
	Snowshoeing
	Sledding, tobogganing
	Other non-motorized activities (races, endurance events)
	MOTORIZED ACTIVITIES
	Driving for pleasure on roads (paved, gravel or dirt)
	Riding on motorized trails (non-snow, OHV/ATV)
	Snowmobile travel
	Other motorized activities (races, games)
	VIEWING & LEARNING—NATURE & CULTURE
	Viewing/photographing wildlife, birds, fish, etc.
	Viewing/photographing natural features, scenery, flowers, etc.
	Visiting historic and prehistoric sites/areas
	Nature study
	Visiting a nature center, nature trail, or visitor center

✓	RECREATION ACTIVITIES
	CAMPING OR OTHER OVERNIGHT
	Camping in developed sites (family or group sites)
	Primitive camping (motorized in roaded areas)
	Primitive camping (backpacking in unroaded backcountry areas)
	Resorts, cabins, or other accommodations on Forest Service managed lands (private or FS)
	FISHING & HUNTING
	Fishing—all types
	Hunting—all types
	OTHER ACTIVITIES
	Picnicking or family day gatherings in developed sites (family or group)
	Gathering mushrooms, berries, firewood, or other natural products
	Relaxing, hanging out
	Escaping heat, noise, pollution, etc.
	Exercising
	Walking/Exercising Pet(s)
	OTHER ACTIVITIES NOT LISTED? (Please write in below and ✓ to left.)

The question above asks two things: it first asks respondents to identify all of the recreational activities they will be participating in during their visit to the CWM, and it also asks them to identity their "main" activity or reason for visiting. Presented in this report are respondents' main activities along with all of the activities respondents identified participating in during their visit.

Seventy respondents either did not answer the question, or answered the question in a way that resulted in it being excluded from this analysis (e.g., checking all of the recreational activities they participate in throughout the year). Subsequently, there were 542 respondents that provided quality data. Of the 542, 116 did not circle their "main" activity. The respondents who did **not** circle a main activity were excluded from Table 8, which includes only the respondents who circled a main activity (N = 426). Table 9 however, includes **all** the activities respondents reported participating during their visit to the CWM (N = 542).

Just as in the first report, the most popular "main" recreational activity participated in by CWM visitors was hiking (29%) (53% of fall respondents participated in hiking). The second most popular activity was backcountry skiing (27.7%), followed by snowshoeing (11.3%), cross-country skiing (11%), and walking and walking/exercising pets (4.5%) (Table 8). An important note to make is the data reported in Tables 8 and 9 were collected during the 2014-2015 winter season, which was the warmest and least snowy winter on record for the CWM. Opportunities to hike in much of the CWM—especially in lower elevations—were abundant. If the snowpack were greater and more comparable to past years, it could be assumed that hiking would appear below the winter activities in Tables 8 as the main reason for visiting the CWM.

Table 8: Respondents' main reason for visiting the Central Wasatch Mountains

	Number	Percent
Hiking	124	29.1
Backcountry skiing	118	27.7
Snowshoeing	48	11.3
Cross-country skiing	47	11.0
Hiking/Exercising pet(s)	19	4.5
Walking	19	4.5
Backcountry snowboarding	11	2.6
Sledding, tobogganing	11	2.6
Trail running	8	1.9
Downhill Skiing (Resort)	7	1.6

Note: Recreational activities that had fewer than four respondents were excluded from this table. N = 426

Table 9 includes all of the activities respondents reported participating in. Hiking (49.8%), exercising (28.6%), backcountry skiing (26.2%), and walking (23.2%) were the most common activities. Viewing/photographing natural features, scenery, flowers, etc. (17.9%) was

the next most common activity, followed by relaxing and hanging out (16.6%), escaping heat, noise, pollution, etc. (15.9%), and hiking/exercising pet(s) (15.9%).

Table 9: All activities in which respondents participated

	Number	Percent*
Hiking	270	49.8%
Exercising	155	28.6%
Backcountry skiing	142	26.2%
Walking	126	23.2%
Viewing/photographing natural features, scenery, flowers, etc	97	17.9%
Relaxing, hanging out	90	16.6%
Escaping heat, noise, pollution, etc	86	15.9%
Hiking/Exercising pet(s)	86	15.9%
Snowshoeing	77	14.2%
Cross-country skiing	62	11.4%
Viewing/photographing natural features, scenery, flowers, etc	61	11.3%
Downhill Skiing (Resort)	37	6.8%
Driving for pleasure on roads (paved, gravel, or dirt)	30	5.5%
Sledding, tobogganing	22	4.1%
Rock Climbing	16	3.0%
Backcountry snowboarding	15	2.8%
Trail running	14	2.6%
Picnicking or family day gatherings in developed sites	12	2.2%
Visiting a nature center, nature trail, or visitor center	11	2.0%
Mountain Biking	10	1.8%
Nature study	8	1.5%
Resorts, cabins, or other accommodations (Forest Service or Private)	6	1.1%
Visiting historic sites	6	1.1%
Snowboarding (Resort)	4	0.7%
Road Cycling	4	0.7%
Primitive camping—backpacking in unroaded areas	4	0.7%
Ice Climbing	3	0.6%
Snowmobiling	3	0.6%
Fishing	3	0.6%
Gathering mushrooms, berries, firewood, or other natural products	2	0.4%

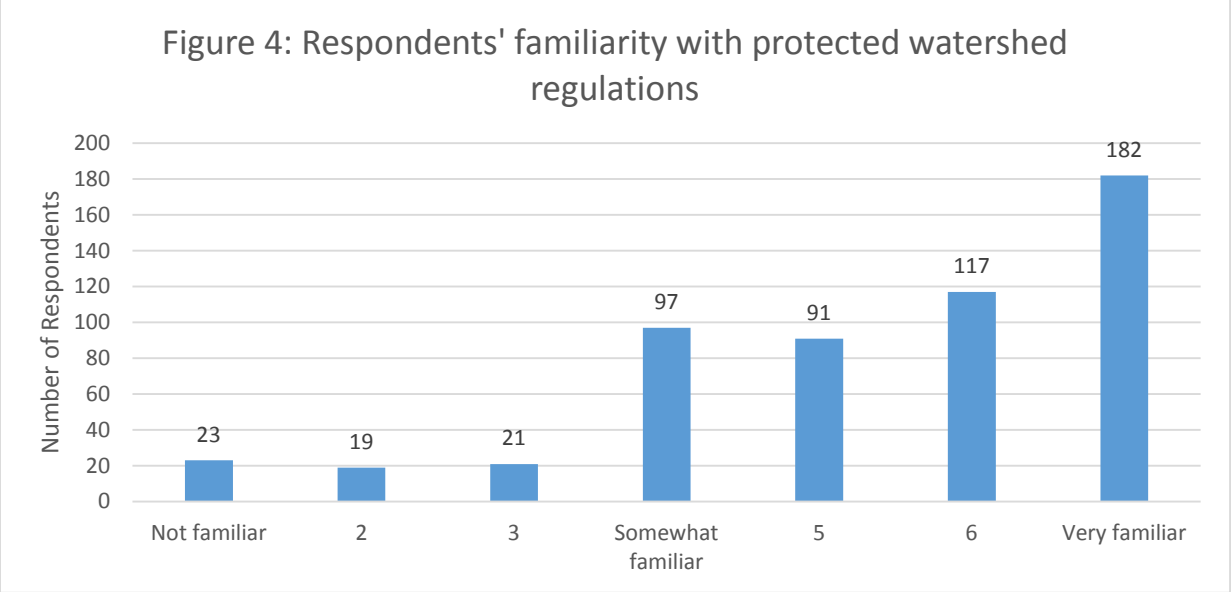
*Percent was calculated from N = 542

Do you know if you are recreating today in a protected watershed? ☐ ***Yes*** ☐ ***No***

How familiar are you with the rules and regulations for recreating in this protected watershed?

Not Familiar			***Somewhat Familiar***			***Very Familiar***
1	***2***	***3***	***4***	***5***	***6***	***7***

Approximately half of the survey locations used in this study are located in a "protected watershed." All respondents were asked if they were recreating in a protected watershed at the time they were surveyed. Out of the 584 people who responded to the question, 388 (66.4%) said "yes," they were recreating in a protected watershed, and 196 (33.6%) said "no," they were not recreating in a protected watershed. Respondents were then asked how familiar they were with the regulations of a protected watershed. The mean for respondents' familiarity was 5.33, and the median was six, which is skewed toward "very familiar." Figure 4 presents a histogram with respondents' self-reported familiarity with protected watershed regulations.



For further analysis, we split the dataset into two groups: those respondents who were in a protected watershed at the time they were surveyed and those who were not. In the summer and fall reports, there was little difference in respondents knowledge of watershed boundaries and regulations. Because the question reads, "Do you know if you are recreating in a protected watershed today?", respondents who were not recreating in a protected watershed, and knew they were not recreating in a protected watershed, could possibly check "yes" because they *do know*

they were ***not*** *in a protected watershed.* To eliminate this confusion, the question was rewarded. The goal of this question is to test if visitors know if they are recreating in a protected watershed, and the wording of the question has presumably generated some inconsistent results. Therefore, the question has been reworded to the following:

"Did you recreate in a protected watershed today?

☐ Yes, I did recreate in a protected watershed, or
☐ No, I did not recreate in **a protected watershed."**

The data presented in this report does show differences from the summer and fall reports in respondents' knowledge of *watershed boundaries and regulations*—winter respondents seem to be more knowledgeable about protected watersheds. For example, the percentage of respondents who were *not* recreating in a protected watershed and reported that they were was 65% during the summer and 67.5% in the fall. The data from winter respondents showed that only 43.4% of respondents thought they were in a protected watershed when they were not. If changes were only seen in these percentages, it would suggest the rewording of the question was accountable; however, winter respondents were all-around more accurate in identifying if they were or were not in a protected watershed, and also reported being more knowledgeable about protected watershed regulations.

The percentage of respondents in a protected watershed that were incorrect in thinking they were not in a protected watershed went down form the summer (26%) and fall (24.9%) to 11.3% in the winter. When respondents are in a protected watershed, the original question is more straightforward, and does not provoke confusion on how to answer; therefore, it can be assumed that these responses are more reliable. In addition, respondents reported having more knowledge of watershed regulations in the winter (median = 6) than in the summer (median = 5) and fall (median = 5). More will be known when the next quarter's data is analyzed, but from what has been seen thus far, it can be assumed that winter respondents are more knowledgeable about protected watershed boundaries and regulations than summer and fall respondents.

Table 10 presents the number and percent of respondents who reported themselves being, or not being, in a protected watershed, and Table 11 presents the mean and median scores of respondents' self-reported knowledge of protected watershed regulations.

Table 10: Respondents geographical knowledge of protected watershed boundaries

	Respondent Answer		Number (Percent)
Not in a Protected Watershed	No		155 (56.6)
	Yes		119 (43.4)
		Total	274 (100)
In a Protected Watershed	No		34 (11.3)
	Yes		267 (88.7)
		Total	301 (100)

Table 11: Respondents self-reported familiarity with protected watershed regulations

	Mean (Median)
Not Protected Watershed	5.26 (6)
Protected Watershed	5.40 (6)

Do you know this National Forest has Congressionally designated Wilderness Areas?

☐Yes ☐No

If Yes, have you ever recreated in a Congressionally designated Wilderness Area in this National Forest?

☐Yes ☐No

If Yes, what is the name of the Wilderness Area(s) in which you recreated?

_____

☐I don't remember the name of the Wilderness Area(s).

What recreation activities do you typically engage in during your visits to Wilderness Areas? (List below)

_____

Another question respondents were asked was if they knew the Uinta-Wasatch-Cache National Forest had congressionally designated Wilderness areas. Of the 591 respondents who answered the question, 168 (28.4%) respondents said they did not know the U-W-C National Forest had Wilderness areas, and 423 (71.6%) said they did know. Respondents were also asked if they had ever recreated in the Wilderness areas on the U-W-C National Forest, and of the 556 who responded to the question, 223 (40.1%) said "no," they have not recreated in any of the Wilderness areas, and 333 (59.9%) said they have. Of the people who had recreated in the Wilderness areas, 101 said they had recreated in the Mount Olympus Wilderness Area, 101 said they had recreated in the Lone Peak Wilderness Area, 29 said they had recreated in the Twin Peaks Wilderness Area, and 124 said they had recreated in a Wilderness area but they did not remember the name of the Wilderness Area(s). The most popular recreational activity in Wilderness areas was hiking (70.6%). Other popular Wilderness activities reported by respondents were backcountry skiing (38.5%) and primitive camping (18.6%) (Table 12).

Table 12: Activities respondents reported participating in in Wilderness Areas

	Number	Percent*
Hiking	235	70.6%
Backcountry skiing	128	38.4%
Primitive camping (backpacking in unroaded areas)	62	18.6%
Rock climbing	47	14.1%
Trail running	45	13.5%
Mountain biking	41	12.3%
Snowshoeing	31	9.3%
Cross-country skiing	17	5.1%
Backcountry snowboarding	12	3.6%
Fishing	12	3.6%
Hiking/Exercising pet(s)	12	3.6%
Viewing/photographing wildlife, birds, fish, etc.	11	3.3%
Viewing/photographing natural features, scenery, flowers, etc.	7	2.1%
Picnicking	6	1.8%
Walking	4	1.2%
Hunting	3	0.9%
Road cycling	1	0.3%
Non-motorized water travel (canoe, kayak, raft, sail)	1	0.3%
Sledding, tobogganing	1	0.3%
Nature study	1	0.3%

*Percent was calculated from N = 333

About how many people <u>outside of your group</u> did you encounter (see, talk to, interact with, etc.) while recreating today? _____ people

What do you think about the number of people you encountered while recreating today?

Did they positively enhance your experience? ☐Yes ☐No
If Yes, in what ways? Please describe:

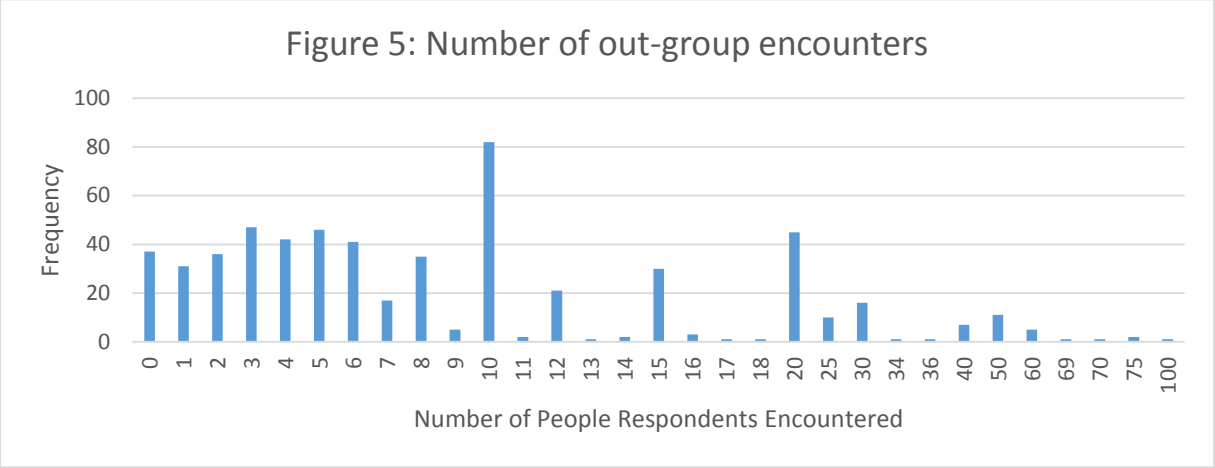
_____

Did they negatively affect your experience? ☐Yes ☐No
If Yes, in what ways? Please describe:

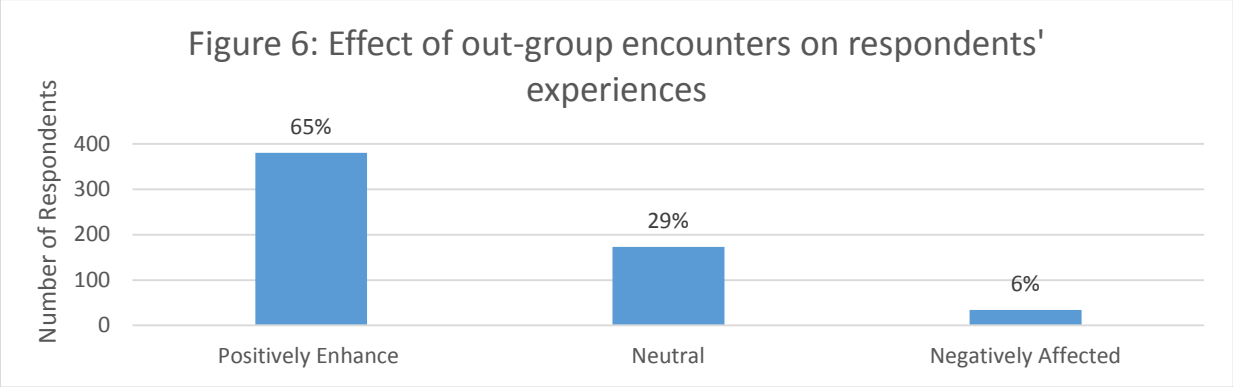
_____

☐They neither positively enhanced nor negatively affected my experience.

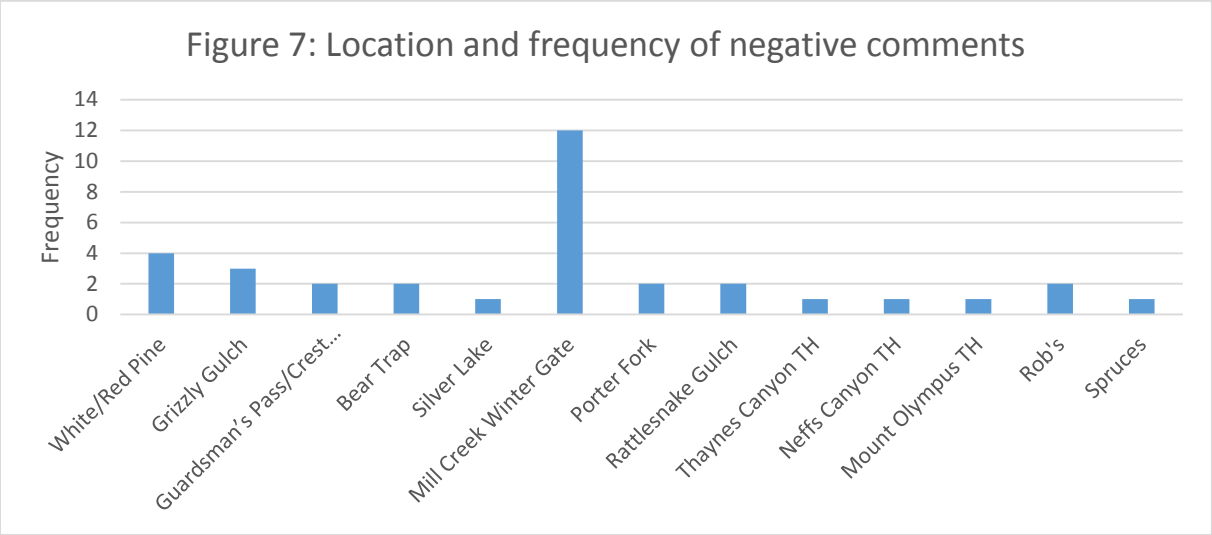
The number of encounters experienced by respondents ranged greatly based on site, day of the week, and time of day. The mean number of encounters experienced by respondents was 10.7, which is down from the fall's report with a mean of 11.89, and summer's report with a mean of 14.5. The median was seven. The number of encounters ranged from 0-100. Figure 5 presents the number of out-group encounters respondents had while they were recreating in the Central Wasatch Mountains.



Respondents were asked how the people they encountered affected their experience while recreating. The majority (65%) said the people they encountered positively enhanced their experience, and 29% said the people they encountered had no effect on their recreational experience. Only 6% of respondents said the people they encountered negatively affected their recreational experience. Therefore, 94% of respondents said the encounters they had with people outside of their group either positively enhanced or had no effect on their recreational experience. Figure 6 presents the proportion of respondents whose trip was positively enhanced, negatively affected, or was not impacted by the encounters they had with people outside of their group. Comments that were left by respondents explaining why the encounters they had positively enhanced their experience can be found in (Appendix C on page 51), and comments explaining how respondents' out-group encounter negatively affected their recreational experience can be found in Appendix D on page 59 (negative comments are grouped by location).



For further analysis, the frequency of comments left by respondents describing why the encounters they had negatively affected their experience was graphed by location (Figure 7). Millcreek Winter Gate had twelve negative comments, which was far more than any other site. Negative comments grouped by location can be found in Appendix D on page 59.



Are there places in the Central Wasatch Mountains you no longer visit because encounters with other forest users/uses have negatively affected your recreational experience? ☐ Yes ☐ No

If Yes, please identify the area(s) and explain the type of encounter and why you no longer visit:

_____

_____

_____

Respondents were asked if there were any areas in the CWM that they no longer visit because they have had negative experiences with other forest users or uses. Of the 593 people who responded to the question, 470 (76.8%) said there were not areas they no longer visit because they have had negative encounters, and 123 (20.1%) said there are places they no longer visit. Comments left by respondents explaining the areas and reasons why they no longer visit them can be found in Appendix E (Page 60).

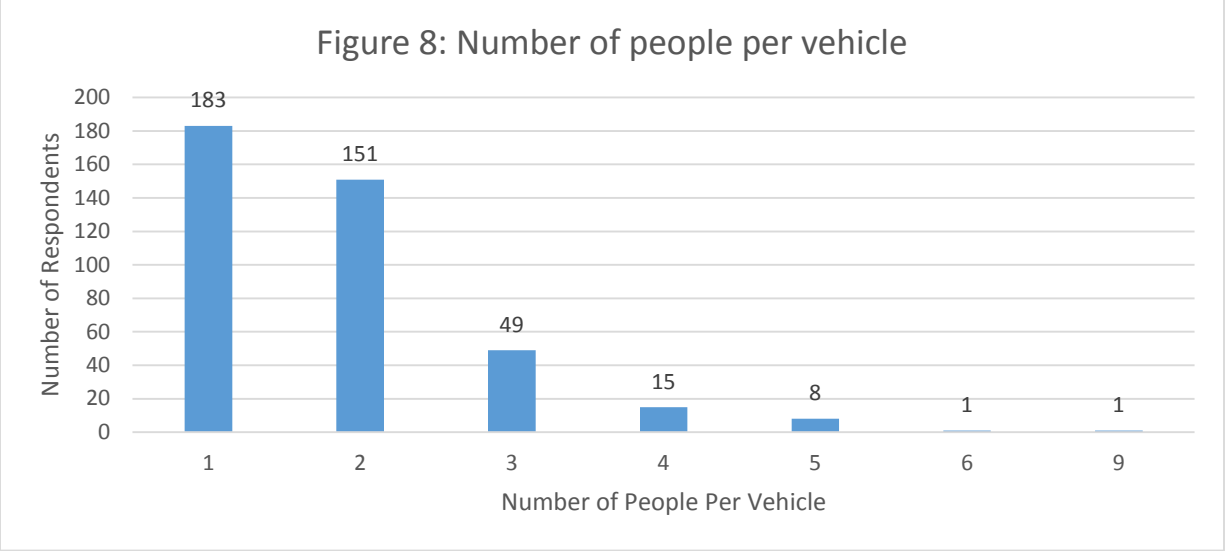
How did you access the recreation site you are visiting today? (Check one)

☐Personal Vehicle—How many people were in your vehicle <u>TOTAL</u>? _____
☐Public Transit (bus, TRAX)
☐Private Shuttle
☐Biked on my own
☐Walked on my own
☐Other Please describe: _____

To better understand the way CWM visitors access recreation sites, respondents were asked what mode of transportation they used to access their desired recreation location. The majority (95.8%) (92.7% over the fall) of respondents used their personal vehicle, 2.9% walked on their own, and 0.3% biked. Not one respondent used public transportation, and 0.3% used a private shuttle. The number of passengers was measured as the total number of people in the respondent's personal vehicle. The median number of people in personal vehicles was one (mean = 1.16) (this is fewer than the fall's report where the median number of passengers was two with a mean of 1.67), and the range was 1-9 people. Table 13 presents the modes of transportation used by respondents to reach their desired location, and Figure 8 presents the number of people per vehicle.

Table 13: Respondents' mode of transportation to reach desired recreation location

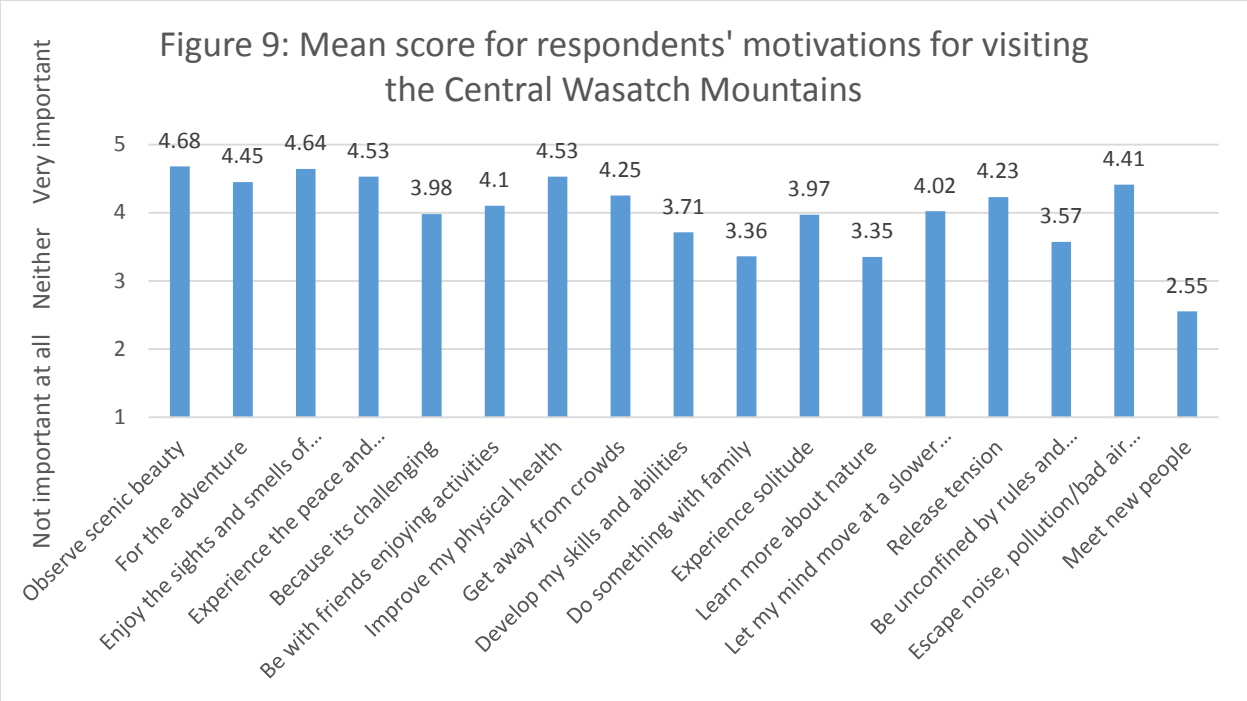
	Number	Percent
Personal vehicle	566	95.8
Private shuttle	2	0.3
Biked on my own	2	0.3
Walked on my own	18	3
Motorcycle	3	0.5
Total	591	100



What motivated you to recreate <u>TODAY</u>?

	Not Important at All	*Somewhat Unimportant*	*Neither Unimportant nor Important*	*Somewhat Important*	*Very Important*
Observe scenic beauty	***1***	***2***	***3***	***4***	***5***
For the adventure	***1***	***2***	***3***	***4***	***5***
Enjoy the sights and smells of nature	***1***	***2***	***3***	***4***	***5***
Experience the peace and tranquility	***1***	***2***	***3***	***4***	***5***
Because its challenging	***1***	***2***	***3***	***4***	***5***
Be with friends enjoying activities	***1***	***2***	***3***	***4***	***5***
Improve my physical health	***1***	***2***	***3***	***4***	***5***
Get away from crowds	***1***	***2***	***3***	***4***	***5***
Develop my skills and abilities	***1***	***2***	***3***	***4***	***5***
Do something with family	***1***	***2***	***3***	***4***	***5***
Experience solitude	***1***	***2***	***3***	***4***	***5***
Learn more about nature	***1***	***2***	***3***	***4***	***5***
Let my mind move at a slower pace	***1***	***2***	***3***	***4***	***5***
Release tension	***1***	***2***	***3***	***4***	***5***
Be unconfined by rules and regulations	***1***	***2***	***3***	***4***	***5***
Escape noise, pollution/bad air quality	***1***	***2***	***3***	***4***	***5***
Meet new people	***1***	***2***	***3***	***4***	***5***

There are many reason why people visit public lands, and the list of motivations above are some of the most common. Respondents were asked to rank on a scale from “not important at all” to “very important” each of the motivations listed in the table above. Respondents ranked “observe scenic beauty,” “enjoy the sights and smells of nature,” “experience peace and tranquility,” and “improve physical health” as the most important motivating factors for recreating in the CWM. Respondents ranked “meet new people”, “learn more about nature”, “do something with family”, and “be unconfined by rules and regulations” as the least important motivating factors for recreating in the CWM. Figure 9 presents all of the motivations with their corresponding mean scores.

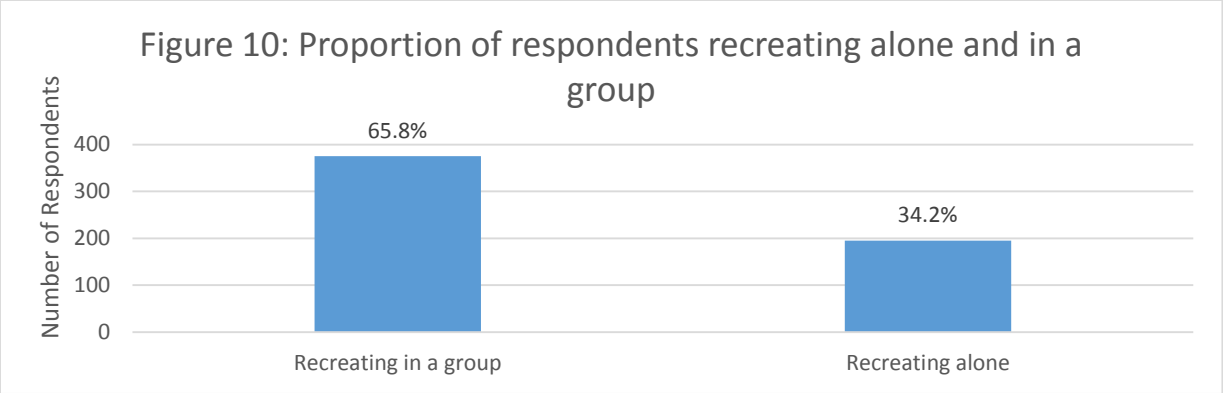


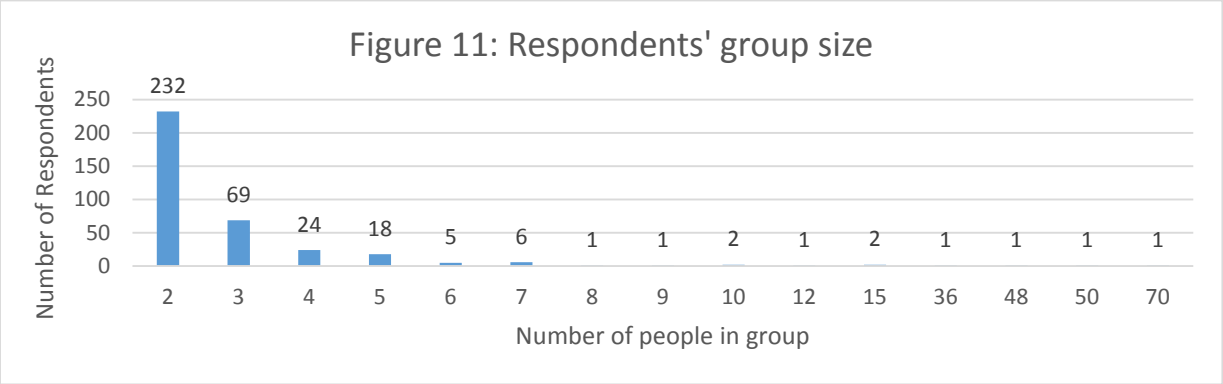
If you could choose just one or two words to describe your personal feelings about the Central Wasatch Mountains what would the word(s) be?

The word map on the cover page of this report was developed from the frequency of words respondents used to describe their personal feeling toward the CWM. The website named *Tagul* was used to develop the word map. For a larger image of the word map, please refer to Appendix F on page 65.

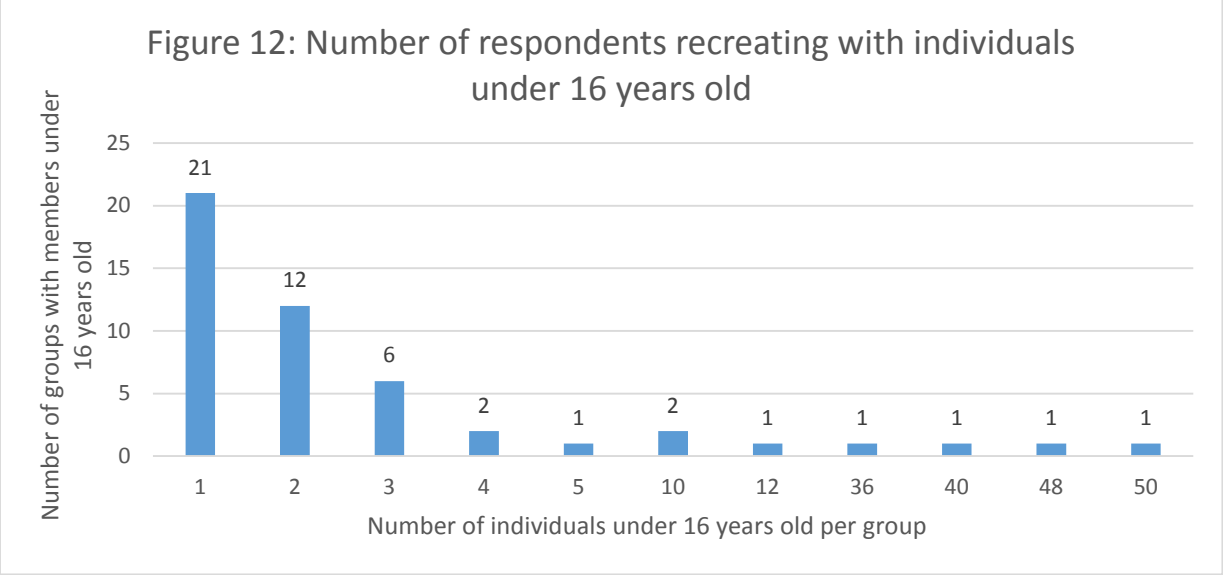
Are you recreating alone today? ☐ Yes ☐ No
If No, how many people (total) are in your group? _____ people
Of these, how many are under 16 years of age? _____ people

To gain a better understanding about the group structure of CWM visitors, respondents were asked if they were recreating alone, and if they were not, they were asked how many people were in their group, and how many people in their group were under sixteen years or age. Of the 57 who responded to the question, 375 (65.8%) said they were recreating in a group, and 195 (34.2%) said they were recreating alone (Figure 10). For respondents who were recreating in a group, the mean group size was 2.16 (median 2), with a range of 2-70 (Figure 11) There was a significant decrease in the number of people under 16 years old; only forty-nine respondents were recreating with people under the age of sixteen compared to the fall's 104.



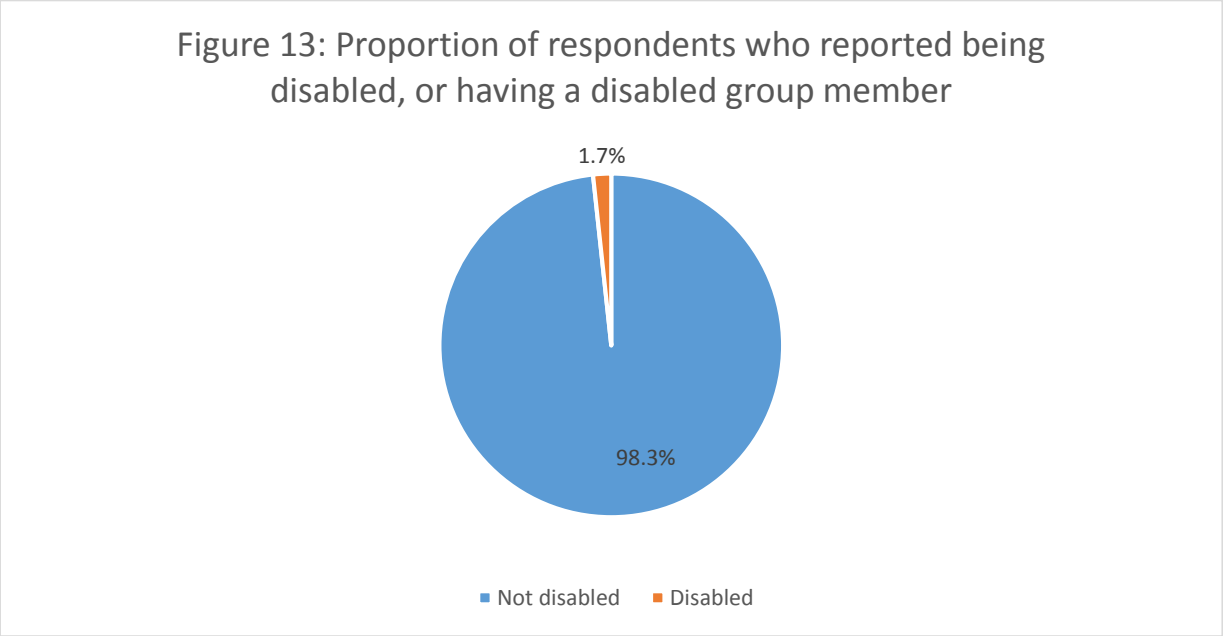


Just over 9% of respondents were recreating with people under 16 years old. Most had one (42.9%) to two (24.5%) people with them who were under 16 years old (Figure 12).



Does anyone in your group have any disabilities? ☐Yes ☐No
If Yes, were the areas and facilities you visited accessible? ☐Yes ☐No

Of the 590 who responded to the question, 10 (1.7%) reported themselves, or someone in their group as being disabled (Figure 13). Over the summer, 5% of respondents reported themselves, or someone in their group as being disabled. During the fall, there was a nearly fifty percent decrease (2.5%) in the proportion of disabled visitors, and during the winter, the percentage dropped again to 1.7%. Respondents were asked if the sites and facilities they visited were accessible, two of the ten said they were not. No comments were left describing why the area was not accessible.

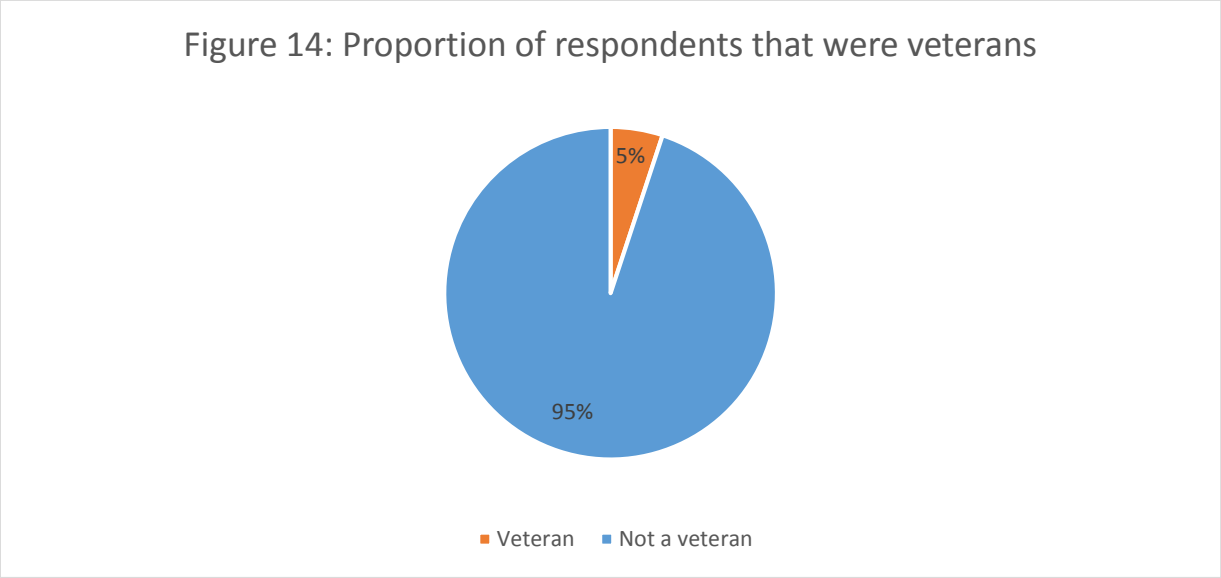


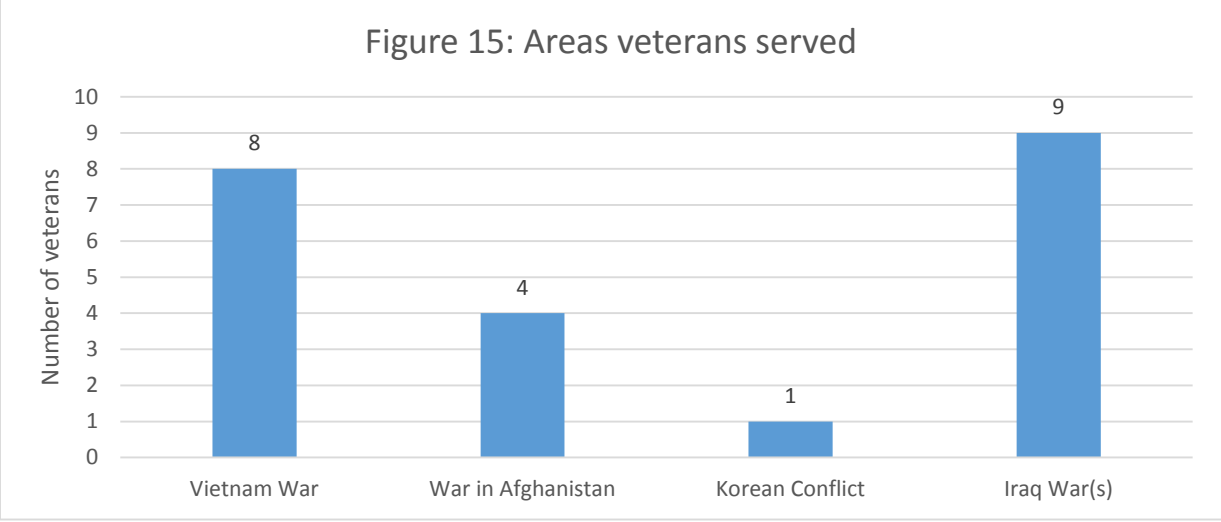
Are you a veteran? ☐ ***Yes*** ☐ ***No***

If Yes, where did you see service? ☐ ***World War II*** ☐ ***Korean Conflict***
☐ ***Vietnam War*** ☐ ***Iraq War(s)***
☐ ***War in Afghanistan*** ☐ _____

Are you a wounded or disabled veteran? ☐ ***Yes*** ☐ ***No***

Of the 591 who responded to the question, 33 (5.6%) reported themselves as being veterans. The most common area served by these veterans was Iraq (40%), the second most common was Vietnam (36%). Out of the 33 veterans, six reported being either wounded or disabled. Figure 14 shows the proportion of veterans in this study's sample, and Figure 15 shows the areas where the veterans served.



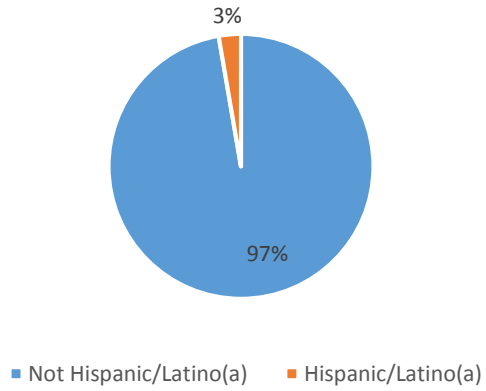


Do you consider yourself Hispanic or Latino(a)?

☐Yes, Hispanic or Latino(a)
☐No, not Hispanic or Latino(a)

Respondents were asked if they considered themselves Hispanic or Latino(a). Of the 591 people who responded to the question, 16 (3%) identified as Hispanic or Latino(a). Figure 16 presents the proportion of respondents that identified as Hispanic or Latino(a).

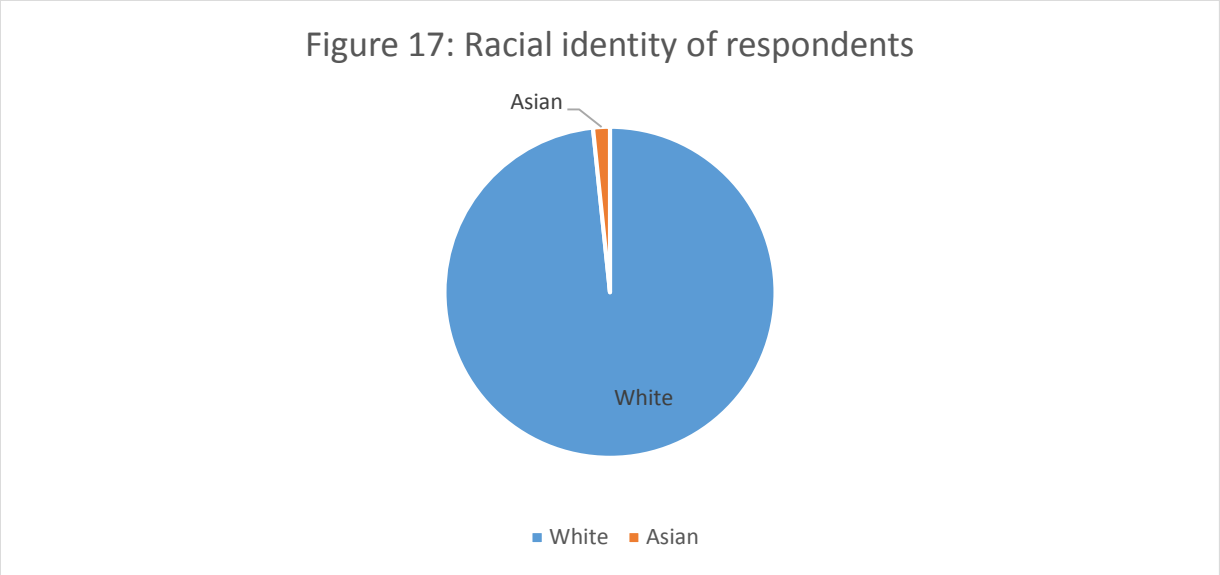
Figure 16: Proportion of respondents who identified as Hispanic or Latino(a)



With which racial group do you most closely identify?

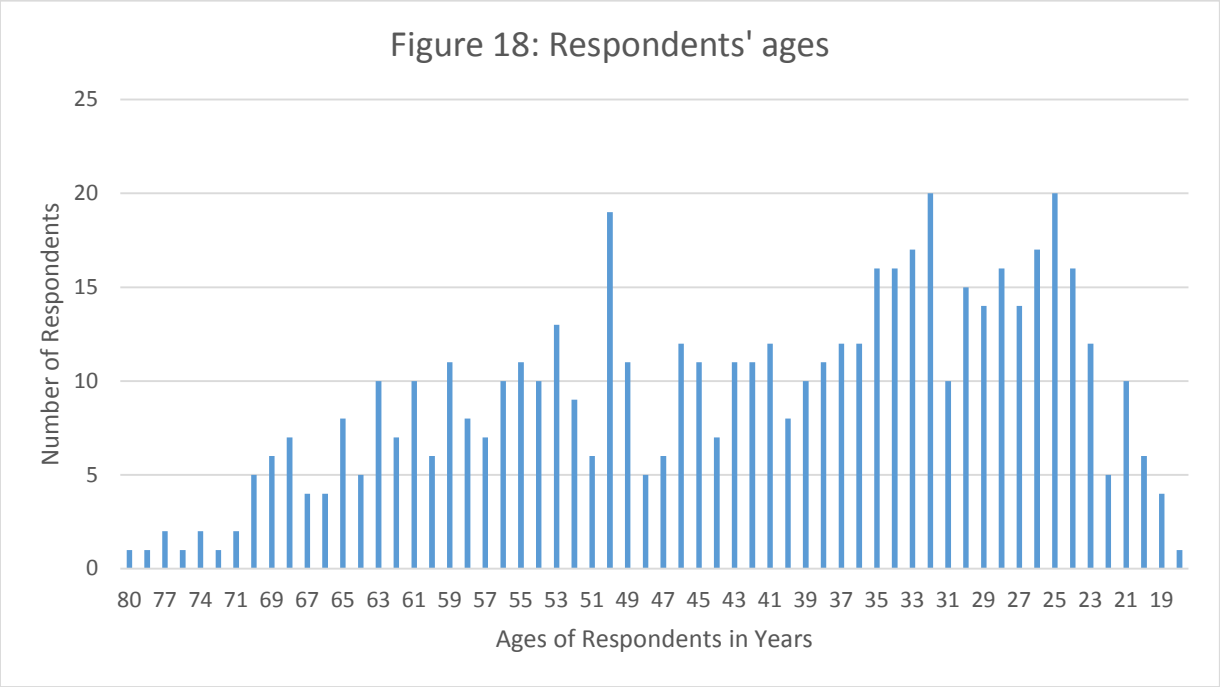
☐American Indian/Alaska Native
☐Asian
☐Black/African American
☐Native Hawaiian or other Pacific Islander
☐White

Respondents were asked which racial group they most closely identified, and 98.4% identified as "white." "Asian" (1.6%) was the next most common racial group respondents identified. One respondent identified as "American Indian/Alaska Native", one identified as "Native Hawaiian or other Pacific Islander", and two identified as "Black/African American. Figure 17 presents the proportions of races that respondents most closely identified.



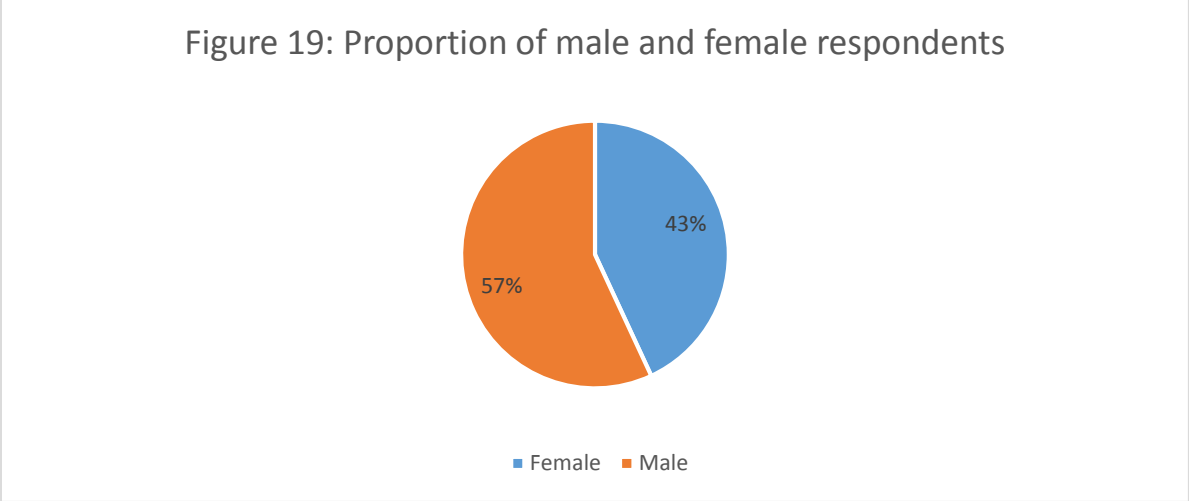
In what year were you born? _____

The mean age of respondents was 42 years, and the median was 40. Figure 18 presents the wide distribution of respondents' ages.



What is your sex: ☐ Male ☐ Female

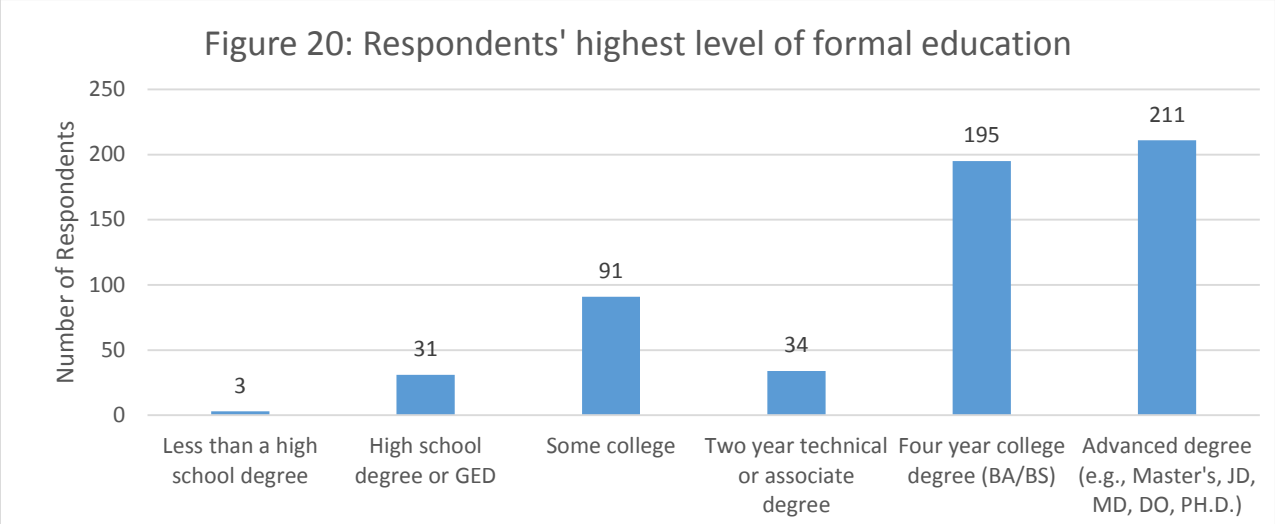
The proportion of male respondents increased during the winter to 57%, which is up from the 54% in the fall, and 51% during the summer (Figure 19).



What is the highest level of formal education you have completed?

☐ Less than a high school degree ☐ High school degree or GED
☐ Some college ☐ 2 year technical or associate degree
☐ 4 year college degree (BA/BS) ☐ Advanced degree (e.g., Master's, JD, MD, DO, Ph.D.)

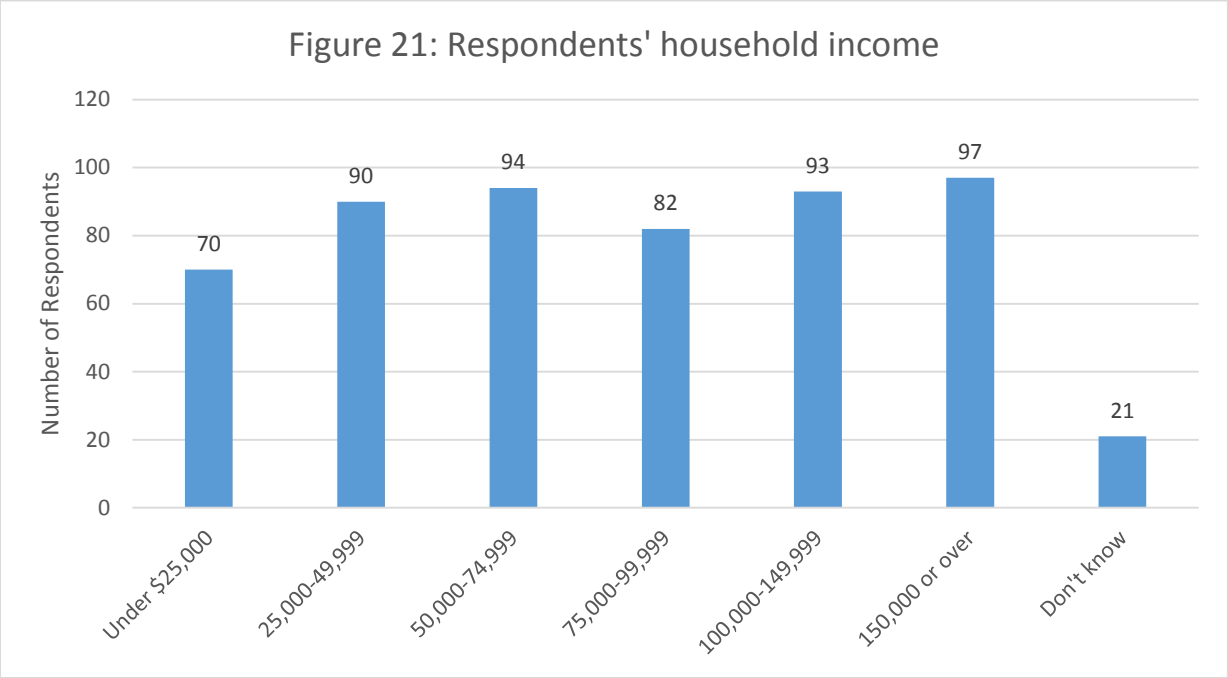
The majority of respondents reported having a four year college degree (35%) or an advanced degree (37%). Figure 20 presents the respondents highest level of formal education.



Information about income is important because people with different incomes come to Public Lands for different reasons. What is your annual household income?

- ☐ ***Under $25,000***
- ☐ ***$25,000-$49,999***
- ☐ ***$50,000-$74,999***
- ☐ ***$75,000-$99,999***
- ☐ ***$100,000-$149,999***
- ☐ ***$150,000 or over***
- ☐ ***Don't know***

The mean and median household income of respondents were both between $75,000-%99,999. Figure 20 presents the household incomes of CWM visitors.



Appendices

Appendix A: Comments for Forest Service

If you could ask the U.S. Forest Service and/or other Public Land Management Agencies to change some things about the way they manage the Central Wasatch Mountains, what would you ask them to do?

A few more areas where dogs are allowed & snowmobiles are not.

A few trails could have better markings and info for new hikers.

Add more hiking trails. Bring more separation between Mt bikers and hikers.

Additional signs.

Advertise.

All areas off leash for dogs!

Allow dogs.

Allow dogs.

Allow dogs - More public transportation to decrease car use up here.

Allow dogs - at least in some areas some of the time.

Allow dogs in all campgrounds.

Allow dogs in more areas.

Allow dogs in more areas/canyons. Don't close upper Millcreek most of the year.

Allow dogs in more areas.

Allow dogs more places.

Allow dogs more trails more days.

Allow more permits for guide service. Increase trail budget for maintenance and construction. Limit ski area expansion.

Allow snowmobile access on designated trails.

As few people as possible.

Ask the people who use the land, not the corporations. Why do resorts have the right to kick people off public lands?

Balance.

Be more proactive about educating the public about the value of preserving open space and underdeveloped, wild places.

Be sure people with dogs have only friendly dogs. Make bikers pay too! They pollute & throw trash & wreck up trails.

Better (cheaper) public transport up Big & Little Cottonwood Canyons.

Better dog info. More signage.

Better enforcement with dog clean-up.

Better handle crowds/parking.

Better marked trails.

Better marking of trails.

Better public transport.

Better security in parking areas.

Bike lane in Millcreek Canyon.

Block ski area expansion.

Build snow sleds over roads. May be an issue for UDOT.

Can you please put more trail markers at different points along the trails?

Can't think of anything at the moment.

Cancel One Wasatch -> horrible idea.

Change OSV restrictions for Private Land Owners.

Clarity around where I can fish.

Cleaner air.

Close the gate in Millcreek on bike (even) days through the summer.

Compulsory public transit to access canyons. No single-driver cars on weekends.

Conservation, not preservation.

Continue as it. Keep things the way they are! Already beautiful.

Continue developing trails for hiking/running.

Continue improving trails.

Continue to allow the people to use this land as opposed to allowing corporations to profit off of it.

Continue to balance USE!!

Continue to have off leash areas for dogs. Odd/even in canyon for dogs and mountain bikes.

Continue to maintain trails, more off leash options.

Control speeding. Clearly advertise dog-off leash days.

Control vehicle traffic.

Control vehicles and motorcycles a little better. Where they are allowed.

Create more dog parks -- of leash. Add another garbage can.

Create more mountain bike trails. I know they have to make a living, but I would like to see heli skiing restricted/not allowed.

Develop more mountain bike trails. Make bowhunters feel more welcome.

Dirtbike trails.

DNR could provide more accurate info on hunting regulations. I got a different answer about the legality of rifle hunting in Lamb's each time I talked to a different person.

Do not allow motorcycles on trails through the wilderness.

Do not expand access.

Do not let One Wasatch happen! No lifts on public use areas!

Do not let private interest direct the management.

Do NOT put in any more lifts linking ski resorts. Get better public transportation instead!

Dog free days. Dog poop enforcement.

Dogs not on a leash can be scary, but I like the new rule.

Doing a good job!

Doing a great job--keep it up!

Doing a great job!

Doing a great job.

Don't allow any additional ski resort expansion.

Don't be bullied or pressured by proponents of development. The real economic benefits lies in conserving our watershed.

Don't be paranoid about dogs that are civilized and under control.

Don't expand ski resorts. No One Wasatch.

Don't let ski resorts expand. Preserve the wilderness feeling/experience.

Don't see anything wrong.

Don’t charge to park @ Spruce’s in summer. Don’t lock gate @ lower parking, particularly when there is no snow (Mill B). Let us park overnight at Spruce’s. Bus service up the canyon.

Educate kids in K-7 to respect this place. The other ones don't.

Educate on Leave-No-Trace and staying on trails. Possible public education seminars?

Educate the public about how little Wilderness there is compared to people in the Wasatch. Teach people why this makes Leave-No-Trace the standard to use when using these areas.

Encourage more areas where people can enjoy water access with pets.

Encourage public transportation.

Enforce dog leash laws.

Enforce dog regulations more.

Enforce leash laws and dog poo.

Enforce the rules.

Enlist citizens who recreate to help maintain trails. More improved trails.

Ensure you don’t cave into commercial interests - continue to serve the public and keep land rather undeveloped.

Everything is great. Please maintain the "no dog" rule in Big/Little Cottonwood canyons.

Everything is great

Exclude motorized vehicles when appropriate.

Fast and efficient public transportation. Develop entertainment/lodging at canyon bottoms for tourists.

Fee based management (i.e., more trail signs and trail maintenance). Busses in the summer.

Fee for canyon access to keep up areas.

Fewer cars driving up the canyons.

Fewer cars. Light rail--no mandatory parking areas.

Fewer fees.

Fewer ski lifts. Less private land. More public transportation.

Fight against any further development of USFS lands for ski resorts (Ski Link, etc.).

Fix trails. Add new trails.

Further restrict snowmobile and snowcat access to cabins that are on inholdings.

Get rid of Powderbirds--heli doesn't belong in the Central Wasatch. Develop volunteer/youth trails maintenance programs.

Get rid of all motorized vehicles.

Get rid of all snowmobilers in the Central Wasatch.

Get rid of all snowboards.

Give us more snow. Everything else is good.

Greater enforcement of cleaning up after dogs in mountain, primitive character land.

Groom/set ski tracks more often. More education about staying off the tracks, more off leash areas.

Happy with their job.

Have more of a residence. Seems that the rangers are hired help, live in building more that are outside. This survey is a great start.

Have people manage dogs better.

I can't think of anything.

I don't really like the heli skiing. If they would use less avalanche control that would make me feel safer. Definitely stop One Wasatch or Ski Connect.

I just moved to SLC and am not familiar with the area.

I think you guys are doing a great job.

I wish I didn't have to pay to go up AF canyon.

I wish more money were available to put rangers on busy trails/areas. Helps keep people on their best behavior. I realize the money will not be available.

I wish we could fix the mine tailings.

I would ask for more online information about the trails such as information about native plants & animals, their seasonal habits, etc.

I would encourage them to keep ski resorts within their existing boundaries & not allow further development in or across public lands.

I wouldn't mind a better Big Cottonwood hut system.

I'd have to think about that, oh yeah, No Ski Link!!!

I'm perfectly content.

If anything, allow use of the rivers (private property access in rivers).

Improve trails for summer. Keep ski resorts boundaries in check. Get private parcels to be public. Improve parking/protect bouldering--good job on getting rid of Grist Mill.

It drives me crazy when people leave their dog poop in bags on the side of the trails.

It got really icy near the end, maybe melt that.

It would be nice to be more dog friendly but it's understandable that we are in the watershed. Also, it would be a lot nicer to lower ski resort day passes. It would be nice to have environmentally friendly transportation up canyons (especially Millcreek Canyon).

It's good the way it is.

Just keep on keeping things clean.

Keep current balance between resorts and backcountry use.

Keep development away from natural resources.

Keep development our development.

Keep doing what you do. More Leave-No-Trace signage.

Keep doing a good job.

Keep it accessible.

Keep it beautiful, undeveloped, scenic, and free.

Keep it going for the tax money you already receive from me!

Keep it Natural & Undeveloped.

Keep it public.

Keep more available during winter.

Keep motorized use out. More wilderness designations!

Keep people more informed.

Keep resort development as it is.

Keep resort skiing boundaries where they are.

Keep restrooms open all year.

Keep ski areas confined to current boundaries.

Keep the Millcreek gate open later.

Keep the primitive areas primitive. No new ski areas develop. We have enough.

Keep the remote feeling. Development is inevitable, but keep it minimal. The fact you are 20 min. from downtown and feel like you are in secluded mountains is what make the Wasatch so incredible.

Keep them open. Thank you.

Keep trails in good shape.

Keep undeveloped areas wild. Make accessibility for people from all socioeconomic classes a priority. Increase education about the benefits of wilderness areas. Improve public transportation in the mountains.

Keep up the good work!

Keep up the good work.

Keep public access and no more development. NO ONE WASATCH.

Learn more about distance to locations.

Leave it as is.

Leave it as it is. Better signage--elevation and peak names.

Leave them alone.

Less tree management in the name of fire management - these are forests for a reason - no more new trails, too many people ruin experience - Be sure to remember these forests are wildlife habitat too.

Less motorized access--like helicopters in the winter.

Less motorized vehicles.

Less motorized vehicles!

Less motorized use.

Let dogs in our canyons.

Let me bring my dog to Lake Blanche.

Let skiers hike uphill at resorts. Resorts are on public lands.

Light rail up LCC then tunnel to Brighton & PC. Light rail down Parley's.

Like it like it is.

Limit ATVs. Enforce dog laws.

Limit commercial development.

Limit development of the remaining undeveloped areas please. Leave things as they are now in undeveloped areas.

Limit growth & development. Encourage more shuttles & fewer cars.

Limit resort expansion. Keep snow machines out.

Limit ski resorts. Allow dogs.

Limit the snowmobiles and helicopters, and don't interconnect the ski areas.

Limit/Eliminate snowmobiles/ATV travel. Do not develop Guardsman's Pass. No Ski Link--No One Wasatch. Ban heli-skiing.

Love areas with dogs off leash. Just don't limit this. Other than that, I love it here.

Maintain cross country ski tracks.

Maintain no ski area expansion.

Maintain wilderness characteristics. Clear, kind direction at Spruce's Campground.

Make it less for people. Make them work for getting up mountains. Don't build stairs.

Make more places off-leash friendly.

Make room for everyone and lots of hobbies. Open up cabins and yurts for permit in Millcreek Canyon.

Make same areas more accessible for individuals with disabilities.

Make sure it is maintained well.

Make the resorts keep their current boundaries. Work with resorts to enable safe rewarding uphill traffic.

Make your distance mileage on your trail head sign accurate. All of your new signs are incorrect. They are based on trailheads that started at different places.

Management of vehicles.

Mass transit as only option up Cottonwood Canyons.

Mileage markers on trails.

Monitor ATV usage on singletrack.

Monitor graffiti abuse.

More actively enforce road closures.

More bike trails.

More dog friendly areas!

More designated areas for dogs.

More dog access.

More dog access. More public transportation.

More dog accessible areas. I understand watersheds, but really....animals poop too. Enforce owners to clean up after their pets instead of restricting access for those of us who are responsible.

More dog accessible places!

More dog areas!

More dog areas. Better Trails.

More dog friendly.

More dog friendly areas i.e. permits for watershed - More parking.

More dog friendly trails, please!

More dog friendly trails.

More education for multiuse trail users, particularly mountain bikers.

More enforcement of dogs on leash policy.

More motorcycle trail options in Wasatch Mountains in SL County.

More mountain bike trails in Big and Little Cottonwoods. No linking canyons via ski lifts etc...

More off leash dog areas.

More off-leash areas for dogs.

More parking.

More parking if possible. More dog only trails for odd days.

More parking in Big and Little Cottonwood.

More parking.

More places where dogs are allowed off-leash.

More public transportation.

More restrooms and running drinking water.

More severe fines for dog remains (I have two dogs--let's be more responsible).

More trailheads.

More trails.

More trails - especially bike trails. Less commercial building. Limit ski area expansion. Limit heliskiing areas/days and or trips. Oppose "One Wasatch." Police the dog restrictions especially in Millcreek where the compliance is negligible.

More trails and shuttles.

More trash cans along the big trail.

More trash containers and pick-up.

More trashcans, often there is trash on the trail.

More trashcans.

Mountain biking in watersheds. Keep working to get more youth / families into the forest!

Mt. bikers are dangerous to others—often.

My main issue would be about dogs in other canyons. I come hike the majority of the time because I love running with my dog. I wish there was a way to have dogs in other canyons as well.

Need more areas for dogs.

Need more places we can hike w/ dogs off leash - very restricted.

No change.

No changes.

No comment, I'm a new resident.

No construction, less development in general, be ethical, make sound decisions.

No development.

No dogs on the Millcreek skate ski trail.

No further development of backcountry areas, esp. by big ski resorts - NO further lifts/chair access. Partner with Mountain trails Foundation in Park City to link SLC side trails with PC trails

No Interconnect please!!!

No Interconnect.

No more building allowed. Maybe think of alternative transportation up + down canyon such as light rail or better more covenant busing system. Up Little and Big Cottonwood Canyons.

No restrictions on dogs - clear some brush on trails.

No more development!

No more development.

No One Wasatch.

No opinion.

No resort expansion.

No ski area expansion.

No Ski Link.

No ski resort expansion! Reduce motorized use.

No ski resort expansion. No motorized use.

No Snowboarding at Alta!

No suggestions.

Non-motorized users are the largest user group. Policies should reflect that, not the belligerent nature of industry money of the motorized user group.

Not enough information now to ask.

Not sure. They seem to be doing a pretty great job.

Nothing I can think of. Great job! Thank you!

Nothing, I prefer to leave it the way it is.

Nothing, it's perfect here.

Nothing, the hike was great!

Noting--they are doing a great job!

Open more areas to Mt bikes. They do less damage than horses.

Open up more watersheds to dogs. Maintain the wilderness open space - you cannot make more - bigger ski areas are not better and overuse degrades the environment for people and the wildlife that depend on it.

Open up more wilderness lands to things like mountain biking. Why not?

Open up some space for dogs.

Permanently preserve.

Plans to protect remaining wilderness, not allow Skilink/One Wasatch or related concepts that will cause more development in Wasatch.

Please conduct surveys under a heat lamp / fire.

Please don't sell any land. Keep it public. Can you do this?

Please don’t build in non-resort areas (i.e. Ski Link)!

Please give consideration to the spirit and health of nature. With high pressure on sensitive land, place more restrictions on development. We need you Forest Service! You need to put your foot down & resist "one Wasatch." You need to be "vocal" in support.

Please preserve the natural character of the Wasatch. Please improve trail maintenance on upper Mill B North Trail, Desolation Trail, and parts of Twin Lakes Trail.

Post trail maintenance dates.

Preserve the public lands to local residents.

Pretty good. Can't think of anything - Parking is good

Pretty happy, good folks, good people out here. I would like a ban on external speakers. I don't want to hear other people's music. Head phones are cool, but speaker phones suck.

Prioritize protection of dispersed and non-motorized recreation and recognize it is not compatible with developed or motorized recreation. Plan for climate change. Minimize cars in canyons.

Protect backcountry areas & undeveloped areas - better trail maintenance.

Protect from development.

Protect wilderness. Decrease overcrowding. Develop trails.

Protect wilderness. No more development. No Ski Link. No resort growth.

Provide more funding to very high visitation in Cottonwoods to improve management.

Provide more space for dogs to run off leash.

Provide soap in bathrooms. Allow dogs (upgrade water treatment).

Public transit in the BCC and LCC canyons.

Public Transit system up the canyons.

Put breaks on ski resort expansion. Stop charging fees--these forests are already mine as a taxpayer. Build more trails to disperse trail users. Put out the message that Forest Service and land agencies are severely short of money.

Put in trails or light-trains up Big & Little Cottonwood - instead of the cars.

Quite happy!

Reach out for volunteers.

Realistic expansion & control the Big Resort Punch for "vail" expansion into the Wasatch Front.

Really nothing. I think they are pretty great.

Really slow money collection at Millcreek station on holidays. All the cars idled and polluted. The line of cars was 50+ long. The person watching the shed was so slow and would not change their system to go any faster.

Regulations are too much and too many rules.

Relax, let more people enjoy without shutting down areas to multiuse. I love minimalist backpacking but I also enjoy enduro cross motorcycle and I am alarmed at the loss of places in which to enjoy that activity.

Remove development, enjoy recycling, highway department.

Restrict development.

Restrict motorized access, close areas to ATV/motorcycles. Improve Parking areas/picnic areas to concentrate access and get folks out of their vehicles.

Restrict Wasatch Powderbird or other heli-skiing. Continue to allow dogs in Millcreek Canyon, and allow mountain bikes every other day.

Retire snowmobiles from this area.

Rid them of Snakes :-)

Running water.

Say no to ONE Wasatch/Skilink. Keep current backcountry areas wild.

Seems super good, maybe more finance.

Set aside more public land for primitive camping. It's maintained with our tax money, we should be able to camp anywhere for a day or two.

Set up a shuttle system for people wanting to recreate in Millcreek Canyon.

Shuttles up the canyon to reduce traffic.

Snow shed over roads. Prevent road closures. More gas-x(?) avalanche control--better than artillery.

So many people! Dusty trails. Give them a rest once in a while. Trampled! Building Mountain. No more homes!

Stay at night.

Stay green.

Stay the heck out.

Stop developing forests and public lands.

Stop developing it.

Stop developing our backcountry.

Stop development.

They are doing a great job.

They are doing great.

They are getting too restrictive.

Too much dog poop up Millcreek.

Too much traffic--make buses free.

Trail marks so you have checkpoints. An app for trail map.

Trails maintenance and monitoring to avoid erosion, short-cutting, and trails degradation.

U.S. Forest Service, BLM, etc: Do not let the state of Utah take over our federal lands. Fight it with everything you've got!

Understand watershed, but if there was a program to license well-behaved dogs & responsible owners, there are many areas we would love to go, but as "dog-people", can't. We love Millcreek Canyon so much for its dog friendly approach.

Vote for more trail work.

Why aren't there more dog trails?

Why is there no one-way, downhill bike trails that can be shuttled? Will you build some? Would you support private groups building downhill tracks in Grand Junction with the Forest Service?

Winter closures gates should only be closed when necessary.

Work on cleaning graffiti in LCC.

Year-round open restrooms.

Appendix B: Comments regarding management, protection, and development of the Central Wasatch Mountains

Do you have any additional comments or thoughts about issues regarding the management, protection, or development of the Central Wasatch Mountains?

A challenging balancing act with no easy answers.

Awesome.

Balance.

Bathrooms smell.

Better maps / know how to locate them on the internet.

Better public transportation (i.e. train/trax) would be nice during wither to reduce traffic.

Bust the graffiti artists.

Charge a reasonable fee ($10) to drive private autos up Big and Little Cottonwood canyons. Use the funds to establish more parking and buses. Do not allow any more ski area expansion. One Wasatch concept is a very bad plan and will only benefit a few rich individuals while destroying the peace, tranquility & water for the masses.

Continue to manage usage as it gets heavier use. Thank you volunteers for what you do! We love it!

Do not build Interconnect. Keep Guardsman's Pass un-plowed.

Doing a good job.

Doing a great job

Doing a great job :-)

Doing great!

Doing Great!

Don't develop this area!

Don't develop!

Don't develop; no Ski Link!

Don't let ski areas expand. They should stay in their current boundaries.

Eliminate development.

Enforce mountain bike regulations.

Expansion of the ski areas would throw off the whole balance of recreational areas in the Wasatch. They already take up too much land. Many of the trailheads see a great deal of activity especially Grizzly Gulch.

Get people to clean up their poop (dog poop).

Good protection. Maybe some wildlife sanctuary.

Great experience. Really appreciate those who run it!

Great job!

Great job. Keep it up. Thanks.

Great place to visit.

I am happy to see you out here surveying the users. It seems as though many decisions in the Wasatch NF are made on assumptions.

I am so grateful that there are wild, public lands to hike. Thank you!

I do not want "One Wasatch."

I do not want to see additional ski area development.

I don't like the idea of One Wasatch. There is enough development lift-served skiing in the Wasatch. Now it is time to conserve.

I hope that the remains undeveloped primitive areas of the Wasatch be preserved and protected from development. No ski link. NO One Wasatch. No ambitious travel plans that involve trains/cables.

I hope to always have access to this beauty--not mass transit.

I like to fly to remote old airstrips in SE Utah to hike, please don't limit that access. Thanks!

I love the wild.

I support a helicopter free Wasatch (except for emergency rescue)!

I think we probably have enough developed ski areas at this point. Let's preserve the rest of the Wasatch for hiking and backcountry use.

I wish more areas were accessible to dogs. I wish there was more public transit avail.

I wish you guys had more funding

Implementing fees in Little Cottonwood.

Improve land protections and stop interconnection of the canyons & Wasatch back. Stop One Wasatch.

Interested in Mountain Accord hope the old mining tunnels can be used for transportation.

It needs to last generations. If it changes and gets overused as much as it has in the past 10 years, there won't be anything to enjoy in another 10.

Job well done.

Keep building single track trails.

Keep doing awesome stuff!

Keep everyone informed of rules and it will help everyone out.

Keep it accessible.

Keep it beautiful & undeveloped.

Keep it open!

Keep it pure & natural. Don't over manage.

Keep more land protected as Wilderness areas.

Keep protecting it; do not allow any more development outside of existing developed areas.

Keep resorts at bay. No more development in the Wasatch.

Keep the backcountry undeveloped + consider bus service in summer + fall in Cottonwoods to lower traffic.

Keep them as they are. Minimum ski resort development.

Keep thinking at least 50 years into the future. Will there be cars in the canyons?

Keep up the good work.

Keep up the good work and keep everything clean like it is!

Keep up the good work! Thank you.

Keep up the great work

Less management & development, more protection such as wilderness designation.

Let's get lots of mountain biking trails!

Limit ski resort expansion.

Love it!

Love them.

Love this place!

Maintain a balance between development and undeveloped areas - don't let balance change to more development!

Make a decision!

More bike trails. Reroute on Mill D is stupid and negatively affected the forest.

More dog access & there should be a resource population growth balance. I don't want to raise my child in "Beijing" quality air in 12 years!

More fee-free camp sites.

More park and rides @ canyon bottoms/base. Let pets ride into those locations where they are allowed. Charge fee to drive up Cottonwood Canyons

More protection, less development, and more management.

More protection. We don't want to turn into Colorado. Keep the Wasatch wild.

More public transportation options would be great. I would pay an access fee for the year.

More signs for watershed.

Need some rules for road-bikers in Millcreek Canyon. No enough room on busy days

Nice mountains.

No additional ski area expansion. Ten times the number of busses with good parking lots.

No construction.

No development.

No Interconnect.

No interconnect between Park City & Little Cottonwood (No Skilink) - Huge detriment to back county. Don't expand Grizzly Gulch.

No more development to connect resorts.

No more ski resort expansion.

No One Wasatch.

NO One Wasatch.

No Ski Link, No Ski Link, No Ski Link.

No ski link!

No snowmobiles/ATVs.

No, good work in your management. Can I get a job here at the Forest Service?

No. Love the Mountains!

Noise management.

Nope.

Nope. Thanks for keeping the mountains beautiful.

Nor more ski area expansion.

Not at this time, but thanks for this opportunity.

Oppose creation of a Millcreek City that extends to the border with Summit County.

People are attempting to buy nature. They are ruining our Wasatch - Voice greater support for leaving what is left the way it is - Rails in the canyons - no car - no more chairlifts! Too many backcountry skiers - why do we want to only accommodate the wealthy. Toll roads? Carpooling?

Please allow less private development to destroy the mountains.

Please continue to participate in the Mountain Accord. Do everything possible to enhance the protection of the Wasatch.

Please make more jobs and volunteer options available. Closer ties to community.

Please protect as much as possible and steer away from private development.

Please protect for future use for me and my family. Very important to the quality of my life.

Protect more wilderness. Stop Ski Link.

Protection against commercial development.

Rail service interlinking BCC/LCC/Park City.

Same level of restriction. No interconnect. More protection.

Save the Wasatch.

Say no to One Wasatch!

Seems well done.

Shut down trails when they are wet to prevent erosion.

Slow/stop resort expansion--even though I love the resort.

Stop One Wasatch.

Stop One Wasatch!

Stop One Wasatch.

Stop ski area expansion, including "One Wasatch."

Stop Ski Link.

Thank you.

Thank you.

Thank you for NOT having a fee for entrance.

Thank you for all of the trail maintenance and camping facilities.

Thank you for all the hard work!

Thank you for all you do!

Thank you for all you do.

Thank you!

Thank you.

Thank you. I would like a better knowledge of all the possibilities, such as in one good map.

Thanks.

Thanks for all of your hard work.

Thanks for all you do!

Thanks for all you do! Keep up the good work!

Thanks for all you do.

Thanks for doing an amazing job!

Thanks for doing this!

Thanks for the new ski track sigh!

Thanks for the survey.

Thanks!

The Cottonwoods need protection against increasing traffic to Park City.

There has been a significant increase in backcountry skiers/boarders, so it would seem justifiable to ban helicopter skiing. This type of noise and pollution is simply inappropriate for such a heavily used area as the Wasatch.

These mountains are the reason why I live in Utah.

They are fantastic recreation opportunity. Please do not approve Ski Link or lift connected resorts.

They need to be protected.

Think we/you are doing an amazing job.

Too many signs on road. More poop stations.

Traffic use in the future.

Try to find the most effective and economic solution.

Use of the rivers through private property should be accessible.

Very against One Wasatch project.

Very beautiful and a great place to spend time.

Very clean!

We appreciate you guys! Thanks!

We love it!

We love the mountains.

Well maintained and my favorite part of living in Utah.

When I pay to enter a common Forest area I feel there should be more garbage receptacles

Would like more places for dogs. Feel like USFS lets ski areas have their way too easy.

Yes, approve further wilderness in the Wasatch such as Mt Olympus wilderness.

You do great work, Thanks!

You're doing a good job.

Appendix C: Comments by respondents explaining why their out-group encounters positively enhanced their recreational experience

All enjoy beautiful spots.

All fellow dog walkers--fun for all to play.

All friendly, respectful.

All having a good time.

All pleasant to be out.

All were pleasant & well-behaved.

Ambivalent--always fun to see dogs interact.

Beautiful day and environment.

Big smiles.

Broke trail.

Chatted about terrain, lines, conditions...Community!

Common interests.

Communicated with what we are skiing.

Communication about snow condition.

Conversation.

Cool information! Spreading the stoke.

Cool personality, welcoming.

Did not see anyone else.

Discussing dogs.

Dog friends.

Encouraged two young men to go to the top.

Enjoy seeing other people.

Enjoying nature, like us!

Enjoying the same activity, friends talk.

Everyone cheerful despite rain, mixed rain/snow.

Everyone happy to be there.

Everyone was friendly.

Friendly.

Friendly banter.

Friendly exchange with like-minded people.

Friendly.

Friendly.

Friendly & courteous.

Friendly and all dogs played.

Friendly and knowledgeable.

Friendly and respectful.

Friendly and smiling.

Friendly chat.

Friendly chats.

Friendly chatting.

Friendly conversation.

Friendly conversation.

Friendly conversation. Dogs played together briefly.

Friendly folks on the lift; courteous skiers.

Friendly greetings.

Friendly hellos, helped when fell.

Friendly Nice.

Friendly people nice dogs.

Friendly people, enjoying wilderness hiking together.

Friendly people, not too many people.

Friendly socializing.

Friendly welcome.

Friendly, dog friendly hikers.

Friendly, good beta.

Friendly, happy, and having a good time.

Friendly, happy, like minded.

Friendly, kind people.

Friendly, said hello.

Friendly, said hello.

Friendly, similar passion, love the outdoors.

Friendly/gave me this survey and info about snow plows.

Friends.

Friendly.

Friendly & outgoing.

Friendly interaction.

Friendly, positive.

Fun for our dog to play with theirs.

Fun sharing experiences on the trail, places to see.

Fun to see other dogs + people having fun.

Fun to see others enjoying the wild.

Fun to talk - see other dogs.

Gave advice and directions. They were friendly and pleasant.

Glad to see other enjoying.

Good attitude.

Good company.

Good company.

Good conservation.

Good conversation.

Good energy.

Good info on snow and weather. Everyone happy about snow.

Good nice folks, nice to be alone though.

Good to see people out and about.

Good to see people out enjoying the woods and mountains.

Greeting like-minded people.

Happy nice people.

Happy to be out.

Having a few other people around is good for safety.

Help set skin track.

Helped me find sunglasses I dropped.

Helped us find where we were going.

I came here to ski with my dogs.

I like seeing other people.

I like seeing people out in unpopulated areas like the Cottonwoods.

I like to see more people.

I love dogs!

I saw a neighbor & we chatted pleasantly.

Interaction, sharing information, and observations.

It was good to see friendly people enjoying the beautiful day.

It's fun to see people along the way and chat.

It's fun to see people outside playing.

It's raining, so what! Happy faces!

Just being friendly.

Just conversation.

Just exchanging pleasantries.

Kind.

Kind people.

Kind, happy people are enjoying the outdoors.

Met skier in parking area--great company for most of the day!

Most smile, say hello, dogs play.

My dog loved it.

Nice.

Nice "hi."

Nice conversation.

Nice friendly.

Nice people.

Nice people.

Nice people.

Nice to see other happy people exercising.

Nice to see other on the trail.

Nice to see other people & dogs out.

Nice to see others recreating.

Nice to see people enjoying nature.

Nice to see people out.

Nice to see people out/friendly.

Nice to see people using the outdoor resources.

Nice walk and area.

No distractions or noise.

One is always nice and friendly.

Opportunity to fill out this survey.

Other dogs.

Peaceful.

People are usually very friendly.

People enjoying the mountains.

People were congenial & nice.

Pleasant hellos.

Police, enjoyed nature.

Positive Attitude, friendly strangers.

Positive attitude.

Respectful of dog rules.

Safety in numbers.

Safety/helpful if encounter problems.

Said "hello."

Said "hi."

Said "hi."

Said "hi" and were pleasant.

Said hello / good morning.

Said hello.

Saying hi, friendly greetings.

School groups were showing them, and talking about, watersheds and animals in the area.

Seeing happy = happy time

Shared info.

Sharing mutual interests.

Sharing similar experiences.

Skin track is in.

Skin track was in.

Smile.

Smile and a brief hello to someone who enjoys your similar lifestyles.

Smile and help with directions.

Smiles.

Smiles and "hellos."

Smiles, saying hello.

Smiles/chat/giggles.

Socializing--community w/ people that enjoy the same things.

Solitude.

Solitude, quiet.

Some people are cool.

Out enjoying the skiing.

Sparse.

Spreading holiday cheer, even in the rain.

Spreading stoke - good vibes.

Stop to talk, nice people. Had nice dogs for mine to play with.

Talked.

Talked about snowbikes.

Talked about trail conditions.

Talked w/ them.

They are friendly.

They did not get in the way.

They didn't take up the entire trail.

They encouraged exercising by their example of it.

They respected the trail and had proper equipment.

They seemed happy to be outside, and happy to see me and my dog.

They set a track (ski).

They smiled and greeted.

They were all friendly.

They were enjoying being outside - Happy & in good mood!

They were happy to be working or skiing.

They were having a good time.

They were nice.

They were nice people.

They were smiling and so were their dogs.

They were talkative.

Told us about a cave and had pups with them.

Very friendly.

Very friendly.

Very friendly people.

Very friendly.

Very happy and cheerful.

Visited.

Visited with neighbor.

We discussed lines to ski.

We have known each other for years.

We know most of the early hikers here.

We're all in for the fun!

Welcome

Were on main road - good to know if we were in backcountry and there was an emergency.

Appendix D: Comments by respondents explaining why their out-group encounters negatively affected their recreation experience by location

Location	Comments
White/Red Pine	Busy area.
	Just want to be alone!
	Too many.
	Tracked up good lines.
Grizzly Gulch	Reducing solitary experience with nature
	They ski the lines I want to ski.
	Too many of them.
Guardsman's Pass/Crest Trailhead	2-stroke snowmobile smoke.
	Snowcat noise.
Bear Trap	Lack of solitude.
	Taking my ski turns.
Silver Lake	Some people are not as cool.
Mill Creek Winter Gate	Crowded.
	Dogs chasing and growling at me.
	I like solitude.
	I selfishly prefer to have it all to myself
	Like to feel alone in wilderness.
	No grumps today.
	People that don't like dogs.
	Skiers gave no warning when coming up behind us, it was dangerous.
	Smoking.
	Some asshole who hated dogs and fun.
	Took up the entire trail, and left dog poop.
	Walking in ski tracks, blocking trail, and leaving dog waste.
Porter Fork	Busy trail.
	DOG POOP! Dog crapped right by me--no clean up.
Rattlesnake Gulch	They weren't very friendly.
	Too many people. I prefer quiet and solitude opposed to crowded trails.
Thaynes Canyon TH	Dogs on the skate track/doggie bags.
Neffs Canyon TH	Sometimes in summer trails get busy
Mount Olympus TH	Today most people were behaving responsibly. Note - other times, people can be irresponsible; littering, making loud noises, swimming in the watershed
Rob's	A lot of folks fail to pick up after their dogs.
	Prefer fewer people.
Spruces	Not today, but usually I like fewer people.

Appendix E: Places and reasons respondents no longer visit

Alta and Mill B South.

Alta, Snowbird, Solitude--too many people in the winter and no allowance for uphill skiing.

I make location decision based on how busy they may be.

American Fork. Too many motorcycles on trails.

Anywhere close to the road on a weekend!

Areas adjacent to ski resorts.

Areas dominated by ski resorts - Solitude and Alta & Snowbird.

Areas where quads illegally ride on single track.

Areas where snowmobiles are allowed, they are noisy death machines.

Albion Basin.

Avoid Mineral Fork in summer due to ATV's; avoid Catherine's Pass/Dry Fork in winter due to snowmobiles interactions & too many people.

Baker Spring in Porter Fork--Wasatch Powder Birds heli ski operation--I avoid all contact with them. They should not be allowed to operate up there.

Bell's Canyon is too busy on the weekends.

Biking trails--Desolation Lake.

Brighton ski resort, because of obnoxious snowboarders.

Brighton ski resort, lower Millcreek trails on busy weekend.

Busy areas like the top of Millcreek and busy dog days in Albion Basin.

But rarely go into Cottonwood Canyons due to no dog rules.

Canyon's Resort.

Cardiff Fork especially Cardiac Bend/Ridge ski areas.

Cardiff - snow machines. Snake Creek - snow machines.

Cardiff and Silver Fork.

Cardiff Fork--snowmobiles. Grizzly Gulch--crowded.

Cecret Lake @ Alta (summer). Skate track in Millcreek on weekends (winter).

Certain trails on mountain bike and dog days.

Corner Canyon--bikers are dangerous to our horses.

Crowded areas.

Crowded places.

Developed areas are very populated/used heavily.

Developed campground - prefer pristine wilderness.

Development for ski area expansion.

Dog Lake.

Dog Lake--people not following dog rules and making mountain biking difficult.

Dog Lake--too many dogs--change name.

Don't like to hike on Mtn Bike days in Millcreek

Don't remember the name - my dog was attacked by another there.

Ferguson, Millcreek, Grandeur.

Ferguson Canyon--smells like dog poop.

Generally avoid Cardiff due to crowds and snowmobiles.

Grizzly gulch—crowded.

Grizzly Gulch, too crowded with backcountry skiers.

Guardsman, winter -> snowmobiles.

Guardsman's--snowmobiles

Heavy traffic/busy backcountry/Little Cottonwood/Big Cottonwood.

Heavy use hiking areas such as Bell's Canyon.

High impacted areas which are advertised in the media. I look for areas with less traffic.

I avoid LCC on busy days.

I avoid Mill B in summer due to number of people.

I avoid places where there is heavy snowmobile use because they are not as peaceful or pleasant.

I avoid them when crowded. Avoid places where there are snowmobiles.

I don't come to Millcreek often because of how many people there are.

I go at different times to avoid people.

I seek more isolated areas but the Wasatch Front is a crowded place--that affects my decision on where to go daily.

I still hike up Neff's but, I had a dog owner use me and my dog as bait practice with my back away from him. That really angered me.

I still visit, but I hate seeing graffiti in the Cottonwood canyons.

I try to avoid dog days.

I try to avoid trails that are frequented by mountain bikers in the summer. To scary/dangerous!

I try to only go to Millcreek on off-peak times--really early if it's a weekend or a holiday.

I typically do not enjoy being with a large group of people. Came for peace and solitude.

I usually avoid bike days or heavily used bike trails. Most are courteous, but I always seem to encounter some bad apples.

In the winter, I do not recreate or visit where there is developed resort skiing. Also, I do not visit Mineral Fork in BCC during summer because of ATVs.

Just try and avoid popular places during peak use.

Killyon Canyon & the hike left of that Neighborhood acts like they own it and bully people - had to call police.

Litter multiple places.

Little cottonwood trail next to Quarry Canyon trail. Over the past 5-years people have spray/painted/graffiti on the rocks.

Mill Creek--too many dogs off leash.

Millcreek - too many people irresponsible with their dogs. A trail in Big Cottonwood Canyon motorcycles passed us on our hike bad mix of uses.

Millcreek Canyon.

Millcreek Canyon.

Millcreek Canyon--bicycle rider on an odd day got mad because I had my dogs off leash on a dog friendly trail.

Millcreek Canyon: too many dogs off leash.

Millcreek on weekends.

Millcreek trails.

Millcreek--mountain bikers.

Millcreek--too many people to comfortably hunt grouse.

Millcreek--too many people.

Mineral Fork in Summer - ATV's (noise, odor) Dry Fork, Snake Creek, Guardsman pass, Catherine's pass, Wasatch Back = Snowmobiles (noise, odor) Peak 9990/Bear Trap = Ski life accessible, crowded.

Monitors area Backcountry WPB have been flown over 4+ times.

Motorized use is awful because of noise and trail damage.

Mt Olympus Trail--too many aggressive dogs/owners.

Mt. bikers in Millcreek Canyon.

No but I worry about the one Wasatch Ski Link

Not a fan of dogs off leash in Millcreek Canyon.

On weekends only--I avoid most all of the major trailheads. I'm retired and go mostly on weekdays.

Overused places.

Parleys nature reserve, too many fences.

Peak 10CT20(?)--too many snowmobiles.

Provo River--or maybe I visit during times over the week/year when it is less crowded.

Random sites in LCC are being littered on too much.

Rarely go up Superior because it is too crowded.

Rarely visit Cardiff—snowmobilers.

Recreational resorts.

S-Curves.

Scott's Pass/Wasatch Crest Trail (extremely high use).

Ski resorts and the most popular trails.

Snowbird.

Snowbird - Mineral Basin backcountry access from resorts.

Snowbird. Corporate, over developed, ruins scenery.

Some chode tried to chop up a tree.

Tanner Dog Park—areas blocked off near stream.

Tanner Park.

The Cottonwoods and Millcreek.

The hot spots in Spanish Fork--broken glass, etc...

The US Forest Service & Alta Ski lifts.

There are places I avoid because they are notoriously crowded, but I have never had a bad experience.

They colony, on any newly develop crap on east side, and any ski area.

Timpanogos/American Fork--dirt bikes.

Too many people for good skiing. Grizzly, Alta side country.

Too many people.

Top of Millcreek--no parking!

Upper Days, Mineral, Cardiff in winter because of Wasatch Powder Birds.

Upper guardsman road in BCC too many snowmobiles.

Upper Millcreek because of dogs.

Upper Millcreek on off leash days. Too many dogs to trail run.

Upper Millcreek--too many bikes.

Vail. Avoid crowds

Wasatch Crest Trail. As a trail runner I have encounter very uneducated rude bikers who get driven up by the shuttle bus and have not learned the trail etiquette.

Wasatch front areas protected by watershed.

Where dogs are not allowed.

Where ever Power Birds are flying!!!

Where there are ATV.

Where there are too many ATV.

Appendix F: Word map from the following intercept survey question, "If you could choose just one or two words to describe your personal feelings about the Central Wasatch Mountains what would the word(s) be?"

Appendix G: Survey Instrument

Visitor
Intercept Survey
Salt Lake Ranger District
Uinta-Wasatch-Cache National Forest

To Be Completed by Surveyor:
Date: _____ Day: M Tu W Th F S Su
Time: _____ Location: _____
a.m./p.m. _____

Surveyor's Name: _____

Surveyor's Telephone Number: _____

Surveyor Introduction:

Hello! I am volunteering to survey visitors using the National Forest here in the Central Wasatch Mountains, as part of a study being conducted by Utah State University's Institute for Outdoor Recreation and Tourism, and we are very interested in learning more about you as a recreationist.

1. **Your information and perspectives on recreational use in the Central Wasatch Mountains are very important!**

   Your participation in this survey is voluntary and all of your answers to these questions will be kept strictly confidential.

   Would you be willing to take a few minutes to complete this survey?
   ☐ **Yes** ☐ **No** (No = Refusal)

2. **Then ask, "Is recreation your primary purpose for visiting the Central Wasatch Mountains today?"** ☐ **Yes** ☐ **No**

   If No, ask "What is the purpose of your visit here today?"
   - ☐ Working or commuting to work **(thank you and end interview)**
   - ☐ Stopping to use the restroom **(thank you and end interview)**
   - ☐ Only passing through, going somewhere else **(thank you and end interview)**
   - ☐ Some other reason **(thank you and end interview)**

****

FLIP PAGE AND HAND SURVEY TO RESPONDENT

Your participation is greatly appreciated, and by participating in this study you are helping in planning for the future of the Central Wasatch Mountains.

The information collected will be useful for the National Forest, Salt Lake City, and Mountain Accord—a multi-phase initiative that seeks to make critical decisions regarding the future of the Central Wasatch Mountains, made up of a collaboration of public and private interests, including state and local governments, federal agencies, and businesses and grassroots organizations.

With a question, when asked, please check (✓) the appropriate box ☐.

3. Are you a resident of the United States?

☐ Yes If Yes, what is your Home Zip Code? _____

☐ No If No, what Country are you from? _____

4. How long are you going to be recreating on this trip?

☐ Short trip under three hours

☐ About half the day

☐ The majority of the day

☐ Overnight

☐ Multiple days – If so, how many? _____days

5. On this trip, are you planning on visiting any other sites besides this one? ☐ Yes ☐ No
If Yes, how many other sites are you going to visit? _____ sites

6. On average, how many times per year do you visit the National Forest here in the Central Wasatch Mountains? _____ times per year

7. What types of areas do you use most often when recreating here in the Central Wasatch Mountains?

☐ Developed areas, such as developed campgrounds, picnic areas, ski resorts, etc.

☐ Undeveloped areas, such as trails, dirt roads, rivers and lakes, dispersed camping, wilderness, etc.

☐ I use both developed and undeveloped areas equally.

8. Overall, how satisfied or dissatisfied are you with your visit to the Central Wasatch Mountains today?

☐ Very satisfied

☐ Somewhat satisfied

☐ Neither satisfied or dissatisfied

☐ Somewhat dissatisfied

☐ Very dissatisfied

9. For TODAY, please check "✓" all of the Recreation Activities have you participated in (or will participate in). Then, Circle your MAIN activity or purpose for visiting the Central Wasatch Mountains TODAY.

✓	RECREATION ACTIVITIES
	NON-MOTORIZED ACTIVITIES
	Walking
	Hiking
	Horseback Riding
	Road Cycling
	Mountain Biking
	Non-motorized water travel (canoe, kayak, raft, sail)
	Rock climbing
	Ice Climbing
	Downhill skiing (Resort)
	Snowboarding (Resort)
	Cross-country skiing
	Backcountry skiing
	Backcountry snowboarding
	Snowshoeing
	Sledding, tobogganing
	Other non-motorized activities (races, endurance events)
	MOTORIZED ACTIVITIES
	Driving for pleasure on roads (paved, gravel or dirt)
	Riding on motorized trails (non-snow, OHV/ATV)
	Snowmobile travel
	Other motorized activities (races, games)
	VIEWING & LEARNING—NATURE & CULTURE
	Viewing/photographing wildlife, birds, fish, etc.
	Viewing/photographing natural features, scenery, flowers, etc.
	Visiting historic and prehistoric
	Nature study
	Visiting a nature center, nature trail, or

✓	RECREATION ACTIVITIES
	CAMPING OR OTHER OVERNIGHT
	Camping in developed sites (family or group sites)
	Primitive camping (motorized in roaded areas)
	Primitive camping(backpacking in unroaded backcountry areas)
	Resorts, cabins, or other accommodations on Forest Service managed lands (private or FS)
	FISHING & HUNTING
	Fishing—all types
	Hunting—all types
	OTHER ACTIVITIES
	Picnicking or family day gatherings in developed sites (family or group)
	Gathering mushrooms, berries, firewood, or other natural products
	Relaxing, hanging out
	Escaping heat, noise, pollution, etc.
	Exercising
	Walking/Exercising Pet(s)
	OTHER ACTIVITIES NOT LISTED? (Please write in below and ✓ to left.)

10. Did you recreate in a protected watershed today?

☐ Yes, I did recreate in a protected watershed, or
☐ No, I did not recreate in a protected watershed.

How familiar are you with the rules and regulations for recreating in this protected watershed?

Not Familiar			Somewhat Familiar			Very Familiar
1	2	3	4	5	6	7

11. Do you know this National Forest has Congressionally designated Wilderness Areas?
☐ Yes ☐ No

If Yes, have you ever recreated in a Congressionally designated Wilderness Area in this National Forest?

☐ Yes ☐ No

If Yes, what is the name of the Wilderness Area(s) in which you recreated?

_____

☐ I don't remember the name of the Wilderness Area(s).

What recreation activities do you typically engage in during your visits to Wilderness Areas? (List below)

_____

_____

12. About how many people outside of your group did you encounter (see, talk to, interact with, etc.) while recreating today? _____ people

What do you think about the number of people you encountered while recreating today?

Did they positively enhance your experience? ☐ Yes ☐ No
If Yes, in what ways? Please describe:

_____

Did they negatively affect your experience? ☐ Yes ☐ No
If Yes, in what ways? Please describe:

_____

☐ They neither positively enhanced nor negatively affected my experience.

13. Are there places in the Central Wasatch Mountains you no longer visit because encounters with other forest users/uses have negatively affectd your recreational experience? ☐ Yes ☐ No

If Yes, please identify the area(s) and explain the type of encounter and why you no longer visit:

_____

_____

_____

14. How did you access the recreation site you are visiting today? (Check one)

- **☐ Personal Vehicle—How many people were in your vehicle TOTAL? _____**
- **☐ Public Transit (bus, TRAX)**
- **☐ Private Shuttle**
- **☐ Biked on my own**
- **☐ Walked on my own**
- **☐ Other Please describe: _____**

15. What motivated you to recreate TODAY?

	Not Important at All	Somewhat Unimportant	Neither Unimportant nor Important	Somewhat Important	Very Important
Observe scenic beauty	**1**	**2**	**3**	**4**	**5**
For the adventure	**1**	**2**	**3**	**4**	**5**
Enjoy the sights and smells of nature	**1**	**2**	**3**	**4**	**5**
Experience the peace and tranquility	**1**	**2**	**3**	**4**	**5**
Because its challenging	**1**	**2**	**3**	**4**	**5**
Be with friends enjoying activities	**1**	**2**	**3**	**4**	**5**
Improve my physical health	**1**	**2**	**3**	**4**	**5**
Get away from crowds	**1**	**2**	**3**	**4**	**5**
Develop my skills and abilities	**1**	**2**	**3**	**4**	**5**
Do something with family	**1**	**2**	**3**	**4**	**5**
Experience solitude	**1**	**2**	**3**	**4**	**5**
Learn more about nature	**1**	**2**	**3**	**4**	**5**
Let my mind move at a slower pace	**1**	**2**	**3**	**4**	**5**
Release tension	**1**	**2**	**3**	**4**	**5**
Be unconfined by rules and regulations	**1**	**2**	**3**	**4**	**5**
Escape noise, pollution/bad air quality	**1**	**2**	**3**	**4**	**5**
Meet new people	**1**	**2**	**3**	**4**	**5**

16. If you could choose just one or two words to describe your personal feelings about the Central Wasatch Mountains what would the word(s) be?

_____

17. Are you recreating alone today? ☐ Yes ☐ No

If No, how many people (total) are in your group? _____ people
Of these, how many are under 16 years of age? _____ people

18. Does anyone in your group have any disabilities? ☐ Yes ☐ No

If Yes, were the areas and facilities you visited accessible? ☐ Yes ☐ No

19. Are you a veteran? ☐ Yes ☐ No

If Yes, where did you see service? **☐ World War II** **☐ Korean Conflict**
☐ Vietnam War **☐ Iraq War(s)**
☐ War in Afghanistan ☐_____

Are you a wounded or disabled veteran? ☐ Yes ☐ No

20. Do you consider yourself Hispanic or Latino(a)?

☐ Yes, Hispanic or Latino(a)

☐ No, not Hispanic or Latino(a)

21. With which racial group do you most closely identify?

- ☐ **American Indian/Alaska Native**
- ☐ **Asian**
- ☐ **Black/African American**
- ☐ **Native Hawaiian or other Pacific Islander**
- ☐ **White**

22. In what year were you born? _____

23. What is your sex: ☐ Male ☐ Female

24. What is the highest level of formal education you have completed?

- ☐ **Less than a high school degree**
- ☐ **High school degree or GED**
- ☐ **Some college**
- ☐ **2 year technical or associate degree**
- ☐ **4 year college degree (BA/BS)**
- ☐ **Advanced degree (e.g., Master's, JD, MD, DO, Ph.D.)**

25. Information about income is important because people with different incomes come to Public Lands for different reasons. What is your annual household income?

- ☐ **Under $25,000**
- ☐ **$25,000-$49,999**
- ☐ **$50,000-$74,999**
- ☐ **$75,000-$99,999**
- ☐ **$100,000-$149,999**
- ☐ **$150,000 or over**
- ☐ **Don't know**

26. We would like to learn more about your recreational experience and your perspectives on planning for the future of the Central Wasatch Mountains.

Would you be willing to participate in a follow-up e-survey, sent to you in a couple weeks after your visit today?

☐ **Yes** ☐ **No**

<u>If</u> <u>Yes</u>, please provide your first name and e-mail address below:

First Name: _____

E-mail Address: _____

(please write clearly)

Flip page for question 27 and 28

27. If you could ask the U.S. Forest Service and/or other Public Land Management Agencies to change some things about the way they manage the Central Wasatch Mountains, what would you ask them to do?

28. Do you have any additional comments or thoughts about issues regarding the management, protection, or development of the Central Wasatch Mountains?

Thank you for your time and thoughtfulness in completing this survey.
Your participation is greatly appreciated.

Institute for Outdoor Recreation and Tourism
Utah State University

ID 32379

WASATCH FRONT REGIONAL COUNCIL

October 12, 2022

Josh Van Jura
Little Cottonwood Canyon EIS c/o HDR
2825 N. 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 Final Environmental Impact Statement

Mr. Van Jura:

As a Participating Agency to the State Route 210 (SR-210) Environmental Impact Statement, the Wasatch Front Regional Council (WFRC) thanks you for the opportunity to comment on the Final Environmental Impact Statement. Provided below are comments from the Wasatch Front Regional Council. Please note that these comments were prepared by WFRC staff and were not considered by our Council.

Little Cottonwood Canyon Final 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 commenting on any specific alternative or option for implementation. **Our primary comment is that we believe that any approach taken in LCC should maximize the opportunities for integration with the regional transportation system and facilitate utilization of transit and non-auto options in LCC and on Wasatch Boulevard and other approaches to LCC.**

When focusing on LCC, as in the EIS, the potential broader regional impacts and benefits of a regional system connection should be fully considered. We recommend that implementation strive for regional connectivity and integration to the existing transit, roadway, and active transportation systems. Efforts should be made to limit traffic and reduce congestion on Wasatch Boulevard.

The final EIS recommends increased bus service and connections as an interim/phased approach. This interim approach seems beneficial to providing near-term enhanced integration with the regional transportation system.

Again, thank you for the opportunity to provide comments and participate in this important study. WFRC looks forward to our continued participation.

Sincerely,

Jory S. Johner
Director of Long-Range Planning

ID 35184

To whom it may concern,

As a member of the outdoor community and a taxpayer of Utah, I am extremely interested in the project regarding Little Cottonwood Canyon. The canyon is one of Utah's greatest gems and deserves protection. The canyon is not DisneyLand, it is a pristine mountain environment and should remain as such. **It is time we stopped modifying our environment and started to modify our behaviors.**

I appreciate the efforts taken by UDOT and other parties to solve the traffic issues that woe this canyon. Phased implementation though enhanced bus services, tolling, and restrictions to single occupancy vehicles are a great start. Significant effort should be taken to implement these ideas and others before moving onto the construction of a gondola or other costly ideas.

The goals of this project are to improve mobility, reliability, and safety in 2050. Issues with mobility and safety are largely related to the presence of two large ski resorts at the top of the canyon. The ski resorts are the reason a large number of people flock to the canyon and people create mobility and safety issues.

This project has many beneficiaries. It benefits resort goers, trailhead users, residents of the canyon, residents below the canyon, people driving to work, the tourism industry and associated companies, and the ski resorts themselves. While it does benefit many groups, Alta and Snowbird ski resorts are the main beneficiaries. They will likely see increased revenues and as the main beneficiaries, Alta and Snowbird should be required to pay the cost of these projects. Tourism benefits the state, but the gondola is designed with private resorts in mind. Why should taxpayers, many of whom will not step foot in Little Cottonwood Canyon, be required to fund this project. Whether the money comes from the state or federal government, the problems associated with Little Cottonwood Canyon are caused by the traffic heading to ski resorts. As such the ski resorts should be required to solve the problem they are causing.

It is true that other canyon's, Mill Creek for example, have traffic issues; however, none compare to that of Little Cottonwood Canyon. Ski resorts are the primary reason for traffic and safety issues and should be regulated. It should be the task of the ski resorts, not anyone else. An ideal system to regulate parking is explained in the next paragraph.

Guests at the resort wishing to drive themselves would purchase a parking pass prior to their trip along with their ski passes. Pass holders desiring to avoid this would be able to ride buses. Each parking pass would have a canyon entrance and exit time. Pass holders would only be allowed to enter the canyon at their specified time. Monitoring equipment would be placed at the canyon entrance and steep fines would be assessed to those in violation.

This system could easily be programmed into an app on individuals cell phones. The app would allow users to make parking reservations, purchase ski passes, provide them with canyon and parking maps, entrance and exit times, and bus system information.

Studies and traffic flow models would determine the number of vehicles that would be allowed to park at each resort. The same models would also determine the schedule of those wishing to park. Ski resorts would need to collaborate with UDOT and the Forest Service to include traffic destined for trailheads, residences, and other canyon users.

Designated entrance and exit times would spread the traffic out over a larger amount of time. Parking passes, limited parking spaces, entrance and exit times would also encourage canyon visitors to use bus services. If buses, with existing road widths, were more widely used we could see a reduction in traffic similar to that of Zion National Park before buses were used.

We should think of this canyon similarly to how we think of river management. To float the Colorado River through the Grand Canyon, one must have a reservation. That reservation tells the user when they can enter, how many people they can have with them, and when they exit. Such a strategy would preserve this canyon. Modifying our behavior and not the environment is key to preserving it for future generations.

I believe these ideas would protect the canyon, save taxpayer dollars, improve the experience of users, and ensure continued profits for resorts. Please reach out to me to further discuss moving forward with these ideas.

Best,

Scott Mershon

ID 35354

[redacted]

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

Dear UDOT Project Team,

I have resided in the Salt Lake Valley for more than 20 years. I am, and have been, a frequent visitor to LCC throughout this entire time. I hike, trail run, bike, resort ski, back country ski and rock climb in LCC.

I am opposed to the Gondola Alternative B (and A for that matter.)

UDOT and the USFS have failed to meet the NEPA requirements for an EIS. In the words of Peter Dahlgren in the Salt Lake Tribune on 28 July, 2022, "Shame on UDOT. They should be sent back to the drawing board." I could not agree more.

My comments to the EIS are as follows:

1. The traffic congestion problems in LCC are caused solely by resort skiers at Snowbird and Alta.
2. These resorts are owned by large and profitable companies. Taxpayers should not be burdened with the cost of fixing a problem the resorts intentionally caused for their own private financial gain.
3. If Alta and Snowbird are subsidized with hundreds of millions of dollars in taxpayer money, it is a foregone conclusion that Brighton and Solitude will demand equal treatment. UDOT should take the cost of the taxpayer subsidy for LCC and double or triple it for BCC. This would be a more honest estimate of the cost to taxpayers.
4. No solution to the traffic congestion problem will be successful without the vast majority of the parking spaces on resort property being removed along with banning resort skiers from parking along the highway near the resorts. As long as there are parking spaces, people will use them, even if there is a good public transportation option (and the gondola is bad option.)
5. The Gondola option is so bad, no one will want to ride it. (See details below.) The resorts will profit handsomely from this as they will be able to charge high prices to park at the base of ski lift, unless they have been forced to remove the vast majority of their parking spaces. The resorts will laugh all the way to the bank while taxpayers are left holding the bill, and the canyon permanently scarred.
6. UDOT has made a tragic and fatal mistake by looking only at LCC. The transportation Needs Assessment Study Area should have included LCC and BCC together. Only by looking at both canyons together can the best alternative be identified, evaluated, debated and selected. As a result of this failure, the entire EIS process should begin anew looking holistically at the best

solution for both LCC and BCC. In this regard, the best option for both canyons is a ski train tunnel built, maintained and operated at the sole expense of the four resorts, beginning in Park City, not the mouth of the canyons (see further comments below) and the removal of most of the resort parking spaces.

7. It is clear that UDOT is not the correct agency to generate this EIS. UDOT has failed in its fiduciary obligation to the citizens of Utah to evaluate a variety of alternatives for public comment and consideration. Therefore, the process should start all over again with another agency in charge of the EIS.
8. Let's be clear, UDOT only ever provided one alternative, disguised as multiple alternatives. The only alternative UDOT presented was one that required taxpayer subsidies to the ski resorts to the tune of hundreds of millions, if not billions of taxpayer dollars. No other alternatives were presented. However, there are multiple alternatives to resolve the traffic problems in LCC (and BCC for that matter) that would cost taxpayers little or no money. Why did UDOT fail to offer an alternative that protects taxpayer pocketbooks? Why did UDOT assume that the only possible alternative involved taxpayers subsidizing the very profitable companies which own the resorts? Because of UDOT's demonstrated inability to protect the taxpayer, another, independent organization should be empowered to prepare the EIS.
9. I put forth below two alternatives that would cost taxpayers little or no money. Both of these options should have been included as alternatives for public comment so that the advantages and disadvantages of them could be publicly debated. In both alternatives, the cost burden rests with the ski resorts: they created the traffic problem in their relentless pursuit of money and they can pay to solve the very problem they created. There is no reason whatsoever that taxpayers should bear this burden. I also reference a third option.
    a. The first fiscally responsible, taxpayer friendly alternative is to play hardball with the resorts: either they remove the vast majority for the parking spaces at their resorts and replace them with other means of transportations at their sole expense (likely buses) or the USFS revokes their special use permits to operate on public land. Without the ability to operate on public land, the resorts will shrink in size and with that, visitation will decrease. Problem solved at no taxpayer expense. Note, if it is not important enough for the resorts to pay for a "driveway" to their resort, it is not important enough for taxpayers to pay for it.
    b. The second fiscally responsible, taxpayer friendly alternative requires that UDOT look at a map and consider a solution that also resolves the looming traffic problems in BCC. It is a geographic fact that the bottom of the ski lifts at Brighton and Solitude in BCC as well as those at Alta and Snowbird in LCC are much close to Park City than they are to the mouth of their respective canyons. Therefore, it is logical to look at providing access to the four resorts from Park City, a real ski town, I might add. (This was attempted several years ago with Ski Link into BCC which was a bad idea for many reasons, but a tunnel is an ideal solution.) The State of Utah and the appropriate federal agencies should grant the resorts the right to dig a ski train tunnel from downtown Park City to the four resorts. The train would only be daylighted on resort property near the base facilities. The ski resorts would build, maintain and operate the tunnel and train at their

sole expense. In return for this permission, the resorts would be obligated to remove the vast majority of the parking spaces at their resorts. A train in a tunnel would be much faster and would transport far more skiers than gondolas up the canyon. Furthermore, a train tunnel would build on the long, proud mining history of Park City. It would also transform Park City into a world class ski town. (A gondola from the mouth of the canyons does not transform Cottonwood Heights or Sandy into world class ski towns.) A ski tunnel would be a huge economic boon to Park City and Utah and would help preserve the scenic viewshed of the Wasatch.

c. A third alternative, which is also much better than a gondola, was clearly articulated by Mr. Peter Dahlberg in an opinion piece in the Salt Lake Tribune on 28 July, 2022, entitled "A tunnel to Alta should have been one of UDOT's LCC options." I agree that UDOT should have made this an alternative. Furthermore, going a step further, the resorts should pay to build, operate and maintain the tunnel as it would only be daylighted at the base of their ski lifts. This tunnel could also be a train tunnel, not a car tunnel. While clearly feasible, a car or train tunnel from the mouth of the canyon does not offer the same benefits as a ski train tunnel from Park City, discussed above.

10. In addition to the overarching comments and alternatives stated above, I provide the following comments specific to the UDOT preferred alternative:
    a. After a long day of skiing, many people are dead tired and so are their children. The last thing they will want to do is <u>stand in line for an hour or more</u> to board a slow-moving gondola and then have to <u>stand on their feet for another hour</u> for the slow ride down the canyon. Children will be screaming and crying the whole time. With a ski train and its much larger capacity, faster speed and shorter travel distance, the wait to board would be much shorter and people can comfortably sit and sleep for the short ride back to Park City (or down the canyon, if that option is selected.)
    b. I assume the time estimates for the gondola trip are best case scenarios and that in practice the average time will be much slower due to winds, weather, avalanche mitigation, etc. UDOT needs to be truthful and transparent as to what the real travel times will be.
    c. Assume for the moment that the gondola was operational during the COVID19 pandemic. How would it have been affected? Would the gondola run at all? Would each gondola car only be filled to half, or quarter or one tenth capacity? People are packed check to jowl in the existing Snowbird Tram and the proposed gondola would no different. (A super-spreader event if there ever was one.) A train with seats has a much lower density of people and would be much safer to ride than a gondola.
    d. What is the per person cost to ride the gondola? Would ticket prices pay for the entire maintenance and operation of the Gondola or would taxpayers be paying for the O&M costs?
    e. Did UDOT perform any studies as to how much money resort skiers would be willing to pay for a gondola ride instead of driving themselves or riding a bus? This seems to be a crucial piece of missing information.

f. It does not appear that UDOT considered the effects of climate change upon the resorts. Nor did UDOT consider the effects of a shrinking Great Salt Lake on the snowfall at the resorts. In the not-too-distant future, the resorts will likely struggle to be viable ski resorts, skier-days will dramatically decline and taxpayers will have then subsidized a gondola to nowhere.
g. Freight and commercial deliveries cannot be made via the gondola. Commercial deliveries can be made via a car or rail tunnel. Given that these vehicles are slow moving up and down the canyon surface road, they should be relegated to a rail or vehicle tunnel.

11. Under no circumstance should back country access and parking for back country access be restricted. Dispersed back country users such and skiers, snowshoers and rock climbers should not have their access restricted so as to help solve a problem they did not create.
12. The gondola will sit idle for eight months of the year. However, it will be an eyesore for 12 months of the year and an expensive one at that.

I will close by reiterating that UDOT and the USFS have failed to meet the NEPA requirements for an EIS, they failed in their duty and protect the taxpayer and therefore this whole process should go back to the drawing board with a new agency in charge of the EIS.

Sincerely,

Eric Hobday

ID 35705

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

October 17, 2022

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 Final EIS

To Whom It May Concern,

This letter transmits comments from Metropolitan Water District of Salt Lake & Sandy (MWDSLS) in response to the *Final 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' 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.

Because so many rely on Little Cottonwood Creek as a source of water, MWDSLS believes that source water protection and drinking water quality need to be carefully considered before any transportation improvements are implemented. MWDSLS has concerns that implementing the preferred alternative (Gondola B) could impact drinking water through increased visitation, usage, and development in the canyon. 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. MWDSLS believes that the analysis of impacts to water quality has been too narrowly focused and does not address potential unintended consequences from constructing a gondola in Little Cottonwood Canyon.

MWDSLS also believes that a more balanced approach to identifying solutions to traffic in the canyon is needed because there are multiple issues to address, multiple stakeholders to involve, and a variety of uses to consider. By focusing the EIS on solving winter traffic issues, many of the other issues in the canyon were overlooked as were the needs of many stakeholders. This was reflected in MWDSLS's comments, as well as comments of many other groups and individuals that were submitted in response to the Draft EIS

MWDSLS supports implementing an enhanced bus option with tolling and other incentives to encourage carpooling and use of public transportation. This was the solution with the least environmental impact identified in the EIS and, MWDSLS believes, will solve many of the traffic issues without the risk posed by construction of a gondola.

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

MWDSLS appreciates the opportunity to work with UDOT throughout the EIS process and looks forward to continuing to work together in the future. MWDSLS recognizes that 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

CC: Vince Izzo, HDR vincent.izzo@hdrinc.com

ID 38614

To Whom It May Concern,

I am letting you know that I am totally AGAINST having over a half billion dollar gondola built to serve the ski resorts in Little Cottonwood Canyon. It will benefit the few and make every taxpayer in Utah from Box Elder to St. George pay. That certainly makes a lot of sense to me- NOT!

If UDOT is so concerned about the amount of pollution the buses will create going up and down the canyons over time, then why haven't they thought of using electric buses that won't create the pollution? After all the Green Deal is trying to shove electric cars down our throats so why not electric buses? They are making them.

Why are you singling out two ski resorts for a gondola when you have Big Cottonwood Canyon with two ski resorts also? Looks like one canyon is being favored over the other.

People like to escape the city and be with nature and have tranquility. A gondola would totally ruin and deface the beautiful canyon we have so enjoyed for many years. I am one of these people.

I read where it would not only cost over half a billion dollars to build but then the taxpayers would be paying an estimated annual upkeep and maintenance cost of $10 million. Don't make the majority of the people of Utah pay for something they can't or won't ever use.

If skiers are worried about getting up and down the mountain every day, why don't they group together and share a room at a resort and split the cost? If they can afford to spend $150-$184 per day for a pass, then they could share the other expenses. When I go on a trip, I plan on spending extra money.

I have been bothered the past several years that the city of Alta has charged people to drive to the Lake Catherine trailhead parking lot. When I asked what they do with the money they replied that it was for road maintenance. Road maintenance my eye! The ruts are so deep now that they could take out the transmission in my car. They haven't done anything to the road since they began collecting the money.

There are bigger fish to fry in the state of Utah and building a gondola in Little Cottonwood Canyon isn't one of them. End of story.

American Mountain Guides Association
4720 Walnut Street, Suite 200
Boulder, CO 80301
(P) 303.271.0984 | (F) 720.336.3663
www.amga.com | info@amga.com

ID 38620

October 17, 2022
Little Cottonwood Canyon EIS
Utah Department of
Transportation
C/o HDR
2825 E Cottonwood Parkway,
Suite 200 Cottonwood Heights,
UT 84121

RE: American Mountain Guides Association Comments to Little Cottonwood Canyon Final Environmental Impact Statement

UDOT Planners,

The American Mountain Guides Association (AMGA) welcomes this opportunity to submit comments to the Little Cottonwood Canyon (LCC) Final Environmental Impact Statement (FEIS). In 2018 the Utah Department of Transportation (UDOT)—in partnership with Utah Transit Authority (UTA) and the U.S. Department of Agriculture Forest Service—began an EIS for LCC to provide an "integrated transportation system that improves the reliability, mobility and safety for residents, visitors, and commuters who use S.R. 210." UDOT has identified its preferred Alternative B that would construct a gondola from a base station at La Caille up Little Cottonwood Canyon to Snowbird and Alta ski areas. AMGA opposes this proposal as it fails to address the transportation needs of all users throughout the canyon, in particular dispersed recreational users, and would destroy or otherwise impair the natural qualities and valuable climbing resources found in the canyon

American Mountain Guides Association

The American Mountain Guides Association is a 501(c)(3) educational non-profit organization that provides training and certification for climbing instructors, mountain guides, and ski guides throughout the United States. Founded in 1979, the AMGA has trained over 13,000 climbing and skiing guides who provide outdoor experiences for the general public that emphasize safety, stewardship, and education. As the American representative to the International Federation of Mountain Guide Associations (IFMGA), the AMGA institutes international standards for the mountain guiding profession in the United States and serves as an educational body for land managers, guide services, outdoor clubs, and other recreation stakeholders. The advocacy arm of the AMGA supports sustainable use of public lands, facilitates stewardship projects, and works in cooperation with guides and land managers to promote best practices and preserve access to areas utilized by the guided public. Please also see our comments to UDOT's Draft EIS dated September 3, 2021. Little Cottonwood Canyon is an exceptionally important resource for climbers, guides and the guided public. Climbing guides and guide companies that are permitted in Little Cottonwood Canyon—either on private or US Forest Service lands—include: Utah Mountain Adventures, Red River Adventures, The Mountain Guides, Prival, Backcountry Pros, Aspect Adventures, Wasatch Mountain Guides, and Inspired Summit Adventures.

COMMENTS

AMGA believes that UDOT's preferred Alternative B will cause unacceptable impacts to Little Cottonwood Canyon because the gondola would destroy highly popular climbing areas while negatively impacting the natural experience of many other dispersed recreation uses. This important public resource is the most popular climbing destination in the Wasatch Mountains which has a long tradition as a training ground for Salt Lake climbers and mountain guides.

AMGA believes that the high degree of physical impacts[1] proposed by this alternative should be considered only after lesser destructive alternatives are analyzed in detail. As noted by the Salt Lake Alliance and others, the climbing community and local climbing guides have invested considerable time, energy, and resources into maintaining public access to areas in the planning area, such as Gate Buttress and its parking area. These efforts have included significant public outreach and the formation of mutually-beneficial partnerships with stakeholders such as The Church of Jesus Christ of Latter-day Saints. UDOT's proposal would significantly restrict parking, damage the climbing resource, and impact access trails in precisely the locations where the climbing community and other stakeholders have invested so much effort to preserve public access.

UDOT's gondola proposal will significantly damage the climbing experience in Little Cottonwood Canyon in the following ways. First, access to climbing areas will be compromised during years of construction and once it's finished destroying and/or removing the irreplaceable and historic world-class climbing and undeveloped viewsheds. The current views of the canyon—with its inspiring granite buttresses, pine forests, and mountain streams—will be spoiled by gondola towers and cables, and the constant drone of machinery and construction. Furthermore, UDOT's proposal is not fully funded with at least a half billion dollars still outstanding to finish the job. What else could be done with these funds other than destroying a world class natural experience serving Salt Lake City's urban population? Accessible natural areas such as LCC are what draw people to live in and visit Utah. Moreover, the gondola is designed to serve only ski resort users, addressing a traffic problem that exists only a few months of the year. Among those that will be impacted by this proposal are dispersed use recreation such as climbers, mountain guides, and the guided public.

AMGA supports the position of the Salt Lake Climbers Alliance. Transportation infrastructure that physically and permanently alters the canyon should only be considered after less impactful options have been implemented and shown not to be effective. Instead of this unnecessary and destructive gondola proposal, we believe that expanded electric bus service coupled with tolling and other traffic mitigation strategies that include dispersed recreation transit needs should be attempted by UDOT before irretrievably and permanently damaging landscape and the valuable natural experiences found in Little Cottonwood Canyon.

[1] UDOT's preferred alternative threatens classic and historic climbing areas throughout Little Cottonwood Canyon including at least 64 boulders and 273 boulder problems.

* * *

AMGA urges UDOT to reconsider its preferred alternative and reexamine a less impactful and cheaper transportation solution centered on expanded bus service combined with other traffic mitigation strategies such as tolling, while also preserving the parking needs of dispersed recreational users throughout the canyon. Such an approach would address the needs of the dispersed recreation community and many others that oppose permanently scarring the historic and highly valued climbing resources and extraordinary natural environment in Little Cottonwood Canyon.

Sincerely,

Jason Keith
Senior Policy Advisor
American Mountain Guides Association

ID 38622

Salt Lake Climbers Alliance
[redacted]
SaltLakeClimbers.org

October 17, 2022

Utah Department of Transportation (UDOT)
Little Cottonwood Canyon (LCC)
Final Environmental Impact Statement (FEIS)
c/o HDR
2825 East Cottonwood Parkway, Suite 200
Cottonwood Heights, Utah 84121

RE: Little Cottonwood Canyon Final Environmental Impact Statement (FEIS)
Salt Lake Climbers Alliance (SLCA) Comments

Dear UDOT Project Team:

The Salt Lake Climbers Alliance (SLCA) appreciates the opportunity to comment on this Final Environmental Impact Statement (FEIS). Having reviewed the response from UDOT on the SLCA's submitted comments to the Draft Environmental Impact Statement, as well as the newly proposed Phased Approach to the specified gondola alternative, the SLCA maintains that there are critical flaws to the FEIS in total; specifically, that the total scope of the project is too narrow and the purpose and need are not satisfied by the proposed solution.

The SLCA makes the following recommendations and requests of UDOT:

1. In alignment with the Salt Lake County Council that The Gondola Alternative B proposal be eliminated from consideration in its entirety or at minimum be put on hold until the following have been demonstrated.
    a. The enhanced bus service as recommended by UDOT is in effect and a study on usage occurs;
    b. SLCA is added as an engaged stakeholder of S.R. 210;
    c. Updated analysis of S.R. 210 recreational use and impact data, in coordination with the USFS and an updated Management Plan for the area.
2. UDOT releases a timeline and plan for the Enhanced Bus Service without road widening as this has been proposed by UDOT per the FEIS statement.
3. The Trail Head parking issue be decoupled from the FEIS statement and given priority to move forward with independent funding.

Salt Lake Climbers Alliance's Position

The Salt Lake Climbers Alliance has and will continue to advocate for enhanced electric bus service, with no roadway widening or large-scale infrastructure, that runs year-round and stops at trailheads, thereby serving all user groups in Little Cottonwood Canyon and satisfying mobility demands.

The purpose outlined in the EIS is incomplete, as there is no statement or requirement to maintain the integrity of the canyon as a natural resource; further, the purpose and need do not account for the diversity of use and demand of the canyon, providing a flawed methodology of analysis that allows for a traffic congestion solution that only serves a percentage of annual canyon users for a fraction of the annual days it is needed. Demand for level of service on S.R. 210 for less than 6% of the year cannot come at the expense of the preservation of Little Cottonwood Canyon as a natural resource.

The FEIS fails to consider in detail the full impacts of the proposed Gondola Alternative B and additional congestion mitigation strategies on regional transportation. The FEIS acknowledges that tolling on S.R. 210 could increase the demand on S.R. 190 yet fails to conduct any analysis on the cumulative impacts, showing again that the narrow purpose and need of the FEIS is insufficient, particularly given the scale of the proposed project, and the cost. Further, the presentation of the FEIS via multiple separate documents without any hyperlinks prevents adequate public review.

Finally, despite claims made in the FEIS that public comment has been taken into consideration and addressed, there is measurable, significant, and widely recognized opposition to the proposed solution. As UDOT planners are aware, the project received a record number of comments on the DEIS[1] and a chapter revision with additional analysis was required in early 2022 based on numerous comments voicing concern for climbing resources[2]. These alone indicate strong public interest in this project and the SLCA is skeptical that UDOT has fully considered and addressed public comment. In addition to the record-breaking public comments, a December 2021 poll by the Deseret News/Hinckley Institute of Politics cited only 20% of respondents in favor of a gondola system to address traffic congestion in Little Cottonwood Canyon.[3] An additional and notable layer of opposition to the project is the recent passage of a resolution by the Salt Lake County Council to condemn the proposed Gondola Alternative B.[4]

The SLCA's focus in this letter is related to climbing resources; however, inadequate consideration is also given to other forms of recreational resources that will be severely impacted. There are user groups of the natural resource that are unaccounted for in the FEIS

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[1] Kyle Dunphey, "Record breaking number of public comments could delay Little Cottonwood traffic plans," *Deseret News*. 14 September 2021. https://www.deseret.com/utah/2021/9/14/22673766/record-breaking-number-of-public-comments-could-delay-little-cottonwood-traffic-plans-gondola-or-bus

[2] John Reed, "Climbers help delay UDOT decision on Little Cottonwood Traffic Plan," *KUER News*. 5 April 2022. https://www.kuer.org/news/2022-04-05/climbers-help-delay-udot-decision-on-little-cottonwood-canyon-traffic-plan; also see S-28

[3] Kyle Dunphey, "Gondola? Buses? New poll asks locals what they think will solve ski traffic woes in one of Utah's most crowded canyons," *Deseret News*. 9 December 2021. https://www.deseret.com/utah/2021/12/9/22822405/poll-little-cottonwood-canyon-bus-system-favored-over-gondola-udot-alta-snowbird-ski-resort-utah

[4] Jacob Scholl, "Split Salt Lake County Council votes to condemn gondola plan with new resolution," *Salt Lake Tribune*. 4 October 2022. https://www.sltrib.com/news/politics/2022/10/04/salt-lake-county-council-votes/

proposal, and the comprehensive scope of the impacts unplanned for, unmitigated, and unacceptable.

Our comments will address the following points:

1. **New and Substantive Comments**
    a. Inappropriate and Outdated Data Used to Determine Purpose and Need
    b. Lack of Transparency and Detail on Implementation and Evaluation of Enhanced Bus Service
    c. Flawed Logic for Mitigation of Impacts to Climbing Resources
    d. Careless Analysis of Historic Designation of Climbing Resources
    e. Flawed, Inadequate, and Inaccurate Analysis of Viewshed and Scenic Byway Impacts
    f. Inadequate Analysis of Impacts to Neighboring Canyons and Surrounding Transportation Networks
    g. Disingenuous Framing of Coordination and Communication with Stakeholder User Groups
    h. Lack of Detail and Coordination in Plans for Parking and Trailhead Alternatives
    i. The Cost Analysis within the Selection Criteria is Incomplete
    j. The Reliability of the Gondola System Has Not Been Fully Analyzed
    k. The Gondola Does Not Qualify for a Federal Highway Administration (FHWA) Easement
    l. Neglected and Inadequately Addressed Environmental Justice Implications

2. **UDOT's Chapter 32: Response to Comments (Insufficiently Addressed Comments in FEIS and Critique of 4f Analysis)**

3. **Links to SLCA's previously submitted comments during the EIS process**

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1. New and Substantive Comments

Inappropriate and Outdated Data Used to Determine Purpose and Need

To determine the need of the LCC EIS, UDOT has made assumptions about the timing and seasonality of peak periods by using population growth projections in only two Utah counties and daily or hourly traffic information from a variety of years. UDOT highlights hourly data collected in 2017, traffic volume data from 2010 to 2016, and traffic growth rates from 2003 to 2017. Because UDOT and the USFS have both failed to complete a recent capacity study of LCC, also cited are visitation estimates from 2013.[5] Quality and reliable data is cumbersome to collect, however it is flawed to assume these estimates carry any weight when they are five or more years old and it should be obligatory to collect more recent data to aid in the development of such large-scale and permanent infrastructure.

The SLCA believes this is a necessary step in determining the true purpose and need for this project because the COVID-19 pandemic amplified an already increasing public lands use and visitation, likely altering the true timing and seasonality of peak periods. Several articles demonstrate the influx of visitation seen by public lands, including:

[5] See 1-28 to 1-30

1. In 2020, unweighted participation in day hiking rose more than any other activity, by 8.4%[6];
2. Approximately 20% increase in outdoor recreation in the U.S.[7]; and
3. In one survey, 37.7% of respondents said that their outdoor recreation behaviors have been changed as a result of the pandemic long into the future. Primary changes include utilizing local public lands more often and diversifying recreation activities.[8]

In addition, fall traffic congestion in both Cottonwood Canyons was cited in the news in fall of 2021[9] where UDOT's own John Gleason is quoted as saying, "It's an indicator that the Cottonwood canyons, it's not only about skiing and snowboarding. There's a strong interest in getting out and experiencing everything that Big and Little Cottonwood Canyon have to offer year round." This directly contradicts both the purpose and need cited for this EIS, where the purpose mentions making improvements for "all" canyon users and the need suggests that wintertime congestion is the issue to be addressed. UDOT has skirted the facts of public lands visitation by dispersed recreation and current traffic studies to focus on resort users and wintertime traffic alone resulting in the purpose and need as currently stated in the FEIS. SLCA requests a careful re-examination of this purpose and need based on updated and adequate traffic and visitation data.

Lack of Transparency and Detail on Implementation and Evaluation of Enhanced Bus Service

The phased approach proposal outlined in the FEIS describes using some "components" of the Enhanced Bus Service Without Roadway Widening alternative. What is not accounted for in this phased approach is when or how enhanced bus service will be implemented. Funding to accomplish this task is also not accounted for, nor is cost, whereas cost for each alternative has been outlined for each alternative previously. Finally, there is no description of how, or if, the enhanced bus service approach will be evaluated for effectiveness nor how a successful phased approach is defined. In essence, there is inadequate information provided in the FEIS in consideration of the phased approach and the outcome of the partial enhanced bus service alternative. Further, if funding for improved bus service can be acquired, there is no plan provided for oversight of UDOT/UTA coordination, a required component of enhanced bus service. In particular, what level of service is expected to be provided and what entity is responsible for the success or failure of that service? We expect these questions and the concerns outlined here to be addressed in UDOT's Record of Decision (ROD).

In the identification of the phased approach (combined Enhanced Bus and Gondola Alternative B options), the FEIS has not clearly defined the costs or levels of impacts to the environment and dispersed recreation users. With regards to environment and dispersed recreation impacts, the FEIS has not sufficiently estimated the temporal construction impacts of this new phased

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[6] Outdoor Industry Association, *Increase in Outdoor Activities Due to COVID-19*, 13 Aug 2020. https://outdoorindustry.org/article/increase-outdoor-activities-due-covid-19/

[7] Taff, Derrick B., William L. Rice, Ben Lawhon, and Peter Newman. Who Started, Stopped, and Continued Participating in Outdoor Recreation during the COVID-19 Pandemic in the United States? Results from a National Panel Study. 17 December 2021. https://doi.org/10.3390/land10121396

[8] William L. Rice, Ben Lawhon, B. Derrick Taff, Tim Mateer, Nathan Reigner, and Peter Newman. The COVID-19 Pandemic is Changing the Way People Recreate Outdoors. https://lnt.org/wp-content/uploads/2020/10/GeneralPublic-Covid-Phase-I-Survey_FINAL.pdf

[9] Ben Winslow, "Fall colors lead to record traffic in Cottonwood Canyons," *Fox 13 News*. 6 October 2021. https://www.fox13now.com/news/local-news/fall-colors-lead-to-record-traffic-in-cottonwood-canyons

approach, including how dispersed recreation user groups and regular traffic in the canyon will be affected as a result of the potentially drawn out timeline for complete implementation. UDOT has stated that because both options, Enhanced Bus and Gondola Alternative B, have been evaluated according to the required NEPA process, no supplemental EIS is warranted. However, a phased approach that takes much longer to implement over time and could result in additional cumulative impacts to the watershed and canyon environment, as well as dispersed recreation user experience. According to the Federal Highway Administration, when there are changes or new information about a project, a supplemental EIS is required. The combination of the Enhanced Bus Alternative and Gondola Alternative B and the potential for cumulative impacts should be regarded as changes to a project, as many questions about the implementation of the phased approach remain unanswered by UDOT.

The details of a fully funded enhanced bus alternative have not been fully articulated in the FEIS, especially given the recent news of cuts to the UTA ski bus service.[10] In a meeting on September 30, 2022 with SLCA, the UDOT planning team said they were unaware of the cuts that were being made to this service and were surprised to hear the news.[11] This is concerning for two reasons:

1. It appears as if UDOT has not sincerely engaged with UTA on the implementation of the enhanced bus service, and
2. without a fully funded enhanced bus service, it is impossible to know the extent to which this alternative alone could be successful in meeting the purpose and need of this EIS.

To that end, it is unclear what the evaluation process might look like as UDOT begins to implement the enhanced bus service because no such structure or metrics for evaluation are suggested in the FEIS. In the same meeting on September 30, 2022 with SLCA, UDOT stated that the FEIS has no process for evaluating whether this alternative alone is meeting the purpose and need of the EIS prior to implementing Gondola Alternative B. The FEIS needs to consider what metrics could and should be used to evaluate this less costly and less impactful alternative before committing to altering the landscape with large-scale infrastructure. These metrics should be determined and introduced for full public transparency.

Flawed Logic for Mitigation of Impacts to Climbing Resources

The SLCA and its public and private partners have invested a large amount of time and resources into recreation infrastructure in lower LCC, including extensive trail and staging area improvements to and at climbing sites. UDOT, in coordination with the USFS, underestimates and grossly lacks detailed plans regarding impacts to the recreation infrastructure that the SLCA carefully planned and implemented on both National Forest lands and privately held land by The Church of Jesus Christ of Latter-day Saints. The ROD needs to detail plans and funding mechanisms for alterations and mitigation of natural resource impacts and the impacts to the recreation infrastructure already in place in the lower canyon climbing areas. SLCA needs to be recognized and consulted as a stakeholder and expert in climbing area infrastructure in these plans.

[10] Blake Apgar, “In a major move, UTA to sharply cut back bus service in three counties, and it’s going to affect skiers,” *Salt Lake Tribune*. 28 September, 2022.
https://www.sltrib.com/news/2022/09/28/major-move-uta-sharply-cut-back/
[11] UDOT & SLCA Policy Committee FEIS Meeting, September 30, 2022.

The FEIS suggests that the loss of climbing resources can be easily replaced or mitigated.[12] In particular, the FEIS suggests that boulders could be relocated or new opportunities discovered within the Alpenbock Loop and Grit Mill areas and trails built to provide access. These mitigation suggestions make it clear that UDOT has not sincerely engaged with the SLCA on the severity of the impact to these resources. To suggest that boulders can and will be relocated is problematic. Relocating boulders would require extensive vegetation and soil removal, which would likely have water quality impacts to the extent that this action alone should warrant an EIS. In addition to the physical impacts to the canyon, the relocation of boulders, and resulting changes to the experience of those climbing resources forever, and negatively impacts the historical and cultural significance of these resources.

This statement, "If it is not possible to relocate boulders, new trails would be constructed to provide sustainable access to boulders that do not currently have trail access within the Alpenbock Loop and Grit Mill Climbing Opportunities areas." raises additional questions.[13] It is not clear if the FEIS is suggesting that there are additional climbing resources that could be discovered within the same area or if the existing trail network is simply not comprehensive. Either way, to suggest that historically and culturally significant climbing resources could be easily replaced is incorrect. That is not to say that there are not "undiscovered" climbing opportunities within the area, but that these specific routes and boulders are irreplaceable because of their significance to climbing history and their unique climbing attributes.

Careless Analysis of Historic Designation of Climbing Resources

The FEIS includes analysis of the historic climbing area along the north side of S.R. 210, called Site 42SL968. In reference to *FINAL Third Addendum for the Class III Archaeological Inventory for the Little Cottonwood Canyon Environmental Impact Statement, Salt Lake County, Utah*, the FEIS determined that this site was indeed eligible for the National Register of Historic Places under CFR 36. We agree with the determination of eligibility and appreciate that UDOT addressed the historic significance of Site 42SL968 and its cultural resources. However, we are concerned by the integrity of this analysis and the speed in which it was carried out.

The FEIS determined no adverse effect to this district, with particular regard to the viewshed on the principle statement that "the concept that views were important to early climbers is inferred rather than well documented; the chief focus of the climbers centered around the buttresses and the technical skill required to make first ascents rather than aspects of scenery and viewshed."[14] There is a well established scholarship that addresses this particular concept, in which the views of natural landscape correspond directly to the outgrowth of outdoor recreation, as well as the link between the Transcendental movement of the 19th century with the development of modern climbing and mountaineering.[15] The notion that the importance of views is merely inferred ignores a background of scholarship, and moreover illustrates a general lack of understanding of particular aspects of this cultural resource, an issue that could have been preemptively addressed had UDOT more intentionally collaborated with the SLCA throughout the NEPA process. For example, the SLCA are experts when it comes to the history of the

[12] See 26-49
[13] See 26-49
[14] FINAL Third Addendum for the Class III Archaeological Inventory for the Little Cottonwood Canyon Environmental Impact Statement, Salt Lake County, Utah.
[15] For more on the importance of views with outdoor recreation historically see Joseph Taylor's *Pilgrims of the Vertical,* Jared Farmer's *On Zions Mount,* Nicolson's *Mountain Gloom and Mountain Glory,* Jeff McCarthy's *Contact* and "Why Climbing Matters"

climbing resource in the Wasatch and has two professionals in the organization whose work and expertise directly relates to this subject matter. One such professional works at the J. Willard Marriott Library at the University of Utah, which contains numerous important collections of primary source materials pertinent to properly documenting and evaluating the historic significance of this area. In addition, we also contest that the trails included in the area are omitted from evaluation, as portions of the modern trails in the area are maintained original historic trails.

The FEIS found no adverse effect on the historic district, thus not initiating the Section 106 process under CFR 36. However, there remain many questions about the no adverse effect determination. As addressed in the section below (Inappropriate Analysis of Viewshed and Scenic Byway Impacts), there was inadequate research done on the significance of viewsheds in both the primary and secondary literature, and we find that the lack of a Section 106 evaluation is concerning and needed for the ROD.

Flawed, Inadequate, and Inaccurate Analysis of Viewshed and Scenic Byway Impacts

The FEIS has not adequately and appropriately addressed the drastic alteration to the viewshed of Little Cottonwood Canyon that would be caused by Gondola Alternative B and the allowance of this infrastructure to be implemented would directly contradict the U.S. Forest Service's interest in protecting viewsheds. As early as 1979, the U.S. Forest Service found that "landscape scenes exhibiting a high magnitude of man-induced objects or conditions are less preferred than scenes with lower magnitudes--high levels of development detract from the aesthetic view of a landscape."[16]

The FEIS states that travelers on Little Cottonwood Canyon State Scenic Byway (that is, S.R. 210) "are considered to have a high sensitivity rating and concern for aesthetic and scenic values"[17] but goes on to say that "where the gondola infrastructure is visible it would be visually dominant and would demand the attention of visitors, especially where the gondola alignment crosses over the scenic byway. Since views along the scenic byway would be dominated by gondola infrastructure, the visitor experience would be degraded and would therefore limit the U.S. Forest Service's ability to manage the scenic byway to protect scenic vistas and intrinsic scenic qualities."[18]

Moreover, UDOT has determined that "Regarding visual impacts, recreation users are considered to have moderate viewer sensitivity."[19] This determination raises several questions, the FEIS does not fully explain the rationale for this determination. Recent studies have illustrated that, in an index of viewer sensitivity using National Forest visitor data, viewer sensitivity for recreation users is either high or very high, depending on domination recreation practice.[20] The ROD needs to provide a comprehensive and detailed viewshed analysis to

[16] Nieman, Thomas J.; Futrell, Jane L. 1979. Projecting the visual carrying capacity of recreation areas. In: Elsner, Gary H., and Richard C. Smardon, technical coordinators. 1979. Proceedings of our national landscape: a conference on applied techniques for analysis and management of the visual resource [Incline Village, Nev., April 23-25, 1979]. Gen. Tech. Rep. PSW-GTR-35. Berkeley, CA. Pacific Southwest Forest and Range Exp. Stn., Forest Service, U.S. Department of Agriculture: p. 420-427
[17] See 17-7
[18] See 17-58
[19] See 32-30
[20] Palmer, James F., and Donald B.K. English. "An Index of Viewer Sensitivity to Scenery While Engaged in Recreation Activities on U.S. National Forests." *Landscape and Urban Planning* 189 (2019): 91-98.

determine the full impacts that such large scale infrastructure (Gondola Alternative B) would have on the recreation and traveler experience in LCC.

Inadequate Analysis of Impacts to Neighboring Canyons and Surrounding Transportation Networks

The analysis of impacts to neighboring canyons and surrounding transportation networks within the FEIS is insufficient. The FEIS does not analyze how tolling implemented in LCC will impact Big Cottonwood Canyon, or even other neighboring canyons, which are not within the project's geographic scope. Although mentioned in DEIS Chapter 2 and again in FEIS Chapter 2, a toll implemented for Big Cottonwood Canyon would trigger the NEPA process. Throughout the EIS process for S.R. 210, UDOT has been acting on behalf of the Federal Highway Administration, a federal agency. Pursuant to 40 CFR 1508.18, implementing a toll would be considered a major federal action under (b)(4), thus requiring UDOT to prepare an assessment under NEPA.[21] UDOT has not been transparent in this regard in either the DEIS or FEIS. In addition, tolling in BCC–at any point on S.R. 190–would likely impact how people access the canyon and thus neighboring canyons and surrounding transportation networks. As such the FEIS and ROD must analyze the cumulative and regional impacts.

Several portions of Chapter 7, Traffic and Transportation, in the FEIS were written based on the assumption that the level of service provided by UTA in LCC would be as it has existed in past years, or better. Due to the recent announcement of changes to the service that UTA will provide, we are concerned that some of the assumptions made within this chapter are no longer accurate. Therefore, the issue of impacts that Gondola Alternative B would have to neighboring canyons and surrounding transportation networks still remains unsolved. Additionally, Gondola Alternative B has a single function capability, compared to fully investing in an electric enhanced bus system that could run all year, serve multiple user groups, and infrastructure that could be repurposed and re-used to improve regional transportation. In this regard, the investment in an electric enhanced bus alternative would likely provide the "biggest bang for the buck" as well as have positive regional transit impacts. With this new information in hand from UTA, The FEIS should analyze how the Enhanced Bus Service can be implemented and can be successful.

Disingenuous Framing of Coordination and Communication with Stakeholder User Groups

Throughout the FEIS, it cites that UDOT has and will continue to engage with stakeholders, such as the SLCA, for mitigation and final design plans. Based on previous experience with UDOT projects in LCC, as well as the framing of the level of coordination with SLCA throughout the FEIS, we request a more detailed communication plan be articulated within the ROD.

SLCA's previous experience with transportation projects in LCC took place in July 2020 during UDOT's Merge Lane Project, where UDOT did not communicate with the SLCA about the climbing resource (Cabbage Patch and Secret Garden climbing areas) and created the potential for unsafe conditions for those that were both using and trying to access this recreation area during UDOT construction. In addition to safety concerns, vegetation acting as a buffer at the edges of these climbing areas was removed. The SLCA is concerned about the precedent that this experience has set for how UDOT may communicate with SLCA before and during future construction projects, and especially given that the SLCA is both a stakeholder and holds a lease on private property UDOT wishes to utilize for the gondola.

[21] See https://www.law.cornell.edu/cfr/text/40/1508.18

Should this or other large-scale infrastructure projects move forward, UDOT (and the USFS as a cooperating agency), need to define in the ROD:

1. Clear and agreed upon communication protocols with SLCA and other dispersed recreation stakeholder groups regarding access to trails and climbing resources before and for the duration of construction;
2. The USFS as a cooperating agency needs to have a clear and communicated plan in place for identifying and obtaining funding to mitigate the impacts to the climbing resource (e.g., trails, vegetation rehabilitation, trailheads, staging areas, etc.);
3. The process for which dispersed recreation stakeholder groups, including the SLCA, will be consulted, informed, and engaged in the mitigation and restoration of climbing resources and recreation infrastructure;
4. Protocols for coordination with SLCA, the expert in stewardship of climbing resources, for education of USFS (and other) work crews before infrastructure construction or resource restoration begins.

This degree of coordination is currently not included in the FEIS and, given the previously cited experience of SLCA with UDOT projects, we expect that UDOT will rectify this by more sincerely engaging and communicating with SLCA and other stakeholder groups through the above recommendations. Since the timeline for Gondola Alternative B is currently unknown due to lack of funding availability, the SLCA also expects that UDOT will continue to coordinate well into the future on these matters.

Lack of Detail and Coordination in Plans for Parking and Trailhead Alternatives

The FEIS fails to fully analyze the parking availability and modeling of current and anticipated future demand for the Lower LCC Park and Ride,Grit Mill Parking Lot, and Gate Buttress Parking Lot, as well as roadside parking. The FEIS purpose and need is based on future demand, however observations made of available parking at the LCC Park and Ride,Grit Mill Parking Lot, and Gate Buttress as stated in the EIS are only current, suggesting that there is no plan in place to accommodate future growth and use of these parking areas. It should be anticipated as well, at a minimum, that encouraging public transit use in the canyon would increase the demand for space in common parking areas such that it could outweigh the supply since UDOT has not fully considered this catch-22.

Within the FEIS there will be no wintertime parking on S.R. 210 and no parking below Snowbird Entry 1 within 0.25 miles of improved trailheads for future implementation. Reducing parking spaces as a project goal is counterintuitive to improving public transit when applied to all canyon users, all year round. This serves as another example to show that the purpose and need of the FEIS is too narrow, limited only to the user group of the canyon, as opposed to an equitable solution for all users, which is what the outcome of a project to mitigate congestion using any public funds whatsoever should be.

In addition, SLCA is concerned with the level of coordination and apparently expected level of service that would be provided by UTA. As covered in other sections of this comment, this lack of coordination with UTA does not inspire confidence when it comes to UDOT fully committing to implementing an enhanced bus service. The FEIS states that, “By eliminating roadside parking, fewer private vehicles would use S.R. 210 in Little Cottonwood Canyon, which would improve overall mobility.”[22] The plan to remove wintertime roadside parking, and even parking within 0.25

[22] See 2-21

miles of a trailhead, without providing any other option for accessing the canyon via bus, shuttle, or otherwise is alarming since S.R. 210 serves more than those accessing the upper reaches of the canyons and the ski resorts.

The FEIS correctly states that the Gate Buttress parking lot is not under the jurisdiction of the USFS or UDOT, as such, long-term plans for maintenance of potential improvements to the Gate Buttress parking lot need to be established between the USFS, UDOT, The Church of Jesus Christ of Latter-day Saints, and the SLCA before recommendations are made in the ROD. The ROD needs to outline plans for clear communication with stakeholder user groups regarding dispersed use parking lots such as the Gate Buttress.

The Cost Analysis Within the Selection Criteria is Incomplete

The FEIS uses both capital and yearly operational costs as part of the selection criteria yet fails to provide any substantive justification or analysis of those costs.

The FEIS has estimated costs that have unjustified discrepancies. The two bus service alternatives (with and without the additional lanes) provide the exact same level of service yet the capital ($68 vs $96 million, respectively) and yearly operational costs differ ($11 vs $14 million, respectively).[23] No other data is available. Further, no details are given for how UDOT arrived at the cost estimate for the phased approach.[24] During the 30-year life cycle, the yearly operational (and capital) costs for buses will increase as demand increases. That is, the needs of today (2020) are much less than those estimated for 2050, yet the FEIS does not provide any details.

There is a discrepancy in proposed costs for the gondola base station and the two mobility hubs. For example, the amount of parking that will be available between the two is the same, 2500 spaces, however, the estimated cost of two mobility hubs is $99 million and the gondola base station parking is $56 million. While there are additional costs for two hubs, the FEIS fails to justify this difference in cost between the mobility hubs and base station parking. As the FEIS uses both capital and yearly operational costs as part of the selection criteria it must include a full and detailed analysis of all costs.

The FEIS includes some economic impact analysis of the project alternatives yet fails to analyze the cost recovery and utilization of the project alternatives. Though the project goal is to reduce traffic, the net economic benefit is to two private businesses.[25] Thus the FEIS should analyze the cost recovery and utilization of the project alternatives.

The FEIS fails to analyze how tolling costs combined with gondola fares would achieve the necessary reduction in traffic. That is, if the tolling costs are too low or the gondola fares too high there will be no incentive to use the gondola. More granular and accurate cost analysis is required, especially in light of the FEIS including other economic analysis.

The Reliability of the Gondola System Has Not Been Fully Analyzed

The FEIS states that “The gondola system would not be affected by vehicle slide offs or accidents. Vehicle users could decide to use the gondola system if travel lanes on S.R. 210 are

[23] See 2G-8
[24] See S-29
[25] See 6-2

closed or congested."[26] However the FEIS fails to acknowledge that the gondola would be affected by winter storms and high winds which can force planned and unplanned closures. In January 2022 the Sandia Tram became stuck during a winter storm.[27] While such incidents are rare, it took over 16 hours to evacuate just one cabin with 20 riders. The proposed Gondola Alternative B would have some 30 cabins, even if only a few were occupied it would take an incredible amount of time and resources to evacuate each one. The FEIS fails to analyze this reliability.

The FEIS states that "The system would have four stations, each necessary to operate the gondola system. If any part of the gondola system has a mechanical failure, the entire system would stop, stranding users at the base station or the ski resorts. Similar gondola systems are in operation around the world and have shown high overall reliability."[28] Part of this statement is incomplete: *If any part of the gondola system has a mechanical failure, the entire system would stop, stranding users at the base station or the ski resorts.* The statement fails to take into account users stranded in cabins at the time of the failure. For example, at peak capacity, 18 cabins with 35 users in each cabin would result in 630 stranded users.

The FEIS expects the gondola to have over 95% reliability. Given that UDOT anticipates that the gondola will be needed for the 50 peak days during the year then at least 2 days will have a mechanical failure which could result in 630 stranded users on each day. The FEIS fails to take the stranding of users and the resulting rescue costs into account.

Detailed plans for gondola maintenance and rescue operations need to be included in the ROD.

The Gondola Does Not Qualify for a FHWA Easement

Under 23 U.S. Code Section 317,[29] the FHWA (on behalf of UDOT) would not be permitted to request an easement from the USFS for the required right-of-way for the gondola, as the gondola does not meet the definition of a "highway" under 23 U.S. Code Section 101.[30]

Instead, UDOT would have to request from the Forest Service a special use permit and / or right-of-way, as well as a revision to the Forest Management Plan of 2003. As such, the FEIS fails to acknowledge that the Forest Service would have to do their own NEPA analysis.[31] That is the Forest Service cannot rely solely on the LCC FEIS in its present form to issue its ROD as the LCC FEIS does not consider the full scope of issues and analysis that NEPA requires of the Forest Service.

As the FEIS acknowledges the complexity of funding the gondola and looks towards a phased approach, so too must the FEIS acknowledge that the gondola may never be built because it cannot secure the necessary land. Notwithstanding that private land must also be secured.

Neglected and Inadequately Addressed Environmental Justice Implications

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[26] See 2G-12.
[27] Scott Brown, Jami Seymore, Gabriel Chavez, "All riders rescued from Sandia Peak Tram cars," KRQE News. 3 January 2022. https://www.krqe.com/news/albuquerque-metro/multiple-people-trapped-in-sandia-peak-tram-car-overnight/
[28] See 2G-7.
[29] See https://www.law.cornell.edu/uscode/text/23/317
[30] See https://www.law.cornell.edu/uscode/text/23/101
[31] See 28-1.

The FEIS reflects at least six neglected or inadequately addressed environmental injustice concerns that fall under the definition of new (in the context of the EIS) and substantive issues.

First, UDOT has not adequately and in full good faith attempted to analyze or address the transportation equity and environmental justice implications of the FEIS LCC transportation alternatives, seemingly pursuing only limited transportation equity/environmental justice analysis methods. These include statistical and demographic analysis of LCC visitation based on sweeping assumptions, and lacking empirical verification. This is perhaps most evident in a lack of meaningful consultation and/or involvement of representatives from marginalized populations, including those protected from discrimination, such as Title VI of the Civil Rights Act (1964) and Section 504 of the Rehabilitation Act of 1973, which addresses disability discrimination; The Civil Rights Restoration Act of 1987; and The Americans with Disabilities Act (ADA) of 1990. The FEIS appears to reflect the following limitations in particular, which one National Academies of Sciences, Engineering, and Medicine's report explicitly labels analysis "deficiencies" (see pg. 85):[32]

- Little documentation of how public involvement processes were used to inform the identification of affected populations, their needs or concerns, or prospective impacts.
- Insufficient analysis of travel behavior related impacts by income segment, lacking travel related surveys or focus groups to derive findings.
- Little attention given to proportional (to income/resources) financial burden proposed.
- Insufficient limited specificity as to toll schedules (i.e., pricing levels) and toll account management policies and features (e.g., deposit, purchase, monthly fee, minimum balance, replenishment options). Notably, the report notes: "Given the timing of planning and NEPA studies, it may not be possible to fully define all pricing and account management policies; however, the absence of definition appears to undermine the basis for a finding of no significant adverse impacts…" (pg. 86).

Second, the result of inadequate consultation is evident in UDOT's premature dismissal of valid comments made in response to the DEIS. In particular, UDOT dismissed concerns from disabled community proponents regarding gondola inaccessibility by stating that the gondola meets basic ADA compliance requirements. Legal compliance does not guarantee transportation equity.[33]

Third, the purpose and need guiding the FEIS is tailored such that any project resulting from it that receives public funding would be inequitable and contrary to environmental justice principles and objectives. More precisely, following Federal Highway Administration (FHWA) terminology, such a project would exhibit "horizontal market inequities,"[34] wherein, according to the principle of horizontal market inequity, "those who benefit from a project should pay for those

[32] National Academies of Sciences, Engineering, and Medicine. "Environmental Justice Analyses When Considering Toll Implementation or Rate Changes Final Report." (2018). Washington, DC: The National Academies Press. https://doi.org/10.17226/24992

[33] For a discussion of what transportation equity entails and how state departments of transportation can pursue it see: Karner, Alex, PhD., and Kaylyn Levine. "Transportation Equity in Practice: A Review of Public Transit Agencies." Institute of Transportation Engineers.ITE Journal 92.4 (2022): 36-41.

[34] Federal Highway Administration (FHWA). "Guidebook for State, Regional and Local Governments on Addressing Potential Equity Impacts of Road Pricing." (2013). Washington DC: FHWA.

benefits."[35] Because the FEIS has been structured to specifically address traffic related to ski area visitation for the purposes of skiing, any project that emerges from the FEIS will engender horizontal market inequities, as taxpayers will bare at least some (and possibly most) of the financial burden for a project that principally benefits private businesses (ski resorts) and their users. Because the project involves access to an important and regionally-unique environmental resource, the inequity is not simply an economic one (important as that is); rather, the FEIS and any project resulting from it will constitute environmental injustices by the logic of horizontal market (in)equity.

Fourth, the burden of electricity generation for UDOT's preferred alternative to address wintertime traffic in LCC (a gondola) would displace the most harmful environmental impacts onto typically minority, low-income, and indigenous populations, which frequently bear a disproportionate burden of environmental harms and adverse health outcomes.[36] To justify that this is the cleaner or more environmentally-friendly option through the displacement of these impacts is disingenuous to the NEPA process.

Fifth, the FEIS indicates that for tolling in LCC to be effective, a similar tolling system will need to be implemented in Big Cottonwood Canyon (BCC). Yet, UDOT has presented no additional analysis regarding the transportation equity and/or environmental justice implications of tolling in both LCC and BCC. The aforementioned "Guidebook and Toolbox" suggests that UDOT's BCC tolling plans will create and exacerbate at least two types of transportation inequities that amount to environmental justice concerns:[37]

- Horizontal opportunity inequities: UDOT's preferred LCC transportation alternatives would impose opportunity barriers on already marginalized communities, such as people of color, those of lower incomes, and disabled people, by disproportionately limiting their opportunities to engage in outdoor recreation activities in (some) BCC destinations. The extent and nature of such limits as they pertain to BCC lack analysis in the EIS–UDOT needs to provide as much.
- Vertical/outcome inequities: UDOT's preferred LCC transportation alternatives would impose disproportionate burdens on already marginalized communities, such as people of color, those of lower incomes, and disabled people, as the proposed tolling would constitute a greater financial/resource barrier for those of limited resources when compared to those who can readily absorb tolling costs. The extent and nature of such barriers as they pertain to BCC lack analysis in the EIS–UDOT needs to provide as much.

Sixth, UDOT continues to dismiss the environmental discrimination created by the preferred LCC transportation alternatives. The simple fact that UDOT seems intent on increasing transportation and access for already privileged people to relatively costly outdoor recreation alternatives, while limiting the transportation options and access for those with fewer material resources and who engage in other forms of recreation constitutes in-and-of itself an unacceptable willingness to impose transportation inequities and environmental discrimination on already marginalized communities that belies UDOT's public service mandate. As indicated

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[35] National Academies of Sciences, Engineering, and Medicine. "Assessing the Environmental Justice Effects of Toll Implementation or Rate Changes: Guidebook and Toolbox." (2018). Washington, DC: The National Academies Press. https://doi.org/10.17226/24991. See p.26.

[36] See https://www.epa.gov/airmarkets/power-plants-and-neighboring-communities

[37] See also Government Accountability Office (GAO). "Traffic Congestion: Road Pricing Can Help Reduce Congestion, but Equity Concerns May Grow." Report No. 12-119. (2012). Washington, D.C. GAO.

throughout the preceding paragraphs, the FEIS would impose all three major forms of transportation inequities that underlie transportation-driven environmental justice violations:

- Horizontal opportunity inequities: UDOT's preferred LCC transportation alternatives would disproportionately impose opportunity barriers on already marginalized communities, such as people of color, those of lower incomes, and disabled people, by disproportionately limiting their opportunities to engage in outdoor recreation activities in some LCC and BCC destinations.
- Horizontal market inequities: UDOT's preferred LCC transportation alternatives would not impose costs according to benefits received; rather, they would effectively "subsidize" the benefits that UDOT's plans would deliver to LCC ski resorts and ski resort users by imposing costs on all Utah taxpayers, which would disproportionately impact already marginalized communities, such as people of color, those of lower incomes, and disabled people.
- Vertical/outcome inequities: UDOT's preferred LCC transportation alternatives would impose disproportionate burdens on already marginalized communities, such as people of color, those of lower incomes, and disabled people, as the proposed tolling would constitute a greater barrier for those of limited resources when compared to those who can readily absorb tolling costs (or for whom the toll is already covered by their ski passes, removing the barrier altogether).

The FEIS environmental analysis and response to DEIS comments seems to accept limits on access to LCC for marginalized communities as unproblematic. It further discounts the costs/impacts its heavy infrastructure plans (e.g., for gondola construction) would impose on dispersed recreation throughout the Canyon. Despite UDOT's flawed conclusions, dispersed recreation (including the most accessible forms of recreation) are not only not served under the FEIS–the experience of participating in them would be impaired by them.

2. **UDOT's Chapter 32: Response to Comments**
    a. **The USFS asserts it has met its obligations under NEPA to take a hard look at the impacts to climbing resources affected by the two preferred alternatives.**

The USFS cannot merely state that it has taken a hard look at impacts to climbing resources to satisfy its NEPA obligations. Rather, the USFS must actually do an analysis as to the impacts of affected climbing resources to satisfy its hard look obligation, which it clearly has not. The USFS points to no tangible evidence that demonstrates any type of thoughtful analysis to substantiate its assertion that it has met the standard of a hard look analysis dictated by NEPA. The insufficient analysis by USFS is exhibited by its extremely cursory analysis of the impacts to climbing resources in its 4f letter and the lack of meaningful coordination with the SLCA to truly understand the true nature of the impacts to climbing resources that are likely to occur if either of the preferred alternatives become implemented. Furthermore, it is ironic that the USFS points to its 2003 Revised Forest Plan embracing an adaptive management approach. It is unclear to the SLCA why the USFS points towards this reference as there is no evidence of the USFS adhering to adaptive management protocols in how the USFS has been participating in this EIS process; such a shallow reference without any additional explanation is unfortunately consistent with the inadequacy of the USFS NEPA work in this EIS.

    b. **The Salt Lake Climbers Alliance commented that the EIS should have evaluated less impactful alternatives and that alternatives that had adverse impacts to Section 4(f) climbing resources should have been eliminated.**

The SLCA continues to assert that the two preferred alternatives should be eliminated from further consideration on the basis that there are less impactful alternatives that will meet the transportation needs of Little Cottonwood Canyon. The SLCA, as identified in its previous comments, strongly disagrees with the *de minimis* impact determinations that underlie UDOT's proposal of the two preferred alternatives. UDOT asserts that less impactful alternatives such as the Enhanced Bus Alternative will not meet the purpose and needs; however, UDOT has not clearly demonstrated this to be the case, and the SLCA reasserts that UDOT has attempted to avoid a real analysis by unduly constraining the purpose and need statement, as noted in our previous comments.

c. The Salt Lake Climbers Alliance commented that the Forest Service further fails to meet its NEPA obligations by not analyzing reasonable forms of mitigating impacts to climbing resources by examining less impactful alternatives to the two preferred alternatives.

See SLCA response above in 2.b.

d. The Salt Lake Climbers Alliance commented that both UDOT and the Forest Service are both legally obligated to take an approach that adheres to principles of adaptive management; whereby, both agencies take careful steps to begin addressing the transport problems on S.R. 210, learn from those initial steps, and carefully reassess before moving forward. UDOT is required by law to select a less impactful alternative as UDOT has not established that an alternative utilizing the above aspects identified by the Salt Lake Climbers Alliance will not adequately address the S.R. 210 transportation problem.

In response to this comment, UDOT states:

> It is possible that the enhanced bus service alternatives could be phased and start with the implementation of less impactful options to determine the success before moving forward with construction in Little Cottonwood Canyon. The gondola and cog rail alternatives would require immediate construction in order for the alternative to operate. 32-75.

If it is a true statement that for the gondola and cog rail alternatives to be effective alternatives, meeting the purpose and need statement, that they must be implemented immediately, then these two alternatives should be eliminated from further consideration as part of this EIS. By UDOT's admission, funding for these two alternatives is uncertain and consequently implementation will not happen immediately. The SLCA encourages UDOT to eliminate these alternatives due to funding uncertainty surrounding these two alternatives and given UDOT's assertion that these alternatives must be implemented immediately which is an impossibility.

e. Commenters stated that the Enhanced Bus Service in Peak-period Shoulder Lane Alternative would have a substantial impact on climbing resources in Little Cottonwood Canyon and would impact other recreation users including their access to the forest. Some commenters felt that the elimination of roadside parking would increase congestion in the lower canyon. The Salt Lake Climbers Alliance commented that proximity impacts could make some boulder routes (called "problems") or descents more

dangerous without specific mitigations. Objective hazards, such as piles of construction debris and fill, might partially bury boulder problems and block landing areas. And new retaining walls or steep cuts above the roadway could make landings unsafe or impractical.

To meet its hard look NEPA obligations, the USFS should re-examine its 4f analysis. The EIS cannot merely state that if the Enhanced Bus Service Alternative is selected then it will mitigate impacts. The EIS actually must analyze these impacts in order for UDOT and USFS to meet its respective NEPA obligations. As specific evidence on the lack of meaningful engagement and thus the inadequacy of the NEPA undertaken to date, the UDOT asserts the following 'belief':

> Many of the existing boulders (Stick Rock, for example) are within 15 feet of the roadway and are promoted and used as a climbing resource. UDOT believes that, if existing boulders within 15 feet of the roadway are promoted and used for climbing, the additional boulders that would be within 15 feet of the roadway after the road is widened would also continue to be promoted and used for climbing with negligible impact. 32-129.

UDOT asserts here that boulders that are removed during the construction process can easily be replaced by other boulders within a certain distance from the roadway. This assertion illustrates a gross lack of understanding within the EIS process of these resources. Put simply, one cannot simply replace another, as each boulder that has a climbing use is unique and a rarity. UDOT does at least acknowledge that their perspective is based on belief and no actual knowledge or reasonable investigation as to how climbers may actually react to these "new" roadside boulders. This faulty logic underscores the flawed NEPA analysis undertaken by UDOT and USFS that somehow the boulders and associated recreational experience of climbing them can just be replicated by destroying the existing boulders located by the existing road and then the same meaningful experience by these new roadside boulders that are currently further from the road. These boulders further from the road may offer a different, more quiet, bouldering experience by virtue of being further from the road. The USFS and UDOT has done zero real analysis on the impacts to the climbing recreational experience and is so bold to offer a shallow conjecture ('belief') as to these impacts that fails to meet the hard look NEPA standard.

f. Some climbers might feel that the gondola system detracts from their scenic views of the canyon or might feel uncomfortable that they could be viewed by gondola passengers. However, serenity and privacy are not attributes that can be expected while climbing because the area is adjacent to the road and is occupied by trails used by other climbers and hikers. 32-218.

UDOT cannot reasonably assert that the climbing experience has not been severely diminished. UDOT is unduly parsing as to the limited impacts without any real evidence to support the claim regarding there is no expectation of serenity or privacy. Here, the same sort of faulty logic that UDOT takes to creating new roadside boulders after road widening. UDOT does not understand the climbing experience and has not undertaken the sufficient effort to analyze the true impacts to the climbing experience associated with the two preferred alternatives. What UDOT has done is a cursory analysis and then filled in the important gaps–an actual understanding/analysis as to how the alternatives will impact the recreational climbing experience–by assertion of its 'beliefs.' A NEPA hard look analysis requires much more.

g. USFS assertion that individual boulders do not warrant 4(f) protections as individual boulders.

The SLCA continues to disagree with the USFS determination that each boulder does not warrant 4(f) protections. The USFS has not provided an adequate rationale for this position. The SLCA continues to assert each boulder and the experience of climbing a particular boulder on said boulder gives rise to such a unique and significant recreational experience that a 4(f) protection would be warranted on an individual boulder basis, not just on the basis of the aggregation of the boulders as the USFS suggests.

3. Links to SLCA's previously submitted comments during the EIS

a. Little Cottonwood Canyon Draft Environmental Impact Statement Salt Lake Climbers Alliance (SLCA) Comments
b. SLCA's Comments Regarding Revised Chapter 26 to Little Cottonwood Draft Environmental Impact Statement

Sincerely,

Julia Geisler, Executive Director, SLCA [redacted]

SLCA Policy Committee Members: Corey Coulam, Allen Sanderson, Tori Edwards, John Flynn, Kim Rhodes, Caroline Canter, Serena Yau, Mason Baker, David Carter, Alma Baste, Jonathan Knight

cc: [redacted]

ID 38623

David and Ann George
[redacted]

Re: Little Cottonwood Canyon Transport EIS Comments October 16, 2022

Dear UTOT,

Thank you for the opportunity to comment on the Little Cottonwood Canyon Transport EIS. Many concerns have been expressed about the two gondola options, but this letter focuses on safety only. The preferred Option B, the Gondola from La Caille to Alta and Option A, miss an important safety consideration, the potentially deadly risk of stranding 1,000+ passengers in 30 separate gondolas along a roughly 9-mile route due to winds or mechanical failure. It is easy to envision a scenario where weather conditions preclude the use of the road, the gondola is in emergency stop mode and high winds and snow prevent mounting any type of rescue…if that is even possible in the best of conditions.

Safety should be the top priority, and indeed the risk of avalanches is mentioned as one benefit of the gondola. The claim that it provides a way of accessing the ski resorts without the road is only valid in ideal conditions. The missing discussion is what happens if weather conditions (high winds) or mechanical/electrical failure force the gondola to shut down? Many similar gondolas must reduce their travel speed to less than 20% of normal speed in winds above ~30 mph (50 km/hr) to reduce harmonic swinging of the gondola cabs. Operation of a gondola at wind speeds more than 50 mph (80 km/hr) may not be possible at all.

I've seen no evidence that meteorological conditions throughout the canyon are known to a sufficient accuracy to allow the design to advance. Many times, I have personally experienced very strong and shifting winds in Little Cottonwood Canyon. At times these events have been strong enough to blow down acres of forest (Bells Canyon Blow-Down, circa 1980's), causing a massive loss of mature evergreens at mid-altitude, circa 7000 – 9000 ft elevation.

As a professional engineer, I would not be willing to endorse the design of a gondola without full meteorological data on multiple sites along the route at the gondola operating elevation and only with full endorsement from the gondola supplier. The few weather stations in Upper LCC are not representative of the lower canyon.

A related concern is the potential impact of an avalanche on the gondola system. While the gondolas might be less likely to be hit by the full force of an avalanche, I doubt any responsible operator would allow people on the gondolas until the avalanche risk has been mitigated. Thus, the claimed safety advantage of a gondola over the road option is illusory. If avalanche risk is high the gondola will likely have to be shut down.

It would be good to receive answers on the following questions:

1. What is the maximum design wind velocity for the gondola and how was this determined? Do different gondola suppliers have different wind criteria?

2. Are there plans to set up weather stations in Little Cottonwood Canyon to obtain data sufficient for establishing the design basis and if so, where is this discussed in the EIS? I would envision at least 10 years of data to provide a confident basis for design.

3. Have avalanche specialists and the gondola suppliers agreed that the gondola can operate in high avalanche conditions while UDOT and others work to control (explosively release) avalanches?

4. Has an evacuation plan been developed and is the equipment, access and personnel included in the proposal?

5. Has a formal Risk Assessment and Hazard Evaluation been performed?

6. Given the high potential for loss of life, is the project or operating entity required to carry liability insurance sufficient to cover any potential losses? Will the gondola supplier be required to carry liability insurance for the life of the project…say 30+ years?

At this point I believe the risk of even considering a gondola is too great until some of the fundamental design criteria are established and validated by appropriate meteorological data for the route in question. This appears to be a fatal flaw.

Kind regards,

David and Ann George

ID 38624

ERIN MENDENHALL
Mayor

LAURA BRIEFER, DIRECTOR
Department of Public Utilities

October 17, 2022

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

Subject: **Salt Lake City Comments for the FINAL Little Cottonwood Canyon Environmental Impact Statement (August 2022)**

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 FINAL Environmental Impact Statement, S.R. 210 – Wasatch Boulevard to Alta*, dated August 2022 (LCC FEIS or FEIS). As a cooperating agency, the City appreciates the opportunity to provide input to the LCC FEIS.

These comments submitted today are additive to previous comments submitted by the City during this LCC EIS process. For reasons stated in previous input and the comments contained herein, the City supports the phased implementation of components of the Enhanced Bus Service Alternative as well as other operational changes not listed in the LCC FEIS. However, as proposed, the City does not support the selected Gondola B Alternative (Gondola). In fact, the Gondola and road widening alternatives that are considered during the LCC EIS process each represent significant risk to the water resources of the Little Cottonwood Creek watershed given their massive scale of construction and operations. The City supports options with (1) much less physical disturbance of the watershed; and (2) improved scalability and adaptability, both of which would be supported by a phased approach. The City recently adopted a Joint Resolution of the Salt Lake City Mayor and Council supporting a phased approach for transportation solutions and asking to remove the gondola alternatives from consideration.

Background and Context – Importance of LCC for Water Supplies

The canyon watersheds of the Central Wasatch Mountains, including the Little Cottonwood Creek watershed, provide affordable, reliable, high-quality water resources for over 365,000 people within the City's Designated Water Service Area for its public water supply (FEIS Sections S.12, S.13). 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 (see map of the City's Designated Water Service Area, Salt Lake City Code Section 17.16.005). Population growth projections anticipate the need to supply water for another 150,000 residents within our service area over the next 40 – 60 years.

The supply of water from the Wasatch Mountains is affordable, reliable, and of high quality is a direct result of deliberate watershed stewardship and significant watershed investment by the City over the last century, continuing today. The pressures threatening water quality and quantity include 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 FEIS could amplify these threats to the City's drinking water supply. This increased risk is problematic, especially at a time when our region is experiencing a megadrought and aridification.

The high quality of the source water emanating from 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 the communities we serve can be confident that the water from their tap will reliably flow and meet all federal and state Safe Drinking Water Act requirements.

The Salt Lake Region's success and prosperity 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 protecting the City's culinary water supply. The current USFS Wasatch Cache Forest Plan continues this century-long effort. The plan prioritizes the protection 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 protects these interests for the benefit of the public.

Salt Lake City's Legal Obligations Regarding Water Quality and Resources

As noted in previous LCC EIS comments, the City remains committed to its duty of providing clean, safe, affordable, and high-quality water to the communities in our water service area. The City is legally bound by state and federal regulations that oblige us to provide clean, safe water and to protect public health and community prosperity (FEIS Sections S.12, S.13, 12.2). Therefore, the City wants to ensure that all laws, regulations, ordinances, and plans have been considered as part of the LCC EIS process. Please reference the previously submitted LCC EIS comments for additional context regarding the City's legal and regulatory obligations.

The FEIS appears to be largely silent about the way in which new transportation infrastructure would result directly and indirectly in the need for additional water resources within the Little Cottonwood Canyon area. Salt Lake City holds most of the water rights in the Little Cottonwood Creek watershed for the primary purpose of water supplies to its Designated Water Service Area. The City has allowed limited use of its water resources for residential and recreational purposes in the canyon through water supply agreements, but these agreements are not expandable in quantity or geographic area. Therefore, water resources may not be available to support new proposed transportation infrastructure and resulting increased visitation. This is due to physical limitations of the resource and potential conflict with Salt Lake City ordinances (Salt Lake City Code Section 17.04).

Comments to the Selection of Gondola B Alternative in Final EIS

As previously stated, the City feels that the scoping of the issue and its framing of the problem does not adequately capture the actual nature of the transportation issues that Little Cottonwood Canyon and its neighboring canyons face. This LCC EIS process would be improved if it addresses the year-round transportation challenges faced by Millcreek Canyon, Big Cottonwood Canyon (BCC), and Little Cottonwood Canyon (LCC). Visitation and transportation in the tri-Canyon area is linked, and changes in one canyon will have impacts to visitation and transportation in the others.

The City feels the selection of the Gondola B Alternative is problematic for five key reasons (FEIS Chapter 2, Appendix 2E):

- First, the EIS process did not adequately analyze water resources risks posed by the Gondola. The use of the Stochastic Empirical Loading and Dilution Model (SELDM) is most likely adequate for rail and third-lane options but not a gondola format of transportation (FEIS Section 12.4). Given the construction of the data and model with its Monte Carlo methods based on stormwater data collected nationwide, the City has previously stated that this modeling does not realistically or practically incorporate data relevant to a gondola format.

- Second, the La Caille base terminal directs a significant amount of commercial and private automobile traffic near the intake of the Metropolitan Water District of Salt Lake & Sandy (MWDSLS) water treatment plant. As discussed during in-person meetings with UDOT and their consultants, a commercial-style development in the area proposed for the base terminal is vastly different from residential housing. If UDOT finds funding and final approval for the Gondola, the City requests to participate in design review to mitigate the potential impacts. However, participation in design oversight does not mitigate the City's concern for increased focus on LCC and the traffic this base area will draw near to it. Directing a significant amount of traffic to the intake of the MWDSLS water treatment plant is especially concerning as there is little time to react and mitigate impacts. More commercial and industrialized use near an intake is not common-sense water supply protection.

- Third, the FEIS does not adequately scope or analyze the Gondola for multiple reasons. If the Gondola were indeed to be used in the summer, which is not covered by the purpose and need of the FEIS, it seems reasonable to analyze the summer impacts and implications of this use. Yet, the FEIS only looked at the winter issues (FEIS Sections S.2, S.3). Additionally, the FEIS stated project area was the main LCC 210 highway corridor. The selected Gondola route very much departs from the roadway. As previously stated, the City feels that the existing FEIS failed to properly analyze impacts on water quality with the SELDM model (FEIS Sections S.13, 12.4). Associated concerns include the consideration of the FEIS' calculations of wetlands lost but not indirect and unanticipated (crashes, spills, acts of terrorism, unanticipated recreational shifts and use pattern changes…) impacts on this area of water quality (FEIS Chapter 12). The FEIS also does not address the potential for direct and indirect increased demand for water associated with the transportation alternatives.

- Fourth, additional economic consideration should be taken. For instance, the cost of the Gondola is likely underestimated. Given inflation and supply chain issues, it is likely the cost will significantly increase. The per person price of a roundtrip gondola ticket would likely have an influence on whether the capacity of 1,000 people per hour would be achieved. Without a pricing structure modeled to determine feasibility, it is unclear if the selected option would substantially increase mobility within the project area. There are indirect costs not analyzed in the FEIS related to water resource and quality protection that would need to increase due to construction, operation, and increased recreation impacts. These costs would likely become the burden of the public and City water rate payers. For instance, the City actively funds U.S. Forest Service summer seasonal staff, Unified Police Department Canyon Patrol staff, and nonprofit partner staff, which goes towards a cumulative positive impact on mitigating the impacts of recreation. The City also funds restroom capital and O&M projects, the abatement of noxious weeds, within LCC. The City has invested billions of dollars into watershed management, water treatment, and water distribution based on the quality and reliability of the water resources from the Little Cottonwood Creek watershed. The City has over a century of specialized expertise assisting with and directly managing recreation within LCC and feels that the EIS process should have examined further the indirect impacts on water resources.

- Finally, the Gondola route as presently communicated in the FEIS puts a major transit hub either over or near Little Cottonwood Creek at the Snowbird stop. Additionally, the end terminal at Alta will most likely be sited near wetlands. Regardless of engineering needs and or strategic mobility placement related to travel times, they are not in alignment with water supply protection strategies.

FHA Determination & Forest Plan Amendment (EIS Section S.14, Chapter 28)

The City strongly prefers that that any USFS lands related to the Gondola as proposed remain under a special use permit from the Uinta-Wasatch-Cache National Forest rather than be appropriated for transportation-related purposes and any associated easements. If any easements are appropriated for the project directly from FHA, the City requests to work with any grantor of easements to incorporate specific and regulatory stipulations pertaining

to the continuation of water quality protection. This would maintain the purpose of the public lands in that they were originally set aside for water provision and water quality protection.

Deficiencies of LCC EIS NEPA Process

As stated in previous comments, we feel there are shortcomings in the development of the LCC FEIS in failing to meet the required standards of the National Environmental Policy Act (NEPA) as well as issues with the Purpose and Need and Scoping of the LCC FEIS. For example, the LCC FEIS includes the costs of the infrastructure and operation and maintenance (O&M) costs of the Gondola but fail to include the additional costs to entities that bear the impacts and associated costs of increased recreation management needs and drinking water protection. Please reference the comments submitted previously regarding NEPA deficiencies.

Environmental Justice and Social Equity (Chapter 5)

The City has significant social equity and Environmental Justice (EJ) concerns regarding the Gondola. Per the FEIS, the EJ impact analysis area is focused on an area within 0.25 miles of S.R. 210 from Fort Union Boulevard to the town of Alta and includes the proposed mobility hubs at the gravel pit and the park-and-ride lot at 9400 South and Highland Drive (FEIS Section 5.1). Although the LCC FEIS analyzes the EJ impact on communities within this limited geographic area, it does not analyze the equity and fairness impacts on all communities in which the burden of the cost may be borne.

The City also has concerns regarding the increased cost to the public to treat drinking water due to increased pollution sources. This is an additional cost the Public Water System ratepayers will bear, some of whom already struggle with affordability. These costs to the taxpayers and ratepayers are especially concerning as the Gondola will only serve the two ski resorts in LCC. In short, community members will be burdened with cost and will not benefit from the project.

Conclusion

Thank you for your consideration of the City's comments regarding the LCC FEIS. We appreciate the time and efforts of the UDOT Project Team and are hopeful that UDOT will be a strong partner with the City in the protection of water resources, the ecosystem, and Environmental Justice. Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Laura Briefer

Laura Briefer, MPA
Director

ID 38625

Josh Van Jura
Utah Department of Transportation

10/17/2022

Dear Josh,

The four Cottonwood canyons ski resorts – Alta, Brighton, Snowbird and Solitude – appreciate the time and resources you, your team, and UDOT have devoted to addressing the current and looming canyon transportation challenges our state faces.

The general managers of each resort have reviewed the Utah Department of Transportation's Final Environmental Impact Statement released in September and provide the following collective feedback.

While we support the phased approach recommended in the EIS, we do not see tolling without an effective and significantly expanded mass transit alternative to private vehicles as viable or reasonable. It is our understanding that technology that effectively counts moving vehicle occupancy, especially in a snowy winter environment, does not exist. And a traditional toll booth would create an unreasonable bottleneck and traffic backups in the canyon, and into our neighboring communities.

The four Cottonwood canyon resorts have a history of working together with myriad agencies on transportation projects including the creation of the ski bus service, park n ride lots, and employee RideShare vans. The resorts currently pay for most season passholders' and employees' ski bus fare, and assist with the winter maintenance of the park-n-ride lots at the base of the canyons.

The resorts have experimented with various parking reservation systems, carpool parking lots, guest and employee incentives for riding the bus, a RideShare van or carpooling as well as the development of a mobile app to coordinate and incentivize the above. We believe that resort-based parking solutions are more effective than tolling and we are willing to investigate collaborative solutions.

Given the differences between the Cottonwood Canyons and the parking resources of each resort, there is not consistency in the parking systems between the four Cottonwood canyon resorts. However, each season we are all learning more about guest and employee transportation behaviors, and how we can positively impact vehicle occupancy and guest experience.

We look forward to working with the UDOT team and other agencies on how to best tackle this problem until the larger transportation solutions are implemented.

Sincerely,

Amber L. Broadaway

Amber Broadaway
President/COO, Solitude Mountain Resort

Mike Doyle
General Manager, Brighton Resort

Mike Maughan
General Manager, Alta Ski Area

D. Fields

Dave Fields
President/GM, Snowbird

ID 38627

Cottonwood Heights
City between the canyons

October 17, 2022

Delivered Via Email - littlecottonwoodeis@utah.gov

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 Final EIS

Dear Project Team Members and Leadership:

On behalf of the Mayor and City Council, please accept this letter as official public comment from the City of Cottonwood Heights ("the city") regarding the recently published Little Cottonwood Canyon Final EIS ('final EIS'). Attached to this letter are full copies of relevant council actions and previous public comments that remain important and continue to be part of the input from Cottonwood Heights. The following summarizes the comments pertaining to this issue.

RECOMMENDATION

Cottonwood Heights will experience the most direct and sustained impact of any EIS decision. It is important that the city's input be weighed appropriately given the direct and daily impact of any alternative. Cottonwood Heights continues to strongly oppose the construction of a gondola as a solution for traffic in Little Cottonwood Canyon. This solution creates a disproportionate local impact on Cottonwood Heights with no direct benefit. The city continues to strongly support enhanced and prioritized busing as the primary solution for canyon access through phased, flexible implementation as warranted over time. Additionally, roadway safety and accessibility remain a key local priority. Lowering roadway speeds through collaborative redesign and implementing traffic calming measures, while approaching Wasatch Boulevard as a special gateway corridor, can make this attainable.

'FINAL EIS' COMMENTS

Throughout the EIS process, the city has consistently outlined its comments, concerns, and local priorities for the EIS outcome. It has provided this feedback to UDOT formally numerous times through public comments, resolutions, and city council discussions. City representatives have also met with UDOT frequently throughout the process to express concerns and reiterate local priorities. The following is an additional list of comments outlining the city's response to the final EIS document:

- Design speed and formal speed limit remain critical factors in ensuring that safety and a high quality of life are improved and maintained for all residents along the Wasatch Boulevard corridor. The City Council unanimously passed a 2022 resolution affirming this as a local priority.
- The city has been and remains strongly opposed to any gondola alternative, as it is clearly incompatible with the adopted Wasatch Boulevard Master Plan. The city is greatly concerned that rather than having scaled back any gondola solution to address this incompatibility, UDOT instead has proposed a drastic increase to the size of the parking structure at the gondola location, with the proposed 2,500-stall parking structure creating an increased direct negative impact to the city and effectively fracturing the Cottonwood Heights' community around the Wasatch Boulevard corridor.
- The increased gondola parking capacity will likely result in multiple negative conditions, including:
    - At its highest demand, the expanded structure will result in more vehicular traffic on the Wasatch Boulevard corridor during peak days.
    - During non-peak days and/or outside of ski season, the 2,500-stall parking structure will sit largely unused. The substantial addition to parking capacity serves a small number of days per year, while an investment in flexible, scalable bus solutions represents a much more fiscally prudent approach.
    - In many instances, the gondola travel time to resorts is likely to exceed that of personal vehicular travel time. The city finds this to be concerning for the long-term viability and usability of the hub.
- The city requests UDOT prepare a detailed and long-term plan for the proposed phasing implementation. Portions of this plan should be clearly decoupled from the gondola phase. If well-planned and prioritized busing is found to work effectively, then it should be able to stand as a permanent solution in lieu of any gondola construction. Snow shed construction, Wasatch Blvd. commuter traffic improvements, tolling, etc. should all be laid out. The city recommends the following be included as part of this approach:
    - If and when added roadway capacity is warranted, capacity should be designed and added in a way that is not used by regular vehicular traffic, but reserved instead for buses. Buses could use the extra capacity during peak travel times, and extra capacity could be used as a recreational corridor (i.e. enhanced bike lane) during non-peak hours. This concept is similar to the peak-period shoulder lane from the previous enhanced bus alternative.
    - The city recommends that UDOT, in coordination with the city and other directly affected entities, develop a clear timeline for phased bus implementation. This timeline should establish a minimum number of years (15-20 years) to develop and implement a successful bus alternative. If buses adequately address canyon traffic issues, then the gondola implementation would not be necessary. This approach should also develop and establish 'trigger' metrics after the minimum amount of time has elapsed, wherein escalating to the gondola phase may only take place upon consistently meeting certain negative traffic metrics.
    - UDOT should partner with agencies to provide a phased busing plan that is as detailed as that which has been prepared for gondola services. The city recommends that in

preparing this plan, UDOT consider creative approaches, including but not limited to the following:

- Public-private partnerships with ski resorts to incentivize bus ridership by resort patrons
- Exploration of subsidized fares to reduce costs for bus riders
- Immediate and fluctuating tolls based on canyon demand to incentivize bus ridership and improve air quality while reducing peak vehicular traffic on Wasatch Boulevard
- Utilization of existing parking areas as transit stops throughout the Salt Lake Valley to make ridership more appealing for individuals living in nearby communities. For example, portions of existing strip mall parking lots within the Salt Lake valley could be repurposed through public /private negotiations to create cost effective transit/carpools lots that provide direct service to LCC ski resorts on peak period ski days each season. Eventual scaling of usage of these lots to accommodate year-round canyon and other valley transit demand, makes flexible, long term, and cost-effective transit support for Salt Lake valley residents.
- Local shuttle services providing transportation between said transit stops and Little Cottonwood Canyon.

- The city requests UDOT develop a plan to utilize bus investment throughout the year, beyond seasonal Little Cottonwood Canyon resort demand. This plan should include an analysis of the full impact that an investment in busing could have in the canyons and in the greater region. Such an analysis should be prepared for review by State officials before any allocation of funding for EIS implementation.
- The city finds that the enhanced busing with peak-period shoulder lane alternative provides a solution that is equally (or more) effective, in a way that more closely adheres to the Wasatch Boulevard Master Plan and better addresses local impacts.
- The city strongly recommends that UDOT immediately implement tolling on single-occupancy vehicles as a primary step in incentivizing transit use.
- The city is concerned with the removal of existing mature pine and spruce trees along the corridor for the purpose of installing sound walls or adding vehicular roadway capacity. The city recommends that UDOT avoid disturbing healthy, mature vegetation to the greatest extent possible. If removal is found to be unavoidable, the city recommends that UDOT utilize a certified arborist to analyze any tree that may require removal. Instead of removal, the city recommends that UDOT relocate any healthy mature trees to a nearby location along the corridor.
- All EIS cost estimates are based on 2019 projections, which are likely outdated given recent inflation and material/labor scarcities. The city recommends that UDOT update cost estimates for all alternatives prior to issuing a record of decision. This updated estimate will provide a more accurate projection for State leadership considering allocation of funding.
- As stated in the September 2021 public comment from the city, a new traffic study should be completed prior to any final record of decision and implementation to ensure findings are accurate and justify the recommendations of the EIS.

PREVIOUS EIS COMMENTS AND LOCAL PRIORITIES

The city has been consistently and strongly opposed to any gondola alternative. Instead, the city has always favored a phased-in bus priority approach. Cottonwood Heights bears the most direct impact of the final EIS alternative than any other entity or municipality. The city acknowledges and respects the need to explore options for enhanced canyon access and transit usage. Its priority has always been focused on the local impact of any regional decision. The following have been consistent points of emphasis:

Enhanced and safe corridor mobility for all users

- Grade-separated crossings, and enhanced at-grade crossings, coupled with 35mph roadway speeds
- Development of a shared-use path, accessible from adjacent neighborhoods and parking areas, from canyon to canyon

Strong focus on speed reduction and protection of local character and aesthetic through roadway design and speeds

- Lower roadway speeds to 35 miles per hour as occurs throughout Utah on State roads in towns with adjacent commercial and residential components through roadway design and posted speed limit
- Redesign and lower speed mitigate concerns with roadway noise and offset the demand for unsightly sound walls
- Collaborative redesign of Wasatch Boulevard as a special gateway corridor including traffic calming enhancements and other road design components that alert drivers, they are entering a neighborhood area and need to reduce speed.

Appropriate management of traffic congestion and neighborhood access

- Improvement of visibility and safety in and out of neighborhoods adjacent to Wasatch Boulevard, particularly Kings Hill Drive, and Golden Hills Avenue through traffic calming, traffic signals, realigned intersections, improved visibility, and slower roadway speeds

Transit-oriented solutions that alleviate current and future peak-hour congestion from Wasatch Boulevard. Solutions should only be implemented when traffic conditions and data warrant it.

- Focus on enhanced busing with a major transit hub within a future mixed-use development at the Big Cottonwood Canyon area location alleviates congestion within the corridor
- Tolling and bus-only infrastructure throughout the project area incentivizes transit usage in a way that is flexible and scalable

CONCLUSION

Based on the input provided in this letter, previous city comments and council actions, recommendations in the city's Wasatch Boulevard Master Plan, and extensive public input from local residents that are most directly affected by the EIS implementation, the city strongly urges UDOT to carefully and thoughtfully consider these comments and provide actionable responses. The city appreciates the opportunity to provide this input and to meet with UDOT project officials regularly. Cottonwood Heights leaders have a strong desire to maintain a productive working partnership to

address local impacts in a beneficial way, and to closely collaborate on the local priorities shared above (roadway safety, design, speed reduction, aesthetics, and local access).

Attached to this letter is a unanimously approved city council resolution regarding roadway design and speed on Wasatch Boulevard (Attachment 1), as well as the city's September 2021 statement from the preferred alternatives phase of the EIS (Attachment 2). The findings and statements in these documents remain demonstrative of the city's ongoing concerns and priorities.

Sincerely,

Michael T. Weichers
Mayor
Cottonwood Heights City

ATTACHMENT 1

COTTONWOOD HEIGHTS

RESOLUTION NO. 2022-16

A RESOLUTION CONCERNING UDOT'S PROPOSED RE-DESIGN OF WASATCH BLVD.

WHEREAS, SR 210 ("*SR 210*") is a Utah state road traversing the entire Easterly side of the city of Cottonwood Heights (the "*City*"), extending 13.62 miles from SR-190 (at or near Fort Union Blvd.) along Wasatch Blvd. ("*Wasatch Blvd.*") to the mouth of Little Cottonwood Canyon, and thence Easterly up that canyon before terminating in the Town of Alta; and

WHEREAS, the Utah Department of Transportation ("*UDOT*") has announced its intention to redesign SR 210 and that its two preferred alternatives along the Wasatch Blvd. portion of SR 210 in the City will result in an expansion that may result in increased vehicle traffic, higher traffic speeds, and significant increases in the attendant vehicle-caused noise, air pollution and other adverse impacts; and

WHEREAS, the Wasatch Blvd. portion of SR 210 passes through City residential areas housing hundreds of City's residents, all of whom are materially, adversely affected by current SR 210 due to traffic noise and fresh air pollution it introduces into the surrounding neighborhoods, the difficulty exiting or entering the many neighborhoods accessed by SR 210 and of traveling between neighborhoods separated by SR 210, and the dangers to drivers and pedestrians caused by the high speeds of vehicles using SR 210; and

WHEREAS, since UDOT's announcement of its intention to redesign SR 210, City leaders, staff and residents have diligently endeavored to influence UDOT to adopt a design for the Wasatch Blvd. portion of SR 210 that diminishes, rather than increases, the adverse impacts of SR 210 on the City and its residents by utilizing a design emphasizing slower vehicle speeds, traffic calming, and a greater emphasis on active transportation and recreation (running, walking, bicycling, etc.); and

WHEREAS, those efforts by City's leaders, staff and residents have been based on a hope and expectation that UDOT will use its diligent best efforts to mitigate the adverse impacts of SR 210 on the City and its residents to a similar extent as UDOT has mitigated the adverse impacts of many other state roads—such as SR 89--on the communities they pass through, especially those with residential zoning, by reducing speed limits and taking other available steps; and

WHEREAS, throughout those discussions, City's leaders, staff and residents have expressed their strong belief that a key way to diminish the adverse impacts of the Wasatch Blvd. portion of SR 210 on the surrounding neighborhoods will be to utilize a design speed of 35 mph; and

WHEREAS, apparently in response, one or more UDOT officials have stated, in one or more City public meetings, that limiting speeds on SR 210 to 35 mph is a worthy goal; and

WHEREAS, City's Wasatch Blvd. Master Plan (the "*Master Plan*") details City's vision for a future, less intrusive, Wasatch Blvd. and suggests various methods of mitigating its impact on the surrounding neighborhoods, including decreasing vehicle speeds and emphasizing active transportation and recreational uses; and

WHEREAS, City's city council (the "*Council*") met in regular session on 1 March 2022 to consider, among other things, again encouraging—and requesting—UDOT to use all available means to mitigate the adverse impacts of the Wasatch Blvd. portion of SR 210 on the City and its residents by, among other things, (a) re-designing the roadway to conform to the applicable portions of the City's Master Plan, including lanes, sidewalks and other pertinent aspects, and (b) designing to ultimately limit vehicle speed to 35 mph; and

WHEREAS, after careful consideration, the Council has determined that it is in the best interests of the health, safety and welfare of City and its residents to so act;

NOW, THEREFORE, BE IT RESOLVED by the Cottonwood Heights city council that the Council hereby encourages and requests UDOT to use all available means to mitigate the adverse impacts on the City and its residents by, among other things, (a) incorporating into UDOT's proposed redesign of the Wasatch Blvd. portion of SR 210 the applicable portions of the City's Master Plan, including travel lanes, sidewalks and other pertinent aspects, and (b) utilizing designs to limit vehicle speeds to 35 mph.

This Resolution, assigned no. 2022-16, shall take effect immediately upon passage.

PASSED AND APPROVED effective 1 March 2022.

ATTEST: **COTTONWOOD HEIGHTS CITY COUNCIL**

By: _____ By _____
Paula Melgar, Recorder **Michael T. Weichers**, Mayor

VOTING:

Michael T. Weichers	Yea X Nay ___
Douglas Petersen	Yea X Nay ___
J. Scott Bracken	Yea X Nay ___
Shawn E. Newell	Yea X Nay ___
Ellen Birrell	Yea X Nay ___

DEPOSITED in the office of the City Recorder this 1st day of March 2022.

RECORDED this 3 day of March 2022.

ATTACHMENT 2

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.

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

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;
- 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;
- 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).
- 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;
- 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;
- 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;
- 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;
- 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;
- 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.

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;
- 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;
- 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;
- 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;
- 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;
- 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;
- 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.

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-

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;

- 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;
- 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;
- 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.
- 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;
- 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;
- 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).

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;

- 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

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

Wasatch Boulevard Master Plan (link to full plan)

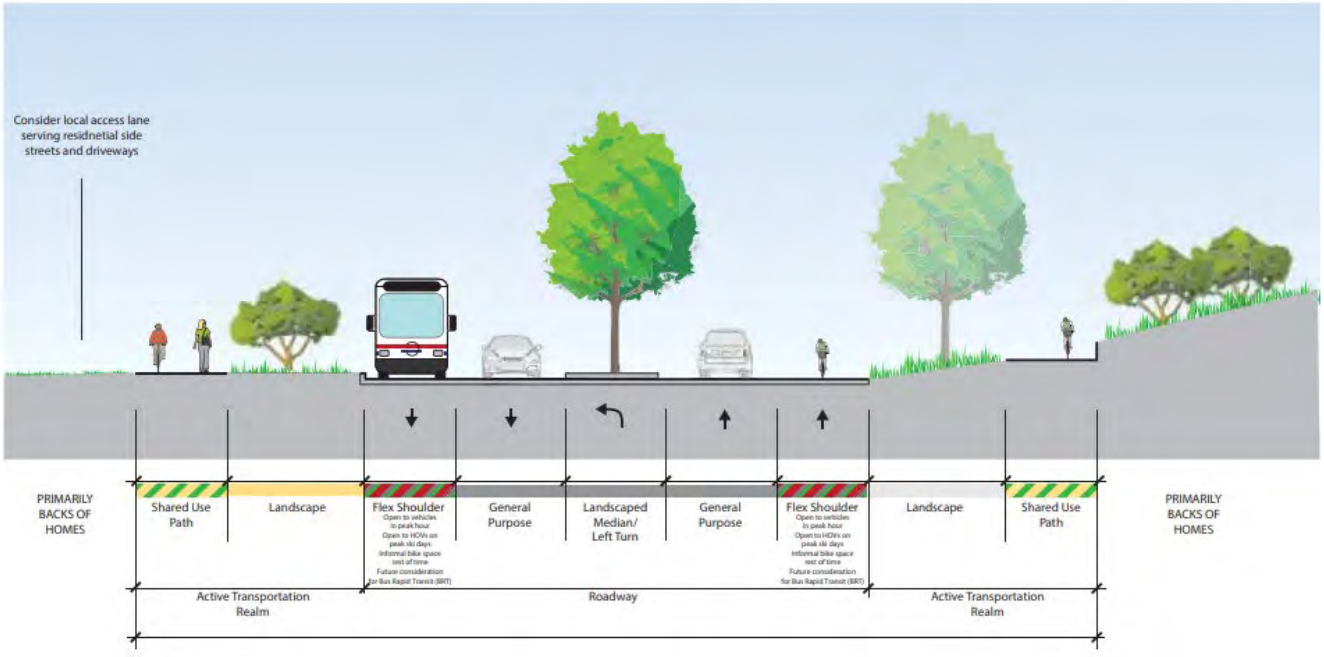
- Preferred Scenario (page 4)
  - 'Consider roundabouts with pedestrian crossings to calm traffic and allowing neighborhood access at key points'
  - 'Reduction of speed limit on Wasatch Boulevard'
- Preferred Scenario Cross Section (page 5)
  - 'Flex Shoulder – open to vehicles in peak hour, open to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

SHARED USE PATH

FLEX SHOULDER

MEDIAN

NATIVE LANDSCAPE



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

The Preferred Scenario moves people through the corridor reliably and safely by:

- Adding a transit-prioritized lane in each direction on Wasatch Boulevard in Segment 1, increasing the corridor's capacity to move people more reliably.
- Adding a lane or shoulder for peak traffic use in each direction on Wasatch Boulevard in Segment 3, increasing the corridor's capacity to move people more reliably.
- Initiating an enhanced bus or bus rapid transit line north along the Valley's east side and terminating at or near the Gravel Pit, providing a high-capacity transit possibility to carry people from the Gravel Pit to major activity centers, reflecting a strong travel market. Cottonwood Heights will work closely with UTA to achieve this increased service and infrastructure.
- Improving and emphasizing transit access along the corridor through road design and function (e.g. flex lanes, transit preemption, BRT, etc.).
- Slowing the speed of Wasatch Boulevard south of Big Cottonwood Canyon.
- Implementing traffic calming features such as medians and roundabouts.
- Enhancing visibility of pedestrians and cyclists at crosswalks at major intersections.

The Preferred Scenario promotes and prioritizes sustainable solutions to Wasatch Canyon access at a local and regional scale by:

- In partnership with UTA, shaping a vibrant canyons hub, with a wealth of park-and-ride spaces, high-quality transit center, frequent transit service to the key canyons destinations, and complementary land uses such as retail and restaurants, hotel rooms, and on-site recreation.
- Implementing flex shoulders on Wasatch Boulevard south of Bengal Boulevard that are open to transit and HOVs only on peak ski days, providing a way to incent trip reduction in the canyons and emphasizing more efficient means of transportation year round.
- Improving communication about canyon and parking conditions.
- Implementing resident access improvements.

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 it at-grade or grade-separated crossings. Slowing down the speed would help this.

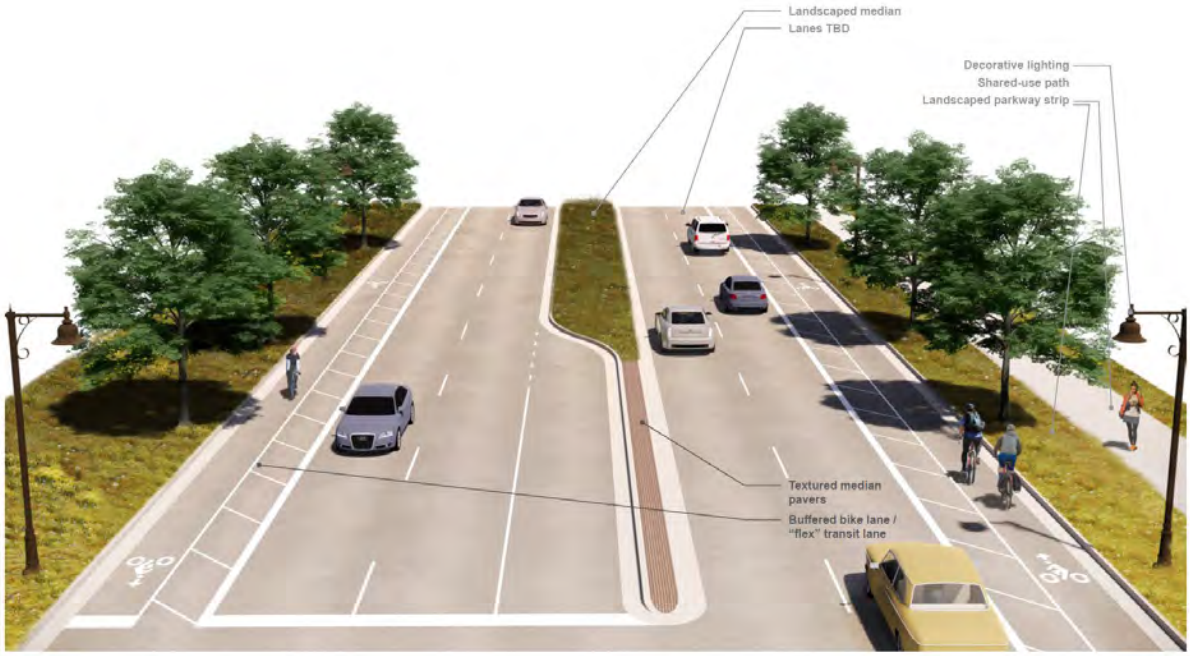
Leverage existing trails and paths

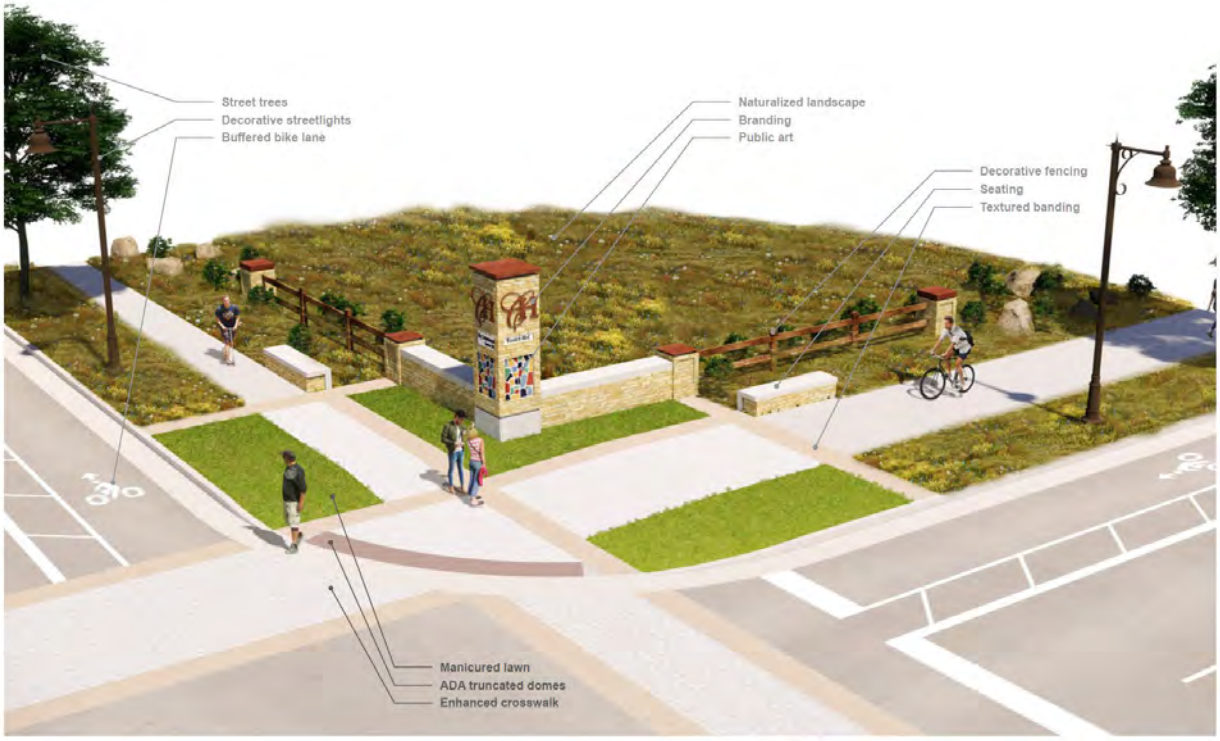
Two major existing and planned trail corridors connect to the Wasatch Boulevard corridor - the Big Cottonwood Creek pathway running northwest from the mouth of Big Cottonwood Canyon; and the planned Bonneville Shoreline Trail east of the developed neighborhoods on the east side of Wasatch Boulevard, 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

SANDY CITY ADMINISTRATION

ID 38628

MONICA ZOLTANSKI
MAYOR

SHANE E. PACE
CHIEF ADMINISTRATIVE OFFICER

To: Utah Department of Transportation
From: Sandy Mayor Monica Zoltanski
Re: Mayor's Public Comment on Little Cottonwood Final EIS
Date: October 17, 2022

I am writing to state my opposition to the Gondola B option as a recommended transportation solution for Little Cottonwood Canyon. As mayor of Utah's 7th largest city, which sits immediately adjacent to the canyon itself, I wish to share not only the sentiments of the people who elected me based on my active platform of responsible stewardship of our environmental and public tax resources, but I also wish to offer details on how the EIS recommendation for the gondola runs contrary to Sandy City's interests.

In a survey conducted by Sandy City in January of 2022, only 23% of Sandy residents supported a gondola system in Little Cottonwood Canyon. 41% of respondents preferred expanded bus service without widening the road and 72% of respondents were in favor of expanded parking with a multi-story parking garage at the current park and ride at 9400 South and Highland Drive. See full survey here.

Sandy City's interests in managing transportation in Little Cottonwood were outlined in a letter dated August 13th 2021 from the past administration and I affirm the same. Sandy City identified the main concerns that needed to be addressed by the EIS, including:

I. **Protecting our watershed and water quality**
II. **Connecting to Sandy City transportation system.**
III. **Getting cars off the road and reducing congestion.**
IV. **Improving the experience of canyon visitors.**

Phase 1 Recommendations

Some of Sandy City's concerns have been addressed in Phase 1 recommendations, but it does not go far enough. I am encouraged that UDOT has recommended allowing time for improved transit operations, innovation, and partnership between the canyon users, resorts, UTA and government. I am confident that by working together we can and will achieve the EIS goal of reducing vehicle traffic on the canyon road by 30%, and we can accomplish this short of the massive price tag of the gondola.

Sandy, Salt Lake County, and the State of Utah need time for the phased approach to take root and deliver meaningful, measurable results. With strategic planning that starts by first addressing proper canyon capacity instead of maximizing the visitor volume, we can protect our majestic canyon while improving the visitor experience.

Since any choice requires funding, and until the phased approach is funded, I ask that UDOT fully commits to a

reasonable timeframe of 5-10 years to implement new ways to manage traffic under the phased approach, including incentivizing reservations, carpooling and tolling as well as strategic mobility hubs to move people year-round in a safe, convenient manner. There is no downside to focusing resources to make the phased approach the best approach. When all parties put their best efforts to meeting sensible traffic demand, we will have time to explore, implement, and measure new technology, electric buses, and strategic mobility transit hubs.

Once we've exhausted the phased options, a gondola or other options may be reconsidered when we have a clearer picture of canyon capacity, consumer behavior and the incremental demand on the canyon depending on growth.

Furthermore, Sandy City has major concerns about Phase 2 as detailed in the Final EIS, including:

I. Water quality

Little Cottonwood Canyon provides 100% of our city's peak season drinking water supply. It is our primary water source for over 100,000 residents and visitors from November through July. This requires diligent protection of the Little Cottonwood Canyon water supply. There are many times of the year where Little Cottonwood water is distributed to customers throughout Salt Lake County through cooperative water management agreements between Metro Water of Salt Lake & Sandy and the Jordan Valley Water Conservancy District. Jointly they serve, and water from Little Cottonwood supports, over 1 million people in Salt Lake County.

The pristine water you see in Little Cottonwood Creek today will be at a Sandy or Salt Lake County customer water taps within 4 to 8 hours. Any contamination becomes an immediate health threat to our community, where concentrated contamination from vehicle accidents, storms, snow runoff events can pollute our drinking water, and/or require shutdown of the water treatment plant. Unlike a water treatment plant on a slow-moving stream or beneath a reservoir that are aware of contaminants days in advance, hazards in Little Cottonwood are upon the plant immediately and often without notice.

Tower construction is risky and can disturb the ecosystem which will negatively impact water quality. UDOT states that watershed protection is not a primary objective. Still, the needs of clean drinking water for 1 million people must be considered. Construction of a major project such as the gondola could have lasting impacts on the environment and a quickly shrinking resource in the State of Utah. Therefore it is absolutely imperative to Sandy that UDOT prioritizes watershed health over transportation, even though UDOT is a transportation agency.

Sandy is encouraged to see UDOT's inclusion of several water quality best practice improvements in the Phase 1 interim recommendations, notably including but not limited to water quality catchment and sizeable treatment buffer areas around all concentrated parking areas, improved sanitation facilities at trailheads and parking areas, as well as installation of concrete vehicle barriers located at areas of high risk for vehicle slide off and accidents that may result in injury or hazardous material spills. The marginal widening of roadway shoulders to

accommodate better roadway runoff treatment, reduce erosion, and improve safety for the growing cyclist and road running recreation in the canyon should be included and not overlooked in the project. The management of the traffic into the canyon, and management of the recreation intensity and impacts upon the natural vegetation and treatment capacity of the watershed, is important in protecting our water supply, both to prevent spills in the first place, and to allow buffer distances for hazmat and other responders to identify, contain and remove any contaminants before they become a public health or environmental impact.

Finally, on a related matter, the declining water levels of the Great Salt Lake signal serious concerns about snowfall and air quality for everyone along the Wasatch Front. If the State of Utah is serious about protecting snow volume in LCC, it should prioritize funding for the protection of the Great Salt Lake over the gondola. dollar-for-dollar, the money spent to combat the shrinking of the Great Salt Lake will have much broader economic and public health impacts than a gondola for resort-goers.

II. **Connection to Sandy City transportation system**

The 9400 S. Highland Dr. transit hub was specifically removed from the recommended solution, with the EIS recommending the location remain a surface parking lot only. No future stall increases, nor other improvements are recommended here. However, the La Caille base station is in an area that is geologically sensitive, geographically constrained, overlaps an EPA Super Fund site and master planned for non-commercial uses in Sandy City jurisdiction adjacent to the site. Sandy City has a strong commercial site on 9400 S Highland Drive that is less constrained in all measures, and more adequately able to handle a transit hub with its associated future development pressures. UDOT has failed to include 9400/SR-209 in its study, even though the EIS says it's the source of 40% of the ski traffic and the plan for the 2,500 vehicle parking structure will add to congestion issues and private property impacts and we feel this was a critical omission in the Final EIS.

The LCC EIS 2050 modeling assumes Highland Dr. will be built, which places the 9400 S. mobility hub at the intersection of two regionally significant major arterial roads. Wasatch Blvd is classified as a major collector road. We understand that if Highland Dr. and the mobility hub at 9400 S. are not built, the probability of widening Wasatch Blvd south of SR-209 is more likely, along with increased SR-209 congestion. However, Sandy does expect lower trip generation to the mobility hub without the Highland Dr. connectivity. Widening Wasatch Blvd will come with significant right of way takes and entire homes being purchased. These decisions and recommended solutions are critical to the future of Sandy regarding land use, geography, and transportation.

III. **Reducing congestion**

Several milestones of the EIS preferred solution have significant negative impacts for Sandy City and its residents. By locating a 2500 stall parking garage at the mouth of LCC, it creates a point source for vehicle trips, pollution, congestion, and development pressure in a location poorly suited for such a project. Such a design runs counter to mass transit objectives of getting people out of personal vehicles crossing the valley through Sandy convening at the mouth of the canyon. Unlike the previous mobility hub proposals, the 2,500-vehicle parking structure in the mouth of the canyon does nothing to reduce traffic congestion on the 9400 S. corridor where 40% of the ski

traffic originates.

Additionally, the La Caille location is geographically constrained by:

- a tight footprint
- substantial vertical grades
- adjacency to Little Cottonwood Creek with its associated floodway
- potential debris flow hazard area
- proximity to the Wasatch Fault
- overlapping a former Superfund site and will expose elevated heavy metal deposits in the vicinity
- adjacency to single family residential zoning
- sole accessibility by 3-lane roads (Single travel lane in each direction)
- requiring additional traffic lights on Wasatch further impacting traffic

While SR-210 is proposed to be widened to five lanes to handle the projected ADT's, SR-209 was not considered for improvements. The impact will be equivalent, with no proposal on how to handle the loading and impacts to Sandy City residents. Early in the EIS process, the traffic split coming into the canyon during heavy travel days was identified as 54% SR-210, 40% SR-209, and 6% Wasatch Blvd to the south. This means the EIS only studied 54% of the problem while determining the gondola base station location and left 46% of the loading outside the scope of the EIS. Both SR-209 and SR-210 are on WFRC's Long Range Plan for improvements. A single point destination at the mouth of the canyon concentrates westbound trips to a geologically constrained location and increases delay to users at peak loading/unloading times. This is the exact opposite of what is desired.

IV. Improving the experience of canyon visitors

The gondola system recommendation in Phase 2 would undoubtedly become an attraction and bring even more visitors to Little Cottonwood Canyon as UDOT states as a positive feature of the gondola in Ch. 6 of the FEIS. Certainly, people will be curious to ride but as it draws visitors who come for the amusement, it will push away visitors who come for the natural experience. UDOT projects a significant population increase in the state and makes the claim that the canyon can and must accommodate this increase without the support from any type of study and analysis. Without a capacity study to understand what kind of traffic the canyon can reasonably sustain without long term damage to the environment, we should not undergo such a massive project.

The FEIS states in Ch. 6 that the preferred alternatives, including the gondola, will bring approximately 2,500 more people to the resorts each day. It is counterintuitive to state that the capacity study is not necessary while aiming to increase the capacity of the ski resorts. We think it is imperative for UDOT to commission a capacity study before implementing Phase 2 and moving more people into the canyon.

A gondola system with 200-ft towers will forever alter the landscape of Little Cottonwood Canyon. Visitors come

MONICA ZOLTANSKI
MAYOR

SHANE E. PACE
CHIEF ADMINISTRATIVE OFFICER

from around the world to enjoy the beauty of these pristine mountains. The gondola would change that view scape and obstruct the splendor of these mountains in the canyon for all who live in the valley and all who visit. Additionally, the 200-ft towers and overhead cables puts in danger Little Cottonwood Canyon's status as a state designated Utah Scenic Byway.

For these reasons, Sandy City is asking UDOT to work through the Phase 1 improvements with full commitment and adequate time to explore the phased approach solutions to meet the goal of reducing car traffic on the canyon road by 30% before irreversible changes are made in the canyon that benefit a limited user group. Improved bus service along with no on-road parking in the ski areas, tolling and reserved parking are likely to meet UDOT's traffic reduction goals by themselves. They should be tried and assessed for some period before deciding to proceed with the gondola.

Future generations will judge the wisdom of how we protect our environment and manage valuable public resources. It is my hope that we can stand proud, together, to say we've done the best for our generation of decision makers by exhausting the phased approach and avoiding the boondoggle of the gondola. Thank you for your time and consideration.

Sincerely,

Monica Zoltanski
Sandy City Mayor

ID 38629

October 17, 2022

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

RE: Access Fund Comments Regarding UDOT Little Cottonwood Canyon Final Environmental Impact Statement

UDOT Planners,

The Access Fund welcomes this opportunity to provide comments to the Utah Department of Transportation's (UDOT) Little Cottonwood Canyon (LCC) Final Environmental Impact Statement (FEIS). The Wasatch Mountains and Little Cottonwood Canyon in particular host nationally significant climbing resources that have a long history and attract visitors from all over the world, contributing significantly to the local economy. Like its draft proposals, UDOT's FEIS focuses far too much on the needs of two ski areas at the head of LCC at the expense of dispersed recreational users who visit the entire canyon. UDOT's preferred Alternative B would destroy climbing resources, significantly impair the canyon's natural experience, and limit parking and damage trails in a highly popular recreation area. Accordingly, the Access Fund opposes UDOT's proposal because less destructive and cheaper options are available to effectively address transportation problems in LCC.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project-specific funding, and educational outreach. Utah is one of Access Fund's largest member states and many of our members climb regularly in Little Cottonwood Canyon. For more information about Access Fund, visit www.accessfund.org.

The Access Fund supports the position of the Salt Lake Climbers Alliance (SLCA),[1] and hereby incorporates their position on this proposal by reference into this comment letter. Specifically, we endorse SLCA's proposal that before any permanent changes are

[1] See https://www.saltlakeclimbers.org/lcc-udot-eis.

made to Little Cottonwood Canyon, a new alternative must be considered that is based on 1) an expanded bus service coupled with 2) traffic mitigation strategies, and 3) addresses the needs of dispersed recreation. The FEIS's highly destructive Preferred Alternative B should only be considered after less impactful options have been implemented and shown not to be effective. The climbing resources that will be damaged by this proposal are highly significant and valued by climbers locally, nationally, and internationally.

Since at least the 1950s many climbs were established in Utah's Wasatch Mountains, especially on the high-quality granite found in Little Cottonwood Canyon,[2] which became the training ground for the local Alpenbock Climbing Club. Especially during the 1960s, the Alpenbock Climbing Club made many first ascents in LCC, scaling numerous routes that remain classics today including *The Coffin*, the *Wilson-Love Route*, *The Sail*, *S-Crack* on the Thumb, and various routes on the Gate Buttress. Increasingly difficult routes were established from the late 1960s into the 1970s such as *Dorsal Fin*, *Mexican Crack*, *The Green Adjective*, *Split Fingers*, *Bitterfingers*, and *Fallen Arches* which at the time were as difficult and high quality as any climbs in the country. In recent decades, the popularity of bouldering also took hold in LCC, which hosts many bouldering areas such as 5 Mile Boulders, White Pine Boulders, Cabbage Patch Boulders, the Gate Boulders, the Secret Garden where the problem *Copperhead* (V10) can be found—an influential climb for Nathaniel Coleman, a US silver medal winner in the 2021 Tokyo Olympics. All of the climbs listed here would be impacted in some way, either through direct destruction or by the industrialization of the area resulting from UDOT's preferred gondola alternative.

COMMENTS

Access Fund believes that UDOT's preferred Alternative B will cause unacceptable impacts to LCC because the gondola would destroy highly popular climbing areas and also negatively impacting the natural experience of many other LCC uses. This important public resource is the most popular climbing destination in the Wasatch Mountains which has a long tradition as a training ground for Utah climbers.

Access Fund believes that the high degree of physical impact[3] proposed by this alternative should be considered only after lesser destructive alternatives are analyzed in detail. As noted by the Salt Lake Climbers Alliance and others, the climbing community has invested considerable time, energy, and resources into maintaining public access to areas in the planning area, such as Gate Buttress and its parking area. These efforts have included substantial public outreach and the formation of mutually-beneficial partnerships with stakeholders such as the Church of Jesus Christ of Latter-day Saints. UDOT's proposal would significantly restrict parking, damage the climbing resource, and impact access trails in precisely the locations where the climbing community and other stakeholders have invested so much effort.

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[2] See https://www.mountainproject.com/area/105739277/little-cottonwood-canyon.

[3] UDOT's preferred alternative threatens classic and historic climbing areas throughout Little Cottonwood Canyon including at least 64 boulders and 273 boulder problems.

UDOT's gondola proposal will significantly damage the climbing experience in LCC in the following ways. First, access to climbing areas will be compromised during years of construction and once it's finished, destroying and/or removing the irreplaceable and historic climbing and undeveloped viewsheds. The current views of the canyon—with its inspiring granite buttresses, pine forests, and mountain streams—will be spoiled by gondola towers and cables, and the constant drone of machinery and construction. Furthermore, UDOT's proposal is not fully funded with at least a half billion dollars still outstanding to finish the job. Many other important public services could be provided with these funds. Accessible natural areas such as LCC are what draw people to live in and visit Utah. Moreover, the gondola is designed to serve only ski resort users, addressing a traffic problem that exists only a few months of the year.

* * *

Access Fund urges UDOT to reconsider its preferred alternative and reexamine a less impactful and cheaper transportation solution centered on expanded bus service combined with other traffic mitigation strategies such as tolling, while also preserving the parking needs of dispersed recreational users throughout the canyon. Such an approach would address the needs of the dispersed recreation community and many others that oppose permanently scarring the historic and highly valued climbing resources and extraordinary natural environment in Little Cottonwood Canyon.

Sincerely,

Jason Keith
Senior Policy Advisor
Access Fund

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

October 17, 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 the Final Environmental Impact Statement (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. 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 Final EIS.

The Final 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. The Final EIS identifies UDOT's preferred alternative as the "Gondola B Alternative" supported by associated improvements to widen Wasatch Boulevard to five lanes, construction of parking structure to gondola service, roadway snowsheds, existing trailhead improvements, restrictions on roadside parking, and tolling or vehicle occupancy restrictions during ski season peak hours. Construction of the Preferred Alternative would be implemented in a phased approach.

The EPA appreciates both UDOT's early coordination efforts in its EIS process and that comments and recommendations provided by the EPA as a cooperating agency were considered and used by UDOT in the development of the Final EIS. While most of EPA's substantive comments and recommendations are incorporated in the Final EIS, we have identified the following topics that we recommend UDOT consider and clarify in its environmental review decision record so that potential impacts or benefits from the selected final preferred alternative can be accurately understood by the public and decisionmakers: (1) CAA transportation conformity; (2) operational assumptions for UDOT's preferred alternative and consistency of impacts analyses; and (3) mitigation and monitoring considerations.

The EPA's detailed comments are enclosed. We appreciate your continued efforts to fully consider our comments in further strengthening the information basis for UDOT's environmental and permitting process. If further explanation of our comments is desired, please contact me at (303) 312-6155 or mccoy.melissa@epa.gov, or Julie Smith, who serves as EPA's point of contact for this project, at (303) 312-6736 or smith.julie@epa.gov.

Sincerely,

Melissa W. McCoy, Ph.D.
Office of the Regional Administrator
NEPA Branch Manager

Enclosure
CC: Vincent Izzo, HDR, Inc.

Enclosure - EPA Comments
Little Cottonwood Canyon Final EIS

(1) Clean Air Act and Transportation Conformity

EPA appreciates the discussion of transportation conformity considerations provided in UDOT's supplementary air quality memorandum as they relate to the identified preferred project alternative (Gondola Alternative B).[1] We recommend addressing aspects of this discussion in the Record of Decision (ROD) to assist the public and decision makers in understanding whether the Project will demonstrate conformity and meet air quality goals. Specifically, the air quality memorandum indicates selection of Gondola Alternative B would require an amendment to the Wasatch Front Regional Council (WFRC) Regional Transportation Plan (RTP) and therefore a new conformity determination would need to be completed before issuance of a ROD.

EPA has concerns regarding the applicability of the existing particulate matter (PM) hot-spot analysis to the evaluation of Gondola Alternative B. We recommend a more rigorous demonstration that the model represents the peak emissions scenario among all proposed alternatives, including the phased implementation of Gondola Alternative B. For example, the Final EIS and supplementary conformity memo assure the reader that the analysis of enhanced bus service and mobility hubs in 2050 represents the peak emissions scenario. However, it is not clear whether a different fleet composition throughout phased implementation of Gondola Alternative B would require an additional analysis year(s) to find and accurately evaluate the highest emissions scenario for Gondola Alternative B. In relevant part, we quote the EPA 2021 PM hot-spot analysis guidance:

> *"In some cases, selecting only one analysis year, such as the last year of the transportation plan or the year of project completion, may not be sufficient to satisfy conformity requirements. For example, if a project is being developed in two stages and the entire two-stage project is being approved, two analysis years should be modeled: one to examine the impacts of the first stage of the project and another to examine the impacts of the completed project."*[2]

Specifically, we recommend that UDOT provide updated information prior to issuance of the ROD or within the ROD that either 1) demonstrates how the existing hot-spot modeling is representative of the peak emissions scenario among all alternatives and accurately reflects the air quality impacts of phased implementation of Gondola Alternative B or 2) supplements the existing hot-spot analysis with one that focuses on the specific project characteristics of phased implementation of Gondola Alternative B. This would provide a more accurate understanding and comprehensive record of actual peak PM emissions upon which UDOT would make current and future decisions for the proposed Project and meet the requirements of transportation conformity.

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[1] Memo titled: "Air Quality Analysis Summary, Applicability to the Final EIS Preferred Alternative and a Phased Implementation Plan." August 31, 2022. Received via email August 31, 2022.
[2] PM Hot-spot Guidance - Transportation Conformity Guidance for Quantitative Hot-spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas, p. 16. October 2021. EPA-420-B-21-037.

We greatly appreciate UDOT's ongoing efforts to meet the requirements of transportation conformity, including consultation with stakeholders of the established interagency consultation team, and look forward to discussing these issues in that forum as well.

(2) Operational Assumptions and Consistency of Impacts Analyses

EPA appreciates that final engineering and operational decisions related to the preferred alternative have not been finalized at this point in the development of the Project. An important example of operational uncertainty discussed by UDOT in the Final EIS is whether the preferred Gondola B Alternative would operate (providing mobility choice and potential congestion alleviation to travelers in Little Cottonwood Canyon) during winter season only or would operate also during summer to provide those same transportation improvements (i.e., transit via gondola).

While UDOT's Final EIS clearly explains that the current transportation improvements are proposed for winter peak season operation of the gondola, we find that analyses in the Final EIS are not consistent in applying this operational assumption. For example, Table S-2 of the Final EIS clearly presents construction, operations, and maintenance costs of gondola operation during both winter and summer seasons, while potential greenhouse gas (GHG) emissions from operation of the preferred Gondola B alternative are presented in Table 10.4-6 as CO_2(e) annual emissions based only on winter season operation. Given that UDOT is assuming both winter and summer operation of the gondola in presenting economic cost considerations in the Final EIS, for purposes of analytic consistency and to account for reasonably foreseeable impacts, we recommend also presenting and discussing estimates of potential impacts such as CO_2(e) annual emissions from the Project that reflect the assumption of both winter and summer gondola operations.

The EPA recommends that UDOT review the Final EIS for similar inconsistencies in operational assumptions among resource analyses and provide updates to resource impacts from gondola operation and maintenance that assume a winter and summer operational schedule. Providing this updated information in the ROD would enhance consistency as well as support UDOT's flexibility and understanding in its decision making in the future because both operational scenarios would be properly considered in the NEPA context.

(3) Mitigation and Monitoring Commitments

The Final EIS includes a broad summary of mitigation measures in Chapter 25. We extend our previous suggestions on the Draft and Final EIS that UDOT provide a strong basis for decision making with a clearer connection between impacts, related mitigation measures and best management practices (BMPs), and we focus our current suggestion on monitoring to protect Wasatch Watershed resources. While the EPA understands that the Project has not advanced to final design and engineering, we recommend that that the ROD provide additional information on how expected direct and indirect impacts from the implementation of the preferred alternative are to be avoided and minimized by UDOT as a part of the Project's implementation and operation.

Mitigation, Monitoring and Aquatic Resources

EPA appreciates that Section 25.2.6 of the Final EIS proposes mitigation and monitoring for potential impacts to aquatic resources in the Project area. Given the importance of the Wasatch Watershed to the livelihood and health of Salt Lake residents and visitors, EPA recommends that the ROD clarify details of mitigation and monitoring measures. This would include those mitigation measures that UDOT will commit to use that are intended to minimize direct, indirect, and cumulative effects of the Project on aquatic resources in the Wasatch Watershed (e.g., due to increased visitation in winter and (potentially) summer recreational seasons). As an example, Section 25.2.6 of the EIS identifies mitigation for impacts to water resources which include visual inspections of equipment for purposes of water quality but does not identify who is responsible for such inspections and what is the planned frequency of these monitoring activities. This same section also indicates the need for measures to ascertain that damage to or leaks from emergency generators and fuel storage tanks associated with the Gondola B Alternative do not threaten important aquatic resources in the canyon, and it provides examples of measures that may be used by UDOT for these protective activities without an indication of what would determine the ultimate choice of mitigation.

The EPA recommends UDOT consider developing and providing greater detail in the ROD about the mitigation measures presented in Section 25.2.6 of the Final EIS. We recommend that UDOT identify the frequency of inspections, documentation standards for inspections, and the entity responsible for inspections of generators and fuel storage tanks for leaks or damage that threaten watershed resources. EPA further recommends that UDOT's ROD present what criteria would be used to select between leak detection systems and double-walled construction installation for such equipment, and when those decisions would be considered and how they would be documented during future engineering and design in the phased implementation of the preferred Gondola B Alternative. These recommendations are intended to improve transparency of future, expected UDOT decisions around avoidance, minimization, and mitigation of potential direct, indirect, and cumulative impacts from the Project to critical water resources in Little Cottonwood Canyon.

ID 38631

MAYOR
ROGER BOURKE

TOWN COUNCIL
ELISE MORGAN
SHERIDAN DAVIS
JOHN BYRNE
CAROLYN ANCTIL

TOWN OF ALTA
P.O. BOX 8016
ALTA, UTAH
84092-8016
(801) 363-5105 / 742-3522
FAX (801)742-1006
TTY 711

October 17, 2022

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

VIA EMAIL

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

Dear Little Cottonwood Canyon EIS Project Team,

Thank you for the opportunity to provide comments on the Final Little Cottonwood Canyon Environmental Impact Statement (the FEIS) 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 is grateful for UDOT's efforts to improve safety, reliability, and mobility on SR 210 for all users.

That being said, the primary purpose of this letter is to express and record my vigorous objection to UDOT's proposed Little Cottonwood Canyon gondola. As Alta's mayor, I do not support the proposed gondola because of the environmental and social impacts it would create, and because the cost to build and operate it would outweigh the benefits it may provide. However, I strongly support UDOT's intent to pursue a phased approach to implementing components of the preferred alternative. Due to these reasons, which are described in more detail below, UDOT must pursue and exhaust less expensive, less impactful, and more flexible interventions to improve safety, reliability, and mobility on SR 210 before implementing something as permanent as the proposed gondola.

The proposed gondola's purpose of reducing 30% of projected winter-season traffic in 2050 is too narrow to justify the projected cost of the project and the permanent impact the gondola would create on the canyon, especially in the context of so much uncertainty about the future of Little

Cottonwood Canyon. Whether the ski industry at-large, or our regional ski industry in Utah, can survive as climate change proceeds is uncertain. What is more predictable, however, is that climate change and demographic trends in Utah will create problems much more significant than difficulties associated with ski area access. Public expenditures of the magnitude required to construct the proposed gondola should be devoted to problems such as wildland fire mitigation, protecting Great Salt Lake, improving air quality along the Wasatch Front, funding public schools, or more widely beneficial transportation infrastructure, rather than to projects that would benefit a narrow and privileged class of Utahns—those who can afford to ski and choose to do so—at the expense of all taxpayers.

Alta and Little Cottonwood Canyon are one of Utah's most famous and important landscapes. To install the proposed gondola on the floor of the canyon, including several towers up to 230 feet tall adorned with blinking red lights, would radically and permanently tarnish Alta's appearance. Because of this, it is perplexing that as part of its analysis of visual resource impacts, UDOT chose just a single key observation point in Alta, from which the gondola is obviously not visible. UDOT should have chosen a key observation point along SR 210 in Alta or nearer to one of Alta Ski Area's base facilities; every person that comes to Alta experiences views from these locations, including every Alta resident, all of whom would see the gondola from their homes and neighborhoods, every day. The proposed gondola would dominate and degrade these vistas, which have been marketed around the world to bring people to Utah.

Since the adoption of the 2003 Wasatch-Cache National Forest Plan, the US Forest Service restriction on adding parking in Little Cottonwood Canyon has functioned as the primary limit to visitor capacity. The gondola would circumvent that restriction and significantly increase the capacity of the transportation system to deliver people to the canyon. UDOT's conclusion in the FEIS that the gondola would only deliver people to ski areas not subject to the Forest Plan appears to be based on an assumption that patterns of recreation visitation will remain static over time, yet it is widely acknowledged that patterns in recreation use and demand are rapidly changing. Alta in particular is already a hugely popular point of origin for recreation activities that take place outside the ski area, and as backcountry skiing and summer outdoor recreation become even more popular, demand for non-resort recreation access in Alta and Little Cottonwood Canyon would inevitably lead people to take the gondola for reasons other than just to visit Alta Ski Area or Snowbird. Since Alta and Snowbird are the only two upper termini of the system, the proposed gondola will preferentially load those two locations and concentrate these impacts.

In comments to UDOT regarding the 2021 Draft Little Cottonwood Canyon Environmental Impact Statement, the Town highlighted technical issues with the proposed gondola that do not appear to be adequately addressed in the FEIS. The Town of Alta conducted an architectural feasibility study on a parcel across SR 210 from the location of the proposed Alta gondola station. The study included modeling the characteristics of a 100-year avalanche event in avalanche paths that affect both the Town of Alta-owned parcel, and the location of the proposed Alta gondola station. The Town's study determined that both the town's parcel, and the location of the Alta gondola station, are subject to very significant avalanche hazard; on the town's parcel, debris flow core heights of over 3 meters are possible, with powder blasts reaching up to 30 meters above the ground. In the modern history of Alta, very large avalanches have crossed both of these locations on several

occasions, with debris spanning the entire distance between the Alta Lodge and the Rustler Lodge and running all the way over and past the proposed gondola terminus location to Little Cottonwood Creek.

The Town's avalanche study did not directly contemplate the location of the proposed Alta gondola station, nor the location of UDOT's proposed Alta bus terminal, but it did suggest that the location and the Town's parcel are subject to similar avalanche hazard. And the Town's study proceeded to determine that constructing a building on the Town's parcel upslope from the proposed gondola terminus would be perhaps prohibitively expensive, technically challenging, and ethically questionable, given the threat to human life and property posed by a potential avalanche in this area. Given all of this, the Town requests more information subsequent to the statement contained on FEIS Section 32.2.6.5K, that "The gondola system, including the terminal stations, would be designed to account for […] canyon avalanches." Specifically:

- Has UDOT modeled the characteristics of an empirical destructive scale 5 (D5) avalanche event originating in the Flagstaff Shoulder, Flagstaff Face, and Binx's Folly avalanche starting zones, to determine the impact pressure, debris flow height or thickness, debris flow velocity, and other characteristics of such an avalanche, in the location where UDOT proposes to locate the proposed bus terminal, the proposed gondola terminal, and the final span of gondola cables?
- If UDOT has conducted such an analysis, did it conclude that it is technically feasible to locate such facilities where they are shown on plans contained in the FEIS, especially the final span of gondola cables?
- Has UDOT evaluated whether constructing elements of the preferred alternative, including the final gondola tower and bus and gondola termini, would divert flowing avalanche debris into adjacent properties, including the Alta Lodge and the Rustler Lodge?

UDOT should consider the following details as it begins a phased approach to improving transportation conditions on SR 210:

- UDOT should develop a local maintenance shed in upper Little Cottonwood Canyon with a dedicated plow truck. If snowplows are already working in the canyon when snow begins to stick to the road surface, it is much easier to maintain adequate surface conditions for efficient traffic flow. But when plows from the UDOT Cottonwood Station are assigned to other roadways as storms in Little Cottonwood Canyon escalate, conditions can become unmanageable much more rapidly.
- Consider updating traction device regulations in order to keep inappropriate vehicles out of the canyon as storms approach and invest in enforcement of the existing traction law.
- UDOT must carefully evaluate the feasibility and effectiveness of implementing the proposed toll below Snowbird Entry 1. UDOT should evaluate whether any reasonably priced toll will be high enough to dissuade canyon users who are already planning to spend a significant amount of money on skiing related activities and lodging. UDOT should evaluate traffic impacts that could occur if visitors attempt to turn around before passing a

toll station. UDOT should exempt canyon residents, essential workers, and service vehicles from paying the toll.

- UDOT should thoroughly evaluate opportunities to optimize traffic flow and driveability on the existing roadway, specifically at merge points and curves with impaired line-of-sight.

Regardless of the outcome of the Little Cottonwood Canyon EIS, I am certain that UDOT and the Town of Alta will need to continue to work together to understand all the details of UDOT's proposals and mitigate impacts to Alta and our community. The Town of Alta looks forward to future collaboration between our agencies and we thank you once again for considering our comments.

Sincerely,

Roger Bourke, Mayor

ID 38632

Oct. 17, 2022

Josh Van Jura
Project Manager
UDOT Little Cottonwood Canyon EIS

Dear Josh,

Congratulations to you and your team on years of hard work that has resulted in a sound recommendation based on thorough analysis of the complexities of year-round transportation in Little Cottonwood Canyon.

Snowbird supports your selection of gondola as the transportation solution as well as working on short-term solutions to address the increasing demand for mountain recreation and resulting traffic and safety concerns. We have dedicated significant resources to the development of software to coordinate, encourage and incentivize carpooling and the use of the ski bus and RideShare vans. We will continue to explore other ways of building vehicle occupancy, especially in light of the recent cuts in UTA ski bus service.

After years of study of all the transportation options, it is clear to those of us involved in this process that gondola is the only solution that addresses the significant safety concerns including winter driving conditions, avalanche, extended road closures, and major non-winter weather events. The gondola also removes the most polluting vehicles off the road, which is critical for air and water quality as well as the impact on the natural environment of Little Cottonwood Canyon.

As mentioned in my previous comments, Snowbird owns the land where the gondola base station will be located and we continue to be willing to provide this land to UDOT in the form of sale, donation or public-private partnership. Also consistent with our prior commitment, Snowbird will pursue a conservation easement of our private land in Big and Little Cottonwood canyons – approximately 1,100 acres, which includes Mt. Superior – once the gondola is constructed.

Four issues of concern in the Little Cottonwood Canyon EIS Final Decision:

Tolling
I do not support tolling as a transportation solution in isolation. Tolling may be an effective means of getting people out of their vehicles into a gondola or another form of mass transit; however, tolling is solely an additional skier fee if implemented below Entry 1, likely creating a massive bottleneck given the current limitations on tolling technology in inclement weather conditions. We believe a better approach is a resort-based, multi-canyon parking reservation system that could even include the proposed Forest Service site fees on one consolidated website or mobile app. Currently there is not consensus between the four Cottonwood canyons resorts on parking reservations but, in time, that may change base on each resort's business priorities, parking resources and traffic patterns.

Roadside parking
Roadside parking is a critical part of the public's access to both dispersed and developed recreation sites. I do not support the elimination of roadside parking until a gondola is completed in Little Cottonwood Canyon. Snowbird works closely with the UDOT teams to coordinate the days on which it is deemed safe from a weather and avalanche perspective to park on the highway and this system works.

Education
I feel it is important that UDOT expand its education efforts around gondola. The more people understand why gondola is the most appropriate, safest, cleanest and best investment in taxpayer dollars, the more they support gondola. I encourage UDOT to go beyond the release of decisions and supporting documents in an effort to better educate people on the benefits of gondola.

Revenue
I believe your analysis did not adequately take into account the revenue generated by the gondola, which will offset much of the operating costs.

Snowbird stands ready to work as a collaborative partner with UDOT and other stakeholders in the short- and long-term to improve transportation and the guest and employee experience in Little Cottonwood Canyon.

Sincerely,

Dave Fields
President/General Manager
Snowbird

ID 38633

2746 SEEBER DRIVE, BLDG A • GRAND JUNCTION, CO 81506
(970) 241-4442 • FAX (855) 835-0073 • www.leitner-poma.com

We Move People

10/17/2022

To: Utah Department of Transportation
4501 South 2700 West
Salt Lake City, UT 84114

On behalf of the entire HTI Group (including but not limited to our ropeway brands of Leitner-Poma of America, Leitner, and Poma) whose north American gondola installations are primarily manufactured by an American workforce in Grand Junction, CO and Salt Lake City, UT, congratulations for picking the gondola option B as the best alternative.
Our group highlights the fact that the gondola system is the ***safest*** public transportation system studied for Little Cottonwood, as a 2022 report of PWC (https://www.pwc.de/de/branchen-und-markte/oeffentlicher-sektor/pwc-studie-urbane-seilbahnen-im-oepnv.pdf) shows:

- 1 accident occurring every 10,563,000 miles travelled.
- In comparison, street cars display 1 accident every 139,808 miles, and buses every 382,764 miles.
    a) Please note that bus accidents may occur more often than cited by PWC in hazardous street conditions as the ones prevailing in the canyon during certain periods in the winter.
    b) Shifting travelers from the road to the gondola would additionally enhance security as individual driving behaviors, prone to human errors & misjudgments, would be exchanged by a professionally-run and monitored public transportation system.

Concerning the ***reliability*** of gondolas, it is worth mentioning that the technology is the only option which guarantees public transportation in every condition, including days in which the road is closed for avalanche control work, road maintenance and/or snow removal activities. 3S (tricable) gondolas are designed for higher capacities (up to 6,000 PPHPD), allowing for hassle-free peak day / hour transportation, even during the busiest powder day, resort events, or during road closures. Moreover, the gondola has the capability to operate during snow storms and at wind speeds of up to 60 MPH (dynamic wind pressure of 400 Pa), dramatically increasing the reliability of public transportation throughout the canyon in every season over traditional options such as buses. Adding to the reliability topic, it is worth mentioning that the HTI Group has more than a century of experience in the cable transportation field, with more than 11,000 ropeways manufactured and installed worldwide, in ski resorts, entertainment, and urban settings. Our Group has also pioneered gondolas to be used for public (mass) transportation, with approx. 80 systems built, some examples include:

- Roosevelt Island Tramway in NYC
- Teleo 3S in Toulouse
- Cablebùs 2 in Mexico City
- Metrocable lines in Medellin

Our ropeways all showcase an availability rate of 99.9% and our extensive winter experience allows us to operate our 3S (tricable) gondolas at that availability rate, even in extreme conditions like the ones prevailing in Little Cottonwood Canyon, no matter the level of avalanche and landslide hazards.
Some relevant examples include but are not limited to:

LEITNER POMA

2746 SEEBER DRIVE, BLDG A • GRAND JUNCTION, CO 81506
(970) 241-4442 • FAX (855) 835-0073 • www.leitner-poma.com

We Move People

- Leitner Zermatt 3S on 12,700ft alt. in Switzerland, featuring a rope span of 1.7 miles between two towers, ideal for avalanche prone areas https://www.youtube.com/watch?v=wPkAcAMgYoc.
- Another Leitner 3S gondola which resembles the environment and use of UDOT's gondola option can be found in Austria, where our Group installed a tricable gondola to transport skiers and hikers through the Stubai canyon to the Stubai Glacier ski resort https://www.youtube.com/watch?v=wt4KJl6_FVQ.

Furthermore, we underline the fact that UDOT's gondola solution is the ***fastest*** alternative compared to the bus connection given its own, straight-line right of way. Our engineers highlight that the gondola travel time of 37 minutes (from the gondola base station to the Alta terminal) as anticipated in the final EIS, is likely to be shortened by approx. 20%, as our technology allows for speeds of up to 18 MPH.

Additionally, the gondola option would allow for a very ***comfortable & scenic*** ride. Our Sigma Symphony cabins (https://www.leitner.com/en/products/ropeway-systems/3s-cabin-symphony/) which carry a maximum of 35 passengers (mixed between seated and standing), would allow for 100% passenger seating in their 28 passenger configuration.
HTI Group's extensive experience as a manufacturer, as an operator, and investor in the cable-hauled mass transportation sector (both for mountainous & urban environments) leads to the conclusion that a more extensive modal shift from the road to the gondola (more than the 30% shift as targeted by the final EIS) would further enhance the safety and the reliability of public transit throughout the canyon. This would also be effective at enhancing the gondola's business case. This shift could be achieved by closing or substantially reducing road 270 traffic during operation times of the gondola from Wasatch Boulevard to Alta/Snowbird. Such measures would also benefit the environment by reducing noise pollution and carbon emissions along the canyon, as well as decreasing the costs and infrastructural requirements of roadside winter maintenance. Moreover, it would enhance the image of the canyon as being environmentally-friendly and virtually car-free. In Europe, world-class mountain destinations like Zermatt or Wengen (Switzerland) successfully managed to ban cars from the roads for most of the year. Another example is Alpe di Siusi / Seiseralm in the Italian Dolomites, where the road to and from the ski area is closed between 9 am and 5 pm and skiers & hikers are required to use a HTI Group 2S (bicable) gondola system (which operates from 8 am to 7 pm, 10 months per year) or an hourly bus connection (https://www.seiseralm.it/en/info/getting-around/traffic-regulation.html).

In closing, we think the justifications for the gondola are many, and would expand as this new mode of transit gained traction and acceptance in the community. This is a change to typical American transit modes, and Little Cottonwood Canyon is poised to lead this shift toward a more efficient future. The ropeway is truly the Ultimate Electric Vehicle.

Sincerely,

Daren Cole
President
Leitner-Poma of America, Inc.

ID 38634

Utah Department of Transportation (UDOT)
Little Cottonwood Canyon (LCC) Final Environmental Impact Statement (FEIS)
2825 East Cottonwood Parkway, Suite 200
Cottonwood Heights, Utah 84121
RE: Little Cottonwood Canyon Final Environmental Impact Statement (FEIS)

Dear UDOT

After reviewing the FEIS the following comments are in order.

The presentation of the FEIS in a web form consisting multiple separate independent pdf documents without any links or easy searching prevents adequate public review. The document references sections that must be downloaded then searched manually. I could not easily find the response to my comments via a word search.

The FEIS fails to consider in detail the full impacts of the proposed Gondola Alternative B and congestion mitigation strategies on regional transportation.

The FEIS acknowledges that tolling on S.R. 210 could increase the demand on S.R. 190 yet fails to conduct any analysis on the cumulative impacts.

The FEIS has not adequately and appropriately addressed the degradation of the Little Cottonwood view shed.

The FEIS fails to provide any substantive justification or analysis of costs yet uses capital and yearly operational costs as part of the selection criteria yet.

The FEIS contains multiple discrepancies and unjustified costs. A single transportation hub costs $56 million but two similar structures with the same combined capacity would cost $99 million. The additional $43 million lacks any justification.

The FEIS fails to acknowledge that the gondola would be affected by winter storms and high winds which can force planned and unplanned closures.

The FEIS expects the gondola to have over 95% reliability. Then of the 50 peak capacity days at least 2 days could have a mechanical failure or other unplanned closures which could result in 630 stranded users on each day. The FEIS fails to take the stranding of users and the resulting rescue infrastructure and costs into account.

The FEIS fails to acknowledge that the gondola gondola does not meet the definition of a “highway” under 23 U.S. Code Section 101 and would not be subject to a FHWA easement.

The FEIS fails to acknowledge the LCC FEIS NEPA is inadequate for the purposes of requesting from the Forest Service a special use permit and / or right-of-way for a gondola, as well as a revision to the Forest Management Plan of 2003.

The FEIS fails to acknowledge that the gondola may never be built because it cannot secure the necessary public land. Notwithstanding that private land must also be secured.

The FEIS fails to analyze how tolling costs combined with gondola/bus fares would achieve the necessary reduction in traffic. There will be no incentive to use the gondola/bus if the tolling costs are too low relative to the gondola/bus fares being too high.

The FEIS fails to include any metrics for judging a successful implementation of the bus service. That is the 2050 goal is a 30% reduction in traffic. But what if the bus system achieves a substantial reduction before that? Would that make the gondola moot?

The FEIS fails to analyze the true economic cost. The FEIS includes economic benefits of two privately owned business yet fails to analyze the cost recovery and utilization of the project alternatives. Though the project goal is to reduce traffic the net benefit is two privately owned business. What if the gondola was never built?

ID 38635

October 17, 2022

To Whom It May Concern:

Utah Audubon Council submits the following comments on the Little Cottonwood Canyon Final Environmental Impact Statement.

Utah Audubon Council is the public policy arm of the five Audubon societies in Utah, whose leaders serve as the Council Board of Directors. The mission of the Audubon Council of Utah is to conserve and enhance Utah's natural environment with special emphasis on birds and their habitat, for the benefit of humanity and the biological diversity of the Earth. The five Audubon societies that comprise the Council are: Bridgerland Audubon Society, Great Salt Lake Audubon, Red Cliffs Audubon Society, Utah Lake Audubon, and Wasatch Audubon Society. Many of our Audubon members have skied, hiked, biked, birded, photographed, and camped in Little Cottonwood Canyon, as well as recreated at its two ski resorts.

We urge UDOT to drop its support for the gondola in the FEIS and proceed with the "phased implementation plan starting with components of the Enhanced Bus Service" and associated infrastructure improvements, tolling and single occupancy vehicles, additional valley parking, and limited roadside improvements.

We previously commented on the DEIS that UDOT should have withdrawn the DEIS prior to issuing the FEIS due to its fundamental flaws, and instead proceed with a Supplemental EIS. We reiterate this as UDOT considers its Record of Decision.

We emphasize that the gondola will have negative impacts that are irreversible and extremely detrimental to the canyon environment. These include impacts to migrating birds, visual pollution, lack of access to trail heads in both winter and summer and complete lack of functionality for any access during the ski off-season, when most Utahns enjoy LCC. The failure of the EIS to address the more comprehensive issues of transit and transportation in the area should have been a deal killer for the gondola, as it simply fails to solve the transportation problems in LCC or the Cottonwood Canyons.

Of course, the gondola will also be paid for by taxpayer who will never ride it to access the beneficiaries – the ski resort owners and those well-off enough to afford to ski LCC, including a large percentage of out-of-state skiers. The positive economic impact of tax revenues generated is out-weighed by the regressive and unfair negative impacts upon the 90+ percent of Utahns who don't ski, much less ski at Alta or Snowbird. With these access problems and the tax inequities for such a large percentage of the local populations, the gondola should be considered an environmental and economic injustice.

Lastly, assuming that UDOT will proceed with the phased implementation plan, we urge that due consideration and time be given to assessing the impact of the current bus driver shortage on the overall evaluation of the plan. This driver shortage is likely a short term impact, but its impact upon transit up and down the canyon this winter at least will be very significant, and it should not be ignored or downplayed as UDOT proceeds with its on-going analysis of LCC transportation.

Respectfully,

Steve Erickson, Policy Advocate Utah Audubon Council
[redacted]

ID 38636

Dear UDOT,

Thank you for this opportunity to comment. I oppose the preferred alternative. A gondola would destroy Little Cottonwood Canyon (LCC). Undoubtedly, it would help reduce the avalanche hazards faced by the traveling public on the highway but at far too great a price both aesthetically and physically!

A gondola would ruin the magnificent views the canyon is famous for. The gondola would totally overcrowd the canyon with people all year long. The canyon's carrying capacity to handle human impacts is already stretched to its limit. A comprehensive, realistic carrying capacity study needs to be completed defining the number of people the canyon can hold before any decision should be made about a gondola.

As designed, the gondola is a 550 million dollar boondoggle that only benefits a limited number of people who can afford to ride it while making everyone else living in SLC metro area pay for it. It is patently unfair. As proposed, it primarily benefits two private ski areas and their investors as well as some financially involved legislators who drafted the legislation allowing it. On average there are only 10 days a winter when the avalanche hazard is High and the road needs to be closed for short periods. It makes no sense to spend 550 million dollars for such a limited time frame and one type of solution.

The gondola would be one the longest, most complicated and expensive ever built in the US. Do the engineers really know if it will work as designed? There is a distinct possibility it could turn into a nightmare breaking down constantly and stranding skiers in the canyon having no other way to exit the canyon. What would happen on a heavy snow day after delivering thousands of skiers to the top of LCC when it breaks down? Everyone would be stranded with no way out of the canyon and nowhere to stay.

Snow sheds need to built on Little Pine, White Pine and White Pine Fingers. These would have a far greater impact of mitigating the avalanche hazard than any gondola. Additionally, a comprehensive Remote Avalanche Control (RAC) system, Wyssen Towers and Gaz X installations need to be constructed down the entire canyon to lesson or eliminate the need for Military Weapons. RAC systems are by far more flexible, dynamic and effective when dealing with the continually changing avalanche hazard in the canyon. It allows forecasters to more precisely deliver control measures on avalanche paths when they need it. RAC systems will greatly increase the safety of the highway in winter for both the professionals doing the control work and skiers traveling up the canyon!

A far better solution to the traffic problem in the canyons would be to incentivize riding busses up the canyons during the winter and summer months. A transportation hub needs to be developed at the gravel pit close to the mouth of Big Cottonwood Canyon(BCC) with dedicated buses leaving every 15 Minutes to each one the of the four ski resorts during the winter. During the slower spring and fall slack times the additional busses could be used to enhance and improve the public transportation system in SLC and the surrounding communities. This would be a far better and more cost effective use of money than building a single use gondola for LCC.

Nearly every community and their inhabitants surrounding LCC and BCC have voiced their opposition to the gondola and would prefer a much more environmentally friendly system like buses. Building the gondola would destroy real estate values around the mouth of LCC. People rushing to the parking lot at the mouth of LCC would turn wasatch blvd. between BCC and LCC into a parking lot on snow days even worse than it is now. Please consider and approve a transportation and avalanche hazard solution that does not include a gondola up LCC canyon.

Thank you for your consideration,

ID 38637

Thank you for the opportunity to comment on the Little Cottonwood Canyon (LCC) EIS. While the gondola has been studied and ultimately recommended as the best alternative, there are many reasons that it is not an appropriate one.

Primary among them is the irreversible environmental and visual damage to the essence of LCC. I moved to Utah and to Alta specifically because of the pristine beauty and tranquility of the canyon and have lived and worked in Alta and Salt Lake City for 43 years. I'm sure I'm not alone, as the current influx of new residents and recreational enthusiasts demonstrate. I mention this because of the concern that the LCC gondola will permanently destroy the unique beauty of LCC and its appeal for both residents and visitors alike, all of whom contribute to the local economy.

The gondola, with huge towers and the noise associated with running it, will forever change the landscape and special character of the canyon and not for the better.

The gondola is extremely expensive to build and an inappropriate use of state and federal taxpayer dollars that can better be used elsewhere such as affordable housing, air quality, other mass transit projects, education, etc. Not only will Utah expend its available state and federal dollars, the project will primarily serve the interests and benefit two private companies at the expense of ordinary Utah residents.

- Relatively few Utah residents will benefit from the massive cost to build the gondola and for most people, the costs to ride it will be prohibitive. This will restrict winter access to LCC for Utahns who do not have the financial resources to get themselves, let alone their families, to this beautiful canyon to recreate.
- No one currently knows the cost of using the gondola but it may even be too much for those who are currently ski resort pass holders.
- The cost and limited nature of gondola stops will adversely affect backcountry skiers, climbers and ice climbers who may, in part, have selected their recreational pursuits as a less expensive alternative to resort skiing.
- It is improper to use taxpayer funds to create a solution that limits the ability of the public to recreate on public lands. This sets a terrible precedent for future projects that also financially restrict the public from enjoying their public lands.
- The cost of the gondola is an expensive solution for a situation that is only a problem for several days a ski season. It is a huge expense for a relatively small problem. It is supposed to help on snowy days, especially weekends, to prevent the traffic snarl or "red snake" effect. But what happens if there is lightning or considerable wind, both of which have become more common? Gondolas cannot run during those conditions. What will happen to the increased numbers of people who then cannot exit the canyon?
- Such an expensive project should benefit multiple types of users, not just skiers. This project does not even contemplate serving people who want to enjoy the canyon in the summer. It is next to impossible to carpool to hike in the summer because the current parking lots are totally full.

In general, the goal of improved transportation would provide a convenient and safe way to access LCC. However, the logistics of the proposed solution are not in the least bit convenient. There are too many steps and too much time to get to resorts. Bus service to the canyon for both residents and tourists would need to be expanded. However, bus service from downtown hotels has been cut and many neighborhoods have seen bus routes and neighborhood stops disappear. A multi-step process requiring parking a car at a lot, busing to the gondola, and then riding the gondola to the resort is a huge inconvenience. Imagine a family of 4 or 5 trying to corral their kids and all their gear into and out of 3 transportation

modes. Not to mention the purported quick timing between each of the gondola cars. It may be a novel experience to ride the gondola, but the inconvenience combined with the cost may prove it to be a singular experience.

It makes sense to support an approach that goes slowly for the foreseeable future without building this massive, expensive and unsightly gondola. It is likely that incremental approaches can provide viable solutions. Relatively small changes in recent years have provided surprisingly large positive results.

- The added lanes at Snowbird entrances and other short passing lanes have greatly decreased the down canyon backup from Snowbird to Alta and the infamous “red snake” traffic problem.
- Weekend reservations for parking at Alta have created a better driving, parking and skiing experience. That change actually prompted new skier habits and spread the up canyon drivers over more hours rather than a two hour rush to get up before parking is gone.
- Increased bus service helped to mitigate traffic but unfortunately bus routes and frequency have recently been cut or limited. Creating new parking lots in the valley such as the gravel quarry on Wasatch Boulevard are essential to encourage carpooling and riding the bus. It is one thing for the ski resorts to encourage carpooling but it is impossible to accomplish if there is nowhere down canyon to park your car.
- Other changes, such as similar parking reservations at Snowbird can benefit the traffic in the canyon. So can adding lanes in certain places.
- And most important in keeping traffic under control on snow days is to ensure that those driving up have the appropriate All Wheel Drive and snow tires to navigate the canyon road.

According to the state, an acceptable alternative is supposed to have a positive effect on tourism. However, LCC resorts have been crowded for years, especially the last few years with the increased use of the Ikon pass. The gondola is designed to bring even more people to LCC with no apparent inclination of state leaders to understand or limit the capacity of the canyon or the ski resorts. Thus building the gondola will likely not enhance the visitor experience at the resorts. Rather it may in fact be negatively impacted to the point of diminishing return. Add to that the cost and inconvenience of the proposed gondola and the destruction of the amazing beauty of LCC, the result may be that even out of state visitors who spend lots of money and who the state so desperately wants to court, may decide that their dollars are better spent elsewhere.

Let’s begin with incremental changes and see where they lead. Small changes have proved to greatly help the traffic flow in the canyon in recent years. More parking in the valley and other changes can mitigate the necessity of building a project that is not only financially costly to build but is also costly to the visitor experience and especially to the health and beauty of such a valuable resource to all of the public, not just to those who can afford it.

Thank you for your consideration.

Betsy Wolf

While I agree with many of UDOT's recommendations as set a forth in the LCC FEIS for addressing the transportation issues facing Little Cottonwood Canyon, I disagree with UDOT's selection of Gondola Alternative B as the preferred alternative. I cannot see the logic in committing to the eventual construction of the gondola and La Caille base station/parking structure unless the Enhance Bus Service alternative (which UDOT is essentially recommending in the interim for the Gondola B Alternative until funding for the gondola and base station are procured) is first implemented, fully tested, and refined as needed, in order to assess if the Enhanced Bus Service alternative is a viable solution to the traffic congestion and safety issues plaguing Wasatch Boulevard and SR 210 during the ski season. The performance and impacts of the Enhanced Bus Service Alternative would be assessed after a minimum five year period had elapsed. Only then should a decision be made on whether to proceed with the execution of the Gondola B Alternative or the Enhanced Bus Service in Peak-Period Shoulder Lane (PPSL) Alternative.

I believe that UDOT should recommend the Enhanced Bus Service as the preferred alternative for the ROD, for the following reasons:

1) This alternative has the least environmental impact to LCC and Little Cottonwood Creek, and would have minimal visual impact to the scenic views;

2) It has the lowest estimated cost of all of the primary alternatives evaluated as per the FEIS;

3) The alternative is scalable with respect to the number of buses to be operated.

4) Implementation of this alternative would not preclude the possible selection of another of the primary alternatives UDOT has identified, if the Enhanced Bus Service alternative is determined to be 1) unworkable, 2) ineffective in reaching performance goals (i.e., reducing traffic congestion, travel times, safety metrics, etc.) as set by UDOT, and/or 3) cost prohibitive during its full scale operation.

I would agree with UDOT that from an efficiency and safety perspective, the Gondola Alternative B makes the most sense for transporting skiers to Snowbird and Alta. But at what cost ? Moreover, there are other factors that need to be considered when evaluating the merits of Gondola Alternative B, among them funding sources, the need to prioritize and address other local and state issues in the face of finite state revenues, and the long term impacts of climate change on Utah's ski industry. Unfortunately, these appear to not to have been considered by UDOT in selecting its preferred alternative.

Estimated Cost and Funding Source(s)

Foremost is the price tag of the Gondola Alternative B, estimated to be between $533 and $550M in 2020 dollars. Granted, these are preliminary estimates, but the cost range is still significantly higher than that for the Enhanced Bus Service Alternative. Although the FEIS does not address any potential funding sources for the gondola, it is reasonable to assume that at least most of the cost will be borne by Utah taxpayers, assuming authorization of funds by the state legislature. Given the myriad of problems that our state faces, and the competing demands for our limited tax revenues, one can argue

that other needs (e.g., addressing water conservation, air quality, the housing shortage, education, etc.) warrant higher priority than funding a gondola that would largely benefit a relatively small and affluent segment of the population.

Potential Impacts of Climate Change on Local Ski Resorts

With respect to our continuing mega-drought, unquestionably exacerbated by global climate change, it is likely that future snow packs in the Central Wasatch Mountains will gradually diminish over the next several decades, especially if the Great Salt Lake continues to recede. As the lake shrinks, a reduction in lake effect snowfall at the higher elevations can be expected as time progresses. Significantly smaller seasonal snow packs, in conjunction with a gradual decrease in the length of the winter ski season in the future, will likely negatively impact the number of days the resorts can operate, and conversely, result in a gradual decline in the total number of ski person-days days each season. A gradual but significant decline in the number skiers and demand for this type of recreation due to shorter ski seasons could make the gondola and supporting infrastructure an expensive and shortsighted boondoggle, and negate the primary rationales for constructing the gondola. In summary, do we as a society really want to spend millions to construct a gondola in Little Cottonwood Canyon that, as climate change progresses, could very well lead to the demise of the ski industry nationwide, including Utah, and ultimately relegate the gondola to a "white elephant" status ? In my view, the scenario I have outlined here is a very real one if we do not take more robust actions to address climate change, and it represents a cogent argument for scrapping Gondola B as recommended alternative.

Sediment Loading into Little Cottonwood Creek

The FEIS summary table for the Gondola B Alternative states that water quality standards for Little Cottonwood Creek will not be exceeded as a result of implementation of this alternative. However, while exceedance of COC MCLs may not be an problem during or after construction, it seems to me excessive sediment loading, as well as pollutants associated with construction of the gondola towers and the access road(s), is likely to impact Little Cottonwood Creek during stormwater runoff, despite any BMPs implemented (Chapter 19, Section 19.2.2.5), of which none are mentioned. Consequently, I fear that UDOT is downplaying the potential for significant adverse impacts to the water quality of the creek, and the possible shutdown, albeit likely temporarily, of the Little Cottonwood water treatment plant. While the footprint for each individual gondola tower will be relatively small, the same cannot be said for the access road needed to reach many if not most of the tower site. In summary, the potential for shutdown of the treatment plant at the mouth of LLC due to excessive sediment loading or construction-related pollution is another reason I am opposed to the Gondola B Alternative at this time.

Other Thoughts on the Enhanced Bus Service Alternative:

I am generally in favor of the various components of the Enhanced Bus Service Alternative, although I would like to see eventual adoption of summer bus service, and the incorporation of bus stops at various trailheads, if this alternative is selected in the ROD. Otherwise, a large segment of the recreational community that uses LLC in the summer months or snowshoes/backcountry skis in the winter will have to use POVs to access the canyon, adding to the traffic congestion and pollution.

One element of the Enhanced Bus Service Alternative, as well as the Gondola B and Enhanced Bus Service In Peak-Period Shoulder Lane alternatives, that I believe absolutely critical to addressing the traffic issue, is the tolling/management of vehicle occupancy. Without this component any enhanced busing service is likely to fall short of expectations.

In concluding, I want to reiterate my support for the Enhanced Bus Service alternative, despite the shortcomings I perceive for this alternatives as noted above. This alternative provides sufficient flexibility and scalability, has the least environmental impact, and has the lowest estimated cost of the alternatives evaluated by UDOT. If the Enhanced Bus Service alternative fails to meet expectations over a minimum five-year operational period as per a series of performance metrics, then UDOT, with public input, should be prepared to select either the Enhanced Bus Service in Peak-Period Shoulder Lane (PPSL) or the Gondola B alternative.

Sincerely,

Richard Jirik

[redacted]

[redacted]

ID 38639

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

October 17, 2022

Re: Final Environmental Impact Statement comments

SAVE OUR CANYONS
Protecting the Wasatch Since 1972

To whom it may concern:

Please accept these comments on behalf of Save Our Canyons, an organization that has been on the front lines of protecting the Wasatch for 50 years. It is important to note that we are a local organization comprised of Utah citizens with a strong interest in protecting the wildness and beauty of the Wasatch Mountains. Our members and our broader community enjoy the Wasatch in a variety of ways: on foot, on belay, on snow, on wheels. Some of our members rarely set foot in these mountains, yet they care about their water and the wildlife that inhabit these areas and love the community and culture they inspire.

Your selection of a gondola in Little Cottonwood Canyon harms the canyon, the community, the opportunities in the canyon, and our culture of care for the Wasatch Mountains. Further, it is totally out of touch with numerous plans, studies and initiatives that have been undertaken over the years. To that end, in recent weeks numerous governments have passed joint resolutions condemning your plans for the harm you are causing not only to the canyon environs, but to the Utah taxpayer.

UDOT's selection of a Gondola 3B (which is actually Gondola 1 or Gondola 2b) is little more than a monument to the state's incompetence and ineptitude, which you identified would not work, yet selected anyway. Not only will it do nothing to solve the problems, it will make them worse, as noted by your own analysis.

Incorporation of All Prior Comments

Save Our Canyons would like to incorporate all prior comments made since the first notice in the Federal Register, inclusive of the multiple re-scoping postings on this process.

Predetermination

UDOT has not allowed an honest or fair analysis of the transportation issues that confront the region. Despite calls from local governments, stakeholders, residents and businesses, UDOT has failed to look comprehensively or allow unbiased analysis of ideas and concepts that better deal with the unique issues that confront the Wasatch Canyons and our growing region.

UDOT did listen to the governor and legislative leaders who early on instructed and urged UDOT to build a gondola on numerous occasions going back to at least 2019. UDOT is beholden to these leaders who set budgets and allocated funding to deal with the state's roadway responsibilities. This hung heavy over the entire process, where UDOT would not think outside the narrow box, to think about the origins of the trips to the canyons and innovate solutions that would remove cars from entering the roadway in the first place. UDOT knew what it wanted to do, build a gondola, it then structured the entire process around that end.

In part it makes sense that UDOT didn't earnestly lead an inquisitive process that allowed ideas to be objectively analyzed. UDOT is in the road and car business and is quite limited in its options to move people – add capacity or make operational decisions. The "logical termini" selected for this project starts at the mouth of Big Cottonwood Canyon (while ignoring the transportation needs of Big Cottonwood Canyon) and ends in Alta. These termini not only ignore contributions from Big Cottonwood bound trips, but are located in a place that requires 99% of the visitors to use an automobile to the mouth of the canyon, thereby inducing, not reducing private automobile trips. UDOT placed its parking garage for the gondola, in a place where visitors have to get through an area it states is impacted by commuter (not canyon) traffic. Were there truly a problem, you would place these parking garages outside the already failing corridor, but UDOT chose the alternative that would compound it. It makes absolutely no sense to require this traffic to compound what you are forecasting; what needs to be done is to organize these trips outside of the congested area to remove these low-occupancy vehicles from the corridor in the first place.

UDOT failed our community, our canyons, our environment and this process by not leveraging the urban environment to operate a transportation system, not centered around the private vehicle, but that gives riders an alternative to bringing their vehicles to an already congested region.

UDOT Chose Alternative It Previously Eliminated

In the FEIS, UDOT eliminated bus shuttles from a hub outside the corridor, finally recognizing that people did not want to make additional transfers. UDOT then had to increase the size of the parking structure at the gondola base, from 1500 to 2500 stalls. As such, UDOT chose an alternative that is "expanded parking and a base station at the entrance to the canyon. The gondola would stop only at Snowbird and Alta only." This alternative describes Gondola 1, which

UDOT eliminated as it did not meet the preliminary screening criteria, citing it “Does not improve mobility at entrance to canyon. Traffic still focused at canyon entrance.”

Table 2.2-4. Improve Mobility on S.R. 210 – Fort Union Boulevard to Alta Screening Results

Alternative	Alternative Description	Preliminary Screening	Level 1 Screening[a]	Level 2 Screening
Gondola (3S) Alternatives – Preliminary Screening Results				
Gondola 1 Base at entrance	This alternative would provide expanded parking and a base station at the entrance to the canyon. The gondola would stop at Snowbird and Alta only.	Does not improve mobility at entrance to canyon. Traffic still focused at canyon entrance.	–	–
Gondola 2[b] Base 1 mile away	This alternative would provide expanded parking and a base station 1 mile from the entrance to the canyon immediately south of the Wasatch Boulevard and North Little Cottonwood Road intersection on the west side of S.R. 210. The gondola would stop at Snowbird and Alta only.	Does not improve mobility on Wasatch Boulevard and is not compatible with adjacent land uses.	–	–
Gondola 3A Base at gravel pit	This alternative would provide a complete gondola alignment from the gravel pit mobility hub (on the east side of Wasatch Boulevard between 6200 South and Fort Union Boulevard) to the entrance to the canyon and continuing to the resorts. The gondola would stop at Snowbird and Alta only.	Aerial corridor is over existing homes, causing privacy concerns.	–	–
Gondola 3B Bus from gravel pit to base at entrance	This alternative would provide a bus trip from the gravel pit mobility hub to a base station at the entrance to the canyon. The gondola would stop at Snowbird and Alta only.	✓	–	–
Gondola 4A Base at 9400 South	This alternative would provide a complete gondola alignment from the 9400 South/Highland Drive mobility hub to the entrance to the canyon and continuing to the resorts. The gondola would stop at Snowbird and Alta only.	Aerial corridor is over existing homes, causing privacy concerns.	–	–
Gondola 4B Bus from 9400 South to base at entrance	This alternative would provide a bus trip from the 9400 South/Highland Drive mobility hub to a base station at the entrance to of the canyon. The gondola would stop at Snowbird and Alta only.	Mobility concerns on 9400 South. Requires extensive road modifications to 9400 South.	–	–

(*continued on next page*)

Gondola 2b was a gondola whose “expanded parking and a base station 1 mile away from the entrance to the canyon immediately south of the Wasatch Boulevard and North Little Cottonwood Road intersection on the west side of S.R. 210. The gondola would stop at Snowbird and Alta only.”

The image below shows that Gondola 2b is, in fact, the La Caille gondola without bus service, which UDOT calls a “gondola with expanded parking and a base station 1 mile away from the entrance to the canyon.” The term “entrance to the canyon” sometimes refers to the Little Cottonwood park and ride, but in other instances it refers to the La Caille option, thus it is inconsistent and confusing. In any event, it's obvious that placing a parking garage of that size, that induces traffic to the area while not taking vehicles off the roadway, is a catastrophic idea reinforced by your own screening criteria and anyone with the misfortune of being in peak traffic conditions. Adding complexity to the system does not improve traffic flow or conditions.

Image showing approximately 1 mile from the “entrance to the canyon.”

Gondola 3B, which was found to pass the screening criteria, differed from Gondola 1 and 2b with ***its inclusion of a bus that served the gondola base from mobility hubs outside the congested corridor.*** “This alternative would provide a bus trip from the gravel pit mobility hub to a base station at the entrance to the canyon. The gondola would stop at Snowbird and Alta only.”

The removal of the mobility hub and bus service makes Gondola 3B effectively Gondola 1 or 2b – or alternatives that failed UDOT’s own screening criteria found “not to improve mobility” (a key purpose of this EIS) and found “not to be compatible with adjacent land uses.” The alternative advanced from the screening process was not only mysteriously revived, but is missing the key stated attributes that distinguished it from alternatives that failed UDOT’s own screening criteria.

Thus, UDOT has selected an alternative that it had previously eliminated from analysis for not meeting its purpose and need.

UDOT's Preferred Alternative selection of a gondola is ineffective in responding to its stated purpose and need.

Inconsistencies and Inadequacies

UDOT modified its purpose and need several times throughout this EIS. So many times it seems that throughout the FEIS, it appears differently in multiple locations. This causes confusion for the reader and suggests too, that UDOT is confused by its process and unsure of what it is doing.

Purpose and needs constricts issues to winter months, yet UDOT uses year round data in many instances to make its predetermined justifications. In response to Save Our Canyons' prior comments, UDOT said that safety was not about crashes in the canyon, but about avalanches. The roadway safety sections, however, are purely about crashes in the canyon and the data is year-round and doesn't adhere to the scope which UDOT itself defined. This is important because if by UDOT's logic, crashes are not tied to the purpose and need because they are more a function of the character and attributes of the canyon, so too should avalanches in a canyon carved by avalanching and glaciation. It should be noted too, that the character of the canyon has been the dominant consideration for management of people, management of natural resources, and management of water. Are we adhering too and protecting the inherent characteristics of the canyon (we absolutely hope we are)? UDOT cannot have it both ways when it suits their preference.

The inconsistencies and inadequacies of the EIS are too voluminous to effectively list in these comments, but are as, if not more egregious, than selecting an alternative which was already eliminated from consideration in the screening process.

Evaluation of Impact of Reasonably Foreseeable, Connected Actions, Cumulative Impacts

While this EIS process has gone on, numerous conditions have changed that warrant additional consideration. One notable condition has been the implementation of reserved parking at the ski areas. This was not in existence at the beginning of the EIS process, but has been announced that any parking at resorts will require parking reservations in advance of driving in the canyon. This means that not everyone will be driving up the canyon as in years past, rather only those with parking permits will, likely having a calming effect on canyon traffic. As a matter of fact, *it is* having a measurable effect on traffic issues. In April 2022, the Alta Town planning commission discussed how the reservation system at Alta the past winter season, really helped to solve many of the issues experienced in Alta.

Additionally, the USFS recently went through a NEPA process of its own where it indicated it would charge fees at trailheads throughout the study area. This too will have an impact on who visits the area, likely having an impact on how, when and where visitors may go in the canyon. None of these considerations have been accounted for, and need to be evaluated and explored so the public can understand the impacts.

Tolling on the highways as proposed by UDOT in this EIS also needs to be considered in concert with these other pricing options, and in both canyons. If a family wants to ski up the Albion Basin road, hauling their kids in a tow behind sled as is done frequently, what fees will they incur? It seems they'd have to pay the toll for using the road, have a parking reservation, and possibly also pay a trailhead fee? What is the impact of assessing all these fees and who are you displacing? Similarly a toll would be implemented in Big Cottonwood. If someone wants to go up Guardsman Pass or Redman Campground, what fees would they have to pay? The concern is they would become prohibitive to the casual or dispersed user, yet prioritize or cater to resort patrons.

Other factors of costs that need to be considered and explored in the EIS include:

- Cost to ride a gondola?
- Will there be a cost to park at the gondola parking garage as there is to park at ski areas?
- Will people use trailheads in close proximity to tolled areas (White Pine & Willow Heights, for example) to park and ride to resorts while avoiding tolls?
- What is the impact on other users that share these corridors which are important for access to public lands and trailheads?
- Does the canyon have a visitor capacity? Are visitation projections consistent with population growth and simulated projections?
    - Ski area growth is predominantly from baby boomers, while millennials and other generations are not taking up resort skiing in the way prior generations have. With less snow & higher costs, will resort visitation grow or might it constrict over time? EIS assumes traffic is on par with population growth which seems to discount several variables, glazing over critical data points in deference to a perpetual linear growth model.

As noted in prior comments, these impacts need to be evaluated, not just for Little Cottonwood, but for Big Cottonwood and likely in Millcreek Canyon as the displacement (intended or unintended) will have impacts on areas throughout the region. Some people may simply decide not to go anywhere in the region, others will likely visit one of the other canyons and this displacement, as designed by UDOT's process, needs to consider the impacts of the displacement and offer mitigations or solutions to these intended and/or unintended consequences.

Missing the Big Picture

In not doing an adequate job in describing the impacts to other areas in our region as noted in the paragraph above, UDOT's bizarre obsession with a gondola has prevented them from understanding how this corridor is used, what it means and its importance. Not just the importance of this canyon which they are impacting, but the importance of this canyon in a regional sense.

They have acknowledged their preferred alternative will increase the number of visitors by essentially the same number of people that could ride a gondola. This means the road will continue to operate with traffic jams, there will just be a questionable number of people per day, likely limited by the number of cars that can park at the gondola base (2500 - 4000 people) while the road is backed up. It is important to note that the traffic jams generally clear once you have entered the canyon, by making people access the gondola along the same route they use to access the canyon, you've likely added 2500 cars to an already congested area. This is why adding buses from mobility hubs from outside the congested area caused by **both Big Cottonwood and Little Cottonwood** on peak ski days is necessary.

As discussed above, a major flaw of UDOT's analysis is that, pointing to no new information in justification, it adopts an alternative that it had earlier rejected —and rejected for good reason. It's obvious that adding the traffic regulation measures to allow vehicle ingress and egress to and from the gondola base facility will exacerbate traffic congestion and delays. The only way to reduce its negative impact is to provide transit to this facility, as UDOT initially proposed but now has abandoned. While busing some small portion of visitors from the base of BCC to the gondola was never going to be a real solution for LCC (much less for the broader, interrelated canyons transportation challenges), it is ironic that UDOT sought to employ buses to try to make its gondola idea work. It was a concept that we, other interested groups, and local governments believe should be taken much farther: buses, specifically electric buses, coming from many regional nodes are how you prevent private vehicles from using SR 210 in the first place.

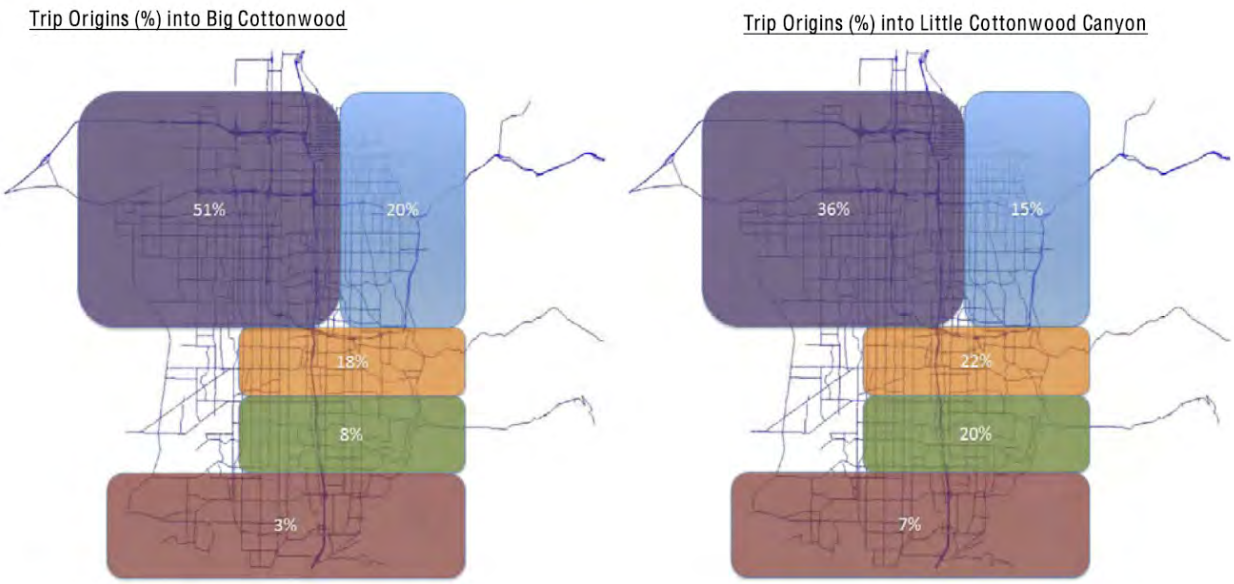
Analysis done by Mountain Accord in 2017 illustrates the need for mobility hubs throughout the valley, as being called for by Salt Lake County, Salt Lake City and other partners.

As you can see from the information below, the majority of visits to both Big and Little Cottonwood Canyons are from the northern end of the Salt Lake Valley. Getting the majority of these visitors on transit nearer their origins (homes/hotels) will remove significant traffic from the system, most notably the project area, before it even becomes a problem. Encouraging these populations to drive and park, along routes that are seeing commuter congestion according to the EIS, makes a bad situation even worse.

Adding local transit routes that serve the "orange and green" polygons of origin would be likely to remove 30% of canyon traffic as it is estimated that about 42% of visits to Little Cottonwood Canyon originate in this area. Looking at micro transit opportunities and or simply improved bus

service focused on better regional connectivity will help people get to work and to our canyons without being reliant upon a vehicle.

Figure 4: Trip Origination for Big and Little Cottonwood Canyons



Source: WSP | Parsons Brinckerhoff

Conclusion

In recent presentations from UDOT notably to Salt Lake County and Central Wasatch Commission, they have essentially said that people who do not want to pay a toll should avoid the canyons on peak days (ie. snowdays) and on holidays, regardless of whether they go to the resorts or not. How will this displacement affect canyon usage? Will it create new peaks in visitation? Holiday weekends are generally busy because school kids have this time off of school so families can spend time outdoors together? But do all these fees and costs impact the ability for families to enjoy their public lands?

In drawing its scope so narrowly, UDOT has not only screened out alternatives that could have helped solve problems, but it also demonstrated that they themselves had problems adhering to this overly narrow scope most notably by selecting an alternative it screened out at a prior phase in the process. UDOT's thousands of pages in the EIS can be summed up with a simple quote - "Lies, damn lies, and statistics." The document is simply not a reflection of reality - rather a compilation of inconsistent information that no respected analyst could attach their names to in order to support a project for three private enterprises - the La Caille base area partners, Snowbird Resort LLC, and Alta Ski Lifts Company. The public does not benefit from the direction UDOT is headed, worse, they are harmed by both the inaccurate portrayal of the situation and conditions and their preferred solution.

UDOT's selection of a gondola in Little Cottonwood Canyon is not surprising as the state has been trying to figure out how to exploit our Wasatch Canyons and aid wealthy elite skiers at the expense of the average user for decades. While they've seemingly managed to meet this unstated purpose and need, the agency has completely and totally failed in meeting its stated scope, purpose and need, which has continued to evolve constantly throughout this process. The preferred alternative hurts the canyon, hurts communities and hurts our collective opportunity to find actual solutions to the year-round issues that confront our region and our Wasatch Mountains.

Beyond what you are doing to this canyon for the addition of resort skier days, is the betrayal of trust UDOT and state leaders have instilled in their constituents. By selecting a gondola, in a configuration you've already acknowledged fails to meet your purpose and need, you've wasted time, resources, and attention for a region that needs actual solutions to the challenges they face – for people, for our environment, for our canyon and our watersheds that plays a critical role in our region.

Anything that doesn't get people to either: significantly alter the occupancy of their vehicle, or get them on a different mode of transit nearer their origins is just rearranging the furniture on the deck of the Titanic.

A gondola isn't a solution to the issues we face. It hasn't been a solution for over 50 years of seemingly perpetual analysis on behalf of the state and ski areas. The constant debates, the glitzy promotion by beneficiaries, and politicking that surround these gondola proposals will never get past the fundamental issues – it doesn't make any practical sense and it lacks the sophistication of the challenges the Wasatch is confronted with. They get more complicated with every degree our climate warms, every foot the Great Salt Lake drops and with every visitor from near or far that come to visit the wonderful Wasatch Mountains. We must rise to these challenges and solve the problems that confront us today and tomorrow – with a keen understanding of what these canyons mean, and what we want them to be for generations to come. The Salt Lake Valley is unique from other areas in the state with amazing landscapes that captivate our hearts and imaginations, having an urbanized core with accessible transit infrastructure in our cities and towns to support great outings in the wildest mountains in our region. We need to harness this to help people enjoy our canyons in a safe, responsible and watershed conscious way - regardless of destination or activity.

Carl Fisher

Executive Director
Save Our Canyons

ID 38643

To the people who would ruin Little Cottonwood Canyon:

Little Cottonwood Canyon is still my favorite place on earth.

When I was in high school in Davis County, my climbing partner and I would coerce either his older sister or my father to drive us into the canyon on Friday afternoons and come back and get us on Sunday evening. We wanted to climb. And we enjoyed being in Little Cottonwood Canyon particularly, camping in as many places as possible.

I was amazed to discover there were climbing routes established in Little Cottonwood Canyon, but the mimeograph copy showing a handful of early routes published by the Wasatch Mountain Club clearly said so. So we started attacking any route we thought we might be able to do. After three attempts we managed to thrash our way to the top of Crescent Crack, near the bottom of the canyon. The last roped pitch involves a steep, scary ramp for a beginning climber, and after I safely down climbed the slab, I anchored myself to boulders on the ledge, hundreds of feet above the trees, and stared out at the canyon. Across the valley I could see the Oquirrh Mountains, but closer, just across the canyon, were beautiful steep ridges, soaring like French Aretes, and sweeping, glacier-polished granite slabs. (which later would be a favorite place to watch Bighorns) Far up canyon I could see almost to the mountains near Alta, with what seemed to be a million steep little gullies in between, each of which I wanted to explore someday. I was a sophomore in high school when I first sat on those boulders, in 1969.

Thinking of gondolas traversing through this scene makes me quite physically ill.

We soon weaseled our way up another storied climb originally called “A Climber’s Schoolroom” by the first ascent party, now simply called Schoolroom, because it has a little bit of everything a climber eventually needs to know something about: chimneys, jam cracks, narrow ledges, friction faces and cool lieback moves. But at the end of the friction pitch which scuttles under an enormous overhanging roof, there is comfortable little ledge suitable for four, complete with

a mountain mahogany tree for an anchor. We stopped there, and I remember it clearly even now over fifty years later, to drink some water and enjoy the view. Across the canyon stood the impressive ridge named after a legendary climber and avalanche forecaster Ron Perla. From Schoolroom, Perla's Ridge is an elegant backward C, rising up and out of steep gullies on either side, slicing gracefully into the sky. We sat for at least an hour, looking at the ridge, trying to imagine where Perla would have climbed it, theorizing just how hard it looked and cogitating whether or not we could climb it. That ledge, and there would be many more airy ledges in my future, are simply great places to be. At least one ledge in Little Cottonwood even has its own name. Because it is a wonderful location to hang out and enjoy the view. I sometimes refer to staring out from belay ledges as "Canyon TV."

And we weren't the only ones. Throughout the seventies people would commonly climb up to the tops of things and have lunch. Even during high pressure systems in winter, many folks would be up there enjoying themselves. Hanging out on ledges, kicking back and looking out over the canyon. In fact, the perfect example of a less-than-perfect climb is getting to a summit obscured in clouds, ruining an otherwise stunning view. A climb just isn't complete without the view.

To say that climbers only look at the rock in front of their faces is to completely misunderstand the very nature and intention of climbing; it smacks of someone who has never been there trying to tell climbers who have just what it is like to be there: it is all pure bull. Being in the mountains or on a desert wall or pinnacle is what we like. Certainly, the challenges which many routes present is a lure, but we often find ourselves climbing easy routes we can practically do in our sleep, just so we can be up there on the canyon walls. Climbing without enjoying the view is like eating ice cream without swallowing; it's just not done. Staring out and the wonderful canyon is something climbers do on every belay stance - not just on the great ledges, every belay.

You are there, in the air, feeling solid, feeling part of the rock, looking out and peering down as if the concept of down doesn't matter at all. You have finally gotten somewhere as a climber when you can look straight down hundreds or thousands of feet and not feel the urgent potential of your own death rising in your throat; when you can do that, you have earned the view. You will never conquer the rock or the mountain, they can't be conquered, but you can certainly own the view. Breathing in the scene is really why you are up there in the first place. In particularly scary locations I frequently suggest to climbing students to look down from where they are, from the scariest place possible: to savor it. To actually enjoy the horrifying exposure which others find totally terrifying. To own the view

Imagine this view with Godzilla towers in it. Gondolas can do nothing but desecrate a scenic canyon.

And it is not just climbers. The Little Cottonwood Canyon road runs directly through the Twin Peaks Wilderness. All sorts of outdoor enthusiasts use the canyon: hikers, backpackers, snowshoers, backcountry skiers, snowboarders, fishermen, photographers, painters and family picnickers. And all of them don't go to Little Cottonwood because it is an ordinary canyon, they go because it is a singularly beautiful one. They look at it and enjoy it, and realize there is nothing else like it anywhere, which is more than enough to go back up there week after week, year after year. After an initial visit, Little Cottonwood Canyon becomes a big part of everyone's lives.

Now imagine big ugly towers sprouting like enormous metal weeds higher than the trees, at thoughtlessly regular intervals throughout the canyon, with steel cables groaning with gondolas. The concrete bases for tram towers will gouge into the canyon, forever destroying boulder fields long used and loved by climbers and hikers for decades. To say that climbers and other canyon users would not notice such a horrible intrusion into a beautiful alpine wilderness is absolutely asinine. How could they not? The gondola plan does not think of anyone but downhill skiers; it is as if all the other users of the canyon simply do not count or matter in the least.

The introduction of a gondola would not slightly change the view; it would not fade into the background of the canyon; it would not become just another part of the view: it would absolutely and irrevocably ruin the view. An ugly series of towers and cables would dominate any photo of the canyon taken from anywhere. For me, I could not abide it. I would just have to climb elsewhere and leave my favorite place on earth behind, living only within the pictures I have of it before it was desecrated.

Climbers do have a long history of loving the views they get from Little Cottonwood. For non-climbers to tell climbers what is important to them is rather like a lizard telling a fish that once they get used to being on land they won't miss the water. Those who want to build a huge gondola project haven't a clue of how climbers think and what we actually do. Perhaps a legal term will help to explain the situation: when it comes to canyon views you have no standing.

Who are these people who say climbers do not notice scenes like this? Climbers savor where they are from every belay ledge, from every little stance, because they know these moments in time will never be repeated. The view is different every time we are up there.

The general public would not be forced to fund a project which will benefit two private ski resorts and their patrons, while ignoring the needs and desires of everyone else. Resort skiers are not the dominant users of the canyon: EVERYBODY ELSE IS.

And as a final insult, the Gondola project, by their own admission, would not decrease the congestion in Little Cottonwood Canyon. It would just make the general public pay for an expensive way to get only their well-heeled clients to two ski resorts. EVERYBODY ELSE LOOSES.

Please shove your boondoggle * project off the table and keep it only in your twisted, self-serving minds. Don't ruin Canyon TV. Here is a definition of the Gondola project:

* Boondoggle: Work or activity that is wasteful or pointless but gives the appearance of having value.

Waste money or time on unnecessary or questionable projects.

A boondoggle it is.

ID 38644

COMMENTS OF MALIN MOENCH ON THE UTAH DEPARTMENT OF TRANSPORTATION'S SELECTION OF GONDOLA B AS ITS PREFERRED ALTERNATIVE TRANSIT PROJECT FOR LITTLE COTTONWOOD CANYON

The Utah Department of Transportation (UDOT) has embraced the Gondola B alternative to solving the seasonal traffic congestion problem in Little Cottonwood Canyon. The Gondola B alternative requires 22 unsightly towers, some as high as 20 stories, and connecting cables. They would be a jarring an invasion of the canyon as a cross-country, high-voltage transmission line. It would be visible from almost every location in the canyon and mar forever one of Utah's most majestic landscapes. It would have this impact not only on skiers, but on hikers, climbers, campers, photographers, and families just visiting for the day.

Because Little Cottonwood Canyon is such a narrow canyon, there would be no way for visitors to escape the constant noise and visual distraction a gondola would create. The historical significance and natural beauty of Little Cottonwood Canyon make it a place worth protecting and preserving. It was sculpted by glaciers over many thousands of years, and its spectacular beauty makes it one of the most iconic natural creations in our valley. It has been photographed, painted and admired by visitors for centuries.

UDOT has made this unfortunate choice without undertaking even a cursory investigation of the cost and benefits of tunneling, or of a mandatory low-emissions bus-only service as is currently being successfully implemented in Zion Canyon. If UDOT had made the such an investigation, it would have found that tunneling could deliver eight-fold more congestion relief at one-fourth the cost, and without disfiguring the canyon. Failing to investigate this alternative is arbitrary and capricious, and a fatal flaw in UDOT's Environmental Impact Statement.

UDOT arbitrarily dismissed tunneling as a viable alternative.

In a November, 2020, document titled: "Draft Alternatives Development and Screening Report Addendum Little Cottonwood Canyon, Environmental Impact Statement Wasatch Boulevard to Alta" UDOT rejected all tunnel alternatives for solving the seasonal traffic congestion problem in Little Cottonwood Canyon on the ground that The Boring Company hadn't already built a vehicle tunnel of the type and length required. It summarized its rejection of all tunnel alternatives this way:

> Without a fully operational tunnel system at the scale or vehicle type needed for the S.R. 210 Project, it is not possible for UDOT to verify the cost and operational characteristics of the tunnel alternative and compare the alternative against other alternatives being considered in the EIS. In addition, because The Boring Company has not drilled tunnels at the length required for Little Cottonwood Canyon in similar mountain environment, there is technical uncertainty regarding the boring technology that would be used. For these reasons, UDOT has determined that the tunnel alternative as proposed is not fully developed at a scale to be considered a reasonable alternative at this time and has eliminated the alternative from further consideration.

If the lack of existing comparable projects were valid grounds for not investigating a Little Cottonwood transit alternative, UDOT must explain why it didn't use this ground to reject consideration of the Gondola B alterative. No three-cable gondolas stretching eight miles, as proposed in Gondola B, have yet to be built anywhere in the world.

UDOT rejected all tunnel alternatives without even glancing at the available evidence. If it had, it would have discovered that there are more than a dozen tunnel drilling companies in addition to the Boring Company that do business around the world. Sixteen of them advertise their services in the current issue of Tunnel Business Magazine. UDOT implies that none of these companies has built a vehicle tunnel long enough to match the length of the Gondola B alterative. If UDOT had undertaken even a cursory review of the tunneling industry, it would have discovered that the industry has built at least 15 vehicle tunnels, and dozens more freight rail tunnels, that are eight or more miles long. https://tunnelingonline.com/.

If a vehicle tunnel were built straight from the gravel pit at the mouth of Big Cottonwood Canyon to the Alta by-pass road, it would run 8.7 miles. It would leave the natural beauty and majesty of Little Cottonwood Canyon essentially undisturbed, exiting to daylight at Snowbird and Alta at locations that are already developed with transit infrastructure.

If UDOT had made a legitimate effort to explore a tunnel alternative, it would have found that there is no need to tear up natural ground cover up and down the canyon to construct a three-cable gondola system of a length, and for a purpose, that has never been tried before. Everywhere else in the world, such gondola systems have only been built to take skiers and climbers from the base of a mountain to its peak. They have never been used as a means of making long-distance transits through mountain valleys because there are much more efficient and less expensive ways of providing such services.

In Little Cottonwood Canyon, an eight-mile three-cable gondola would require access roads big enough to accommodate heavy equipment vehicles to build and maintain platforms for 22 gondola towers, some as tall as 20-story buildings. These mega towers would have the visual impact of high-voltage transmission towers running the length of this once beautiful canyon. If UDOT had made a good faith effort to investigate a tunnel alternative, it would have discovered that there is no need to build such a monstrosity in Little Cottonwood Canyon, nor any need to bulldoze out a four-lane highway the length of the canyon, as UDOT seems to think is necessary to facilitate its Enhanced Bus System alternative.

Norway's Laerdal Tunnel is the longest vehicle tunnel in the world, running 15.23 miles. It was constructed using conventional drill and blast techniques, through a mountain range whose geological terrain is as difficult as any in the world. It is a two-lane, two-directional tunnel 30 feet in diameter. It has shoulders wide enough to allow cars to pull over at any point along their trip, and enough width to allow buses and semis to easily use the tunnel.

Traffic moves through the Laerdal Tunnel at an average speed of 60 miles per hour, thanks to its straight alignment. If replicated under Little Cottonwood Canyon, such a tunnel would cut the time needed to go from the Valley to the slopes to under 10 minutes. The Laerdal Tunnel has better air quality than the outside air, thanks to a multi-stage forced-air filtering system. It is even wired for mobile phone service. In short, the Laerdal Tunnel's functional specifications check all of the boxes that a vehicle tunnel from the Big Cottonwood gravel pit to Alta would need to check.

Connecting the Valley with the Little Cottonwood Canyon ski resorts with a tunnel like the Laerdal Tunnel is clearly technically feasible because it has been done. It is also financially feasible, much more so than the Gondola B alternative. The Laerdal Tunnel was completed in 2000 at a total project cost of $113.1 million. Adjusting this cost for inflation (using the Engineering News-Record construction cost index) indicates that the cost to build the Laerdal Tunnel today would be $226.08 million, or $14.84 million per mile. When this per-mile cost is applied to a tunnel directly connecting the Big Cottonwood gravel pit with Snowbird-Alta, the current capital cost of constructing a Little Cottonwood Tunnel would be $129 million. Adding $15 million for a tolling infrastructure and two other parking areas in the Salt Lake Valley would bring the total capital cost to $144 million. This is less than one-fourth of the cost that UDOT has estimated for the Gondola B alternative at $592 million.

But comparing the utility of a Little Cottonwood Canyon tunnel with the Gondola B alternative is where the advantage of a tunnel is truly jaw-dropping. UDOT never bothered to compare the capacity of the Gondola B alternative to ease the morning rush-hour congestion that occurs in Little Cottonwood Canyon at the height of the ski season to the capacity of a tunnel alternative built to the specifications of the Laerdal Tunnel. UDOT estimates that the Gondola B alternative would be able to carry 1,050 passengers per hour. This is a paltry one-seventh of the 7,000 per-hour passenger load experienced between 7:30 and 9:30 am in Little Cottonwood Canyon during the busiest 10-15 days of the average the ski season.

A Little Cottonwood Canyon Tunnel alternative could carry twice as many passengers per hour, assuming an hourly capacity factor of 2,000 private cars per lane

and 2 passengers per car. (The capacity factor oa 2,000 cars per lane per hour is taken from https://onlinepubs.trb.org/Onlinepubs/hrbproceedings/21/21-035.pdf.) If one 66-passenger transit bus entered the tunnel every minute, the tunnels capacity would be 3,960 per hour—four times the capacity of the Gondola B alternative. If private cars were required to carry a minimum of 4 passengers to enter the tunnel, a tunnel would carry eight times as many passengers per hour as the Gondola B alternative. This is enough to accommodate the entire 7,000-passenger-per-morning-peak-hour passenger load with room to spare.

n short, ***a Little Cottonwood Canyon Tunnel would produce from two to eight times the congestion relief of the Gondola B alternative at one-fourth the capital cost.*** Most importantly, it would do it without permanently disfiguring the majesty of Little Cottonwood Canyon.

UDOT arbitrarily dismissed The Boring Company as a candidate contractor for tunnel construction and operation.

UDOT's selection of the Gondola B alternative is defective because it arbitrarily assumes that only The Boring Company would be eligible to bid on a Little Cottonwood tunnel. It is also defective because it dismisses out of hand the idea that The Boring Company would have been eligible to submit a bid.

A lot has happened to The Boring Company since 2020 when UDOT arbitrarily decided that the Boring Company wasn't competent to bid on a prospective Little Cottonwood tunnel. Last year, it completed the first phase of its Las Vegas loop and won a contract from Clark County to complete the 29-mile, 51-stop system. This April, The Boring Company raised $675 million in equity funding bringing its market value to $5.67 billion, largely on the strength of its successful Las Vegas Loop experience and follow-on contract. The Boring Company is currently in negotiations with municipalities in Florida, Texas, and California for projects that build on its experience with the Las Vegas Loop. The primary objective of the funding round completed this past April is to hire additional engineering and technical staff and to increase its production of its

Prufrock-2 machine, which embodies breakthrough tunnel-boring technology. See https://electrek.co/2022/04/21/elon-musk-boring-company-raises-675-million-to-accelerate-tunnel-digging-under-cities/.

In a continuous process, the Profrock-2 machine assembles tunnel encapsulation walls with precast sections as it bores the hole in a continuous process. This avoids the need that conventional tunneling technology has to interrupt the boring action at frequent intervals to shore up and encapsulate the hole being dug. Using Prufrock-2 machines, The Boring Company will be able to dig a mile of single-direction, 12-foot-diameter tunnel every nine days, at an average cost of $6 million per mile. This is an unprecedentedly rapid and low cost technology. The Boring Company's Prufrock-3 machine, which is in design phase, is expected to reduce that $6 million per mile cost by another 50%. See https://www.nextbigfuture.com/2021/08/boring-tunneling-cost-predicted-to-be-4-5-million-per-mile.html.

One of the major shortcomings of the Gondola B alternative is that it is addresses our region-wide problem of seasonal congestion and overuse of our Wasatch canyons with an isolated solution for just one of those canyons. Brighton, Solitude, Park City, and Deer Valley all experience the same seasonal congestion. If UDOT were to meaningfully investigate the feasibility of The Boring Company building a single-direction, 12-foot diameter tunnel designed for a standardized electric car or bus, as it is doing for the city of Las Vegas, that investigation would reveal that a 30-mile loop could be constructed underneath the Wasatch that would serve all of the major Central Wasatch ski resorts, both back-side and front-side. A single, high-speed lane could start at the Park City resorts, loop through Deer Valley, then Brighton, Alta, Snowbird, back through Solitude and return to Park City, all in the space of 30 miles.

At $6 million per mile, such a loop would have a construction cost of $180 million. It would allow the ski industry achieve its long-sought capability to offer a skier a way to access to all of the major ski resorts of the Central Wasatch in the same day. It would obviate the need to permanently disfigure any of those canyons to ease seasonal traffic congestion. It would take advantage of existing parking and other transit infrastructure that already exists in Park City, without any need to bulldoze and pave the approaches

to Big and Little Cottonwood Canyons. Finally, it would reduce air pollution by diverting a large percentage of ski-generated traffic to zero emissions vehicles during the winter inversion season. Most importantly, it would benefit all of the Central Wasatch, not just two resorts in one canyon, and the politically connected real estate developers who are the masterminds behind the Gondola B alternative.

ID 38645

PATRICK A. SHEA, PhD

[redacted]

THE UNIVERSITY OF UTAH
SCHOOL OF BIOLOGICAL SCIENCES
Research Professor of Biology
Emeritus

[redacted]

October 17, 2022

Mr. Josh Van Jura, Project Manager

Little Cottonwood Canyon's EIA

Utah Department of Transportation (UTA)

Re: Personal and Friends of Alta (FOA) Comments for the proposed Final Environmental Impact Statement (EIS)

Dear Mr. Van Jura and other UDOT employees involved in this effort,

This letter is written both in my individual capacity and as a 42 year long legal representative of the Friends of Alta (FOA) regarding the proposed Final Environmental Impact Statement (FEIS) issued in early September with a closing date for comment of today, October 17, 2022. First, I recognize the legal gamesmanship that UDOT is attempting to achieve, that is, to avoid the error-prone process of the Legacy Highway. This desired goal thou aspired to, will not be achieved for the reasons enurated below. Before listing the various flaws and needed revisions, I want to state clearly, the entire UDOT EIS process has been corrupted by predetermination. That is, various individuals and organizations who will profit from the proposed "Preferred Alternative Gondola Plan B" (PAGP) have guided the process directly or indirectly from the onset. The actual details of this web of improper influence is not publicly known as the date of this letter, and the public's right to know weeps at this charade.

1. The PAGP is predetermined.
2. A wealthy or wanting to be wealthy interested individuals and/or organizations stand to make considerable profit by having the proposed Gondola service on or near their private property investments, which will be referrd to as the LaCamille Village (LCV).
3. The LCV is an aspirational effort to effectively create another Yellowstone Club (Yellowstone Club) like Charles Schwab and other ultrarich individuals created in

Montana, where the minimum membership entrance fee is $13 to !5 million dollars. For this sum, or larger, an individual or organization would be able to be a member of LCV which would feature private residents either in the form of individual domestic sites, condounums, time shares and/or hotels with accompanying accruements of exclusive restaurants and shopping opportunities.

4. It is not known who conceived the idea of the LCV, but three individuals have between intricately entwined in promoting, in my opinion, the concept with the prospect of significant private profit – former Sandy City Councilmen Chris McCandless, former President of the Utah Senate Wayne Neiderhauser and Kevin Gates, owner of LaCaille. These three individuals and possibly others acquired "mysteriously" the acreage of the Gondola base where it would be located, plus 23, and possibly 37.5 acres surrounding the gondola base.
5. Recently Snowbird, a private for profit ski resort, acquired the real estate where the gondola base would be located (https://mail.google.com/mail/u/1/#inbox/FMfcgzGqQwDMvGJkrXQdPRTttclVRchL?projector=1&messagePartId=0.1)
6. CW Management Corp (C is for Chris McCandless and the W is for Wayne Niderhauser) submitted a 73 page "LaCaille Center – Villages and Little Cottonwood Canyon Gondola Proposal on June 17, 2020. (https://mail.google.com/mail/u/1/#inbox/FMfcgzGqQwDMvGKDGPdgjLfRHHlVLTTl?projector=1&messagePartId=0.1)
7. Conjecture has it that the LCV would either finance the gondola or offer the State of Utah a private/public partnership to do the financing of the gondola.
8. With 2022 being an election year the known and unknown supporters are most likely making significant contributions to various state legislators who when re-elected will support the concept of the LCV in theory and with some type of State fianancing.
9. Sometime in late November just before Thanksgiving, or in late December UDOT will announce its Record of Decision (ROD) which will continue to choose the gondola.
10. When the Utah legislature convenes the latter part of Januaryl UDOT will announce there is no or little money available to fund the their designated choice – the gondola. At that point the LCV propopents will propose one of two alternatives. Either they will directly or indirectly privately finance the construction and operation of the gondola as an intrical and necessary part of the LCV project, or a private/public partnership, whereby the State will make an annual "contribution" for both the cost of construction and/or operation.

11. As a result public land owned and "managed" by the United States Forest Service will be reconnorited and used for a few ultra-rich individuals or organiztions.
12. Besides the economic discrimination paragraphs 1 -11 above demonstrate, is the clear economic discrimination not just to the "least advantaged" but to the average citizen of the Utah and the United States. Either because as a private entity the gondola may restrict access to only members of the LCV or the price for use of the gondola will be so extragant that the ordinary citizen will not be able to afford it.
13. UDOT has an opportunity to correct this charade of an EIS process by stopping the present proposed FEIS, and starting anew with the true spirit of the National Environmental Protection Act. If such a corrective action is taken the following process and procedures would be recommended:
    a. The scope of the EIS should be the Wasatch Front and Back (WFB) where more than 85% of Utah's population resides.
    b. With a projected 33% increase in population along the WFB in the next 20 years there is a need for a significant, efficient and effective public dispersed mass transit system. To do such a plan piecemeal is not only inefficient, but unnecessarily costly.
    c. Modern technology, particularly in transportation, is developing quickly. It is an unworhty concept to create a 50 year operational system that service only a few, while alternatives such as electric buses, some of which may be driven automonously, are on the near horizon. The electric bus system would ge both in the short and long term would be less costly, more passenger friendly and help our increasingly polluted environment.
14. If the EIS process is not restarted UDOT should consider in its phased approach to clearly define each phase, both as to cost and projected effect on traffic in Little Cottonwood Canyon. And, establish a defined traffic flow number that would satisfy the stated "Purpose and Need" section of the EIS with the cost of each phase, and a statement that when the defined traffic flow goal is reached the gondola proposal would not be followed or completed.

In closing, Having participated in both Mountain Accord which began in 2013 and evolved into the Central Wasatch Commission. It is extremely disappointing that the monied and influential interests have guided, directly or indirectly, UDOT's EIS process to achieve the goals described in paragraphs 1-11 above. Behind the scene deals for individuals or organizational profits are deplorable and certainly contrary to

the edicts of a free society. I hope UDOT will reconsider where they stand as of October 17, 202 and make the necessary corrections.

In Hope,

Patrick A. Shea

Cc: Mayor Jenny Wilson

Mayor Erin Mendenhall

Mayor Roger Burke

Mayor Zoltanski

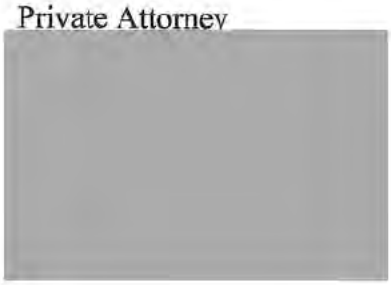
Mayor Weichers

Mayor Silverstini

David Whitakinend

Patrick A. Shea

Research Professor of Biology (Ret.)
University of Utah
&
Private Attorney



ID 38646

ALTA SKI AREA
P.O. Box 8007 • ALTA, UTAH 84092-8007
PHONE 801-359-1078 • FAX 801-799-2340
www.alta.com

October 8, 2022

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

RE: Alta Ski Area's comments regarding UDOT's selection of Gondola B as the preferred transportation alternative and the components of the phased implementation approach.

Dear UDOT EIS Team,

First and foremost, thank you for your hard work on the complex task of evaluating transportation alternatives for Little Cottonwood Canyon and selecting a preferred alternative. Alta Ski Area is supportive of your selection of Gondola B as the preferred alternative. We believe that it is the alternative that best mitigates the causes of congestion in Little Cottonwood Canyon, has the greatest chance of reducing vehicle use in the canyon, and has a reasonable environmental impact. We have concerns about some of the components of the phased implementation approach which we will address in this letter.

What are the causes of traffic congestion and delays in Little Cottonwood Canyon?

During the past 33 years I have traveled the canyon in a wide variety of conditions and experienced traffic congestion and delays ranging from minutes to 3 plus hours. Based upon my personnel experience, observations, and the analysis of a variety data points we have determined that the primary causes of traffic congestion and delays in Little Cottonwood Canyon are as follows:

Weather

The primary cause of significant vehicle congestion and traffic delays in Little Cottonwood Canyon is weather, particularly in the form of snowfall. Snowfall attracts more visitors to the canyon, often closes the mainline between Alta and Snowbird, reduces the traffic flow capacity of the road as it becomes slick, and creates traffic backups due to closures for snow removal and avalanche mitigation work. The impacts of weather upon traffic flow are magnified when vehicles lacking appropriate traction devices are in the canyon and road closures for avalanche mitigation work extend beyond estimated opening times.

ESTABLISHED 1938

Peak Period Recreational Demand

A secondary cause of significant vehicle congestion and traffic delays in Little Cottonwood Canyon occurs during peak periods when more visitors in vehicles are coming than available parking and the more than current transportation system can effectively accommodate. First come first serve parking also concentrates the vehicle traffic into short windows of time as visitors rush to secure a parking spot before the parking areas are full. Alta Ski Area's implementation of a parking reservation system for peak periods during the 21-22 ski season significantly reduced traffic congestion resulting from more people in vehicles trying to come to Alta than available parking.

Why does Alta Ski Area support Gondola B alternative as the preferred alternative?

Of the alternatives presented and analyzed by UDOT, Gondola B, is the least impacted by weather the primary cause of traffic congestion, has less environmental impact than other proposed alternatives, and provides a transportation option that is not dependent upon the road. We also believe that more of the visitors to Little Cottonwood Canyon would use a gondola than a bus solution.

What are Alta Ski Area's concerns about UDOT's phased approach?

Enhanced Bus Service

Providing a seasonal bus service to the ski areas has always been problematic for UTA from a labor standpoint. Bus drivers are hired for yearlong jobs, not seasonal jobs. The current level of bus service works because most of the paid time off for bus drivers occurs during the summer months. Significantly increasing winter bus service may result in UTA having excess drivers during the summer months with no routes to drive which would be an inefficient use of resources. The other labor issue which has reared its head this season is being able to hire enough bus drivers to provide the service and that can be problematic. We have also noted that full buses cannot maintain the speed limit traveling up canyon and reduces the capacity of the highway to move traffic, when the buses are full 60% of the riders must stand for the 50 plus minute ride, and the bus service travel time to Alta can be 3 times longer than using a personal vehicle, which is a significant impediment to using bus service. We are concerned that the bus service can be efficiently enhanced in a manner that will significantly move visitors from personal vehicles to bus service.

Tolling

We believe that tolling will produce minimal gains and it fails to effectively manage the limited supply of parking in the canyon. Tolling will not discourage people from driving a vehicle up the canyon when the parking is full. Tolling will not reduce early morning traffic congestion during peak periods when skiers rush to secure a parking spot. We are also not aware of technology that can be implemented to charge different tolls based upon vehicle occupancy without impeding the flow of traffic.

Based upon our experience this past season with a parking reservation system, it is Alta Ski Area's position that a parking reservation system is significantly more effective at reducing traffic congestion and encouraging carpooling and use of public transit than tolling. During this past season we noted the following in regard to our parking reservation system:

1. Reservations were required during peak periods. We never needed to turn any cars away on days reservations were required this past season because the parking was full. We turned hundreds of cars away on 15 days during the 20-21 ski season. Skiers did not try to come to Alta during peak periods without a reservation which reduced traffic in Little Cottonwood Canyon.
2. Reservations spread out the traffic arriving at Alta during peak periods. Without reservations our main parking lots were often full before 9:00 am during peak periods. With the implementation of reservations our main parking lots generally did not fill before noon as skiers arrived at their leisure knowing they had a parking reservation and did not need to compete for a parking spot on a first come first served basis. From our RFID ticket checking system we noted 14% fewer skiers took their first chairlift ride between 9 am and 10 am last season compared to the prior season. We also noted 21% more skiers took their first chairlift ride between 10 am and 11 am last season compared to the prior season.

3. Carpooling organically increased. The scarcity of parking and the reservation requirement resulted in more skiers carpooling. Skier visitation at Alta this past season was an all time record, up over 20% compared to the prior season while the number of cars parked was within 5% of the prior season. Bus ridership last season improved over the prior season, but it was still less than the bus ridership during 17-18, 18-19, and 19-20 ski seasons.

4. The cost of a parking reservation ($25) did not deter skiers from coming to Alta or change behavior. The reservation requirement did. When considering the total spend by skiers in a day for lift tickets, lodging, rentals, lessons and meals, the $25 parking reservation fee is quite minuscule in skiers total daily spend, especially for destination skiers. Approximately 50% of the skiers visiting Alta are destination skiers. Our position is that tolling will be a significantly less effective tool to encourage carpooling and public transit use than reservations. We are supportive of reservations over tolling as a tool to reduce traffic congestion and manage traffic in Little Cottonwood Canyon.

5. Alta Ski Area was successful in implementing a paid parking reservation system that did not slow the flow of traffic in the canyon. Given the wide variety of visitors that come to Alta each season, we are concerned that a tolling system can be implemented that will not slow the flow of traffic in the canyon and provide discounts for carpooling.

Snow Sheds

We are supportive of measures, such as snowsheds, that increase public safety, reduce the number of road closure days, and/or the length of time required for avalanche mitigation work to be completed in Little Cottonwood Canyon. Snowsheds have proven to be an effective tool in many countries in Europe. Our concern about Snowsheds revolve around their cost in relation to newer avalanche mitigation technologies that could be implemented that provide a similar or enhanced benefit.

Mobility Hubs

We agree that mobility hubs may improve the effectiveness and viability of public transit. More and closer park and ride lots would help public transit and carpooling. Immediate construction of a public transit hub at the LaCaille Gondola base station property area seems to make sense. This hub could service ski buses and could also be a ride share location until the gondola is constructed.

Roadside Parking

We support the elimination of roadside parking in Little Cottonwood Canyon, but believe it should also be extended to the ski areas on the condition that the roadside parking can be replaced by expansion of parking in existing ski area parking lots. This would improve public safety, reduce congestion, and allow roadside areas, particularly those through Snowbird to be used to alleviate traffic flow and merging issues. We request UDOT include recognition that roadside parking at the ski areas could be eliminated by allowing the ski areas to expand their current parking areas.

What does ASL recommend UDOT do in the next 2-5 years while the Gondola B alternative is designed, funded, and implemented to reduce traffic congestion in Little Cottonwood Canyon.

Restrict the use of two-wheel drive vehicles without proper traction equipment in the Canyon from November 1st through April 30th of each year. As indicated earlier in this letter, weather which results in a slick road surface is the primary cause of significant traffic congestion in Little Cottonwood Canyon. Two-wheel drive vehicles without proper traction equipment often reduce the traffic flow to 10 mph or less when the road surface becomes slick. While we can't control the weather, we can work towards only allowing vehicles with proper traction equipment in the canyon. This would need to be done in a way that does not restrict the flow of traffic at the mouth of the canyon. Approximately 45%-50% of the vehicles in our parking lots often have plates on them from other states. These visitors are staying in lodging properties in the Salt Lake Valley or Park City area and come via rental cars, usually 2-wheel drive vehicles without proper traction devices. From our perspective a cooperative program between UDOT and the ski areas that involves expansion of the current sticker program and verification of stickers once the cars are parked at the ski areas is an alternative worth exploring.

Develop a plow station in the Town of Alta

When the road begins to get slick a call is made to UDOT to send up the plows. Often by the time the plows get up the canyon the road has become snow packed and is full of vehicles trying to negotiate the slick road making it difficult to plow or salt. Having plows stationed at Alta that can quickly respond to deteriorating road conditions in a timelier manner can reduce congestions and improve public safety.

Improve the merging of traffic from Alta and Snowbird

Traffic leaving Alta is significantly impacted by the traffic parking on the roadside at Snowbird. During peak periods, over 250 cars are often parked on the roadside at Snowbird. These cars are currently allowed to make a U-turn into downhill traffic which brings the downhill flow of traffic to a stop while they make a three-point turn and merge into the down canyon traffic. The downhill traffic will be reduced to a crawl or experience gridlock until the roadside traffic at Snowbird has merged into the downhill traffic. When the mainline is closed this issue is magnified as the vehicles parked on the roadside on the bypass road are allowed to merge into the downhill traffic at multiple entry points. During peak periods when these roadside parking areas all full and the mainline is closed, traffic flow out of Alta will be reduced to gridlock or a crawl until the roadside parking has merged onto the state road.

Provide an area for vehicles to queue up when the canyon road is closed for avalanche mitigation and snow removal.

Traffic becomes congested and gridlock occurs in the neighborhoods and streets near the mouth of the canyon when the canyon is closed for early morning for snow removal and avalanche mitigation work. Vehicles full of skiers seeking first tracks and employees trying to get to work line up and wait on the streets and neighborhoods near the mouth of the canyon creating gridlock in these areas. Providing a place for vehicles to queue up and wait for the canyon to open without impeding the flow of traffic would significantly improve this situation. Use of the shoulders on 9400 South and Wasatch Boulevard, as well as the lower part of the canyon are options worth considering.

Reduce road closure times for avalanche mitigation and snow removal.

Traffic congestion exponentially expands by the minute when canyon road closures extend beyond 8:00 am. Any improvements that consistently allow opening of the canyon road before 8:00 am on days avalanche mitigation and snow removal are required will minimize this issue. We encourage UDOT to pursue use of more efficient avalanche mitigation devices such as RAC's in the lower canyon, as well as avalanche detection equipment that would allow mitigation work and results to be monitored with less daylight.

Once again, thank you for your hard work on this complex and emotionally charged issue. We agree that the Gondola B alternative is the most reliable and beneficial mode of public transit considering the complex issues of transportation in Little Cottonwood Canyon. Also, thank you for considering our concerns about some of the components in the phased approach and considering improvements that can be implemented in the short term to reduce congestion and improve public safety in the Canyon.

Our hope is that we can continue to work together on this important issue.

Sincerely,

Michael R Maughan
President and General Manager
Alta Ski Area

ID 38647

League of Unincorporated Community Councils

Big Cottonwood Community Council

GRANITE

Sandy Hills Community Council

Willow Creek Community Council

Willow Canyon Community

Date: July 27, 2022

Dear Mayor Jenny Wilson and the Salt Lake County Council,

At the last general meeting of the League of Unincorporated Community Councils (LUCC), we discussed the proposed Gondola being presented as a solution for added transportation to the Wasatch Front area of Little Cottonwood Canyon.

We are writing to inform you, the majority of LUCC members voted to "oppose" the "current" proposed Gondola as a transportation solution for added transportation to Little Cottonwood Canyon.

LUCC asks and recommends that the Salt Lake County Mayor and the Salt Lake County Council "oppose" the current proposal for the Gondola. We believe that the impacts on the canyon for this proposed Gondola would outweigh the benefits it would have on transportation.

In our discussion, residents who live in the area are not opposed to more solutions to transportation in the canyons, but they insist that those proposals should be more cost effective and better serving, both to residents and visitors. This current proposal does not solve all of the issues with ingress and egress of Little Cottonwood Canyon, nor those with Big Cottonwood Canyon's residents and visitors.

LUCC believes that there are many good proposals to the transportation problems for our Wasatch Front Canyons that would serve as better and more cost effective solutions. One of those proposals would be to bridge, or connect, the upper areas of Big Cottonwood, Little Cottonwood, and Park City Canyons. Thus, solving all three areas transportation issues, with one solution. This connection would also offer egress/access for the thousands of visitors who might be in the canyons in an emergency situation such as an avalanche, flood, fire, or extended road closure.

As LUCC, we strive to stay neutral and make decisions based on the needs of our residents, who live in those areas and whom this project would deeply impact.

Sincerely yours,

Ron Faerber, Chairman
League of Unincorporated Community Councils

CC: Governor Cox, UDOT, US Forrest Service, Local Cities, Local Towns, SLCo Planning Commission, Mountainous Planning Commission

ID 38650

CENTRAL WASATCH COMMISSION

October 17th, 2022

Mr. Josh Van Jura, Project Manager
Little Cottonwood Canyon EIS

Subject: The Central Wasatch Commission Comments for the Final EIS and Phased Alternative

Dear Mr. Van Jura and the Little Cottonwood Canyon EIS Project Team

Please accept the following document as comments from the Central Wasatch Commission regarding the Final Environmental Impact Statement and the Utah Department of Transportation's preferred phased alternative. The CWC thanks UDOT for the opportunity to provide valuable feedback for the LCCEIS process.

The CWC is an interlocal agency comprised of the local jurisdictions in an adjacent to the Central Wasatch Mountains. The CWC is charged with implementing the Mountain Accord which addresses transportation, environmental, economic, and recreation challenges. In 2021, the Central Wasatch Commission released the "Pillars for Transportation Solutions in the Central Wasatch Mountains" document, which frames transportation solutions for the Central Wasatch Mountains. The "Pillars," or values, consider visitor use capacity, watershed protection, traffic demand management and parking strategies, a year-round transit service, and integration into the broader regional transportation network, as well as the overall and long-term goal of protection of critical areas in the Central Wasatch Mountains through federal legislation, the Central Wasatch National Conservation and Recreation Area Act (CWNCRA). Since the beginning of the LCCEIS process, the CWC has actively engaged in assessing the foundational documents and reports of the EIS process and successful solutions for transportation in the Central Wasatch Mountains. Throughout that process, each Commissioner has invested heavily in studying and reviewing objectives and options regarding the complex decisions surrounding solutions to the transportation and preservation challenges facing Little Cottonwood Canyon and the Central Wasatch Mountains.

The Commissioners are unified in the opinion that "doing nothing" regarding the challenges facing the Central Wasatch Canyons is not a viable solution. The CWC has come to an agreement on a set of "pillars" that should be considered and implemented in connection with the eventual transportation solution in the Record of Decision. These broad principles are consistent with the original intent of the Mountain Accord, and we believe should be applied to whatever transportation mode is recommended in UDOT's Record of Decision. After reviewing the FEIS, the CWC has evaluated the preferred alternative through the pillar values.

Visitor Use and Capacity

The proposed phasing alternative being considered for the Record of Decision will have the potential to significantly increase the quantity of visitors accessing LCC, and the type of impacts that

increased visitation will have. The phased alternatives pose a risk of “over-use” of LCC, which could result in negative environmental, public safety and water resource consequences. Additionally, over-use could negatively impact the visitor experience for both tourists and locals who seek to enjoy recreation and nature from unmanaged crowds.

These concerns have been raised repeatedly by the public, various groups, and elected officials during the EIS process, but the limited scope of the EIS’s stated “purpose and need” has not allowed UDOT the opportunity to fully consider these issues. To appropriately address the risks, we believe a corresponding visitor use strategy needs to be identified and implemented to complement any existing management plans.

- The CWC Visitor Use Study will be completed later this year and recommend to UDOT to delay ROD until ample time has been given to UDOT to incorporate it into the EIS
- The Visitor Use study will help develop the phased approach alternative timeline, implementation, metrics of success
- FEIS notes the high likelihood of significant increased visitation
- Trailhead stops may require additional NEPA analysis and should be begin immediately

Watershed Protection

Protection of the fragile environmental conditions of the Central Wasatch Mountains is the highest priority for the communities that rely on these Mountains for watershed and water supply. Any transportation solution for LCC should minimize and mitigate negative environmental impacts, including irreversible damage to the watersheds that provide precious drinking water to more than 450,000 people in the Valley and in LCC itself.

Salt Lake City and its Department of Public Utilities are a member of the CWC and the primary watershed manager. The CWC supports the comments and recommendations from SLCDPU, which generally include:

- Inadequate modeling with the gondola with the footprint of the towers and the volume of water discharge
- Failed to properly analyze water impacts
- Removes land protections for footprint of towers, adds risk, and unintended consequences
- Concerns regarding diesel generator backups at the towers near the water source
- The proposed 2,500 stall garage may have significant impact immediately above the intake. Concerns regarding the construction of the facility as well as on-going protections and potential accidents that could impair the creek right before entering intake.

Transportation Demand Management, Parking, and Transit Strategies

The Commissioners favor the implementation of a set of traffic management strategies that address both traffic impacts on the roads accessing Big and Little Cottonwood Canyons, as well as the roads within these Canyons. In addition, consideration of expanded transit service and parking management outside of the Canyons is critical, regardless of the transportation mode selected for LCC.

Management strategies outside of the Canyons include providing parking in dispersed locations and improved transit service. The Commissioners also favor appropriate roadway improvements along Wasatch Boulevard that align with Cottonwood Heights Wasatch Blvd. Master Plan. Canyon traffic management options include variable tolling, limited access for single occupancy vehicles, carpool programs, and the reduction of on-road parking. These Canyon strategies should be utilized immediately as a "first phase" of the proposed phased alternatives, i.e., even before a long-term LCC transportation mode is designed and constructed. None of the proposed transportation alternatives in the EIS will be fully effective without corresponding traffic demand management, expanded regional parking, and transit strategies.

- Initial phased approach aligns with the values and preferences from above.
    - How will the bus approach integrate with UTA's service system?
    - How much more service will be added to the current system?
    - How will this proposed service overcome today's challenges?
- Tolling
    - Understand the need for tolling just the upper portion of the canyon on peak winter days
    - Better define pricing structure
    - How will both a tolling and parking fee impact visitation?
    - Would tolling have any impact on peak PM demand?
- Eliminating parking adjacent to ski areas
    - Will this be a phased approach as well?
    - If parking is eliminated where is that people demand going?
    - Will there be bus service that meets the demand?
- Recognizing more parking is need outside of the canyons
    - How will the flow and management of the parking structure be implemented to ensure minimal congestion on Wasatch Blvd.
    - Concerns about not fully developing gravel pit, 9400 s & highland, and connections to trax stations

Integration into the larger regional transit system

Understanding that the EIS is limited from a geographic perspective to a narrow focus on LCC and its immediate surrounding area, a broader, more comprehensive approach should be used when implementing solutions for traffic issues related to LCC. To that end, consideration should be given to the integration of any LCC-oriented system with transportation issues attendant to Big Cottonwood Canyon and the broader valley-wide transportation network. To justify the cost from a public benefit perspective, a large-scale infrastructure investment that serves a singular purpose (i.e., alleviating traffic congestion issues affecting LCC) should be accompanied by broader service and infrastructure investment in other areas of the valley.

- The FEIS fails to address how this will integrate into to broader regional transit system
- Recommend having all improved bus service start at a TRAX station
- There are now several key points in the FEIS that call for action in Big Cottonwood Canyon. This is a recognition that work needs to be done in BCC.
- CWC taking on BCCMAP work in advisement of UDOT to help move forward BCC mobility solutions
- Recognize the concerns of Cottonwood Heights Blvd.

    - Design speed and formal speed limit remain critical factors in ensuring that safety and a high quality of life are improved and maintained for all residents along the Wasatch Boulevard corridor.
    - Concerns about the 2,500-stall parking structure creating an increased direct negative impact to the city and effectively fracturing the Cottonwood Heights' community around the Wasatch Boulevard corridor. Additionally, the increased vehicles will have negative impact on air quality.
    - Additional parking stalls will lead to lower levels of vehicular service on peak ski traffic days, thereby prompting an increase in capacity on Wasatch Boulevard. The increased parking capacity then becomes a self-imposed justification to add vehicular capacity to the corridor, to which Cottonwood Heights is opposed.
    - Cottonwood Heights is concerned with the removal of existing mature vegetation along the corridor for the purpose of installing sound walls or adding vehicular roadway capacity. The city recommends that UDOT avoid disturbing healthy, mature vegetation to the greatest extent possible. If removal is found to be unavoidable, the city recommends that UDOT utilize a certified arborist to analyze any tree that may require removal. Instead of removal, the city recommends that UDOT relocate any healthy mature trees to a nearby location along the corridor
- Recognize key points from Sandy and Alta

Year-round transit service

The Commissioners consider year-round transit service to destinations in the Canyons a priority, including dispersed recreational opportunities, and other dispersed recreational opportunities in the surrounding areas (such as areas along the foothills). The existing LCC EIS only considers winter, peak transit service.

- The FEIS fails to recognize the need and demand for year-round transit service
- If considerable amount of resources are going into buses over the next few years, the service provider should be able to use those resources during the summer as well. The buses purchased to increase service during the winter season should also be used throughout the year.
- Recognize that gondola B does evaluate summer usage, but the forecasted usage is extremely limited
- Why was not a similar evaluation done for year-round bus service
- How can the proposed trail head parking improvements accommodate future multi-modal trips (running, bikes, transit, etc.)

Long-term protection of critical areas through federal legislation

Transportation improvements for LCC should be coupled with improved land and natural resource protection. The ultimate transportation solution should be conditioned upon the passage of federal legislation (the Central Wasatch National Conservation and Recreation Area Act). This coupling of federal legislation to transportation is necessary given the delicate balance that was central to the Mountain Accord agreement, based on four principal tenets: transportation, economy, recreation, and environment.

- Recently, the CWC released its Environmental Dashboard which monitors five main elements of the Central Wasatch. This tool, meant to be used by the public, for subject area experts, educators, press, and policymakers, will be helpful in setting both metrics of success and monitoring conditions during phased implementation.
- The time may be ripe to move the proposed CWNCRA forward as transportation solutions are being finalized.
- Language in the bill is flexible enough to accommodate UDOT's phased approach
- Would any change in land-use, management plans, land designations during bus phasing have an impact on future high-capacity transit options?

In addition to the evaluation of the FEIS through the Pillars lens, the CWC has the following recommendations:

- A complete and thorough action plan that gives the public a timeline of implementation
- A collaborative effort to define what success looks like, mutually agreeing on successful metrics and evaluation measures throughout the phased implementation
- A detailed plan of how the Cottonwood Canyons Transportation Investment Fund will be used to implement the phased approach alternative
- Please provide an updated cost estimate in current year dollars
- Tolling issues regarding single occupancy vehicles (residents, delivery trucks, emergency vehicles, utilities vehicles) still being charged. The
- Is there a preference for the service provider (UTA, UDOT, outside party)? Is there support from public service provider?
- Please further describe how the gondola alternative is "scalable." How/where will cabins be stored?
- The decision to move forward with the gondola an option should not be a funding-based decision but a metrics, data, and level of service decision. Consider using the 30% reduction of vehicles immediately and perhaps use that as the near-term metric.
- In an era of shrinking water supplies the Central Wasatch provides an invaluable water resource, not only in drinking water but also as tributaries to the Great Salt Lake. Protecting watershed and water supplies in the Central Wasatch go hand in hand with GSL protections.

Individual jurisdictions, that comprise of the CWC, have provided their own comments on FEIS.

The CWC thanks UDOT for the opportunity to review and comment on the FEIS materials, report, and the proposed phased alternative. Without a doubt, the UDOT LCCEIS team has put in a tremendous amount of thought and effort to try and address mobility issues in Little Cottonwood Canyon. There are several key values from the CWC's Pillars document that are not addressed in the FEIS. Additionally, several CWC member jurisdictions have concerns regarding watershed protection and roadway design. It is our hope that these recommendations, and those of the CWC member jurisdictions, are considered, studied, and incorporated into the Record of Decision. The CWC remains a committed partner, willing to collaborate with UDOT and stakeholders to find the best solutions for the Central Wasatch.

Sincerely,

Chris Robinson, CWC Chair
Summit County Council

Erin Mendenhall, CWC Co-chair
Salt Lake City, Mayor

Jeff Silvestrini, CWC Treasurer
Millcreek City, Mayor

Dan Knopp, Commissioner
Town of Brighton, Mayor

Monica Zoltanksi, Commissioner
Sandy City, Mayor

Mike Weichers, Commissioner
Cottonwood Heights, Mayor

Nan Worrel, Commissioner
Park City, Mayor

Roger Bourke, Commissioner
Town of Alta, Mayor

ID 38686

October 17, 2022

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

Re: Final Little Cottonwood Canyon Environmental Impact Statement: S.R. 210 from Wasatch Blvd through the Town of Alta

Dear UDOT Project Team:

The following letter provides comments from the Salt Lake County Mayor's Office to the Utah Department of Transportation (UDOT) on the Little Cottonwood Canyon Environmental Impact Statement (EIS) S.R. 210 | Wasatch Blvd to Alta. Salt Lake County remains grateful for the opportunity to act as a Participating Agency in connection with this critically important endeavor.

Please note that the issues outlined below represent my position as the Chief Executive official of Salt Lake County, following years of engagement on this issue, as well the position of a majority of the Salt Lake County Council, the members of which have added their signatures to this comment letter. In addition, the Salt Lake County Council and I adopted a Joint Resolution in support of various issues addressed in this comment letter (see ***Attachment A***). This letter, together with the Joint Resolution, demonstrates that Salt Lake County, as a governmental body, has significant concerns with the recommendations made by UDOT in its Final Environmental Impact Statement issued on August 31, 2022 (Final EIS).

Summary

Overarching concerns with UDOT's Preferred Alternative Recommendation: Gondola B (Base Station at La Caille) ("Gondola B"), with a phased approach implementation.

We appreciate UDOT recognizing the value of a "phased implementation approach" in addressing the traffic problems in and around Little Cottonwood Canyon (LCC), and we agree that Enhanced Bus Service (with no canyon road widening) should be an aspect of that strategy. We disagree, however, with the conclusion that the phased approach is merely an *initial phase* before implementing the Gondola B option. Rather, we believe that UDOT should not recommend Gondola B as the preferred alternative in the Record of Decision (ROD). We recommend an expanded version of the phased approach (which we otherwise refer to as the "Common-Sense Solutions" approach) as the final preferred alternative.

The Common-Sense Solutions approach entails many of the phased approach elements included in the Final EIS (such as enhanced busing, tolling infrastructure, trailhead parking, limitations on roadside parking, etc.). However, the Common-Sense Solutions approach expands upon the phased approach; it also includes additional traffic congestion mitigation techniques, such as parking management strategies, multi-passenger occupancy incentives, traction device requirements and enhanced enforcement. When implemented, the Common-Sense Solutions approach will adequately address the "*safety, reliability and mobility*" concerns identified in the EIS process, while preserving existing recreational opportunities and the magnificent visual experience of LCC, all at a significantly lower initial capital cost.

Although many aspects of the Common-Sense Solutions approach are not new, these solutions have never been implemented in a *comprehensive and coordinated* manner — and have never been backed with adequate funding. Perhaps some aspects of the approach have been tried in a piecemeal fashion, but what we are calling for now is an investment in *a strategically, integrated system*. This approach will require broad, continued collaboration between various stakeholders, including UDOT, Salt Lake County, the U.S. Forest Service, Utah Transit Authority (UTA), private landowners, local municipalities, and police agencies (such as the Unified Police Department, the Utah Highway Patrol and Sandy and Cottonwood Heights law enforcement agencies). This coordinated effort can (and should) start immediately following the issuance of the ROD (and appropriation of funding). There will be no need to wait. The approach will also have the added advantage of occurring simultaneously with the ongoing canyon "visitor capacity" assessment.

A Common-Sense Solutions approach allows us to move forward with solutions *and* gives us the flexibility to see what works, allowing for a change in course if circumstances warrant. For example, bus inventory can be "scaled up" as demand increases; conversely, plans to expand the fleet based on projections can be downsized if the projections turn out to be inaccurate. In addition, various aspects of the Common-Sense Solutions can be implemented simultaneously or "stacked" within a relatively short time frame. Think of it as the pursuit of a combination of strategies (such as enhanced busing, tolling, micro-transit options, expanded parking reservations, etc.) that allows for levers to be pulled (or adjusted) as impacts are measured, ultimately this will result in a more informed and potentially less expensive solution. The Gondola B option fails to provide that opportunity for long-term flexibility[1]. Once the "shovels are in the dirt" for the gondola, any realistic opportunity to "shift gears" and adopt another major system will have passed.

The Common-Sense Solutions approach is a highly judicious response in that it recognizes that there are hundreds of unknown variables at issue with a project of this complicated scope and long-term nature. Taking an appropriate amount of time to invest in *pragmatic and adaptable* solutions that offer the ability to pivot is the *smarter,* more fiscally prudent approach for a 50+year highly complex infrastructure project. Put simply, our community should not commit to a large-scale, permanent, visually degrading, costly capital project like Gondola B before we understand the actual effects of these more practical, flexible, and less costly solutions.

Framework for Common-Sense Solutions Approach

The Common-Sense Solutions approach provides an opportunity to measure the effectiveness of a variety of initial techniques over a three-five-year period based on performance metrics. If sufficient gains have not been made during that time, then a decision can be made as to the next steps, including consideration of whether a new EIS or supplemental EIS process is appropriate.

[1] We note that some commentors have objected to the use of the word flexible in reference to the adaptability of the Common-Sense Solutions approach. To be clear, our use of the term flexible is intended to mean flexibility over the *life of the system*, not necessarily from a day-to-day operational perspective.

Phased Approach/Common-Sense Solutions Investments & Techniques

- ✓ Investment in the Enhanced Bus Alternative as described in the Final EIS, with electric bus technology.
- ✓ Construction of mobility hubs at the Gravel Pit and 9400 South/Highland Drive locations[2].
- ✓ In addition to tolling infrastructure, other travel demand management strategies, including vehicle occupancy restrictions during peak travel times, resort parking reservations, and enhanced smartphone app technologies to assist travelers in mode choices and parking availability[3].
- ✓ Multi-passenger vehicle incentives such as micro-transit, carpooling, and rideshare programs.
- ✓ Increased enforcement of UDOT's Traction Law, together with expanded hours of traction device inspection operations.
- ✓ Increased canyon roadside parking fees. Supplemented with increased parking violation enforcement, November–April on peak days/at peak hours: Friday, Saturday, Sunday, and Holidays from 5–10 am; 3–6 pm; 9–10 pm (to prevent overnight parking).[4]
- ✓ Other elements already contemplated by the Final EIS, such as trailhead parking, on-street parking enforcement measures, and noise walls.

Estimated Costs of the Common-Sense Solutions/Potential Funding Opportunities

- Estimated Costs
  - See ***Attachment B*** for Preliminary Cost Estimates of the Common-Sense Solutions Approach.

[2] The Final EIS eliminated the Gravel Pit and 9400 S/Highland Drive mobility hubs when it increased the gondola base station parking garage to 2,500 spaces. We recommend adding those mobility hubs back into the preferred alternative, as well as considering (over time) adding a set of micro-hubs scattered throughout the valley. This system of mobility hubs could seamlessly integrate different modes of transportation to maximize connectivity and access for transit riders. The hubs would be amenity rich and focused on "place making." For example, they might include storage lockers, bicycle parking and repair facilities, wi-fi service, retail, and restaurants/cafes to create a robust array of options to incentivize transit ridership.

[3] We acknowledge that some of these strategies already exist (e.g., UDOT's smart app), but the *totality* of the strategies have never before been *collectively* tested, and, with additional funding, they could be vastly improved upon. Even a small portion of the half a billion dollars contemplated by the Final EIS could dramatically enhance some of these tools that are already being utilized, like UDOT's app.

[4] Salt Lake County is currently in the preliminary stage of considering an amendment to a canyon roadside parking ordinance (in unincorporated areas) that includes the possibility of increasing street parking violation fees with enhanced violation enforcement on peak days, during peak hours.

- Potential Funding Opportunities

    - We have explored potential funding sources for the Common-Sense Solutions approach and have identified numerous potential opportunities through the "Bipartisan Infrastructure Law" as well as funding at the national, state, and local level. For example, the cost of electric buses and charging infrastructure could be eligible for the "Buses and Bus Facilities" program or the "Low or No Emissions Grant" program," and the cost of the enhanced smartphone app technology could be eligible for the "Strengthening Mobility and Revolutionizing Transportation (SMART)" program or the "Advanced Transportation Technology and Innovation (ATTAIN)" program.

    - In addition to these formula and competitive funding opportunities from federal programs, there is also the potential for legislative action at the state level through the Transportation Investment Fund (TIF), the Transit Transportation Investment Fund (TTIF), or separate appropriation identified for a specific funding need.

    - Local funding opportunities could also potentially come from the County option sales and use tax for highways and public transit revenue or the County's ongoing investment in local law enforcement efforts. There is also potential revenue available through competitive grants that Wasatch Front Regional Council administers such as the Surface Transportation Program (STP), Congestion Mitigation Air Quality (CMAQ) Program and the new Carbon Reduction Program (CRP).

    - These are merely a handful of examples of various potential funding opportunities for the Common-Sense Solutions approach.

<u>Demonstrable Success</u>

The potential success of the Common-Sense Solutions approach isn't theoretical. Some benefits of the approach are already underway. For example:

- Alta Ski Area's parking reservation system during the 2021-2022 ski season reduced traffic congestion in LCC without a corresponding decrease in skiers. According to Alta's General Manager, the Alta parking reservation system experience was "amazing" in that it: "(1) spread out the traffic flow during the morning hours, (2) reduced the number of vehicles coming to Alta on weekends and holidays, (3) reduced the early morning queuing at the canyon mouth on road closure days, (4) increased carpooling, (5) improved the parking experience at Alta, and (6) improved the skier experience."[5]

- Wasatch Backcountry Alliance conducted a highly successful micro-transit van program during the 2021-2022 season that shuttled dozens of skiers to and from Alta. That program has the potential to scale up even further, especially with additional coordination and funding.

Some commentators suggest that these strategies have already been tried and proven ineffective. We beg to differ. First, many of the strategies have not yet been tested, such as tolling, mobility hubs,

[5] Email from Mike Maughan, Alta General Manager, dated October 4, 2022. Note: It is also our understanding that Sundance Resort operates a successful parking fee program.

vehicle occupancy restrictions during peak travel times, carpooling/ride share programs, and enhanced enforcement/expansion of traction device requirements. Second, although some measures have been explored (such as busing up the canyon), our community has never invested the amount of funding that is now being considered into a new fleet of "better buses," i.e., buses that are sustainable, more comfortable, reliable, quieter and get riders to destinations more quickly. As noted above, some measures have been tried and have demonstrated success even though they are still in an exploratory phase. The Alta Resort parking experiment demonstrated tremendous success, and an adequately funded and coordinated micro transit program could prove to be extraordinarily impactful. The key to the Common-Sense Solutions is the idea that we move forward now with a *collection of pragmatic strategies*, measure what works and adjust accordingly. We are confident that the *cumulative* effect of these strategies will solve the underlying issue without the need to commit to an immovable, irreversible massive infrastructure project.

Fundamental Issues with the Final EIS

Before addressing some of our specific concerns with the Gondola B alternative, we would like to share our thoughts on a broader issue, namely that the EIS process suffered from a fundamental flaw given the limited nature of the stated "*Purpose and Need."* Although we sincerely appreciate the tremendous efforts made by UDOT's team throughout the LCC EIS process and we continue to hold each member of the team in high regard, we have concluded that the EIS process was hampered from an early stage in that the stated project purpose — defined as roadway "*safety, reliability, and mobility*" — was overly narrow. We share the opinion of Salt Lake City Public Utilities (SLCPU) and others that important topics, such as watershed impacts, general environmental concerns and a larger geographical scope of the project area, should have been included in the Purpose and Need.[6] The fact that UDOT so heavily highlighted the road "reliability" factor in its "Final EIS Alternatives Summary" underscores how UDOT prioritized issues related to road efficiency at the expense of other more compelling environmental and social justice concerns.

This limited scope was inappropriate given the unique nature of the road, and surrounding land, at issue. The project in the LCC EIS isn't a routine transportation project. The road that travels through LCC (S.R. 210) is no ordinary road. It runs through a unique physical environment, adjacent to a critical watershed, and it provides access to cherished recreational resources. We believe that the fundamental essence — or "spirit" — of the NEPA process that requires consideration of environmental impacts was overshadowed by the desire to obtain a "free flow of traffic." The result was a failure to appropriately consider the inherent values that LCC represents to our community.

Even if one concedes that the project purpose was adequately scoped, we question whether UDOT effectively considered certain "indirect" and "cumulative" impacts of the Gondola B (as called for in the NEPA process). Examples of such impacts include the topic of "visitor capacity" and issues related to a question of "community fairness." On this latter issue, we remain deeply troubled with the idea that public funds (in the amount contemplated) would be used to address a traffic congestion issue for a highly narrow population when the congestion at issue only occurs roughly 15-20 days per year, and (even per conservative estimates) will only reach a maximum of 50 days per year of congestion impact (50 years in the future). There are *many* transportation corridors throughout Salt Lake County that suffer from traffic congestion, 365 days a year. We believe a legitimate question exists as to why a

[6] It is our understanding that Salt Lake City Public Utilities, a Cooperating Agency, raised these concerns during the project purpose scoping process, as have hundreds of public comments.

desire to make it more convenient for visitors to get to two private ski resorts in a single canyon takes precedence over the needs of other residents of Salt Lake County to get to and from work and other destinations.[7]

Specific Concerns with Gondola B Alternative

Issue: Advancements in Electric Bus Technology

We believe that UDOT should have more thoroughly assessed the viability of electric bus use in LCC during the EIS process. We acknowledge that UDOT ultimately concluded that the Enhanced Bus alternative was more environmentally beneficial than the Gondola B alternative regarding overall emission reductions and air quality (when considered from a statewide perspective). We continue to assert, however, that the omission of a robust consideration of electric buses in the EIS process was a mistake.

UDOT made the following statements regarding electric buses: "*Because electric bus technology is still evolving, electric buses were eliminated from consideration…*"[8] and "*[t]he reason electric buses were not included in the analysis was not to make one alternative look better but rather to give UDOT the option to use diesel buses if necessary. If UDOT evaluated electric buses only, then there would be no option to use diesel buses.*"[9] That logic explains why diesel buses were *included* in the analysis at the outset of the EIS process, but it does not adequately explain why electric buses *were eliminated from consideration, or* at least *not fully considered*, particularly when it became clear over time that electric buses were almost assuredly viable for LCC.

Admittedly, when UDOT began the EIS process, electric bus technology was just beginning to be introduced into selected markets, including Park City. At that time, although electric bus models were technically "market ready," they presented various mechanical and maintenance challenges, as most new technologies do. UDOT noted such when it stated that "*…electric bus batteries currently have both limited range and performance issues on steep grades."*[10] Over time, however, the situation dramatically changed.

In 2022, newer generation buses are being introduced into fleets across the Intermountain West. These buses are more efficient, have longer battery life, and are more structurally sound to handle the rigors of full-time bus fleet usage. In addition, a Proterra electric bus has been specifically tested in LCC and has proven it can handle multiple laps in cold weather conditions on one battery charge.[11] Based on those factors, we believe the current generation of electric buses can handle LCC in all weather conditions, subject to some limited issues that are not insurmountable. It should also be noted that an electric bus option will have a lifetime cost that is either competitive (or even possibly less expensive)

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[7] We also question what other ski resorts in Utah think about the idea of a high cost, publicly funded transportation system that only benefits their competitors' resorts.
[8] Chapter 2.2.2.2 Page 44 of Final EIS (Preliminary Alternatives Evaluation-Transit Alternatives)
[9] Chapter 32.2.9DD Pages 32-126 of the Final EIS (Basis for Identifying the Preferred Alternatives)
[10] Chapter 2.2.2.2 Page 44 of Final EIS (Preliminary Alternatives Evaluation-Transit Alternatives)
[11] In a test conducted in 2020, Proterra found that their ZX5 MAX electric bus in cold weather conditions (21 F) was able to complete 8 laps up and down the canyon on one full battery charge. UDOT LCC (Proterra) High Fidelity Simulation Results

than its diesel counterpart[12]. Lastly, we do not see any issues with the process of heating electric buses. Diesel heaters for electric buses are a low-cost option that would have de minimis emission impacts and would likely only be used in the harshest of weather conditions.[13]

Salt Lake County has carefully evaluated the viability of electric bus technology and has concluded that it is ready for use (or, at a minimum, close to ready for use) in LCC in all weather conditions. We acknowledge that UDOT still has reservations, which is why we call upon UDOT to create a set of testing metrics and performance parameters that electric buses should meet. UDOT could then invite private electric bus companies to participate in a series of tests to determine whether electric buses are, in fact, viable in LCC. This can all be done during this upcoming winter season, prior to the issuance of the ROD. Once it is confirmed that electric buses are viable, UDOT can engage in an updated cost comparison. As noted above, life cycle costs for the bus option could be lower with an electric bus model[14].

We note that NEPA law calls for a supplemental EIS in the event of "significant new circumstances or information relevant to environmental concerns and bearing on the proposed action."[15] We question whether the advancement in electric bus technology during the four-year time frame from when the EIS process started to today, and the failure of UDOT to more fully explore that new technology, warrants the need for a supplemental EIS.

The future use of electric buses (or other sustainable technology) throughout all of Salt Lake County has the potential to make a dramatic impact on air quality for Salt Lake County residents now and for future generations. A NEPA EIS process is called for under federal law when a "*proposed major federal action is determined to significantly affect the quality of the human environment*."[16] NEPA requires that the lead agency consider a reasonable range of alternatives that can accomplish the purpose and need of the proposed action.[17] In our opinion, UDOT's failure to more thoroughly study electric bus technology during the EIS process was a significant omission in this regard.

Issue: Environmental Justice and Equitable Access

We also have concerns with UDOT's environmental justice analysis in the Final EIS, particularly how it relates to the question of social equity and access. One of the guiding principles for including an environmental justice component into a NEPA study is to "*recognize interrelated cultural, social,*

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[12] Electric buses currently have a larger upfront capital investment. On a levelized lifetime cost, however, electric buses are cost competitive, if not the less expensive option on account of maintenance and fuel costs. Electric buses have fewer moving parts than traditional diesel buses, leading to less maintenance needs. For example, maintenance costs for electric buses are estimated to be $0.55 per mile compared with $1.53 for a diesel fleet. In addition, the fuel efficiency of electric fleets is estimated to be 16.5 miles per gallon equivalent compared with 3.8 miles per gallon for a diesel fleet, and the fuel per mile cost of electric buses is estimated to be $0.28 compared with $0.59 for diesel. See: Electric Buses in America (Lessons from Clean Cities Pioneering Clean Transportation)

[13] Emissions from diesel heaters are relatively minimal. 4 liters of diesel can heat an electric bus for 100 km and will emit 105 kg of carbon. https://www.nrel.gov/docs/fy21osti/76932.pdf (Page 40).
https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references

[14] In addition, we question some of the conclusions UDOT made in its assessments regarding vehicle emissions. We acknowledge that UDOT calculated a total emission savings of 640 tons of CO2 from the use of electric buses versus diesel buses. Our measurements, however, suggest those predicted savings to be much higher. We encourage UDOT to work with CO2 emission calculation experts to reexamine their estimates.

[15] United States Environmental Protection Agency website

[16] See link.

[17] United States Environmental Protection Agency website

occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed action."[18] UDOT defined the EIS's "environmental justice impact analysis area" as "*the area within 0.25 mile of S.R. 210 from Fort Union Boulevard to the town of Alta and includes the proposed mobility hubs at the gravel pit and the park-and-ride lot at 9400 South and Highland Drive*."[19] UDOT explained that it selected this geographical scope because its "traffic evaluation" indicated that the area "… *would likely experience most of the project-related impacts from construction and changes in traffic patterns and access.*"[20] As with the scope of the "Purpose and Need," we find this definition too narrow.

With respect to a more routine transportation project, perhaps limiting the "impact analysis area" to the immediate vicinity of the applicable corridor makes sense. But, as noted above, S.R. 210 is not your average garden variety road. It travels through an extraordinary landscape that offers beloved recreational opportunities for all Salt Lake County residents, not merely the residents who live within a quarter of a mile of the corridor. In fact, the geographic area that is within proximity to the project area tends to be more affluent than other areas within Salt Lake County. The residents that live in this area have an important voice in the EIS assessment. They are, however, not the only populations affected by the Final EIS decision.

We believe everyone should have access to public lands, regardless of income or zip code. The preferred alternative recommended by UDOT could create a situation where low-income (and even middle-income) families could be precluded from recreating in LCC above the area where the tolling starts unless they are willing to pay for the (currently undisclosed) cost of the gondola ride and base parking garage fees[21]. According to statements by UDOT representatives, the toll is currently predicted to cost between $25–$30 per vehicle. The Final EIS acknowledges this by observing that one solution for cost-conscious populations is to "*wait to recreate after peak hours*."[22] We don't think access to Utah's "Greatest Snow on Earth" should be limited to only individuals and families that have the financial means to enjoy a morning of winter recreation. Public lands should have equitable access for all, not just the affluent among us. The fact that the preferred solution will be a publicly funded project only underscores this point. The Gondola B alternative does not serve the broad, diverse public who will fund it. Rather, it prioritizes ski resorts, wealthy residents, and tourists.

Issue: Impact on Watershed in Little Cottonwood Canyon

Throughout the EIS process, SLCPU expressed significant concerns regarding risks to the watershed posed by the construction of the Gondola B alternative. We recognize that staff members of SLCPU are among the foremost experts on water quality issues related to the Central Wasatch. We continue to defer to their expert opinion regarding the need to protect the health of the watershed that serves over 450,000 residents of the Salt Lake Valley.

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[18] See Community Guide to Environmental Justice and NEPA Methods Project of the Federal Interagency Working Group on Environmental Justice & NEPA Committee (page 4).

[19] Chapter 5, Environmental Justice of the EIS. Introduction page 5-1

[20] Chapter 5, Environmental Justice, Section 5.1 Introduction page 5-1

[21] We note that UTA, WFRC, UDOT, and MAG are currently conducting a Regional Zero-Fare Study to evaluate the potential for a systemwide fare-free alternatives on UTA's public transit services. After completing the study, if UTA were to implement fare-free public transit options, there would be no out-of-pocket expense for riders taking buses to the desired resort.

[22] Chapter 5 Environmental Justice, Section 5.4.3.2.2 Impacts from Tolling on Lower-canyon Users, page 5-12

According to SLCPU, the construction of the Gondola B towers includes excavation, grading, blasting, and other construction activities, all of which pose a risk of pollutants entering nearby waterways used for public drinking water. In addition, the operation of the Little Cottonwood Canyon Treatment Plant could be compromised on account of pollutants entering the plant from these same construction activities.

SLCPU has also raised a concern regarding the general risks posed by the increase of unmanaged crowds on account of a high-capacity system traveling within a second (or "additive") transportation corridor. Our understanding is that SLCPU considers the risk of overuse as one of the most significant threats to the long-term protection of the canyon's watershed, and we believe UDOT should have more fully examined this concern as an "indirect" impact of the Gondola B alternative.

Issue: Increased traffic congestion on North Little Cottonwood Road and Wasatch Blvd as motorists enter the 2,500-parking stall garage that is part of Gondola B

We have concerns that 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 the Unincorporated Salt Lake County areas at the base of the canyon. By putting all parking for the Gondola B alternative at the base station, as well as increasing the number of parking stalls from 1,500 to 2,500, there is a significant risk that traffic volume will exceed roadway capacity and congestion will result on North Little Cottonwood Road and Wasatch Blvd during peak travel hours.[23]

Issue: Visual Impact of Gondola B Alternative

The single most problematic aspect of the Gondola B alternative is its devastating and irreversible impact on LCC's world-renowned views. We have spoken at length about this concern in our comment letter to the prior draft LCC EIS, but we would be remiss to not highlight it again. We will state simply that the majesty of LCC should not be permanently marred by 22 gondola towers (with an additional 4 angle/base stations) scattered along the 8-mile stretch of the treasured, scenic by-way of Little Cottonwood Canyon Road. At least one of those towers will measure at 262 feet[24]. Even UDOT acknowledged the enormity of this visual impact. We believe UDO should give this consideration greater weight in its final preferred alternative recommendation. [25]

Comments on Sub-Alternatives

Please see ***Attachment C*** for our comments on the Sub-Alternatives.

[23] We also question how UDOT intends to acquire the land needed for the new access road. Will that require an eminent domain proceeding?

[24] As a point of reference, a 262 foot structure is the equivalent of a roughly 19 story in height commercial building (assuming an average measurement of 14 feet per floor). As another point of reference, the Statue of Liberty stands at a total of 305 feet (with the statue at 151 feet and the pedestal base at 154 feet).

[25] We also note that the Federal Aviation Administration may require flashing lights on some of the towers, particularly any tower reaching a height of over 200 feet.

Conclusion

The LCC EIS study first began over four years ago. A tremendous amount of time and energy has been committed to this effort. We remain deeply grateful to UDOT's staff and all stakeholders, partners, and members of the public who have worked tirelessly to engage in the process and provide valuable input.

As lengthy of a time as four years may seem, however, let's not forget that it took millennia for mother nature and glaciers to carve the unique and breathtaking landscape of LCC. Given this historical fact, we believe it makes sense to spend a bit more time exploring the efficacy of less invasive and more practical solutions before we permanently rip up our cherished canyon. We'd rather see common-sense solutions change driving habits than change LCC's natural landscape. Additional time will also allow us to test, measure, and, ultimately, make more informed decisions based on fewer hypotheticals.

Above all, the social equity issues triggered by the Gondola B alternative cannot be easily dismissed. We do not believe that a legitimate justification can be made for spending $550 million of hard-earned taxpayer dollars (pre-inflation, no less) on a transportation option that primarily benefits visitors to two private resorts when we have other more critical community issues to address. Just think of what that level of investment could accomplish for issues such as east-west traffic congestion, the health of the Great Salt Lake, or county-wide affordable housing. The Gondola B alternative is not a benefit for all. It is a benefit for the few.

But there is a better option — implementing the Common-Sense Solutions approach. This option offers real solutions while maintaining the visual beauty of the canyon and protecting our air quality and watershed. We strongly encourage UDOT to reassess its findings in the Final EIS and adopt this smarter, more fiscally prudent, and environmentally sound option.

[SIGNATURES ON THE FOLLOWING PAGE]

Thank you for providing us with the opportunity to share our thoughts regarding the Final EIS.

Sincerely,

Jennifer Wilson
Salt Lake County Mayor

Laurie Stringham
Salt Lake County Council Chair

Jim Bradley
Salt Lake County Council At-Large C

Richard Snelgrove
Salt Lake County Council At-Large B

Arlyn Bradshaw
Salt Lake County Council District 1

Ann Granato
Salt Lake County Council District 4

Attachment A

[Joint Resolution]

RESOLUTION NO. 6022 DATE: October 4, 2022

A JOINT RESOLUTION OF THE SALT LAKE COUNTY COUNCIL AND THE SALT LAKE COUNTY MAYOR SUPPORTING A COMMON-SENSE SOLUTIONS APPROACH TO THE UTAH DEPARTMENT OF TRANSPORTATION'S LITTLE COTTONWOOD CANYON ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, Little Cottonwood Canyon ("LCC") is a treasured natural resource; and

WHEREAS, the Utah Department of Transportation ("UDOT") has been conducting an Environmental Impact Statement related to transportation improvement alternatives for State Route (S.R.) 210 in and near LCC for over 4 years (the "LCC EIS"); and

WHEREAS, Salt Lake County (the "County") has served as a participating agency for the LCC EIS, and members of County leadership and staff have actively engaged in the LCC EIS process since its inception; and

WHEREAS, UDOT recently issued a Final LCC EIS (the "Final EIS"), in which it identified Gondola Alternative B (the "Gondola Alternative"), with proposed phasing, as the preferred alternative to improve transportation in LCC; and

WHEREAS, UDOT is conducting a 45-day comment period for the Final EIS prior to its issuance of a separate Record of Decision (the "ROD"); and

WHEREAS, the Gondola Alternative: i) will cost taxpayers at least $550 million in initial construction costs, together with ongoing operational expenses; ii) will make stops at only 2 private ski resorts; iii) will remove only 30% of vehicular traffic from the canyon road; iv) will entail the construction of 22 high-rise hotel sized gondola towers along the canyon road; and v) has limited flexibility to pivot in the event of changing circumstances; and

WHEREAS, the Final EIS failed to adequately and effectively consider alternate transportation modes, such as electric (or other sustainable) buses and different options for tunneling technology; and

WHEREAS, an alternate common-sense solutions approach (the "Common-Sense

Solutions Approach") exists that has the potential to adequately address the transportation needs highlighted in the LCC EIS, but through more practical and less invasive transportation strategies, such as parking management technologies and policies, multi-passenger vehicle incentives, traction device requirements and regionally placed mobility hubs; and

WHEREAS, the Salt Lake County Council and the Salt Lake County Mayor wish to articulate their joint position on the proposed alternative identified in the Final EIS.

NOW THEREFORE, be it resolved that the Salt Lake County Council and the Salt Lake County Mayor recommend that the Gondola Alternative be eliminated from consideration in the final ROD, and, instead, UDOT adopt the Common-Sense Solutions Approach, which is a more fiscally conservative and environmentally sound option; and

BE IT FURTHER RESOLVED that the Salt Lake County Council, acting as the legislative body for Salt Lake County, and the Salt Lake County Mayor, acting as the executive body for Salt Lake County, intend to continue to support the Common-Sense Solutions Approach as the recommended solution for the transportation issues related to S.R. 210 in and near LCC.

APPROVED and ADOPTED this 4th day of October 2022.

SALT LAKE COUNTY COUNCIL

By: _____
Laurie Stringham, Chair

SALT LAKE COUNTY MAYOR

By: _____
Jenny Wilson

ATTEST:

Sherrie Swensen
Salt Lake County Clerk

REVIEWED AS TO FORM

28 Sept 2022
District Attorney Date

Council Member Alvord voting	"Nay"
Council Member Bradley voting	"Aye"
Council Member Bradshaw voting	"Aye"
Council Member DeBry voting	"Nay"
Council Member Granato voting	"Aye"
Council Member Snelgrove voting	"Aye"
Council Member Stringham voting	"Aye"
Council Member Theodore voting	"Nay"
Council Member Winder Newton voting	"Nay"

Attachment B

Estimated Common-Sense Solutions Costs

Note: Costs are high-level planning estimates that will need to be refined during operational and engineering reviews.

Estimated Common-Sense Solutions Costs

CAPITAL/START UP	TOTAL COSTS	DESCRIPTION
Mobility Hubs (2 at $49M each)	$99,000,000	Design & Construction
Wasatch Blvd Roadway Widening	$62,000,000	Design & Construction
Electric Buses and Charging Infrastructure	$150,000,000	Purchase
Tolling Infrastructure	$5,000,000	Infrastructure
Trailhead Parking	$5,800,000	Design & Construction
Noise Wall	$824,000	Design & Construction
Parking Management Strategies – including resort parking reservation systems and smartphone app technology to let travelers know of parking availability/travel times	$500,000	Technology
Multi-Passenger Vehicle Occupancy Initiatives, e.g. rideshare, carpooling, etc.	$1,000,000	Infrastructure
Expanded Traction Device/Tire Chain Requirements with Expanded Law Enforcement and support staff November-April on peak days/hours	$500,000	Technology & Compensation
Increase canyon roadside parking fees, along with increased enforcement Nov.-April on peak days/hours: Friday, Saturday, Sunday, and holidays from 5-10 a.m., 3-6 p.m., 9-10 p.m.	$250,000	Technology & Compensation
TOTAL	$324,856,000	

As with the Gondola B Alternative (starting at LaCaille), operational cost savings for e-buses is predicted to mitigate the higher up-front costs than diesel buses, thereby resulting in lower lifetime costs.

Items shaded in gray are additional items added for Common-Sense Solutions, i.e., not included in Final EIS calculations.

Attachment C

Sub-Alternatives Assessment

1. **Five-lane Alternative (Wasatch Blvd alternative)** — We support the City of Cottonwood Heights' pursuit of its Wasatch Blvd Master Plan (July 2019).
2. **Snow Sheds with Realigned Road Alternative (avalanche mitigation alternative)** — We would prefer that UDOT eliminate the Snow Sheds sub-alternative from the final ROD. We are particularly concerned about the sheds' size, visual impacts, and environmental impacts.
3. **Trailhead improvements with No Roadside Parking within ¼ Mile Alternative (trailhead parking alternative)** — We support the trailhead parking alternatives set forth in the Final EIS. We particularly appreciate the following goals: 1) enhanced roadway safety; 2) mitigation of traffic conflicts between motorized and non-motorized transportation modes at the trailheads; 3) 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. Salt Lake County further recommends additional parking at trailheads to be studied to better understand the capacity of the trail system. This is due, in part, to a potential for the increased demand on lower trailheads because of the upper canyon toll. Further consideration needs to be given to bus service at the various trailhead parking lots to provide for disbursed recreational opportunities in LCC. This will in part help address some of the equitable access concerns.
4. **No Winter Parking Alternative** — We also support the improved safety measure of eliminating winter roadside parking adjacent to the ski resorts. The 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.
5. **Mobility Hubs Alternative** (at the Gravel Pit and 9400 South and Highland Drive) — We object to the elimination of the two mobility hubs in the Final EIS. Salt Lake County recommends that the mobility hubs be constructed as described in the draft EIS (1,000 parking stalls at 9400 South/Highland Drive and 1,500 parking stalls at the gravel pit) with additional mobility hubs strategically placed in Salt Lake valley that seamlessly integrate into the ski bus service.

ID 38687

Del Draper

[redacted]

October 14, 2022

Utah Department of Transportation, Et. Al.

Re: Little Cottonwood Canyon EIS

Comments on Little Cottonwood Canyon EIS

Identity of Commenter

I am 71 years old and have had a family cabin [redacted]. Over the decades I have driven up and down the canyon literally thousands of times and I am very familiar with traffic patterns in the Canyon. I am an avid skier and ski all Utah resorts. I both use the bus and drive my own car when I go skiing.

General Comments on the Gondola option

What a bad choice. What an expensive boondoggle. This is a monumental error similar to the pumps to drain the Great Salt Lake. Just like those pumps, there are many factors that suggest the Gondola will not work and is not sustainable. These include:

1) If you have to take a bus to get to the bas of the Gondola, it would be much faster to stay on a bus that was going up the canyon. Other than taking the Gondola one time as a novelty most skiers will not use it.
2) It is unclear how much it will cost to take the Gondola. If it is cheaper to drive up and park at the resorts, or to take the bus to the resort, then people will not use the Gondola.
3) The Gondola is not flexible. One huge investment that can not be redeployed in the way the busses could.

The Gondola is also terrible inequitable

1) It is ridiculous to spend $500 million of public money to benefit two privately owned resorts a few days of the year. If the Gondola is really a viable solution, the resorts should pay for it.
2) Only something like 8% of those living along the Wasatch front ski. Why should they be pay to benefit the few who can afford to ski?

UDOT should instead move incrementally. What is the impact on Canyon traffic if tolling is introduced? Try it and see before building a Gondola. What is the impact if Wasatch Blvd. is upgraded so that busses can pass cars stuck in a traffic jam? Try it and see before building a Gondola. What is the impact of a Buses First program that restricts cars until after 10:00 AM on weekends and on powder days? Try it and see, and only after that knowledge is gained spend the money on the Gondola.

UDOT has defined the scope of the EIS too narrowly. The question is not just how to provide better mobility and reliability. The question must also include examining the impact of the increased mobility on the fragile Canyon environment.

Comments on the Busing Alternative:

UDOT needs to continue to review incremental steps to solve the problem in the Canyon and needs to continue to consider the busses as an alternative.

1) The existing road in Little Cottonwood Canyon is adequate about 99% of the time. The traffic problem is limited to a few winter days – probably about 20 or 30 days a year.

   Some of these are weather related and some are too many cars all trying to get up the canyon at the same time. The rest of the year traffic flows just fine.

2) Even on the very worst days when there is fresh powder at the resorts and it may take over an hour to get from the mouth of Big Cottonwood to the mouth of Little Cottonwood, once you are in the Canyon the traffic flows. It usually picks up speed about one mile up the canyon and approaches the 40-mph speed limit as it passes White Pine.

3) There is no need to add a dedicated bus lane in the canyon since the traffic flows in the canyon on the existing road on all days except when there is a weather event.

4) The same cannot be said of Wasatch Blvd. It is of critical importance to improve Wasatch Blvd and North Little Cottonwood Canyon Road so that busses can get by, around and ahead of any car traffic jams.

5) The proposed improvements on Wasatch Blvd do not do this. “Signal Priority” for busses in not adequate. If not a dedicated lane, then some system is needed with traffic controls that closes one lane to all cars and dedicates it to busses on these critical days.

6) Without adequate improvements on Wasatch Blvd the estimated travel times from the Gravel Pit Hub to the resorts in the EIS are meaningless. Busses will be caught in traffic.

7) Conversely, travel time in the Canyon for busses without a dedicated lane only adds a few minutes to travel time over the alternative of having a dedicated bus lane.

8) People will ride the bus if it is efficient and reliable and cost effective compared to the other choices. The bus is only efficient and reliable if it can pass the traffic jams on Wasatch.

9) Tolling in the canyon and charging for parking can make the bus cost effective compared to driving.

10) A personal anecdote: I ride the bus frequently to Solitude. I love how it delivers me right to the lifts, and I don't have to pay to park, nor do I have to walk a mile from the road if the parking lot is full. These same advantages that make the bus appealing can be made to apply to Little Cottonwood Canyon.

<u>Comparing the Enhanced Bus Service ("EBS") to the Gondola Alternative</u>:

1) Enhanced Bus Service is far less expensive. Since a dedicated bus lane in not needed in the Canyon, the cost of Enhanced Bus Service is not just $51 million less than the Gondola, it is $206 million less. (Substitute the $355 capital cost for EBS without a dedicated lane in the Canyon for the $510 capital cost for EBS with the dedicated lane, and add the savings to the $51 million saving of EBS compared to the Gondola).

2) Comparing EBS with a dedicated lane to the gondola is not only a false equivalency with respect to cost, but also a false equivalency with respect to environmental impact. The impact of the Gondola does not look so bad compared to the impact of EBS when the road needs to be widened. When it is acknowledged that EBS can work without a dedicated lane, the true additional adverse impacts of the Gondola are easier to recognize.

3) Busses are scalable and flexible. As the dynamics of the ski business change, or if it dries up, changes can be made in bus schedules, or they can be put to other uses. Not so the Gondola. Rather than focusing on a solution that only addresses the present, UDOT should pursue flexible solutions that can adapt to changes in future demands and uses. By nature of its design the tram alternative will bring less flexibility in its use than an enhanced bus service. As the alignment will be more rigid, it will not provide easy opportunities to scale up or down and will have very exclusive infrastructure that can't be easily relocated to other areas with shifting demand. An improved bus system will allow for greater flexibility along the corridor, with express service, easy changes in service frequency and easy adaptation to other corridors when needed.

4) If it is necessary to take the bus to access the Gondola, why not save time and stay on the bus and ride it up the canyon.

5) While the Gondola adds a small amount of reliability on a few winter days, this additional reliability is simply is not worth the cost.

Respectfully Submitted,

Del Draper

ID 38689

United States Department of the Interior

Office of the Secretary
Washington, D.C. 20240

October 12, 2022

IN REPLY REFER TO: 4111
ER 21/0248

Via Electronic Mail Only

Mr. Josh Van Jura
SR-210 Project Manager
Utah Department of Transportation
4501 South 2700 West
Salt Lake City, UT 84114

Re: Utah Department of Transportation Final Section 4(f) Evaluation for the Little Cottonwood Canyon SR-210 Project in Alta, UT

Dear Mr. Van Jura:

The U.S. Department of the Interior (Department) has reviewed the Utah Department of Transportation (UDOT) Final Section 4(f) Evaluation for the Little Cottonwood Canyon Project SR-210 Wasatch Boulevard to Alta, Utah on behalf of the National Park Service (NPS) and provides the following comments for your consideration:

The Department understands the purpose of the project is 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, Utah. There are five alternatives including enhanced Bus Service, Peak-Period Shoulder Lanes, Cog Rail, and two Gondola Alternatives to improve safety, travel time, and mobility. Actions include lane expansion and stabilization and additional infrastructure for commercial transportation and avalanche control.

The Department concurs with the Final Section 4(f) Evaluation that there are no prudent and feasible avoidance alternatives for Section 4(f) use of the historic properties noted. The enhanced bus service alternatives and gondola alternatives would have *de minimis* impacts and could be selected by UDOT. Because the Cog Rail Alternative was not chosen as the preferred primary alternative, its use with greater–than–de minimis impact to the Alpenbock Loop and Grit Mill Climbing Opportunities Section 4(f) recreation resources did not require documentation of a least-overall-harm analysis in the Final 4(f) Evaluation.

The UDOT and the U.S. Department of Agriculture, Forest Service 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. As noted in Appendix 15B, the project will result in an

Adverse Effect to Historic Properties. As UDOT has consulted with the Utah State Historic Preservation Office and will be developing a Memorandum of Agreement to resolve adverse effect to Section 4(f) properties, the Department has no objection to Section 4(f) approval of 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 these comments, please coordinate with Karen Skaar, NEPA Specialist, NPS Region Serving Department of Interior Regions 6, 7, and 8 at 303-349-4160 or karen_skaar@nps.gov.

Sincerely,

Stephen G. Tryon
Director
Office of Environmental Policy and Compliance

E-Mail: jvanjura@utah.gov

ID 38719

Ralph Becker
5 South 500 West, #102
Salt Lake City, UT 84101
Rbecker801@gmail.com

Subject: Comments on Little Cottonwood Canyon FEIS

October 17, 2022

Josh Van Jura, Project Manager
Little Cottonwood Canyon Environmental Impact Statement

Dear Mr. Van Jura and the Little Cottonwood Canyon Environmental Impact Statement Team:

I appreciate the opportunity to provide comments on the Little Cottonwood Canyon (LCC) Final Environmental Impact Statement (FEIS).

While we have worked together in my prior capacity at the Central Wasatch Commission, I am no longer employed there and offer these comments only as my personal input.

Personal and Professional Background

My comments reflect decades-long involvement with the Central Wasatch Mountains, NEPA, and work for and with many of the jurisdictions with responsibility for the Central Wasatch Mountains. As a consultant, my firm Bear West prepared plans for Salt Lake City, Salt Lake County, Summit County, Utah Transit Authority, and Park City. Bear West prepared numerous NEPA projects for the Forest Service. As an Adjunct Professor, I taught NEPA, public lands, and environmental planning and law courses at the University of Utah. As an elected official (Utah State Representative and Mayor), I had varying roles and responsibilities in addressing the Central Wasatch Mountains. As an initial participant in Mountain Accord while Mayor, I worked to find consensus on issues (including transportation) that had defied resolution for decades in the Central Wasatch Mountains. And, as Executive Director of the Central Wasatch Commission I spent countless hours working on the array of issues, including transportation. Personally, I visit the Wasatch Canyons regularly for a wide range of enjoyable experiences.

General Comments on Little Cottonwood Canyon Environmental Impact Statement and FEIS

I commend UDOT for the tremendous investment of time and resources to address the challenging and controversial solutions for Little Cottonwood Canyon. I don't question the sincerity of the effort or detailed analysis contained in the Little Cottonwood Canyon

Environmental Impact Statement and process. The work is professional and, in many regards, impressive.

The failure of the Little Cottonwood Canyon Environmental Impact Statement process, also reflected in the FEIS, is unfortunate and avoidable. If UDOT had listened to early comments from many participants in the Environmental Impact Statement process and sought solutions intelligently, it could have addressed the needs of Little Cottonwood Canyon without the level of acrimony that has ensued.

UDOT has endeavored to thoroughly analyze and decide about how to reduce traffic congestion in Little Cottonwood Canyon as its Purpose and Need. They have made a detailed road- and traffic-reduction analysis from the perspective of a traditional highway Environmental Impact Statement considering direct environmental impacts. As a limited traffic mitigation study, UDOT has done a credible job. The agency has measured traffic conditions, public safety, and how traffic can be reduced to achieve improved traffic flows.

But an adequate Environmental Impact Statement for Little Cottonwood Canyon should be about more than reducing traffic from the mouth of Little Cottonwood Canyon to Alta Town and Alta Ski Lifts. UDOT has failed to address a transportation solution for Little Cottonwood Canyon in the context of

- the regional, year-round transportation system,
- the broader impacts on the environment of the mountains (especially watershed),
- affected communities and Wasatch Front and Wasatch Back region, and
- the users who will be impacted by the results of a decision based on the Little Cottonwood Canyon Environmental Impact Statement.

In NEPA terminology, UDOT has improperly segmented the Little Cottonwood Canyon road and has not considered connected actions throughout the Environmental Impact Statement process. UDOT has also failed to adequately consider the indirect and cumulative impacts in the Little Cottonwood Canyon and Highway 210 Environmental Impact Statement.

Little Cottonwood Canyon does not exist in a vacuum. It is attached to a larger metropolitan area and the surrounding mountains. It is part of a regional mountain environment with a mandated priority for watershed protection. Little Cottonwood Canyon is part of an array of recreational resources and users. By focusing only on U210 highway and how to reduce traffic congestion, the consequences of this process fail to consider the consequences (direct, indirect and cumulative impacts) on the broader regional environment – as required the National Environmental Policy Act and its implementing regulations.

Given the enormous public interest and background for the Central Wasatch Mountains, it is disappointing that UDOT improperly applied too narrow a scope for the Little Cottonwood Canyon Environmental Impact Statement.

Finally, because UDOT has conducted a highway Environmental Impact Statement and not equally evaluated reasonable alternatives that could mitigate environmental impacts, its alternatives analysis is flawed. While there is engineering detail, alternatives were not evaluated equally. Details of these shortcomings follow.

Specific Issues

The following comments are not intended to address every element of the Little Cottonwood Canyon Environmental Impact Statement. I am attempting to provide some detail on a number of specific comments that in some instances are illustrative of other weaknesses in the FEIS and predecessor elements of the Little Cottonwood Canyon Environmental Impact Statement. For the sake of brevity, some of my comments are in outline form.

1. An incorrect conclusion about Scope, Purpose and Need (P&N). In response to comments that UDOT's scope and P&N is too narrow, the following explanation is given in response to that comment: "UDOT developed the study area to include an area that is influenced by the transportation operations on S.R. 210 and to provide logical termini (endpoints) for the project." That conclusion, in my opinion, fails to consider the basic and overriding guidance for determining if the scope of an Environmental Impact Statement is being improperly segmented. The CEQ guidelines that direct UDOT, FHA and all federal agencies state in 43 CFR 1501.9(3):
   "(1) Actions (other than unconnected single actions) that may be connected actions, which means that they are closely related and therefore should be discussed in the same impact statement. Actions are connected if they: (i) Automatically trigger other actions that may require environmental impact statements; (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously; or (iii) Are interdependent parts of a larger action and depend on the larger action for their justification."

Note that the connected action directive from CEQ guidance does not just relate to "logical termini" for a road. For example, SR 210 is directly connected to SR 209, and other local and regional roads and transit . And, with the Environmental Impact Statement being transit- and demand-management focused, the regional transit system does not begin or end at SR 210. Further, other actions will inevitably be triggered by the transportation solutions in Little Cottonwood Canyon. With increased capacity of the transportation system, visitor use will increase – leading to more people in the Central Wasatch Mountains and impacts from increased visitation.

UDOT has failed to address these connected actions – both for the areas directly and indirectly impacted and for how to address transportation solutions. For example, all of

the bus services start outside SR 210. Possible solutions that do not involve the proposed massive parking lots include improving transit access to SR 210 and could include a different mode, i.e. connecting to the light rail/TRAX line in the middle of the Salt Lake Valley. Such connections could significantly reduce the need for parking, the number of vehicles that could be taken off SR 210, and the overall transportation system costs and functionality serving Little Cottonwood Canyon. SR 210 and transportation solutions directly connected to SR 210 are "interdependent parts of a larger and depend on the larger action for their justification." If UDOT makes a decision that fails to consider connected actions and segments SR 210 as they have in the Little Cottonwood Canyon Environmental Impact Statement, they have violated a fundamental requirement for determining the scope for an Environmental Impact Statement in NEPA/CEQ guidance.

UDOT's Purpose & Need statement also reflects an unreasonable narrowing of the purposes of the Little Cottonwood Canyon Environmental Impact Statement. The objective to reduce traffic alone and by 30% is arbitrary. A 30% reduction may achieve LOS D as analyzed by UDOT, but why is that objective the best solution for Little Cottonwood Canyon? As noted previously, SR 210 does not exist in a vacuum; it is part of a mountain environment and the goals are not limited to LOS D. The Purpose and Need should be reducing traffic (maybe by much more than 30%) and the best means to solve transportation problems while serving the environment and users of Little Cottonwood Canyon. Given the many directly related needs and impacts in Little Cottonwood Canyon, the objective should be to find the best transportation solution that balances the multi-faceted needs of Little Cottonwood Canyon and connected areas.

Because the Scope and P&N are so narrowly written to consider only the SR 210 roadway, accomplishing a larger reduction in traffic for the environmental, public safety, and community interests has been ignored. For example, why didn't UDOT consider a larger decrease in vehicle us in Little Cottonwood Canyon, which would have achieved greater traffic congestion reduction, and would have decreased all the consequences of increased emissions.

2.Year-round transportation not been considered. Failure to address year-round transportation solutions is incomprehensible given the nature of the use of Little Cottonwood Canyon and the connected impacts on Big Cottonwood Canyon. When visitation is already larger during summer months and increasing significantly, transportation solutions should provide for a year-round transportation system. I understand that peak times today are most egregious during busy, snow-filled winter days; but when waiting times on SR 210 and SR 209 during spring, summer, and fall can extend beyond an hour, UDOT should be evaluating and addressing year-round transportation solutions.

3.Alternatives – were not treated equally.

a. Alternatives failed to consider SR210/Little Cottonwood Canyon in the context of the broader, regional transportation system; e.g., how much parking could be reduced at the mouths of the Canyons by having a more robust bus system connection or connection to existing light rail/TRAX? Would differing modes of connection affect public transit use, further reducing the need to drive a private vehicle to the mouths of the Canyons? This is a direct, indirect and cumulative consideration that has been ignored in the Environmental Impact Statement process, reducing alternatives that could have better addressed transportation needs in Little Cottonwood Canyon, Big Cottonwood Canyon and the Valley transportation user.
b. Buses were not given full consideration to address year-round and non-skier access to Little Cottonwood Canyon.
c. Removing consideration of Big Cottonwood Canyon from Little Cottonwood Canyon Environmental Impact Statement consideration created artificial approaches to transportation that could not work without corresponding actions in Big Cottonwood Canyon. This is reflected in the Little Cottonwood Canyon Environmental Impact Statement by some of the final elements of the Environmental Impact Statement, e.g., tolling.
d. Failure to consider rail in an equal way as other alternatives. In a glaring shortcoming of the Environmental Impact Statement and reflection of unequal alternative consideration, UDOT failed to consider information developed and offered by rail experts with over a century of experience as developers, designers, contractors, and operators. The inadequate rail analysis of rail include:
    i. Cost, e.g., constructing 3-foot concrete barrier around rail line for entire length of Little Cottonwood Canyon, avalanche snow shed requirements, at-grade road crossing possibilities, using existing rights-of-way, etc.
    ii. Electrification (UDOT assumes diesel operations even though a proposed, certified rail alternative would use electrification with proven technology),
    iii. Sharing and crossing road rights of way,
    iv. Siting of and alternative corridors to minimize and address environmental and safety impacts, e.g,
        1. failing to consider rail electification as an approach to reduce air and GHG emissions,
        2. failing to consider mitigation on water quality through BMP's or corridor alignment adjustments (UDOT states that runoff contaminants would be "similar to highway runoff contaminants"),
        3. failure to consider alignments that would avoid the need for avalanche snowsheds or could be incorporated more easily into existing road snowsheds,

4. failing to consider compatibility of adjacent rail construction in road right of way without unnecessary distancing or wall construction,
5. failure to adequately consider that a rail right-of-way is narrower, and an approach doesn't require double tracking for the entire length of Little Cottonwood Canyon.

v. time of travel grossly inflated rail times, especially if a potential connection to existing rail or other transit were developed;
vi. impacts on wildlife inflated because of failure to consider common practices for building rail lines around the world;
vii. avoidance through rail alignment alternatives of a need for avalanche sheds;
viii. impacts on wildlife assumes a major barrier around a rail line ("3-foot-high, cast-in-place concrete barrier between S.R. 210 and the cog rail tracks for the entire length of the rail alignment in the canyon"); that is not the common international practice for rail design and construction, including in Utah;
ix. UDOT evaluated gondola and bore-tunnel technology in U.S. and other settings, but did not similarly evaluate rail usage – e.g., Pikes Peak (new rail with known costs and technology at a fraction of the cost UDOT estimates), Alps Mountain rail (around for more than 100 years), etc.;
x. On a personal note, having just returned from two weeks in the Alps Mountain Range and experienced every form of travel there (vehicle, bus, rail, and aerial), it is astounding that UDOT failed to consider technological approaches that have been used and are working successfully for more than a century in differing mountain situations. While I do not claim to be an expert on road design and construction, it stood out to me that in the European Alps I have seen, they mesh their roads, rails, and aerial systems into the mountains, avoiding undue environmental impacts for the operator and the transportation user. (I am not advocating that we follow the European mountain transportation model; we need to learn from and tailor our approach for the Wasatch Mountains.)

4. Watershed – while the Little Cottonwood Canyon Environmental Impact Statement includes watershed and recognized its importance, as noted consistently by Salt Lake City and Metropolitan Water District throughout the Environmental Impact Statement, watershed issues still have not been addressed adequately. Consultation with a Cooperating Agency means more than asking for information; it should also mean respecting the lead agency responsible for watershed being satisfied that its concerns have been addressed. I am not addressing specific issues regarding watershed in my comments because they have been thoroughly and completely

addressed by Salt Lake City DPU, Metropolitan Water District of Salt Lake City and Sandy, and Sandy City.

5. Visual Impacts – the impact from a gondola alternative to the Little Cottonwood Canyon Scenic Byway (SR 210) and the Forest Plan scenery management standard (S22) are rated highly impactful in the Final Environmental Impact Statement. In the Comments Section of the FEIS, it is stated: "the gondola alternatives and the avalanche mitigation (snow shed) alternatives are overall not in conformance with the Scenic Integrity Objectives." "Management actions that would result in a scenic integrity level of Unacceptably Low are prohibited in all landscape character themes." Two-hundred foot + towers, large cabins at that height along cableways, and periodic (if that can be accomplished instead of full-time) bright lighting at night, will change the entire visual character of Little Cottonwood Canyon. While it may be a treat for those in a gondola cabin, for all other users at ground level or in residences, the visual character of Little Cottonwood Canyon will be severely damaged. Remarkably with this analysis, the FEIS concludes that the gondola "would not require a plan amendment for scenery management". UDOT has grossly underestimated the impact of a gondola and has reduced the significance of decisions needed to address the visual impacts. This approach makes little sense: the impacts of a gondola in Little Cottonwood Canyon will change the entire character of this magnificent corridor.

    a. The bias against the cog rail alternative is also displayed in the section on Visual Impacts. UDOT has selected an alternative corridor and construction and operation that does not reflect appropriate, sensible rail development or its impacts. A rail corridor can have a significantly smaller footprint and impact on the scenic/visual environment. A train operates at ground level, is not a continuous presence (one train every 10-15 minutes), and a footprint would not require significant cuts and fills. Yet in Chapter 17, UDOT assumes 70' cuts and fills, and significant distancing between the road and rail corridor. Anyone who has traveled by train in mountain environments elsewhere has experienced approaches to train siting, corridor alignment, mixing with road uses, and use of undergrounding technologies that have mitigated visual and other impacts. A properly developed a train can add to the scenic experience of an area. I would be happy to share specific examples that have been brought to UDOT's attention previously.

6. Conflict with non-ski recreation uses, 4F considerations, and failure to consider the comprehensive impacts on recreational use from proposed transportation improvements in the Little Cottonwood Canyon Environmental Impact Statement. UDOT has glossed over the recreational use increases and resulting impacts on Little Cottonwood Canyon.

4f considerations have been expanded in the FEIS, but the document continues to underestimate the impacts of the gondola on 4f properties. For example, Tanners Flat Campground (a 4f property) would have a tower on the flat, and the cableway would go directly over the campground. How is 4f complied with? There is no proposed alternative routing and no mitigation. Is UDOT suggesting that large towers (this would also be an even larger tower because the gondola changes direction), and direct overhead cars with dozens of people in them staring down would not have a significant impact on Tanners Flat campers and violate the intent of 4f?

7. Funding Not Acknowledged. In stating that gondola or other approaches would happen sometime in the relatively distant future, UDOT fails to recognize that the Legislature has already established a Cottonwood Canyons Transportation Fund that is already contributing $20 million per year to fund transportation improvements that could go a long way (through bonding) to pay for capital investments. At a minimum, this Fund should be disclosed because it could significantly change the timeline for implementing the gondola or other capital investment for any other alternative. While it is agreeable for many people to continue to pursue bus improvements and demand management, the timeline for implementation realistically could happen very quickly.

8. Public Opinion and Local Government Opposition to the Gondola. It is noteworthy that every local governmental entity directly affected by and commenting on the Little Cottonwood Canyon Environmental Impact Statement has opposed the gondola. UDOT's support for the gondola suggests mixed public opinion, but the overwhelming opposition from local governments, who most closely represent local views, should be noted and given precedence in any final decision.

9. Inconsistency in how visitor use would be increased with transportation improvement and the impacts from that increased visitation. Statement in FEIS: "Of the five primary alternatives, only the gondola and cog rail alternatives propose to increase summertime use and only at the ski resorts. The increased use would be from users of the alternatives and not from increased vehicle use, thus reducing the potential for roadside fires. In addition, as the increased summer users would be at the ski resorts with amenities and emergency response, the risk of a fire would be lower." It is nonsensical to note that increasing access by providing alternative and increased mode accessibility would free up road space, thereby increasing opportunities for road usage, and then to conclude that the alternatives would not increase visitation. UDOT should evaluate increasing visitor use, their destinations, and how that impacts the environment, including the visitor experience. And, the impact on the characteristics of wilderness (e.g., experience of solitude) needs to be part of the direct, indirect, and cumulative analysis. One of Little Cottonwood Canyon

and the Central Wasatch Mountains' prime and unique characteristics is the opportunity for a range of recreational experiences. Without significant management improvement, the increase in visitation from the implementation of the Little Cottonwood Canyon Environmental Impact Statement actions, the Little Cottonwood Canyon character and use profile would be significantly and unalterably impacted. These increases in visitation would have environmental impacts that have not been evaluated in the Little Cottonwood Canyon Environmental Impact Statement. A ROD for the Little Cottonwood Canyon Environmental Impact Statement should be delayed until the results of the Central Wasatch Commission Visitor Use Study is completed and impacts from increased visitor use can be evaluated.

10. How will eliminating roadside parking be accomplished? The Little Cottonwood Canyon Environmental Impact Statement states that roadside parking would be eliminated to help address traffic congestion. While that is an admirable goal, the difficulty to accomplish this change is not sufficiently addressed in the Environmental Impact Statement. UDOT attempted to further restrict roadside parking in recent years and had to abandon the effort. Why does UDOT think this objective can be achieved and how does UDOT intend to accomplish this objective?

My comments above are not intended to be exhaustive. In some instances, they are illustrative of broader NEPA issues and in others they go to the limited consideration of impacts beyond direct impacts on the Little Cottonwood Canyon road. I do not underestimate the challenges UDOT faces, and I appreciate the courtesy they have given to a passionate public. Those admirable efforts, however, do not replace an adequate NEPA process for decisions of such magnitude for the millions of visitors to this prized destination – the Central Wasatch Mountains.

Good luck going forward, Your Friend,

Ralph Becker