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

July 10, 2020

Save Our Canyons' Little Cottonwood Canyon EIS - Alternatives Comments

To whom it may concern;

Save Our Canyons is a member driven non-profit organization based in Salt Lake. We are responding to UDOT's invitation to submit comments on the present alternatives-identification phase of the Little Cottonwood Canyon (LCC) EIS, published in accord with its obligations under the National Environmental Policy Act, 42 U.S.C 2500 et seq. While we recognize that the present NEPA process has advanced to the identification of specific potential alternative transportation improvements for LCC, unavoidably, some of our comments regarding the specific alternatives relate to a fundamental defect in the process that has led to the proposal of the present set of alternatives.

For nearly 50 years, we've worked to protect the wildness and beauty of the Wasatch. Our members and the communities we represent are not only frequent visitors to the Wasatch, we have land owners, businesses, scientists, engineers, students and consultants and lawyers in our ranks. Our members and their health and livelihoods, rely on the water that comes from these canyons. We have been patrons of resorts in the area, but also have regard for the ecology and are advocating for a more sustainable future in the Wasatch. As proposed, UDOT's alternatives directly threaten the Wasatch, our water supply, equitable access, and lay a foundation for further economic exploitation of this vital natural resource. We provide these comments in hope that UDOT will drastically alter its course of the EIS, who's purpose, screening criteria and now alternatives fail the Wasatch, and the community of life which it supports.

So that these comments can be better understood, we will begin by describing what the aforementioned defect is.

Need for comprehensive regional planning

Salt Lake City, together with the many contiguous Wasatch Front communities, has become a large metropolitan area, and it is very quickly becoming a much larger one. Anyone who has traveled to a number of large cities recognizes that one thing shared by those that people most enjoying visiting and living in is an appealing, efficient, and integrated transportation system. The process UDOT is conducting for LCC is not part of the planning of such a system. It is a fragment, disconnected from existing polices, strategies, and broader plans. It is another example of a haphazard pattern of one-off, shortsighted, narrowly focused transportation fixes to recurring localized urgencies—urgencies that occur largely because of the lack of a broader plan, or worse, failure to act upon plans that have been tirelessly worked upon by local communities and

governments (Mountain Accord, Salt Lake County Canyons Transportation Plan, Salt Lake City Watershed Plan, USFS 2003 revised plan, Salt Lake County Canyons General Plan, 1989 Wasatch Canyons Master Plan, etc). The problems with Wasatch Front transportation, especially for the canyons, are interrelated; any plan that is not a comprehensive response to the needs identified through a thorough understanding of these interrelationships is doomed to be largely wasteful and ineffective. That is, wasteful to the taxpayer and ineffective as a transportation system.

While we acknowledge the existence of Regional Transportation Plan which is continually updated by Wasatch Front Regional Council, the specific resource management plans that acutely deal with this unique landscape (like those mentioned in the paragraph above), have not been incorporated into the RTP, which operates at a much coarser scale than the other numerous plans that consider the fate of these canyons. Furthermore, these RTP anticipates the accommodation of growth, ignoring the importance of these watershed canyons. The focal point of this EIS is not an area planned to accommodate additional significant residential or commercial growth. To the contrary, numerous plans, ordinances and strategies point to the objective of significantly curtailing residential and commercial growth and development in order to meet the paramount legal obligations of providing, first and foremost, high quality, low cost, drinking water to the population, and two, to protect and preserve the high quality recreational opportunities that exist throughout these canyons. This process doesn't just ignore these priorities, the agency has outright rejected consideration of these, with prejudice toward increased tourism and economic development goals.

It cannot be overstated how critical the protection of the canyons of the Wasatch Front are to our regional quality of life, economy, and public health. Preserving the character of these canyons to maintain quality of life is another necessary dimension of comprehensive transportation planning. The goal of such planning should not be to efficiently pack as many people as possible into the canyons; it must also recognize that, at the same time people need access to the canyons for quality of life, it is an overabundance of people, and the development they bring and attract, that, left unchecked, will degrade the experience of being in these canyons. Transportation planning therefore must include a determination of the scope and intensity of human uses that can occur in the canyons without substantially harming their character and diminishing their contribution to a high quality of life, affordable pure drinking quality water, or other economically oriented ecosystem services. The alternative to such planning is the path we are on —a path toward an eventual equilibrium in which the impetus to continue improving access into the canyons levels off because the canyons have become places that are less attractive to people. Understanding what level of human use LCC can bear (call it carrying capacity, visitor analysis, or other) should have been a starting point for this project. Without this understanding, UDOT is blindly advancing the canyon toward achievement of this tragic equilibrium.

Amenity Migration

One of the drivers of issues in the region is amenity migration. Amenity migration is most simply defined as growth or relocation of people (seasonally or permanently) driven by the desire to nearer an amenity. In our case locally, this amenity is Utah's iconic public lands, and specifically to this project, the amenity is the Wasatch Mountains. While, it appears that UDOT believes the amenity of note is skiing, particularly resort skiing, as that is what it has erroneously focused its

Figure 7a: Central Wasatch Recreation Activity Overview: Number of Respondents and Frequency of Visitation (N = 318)

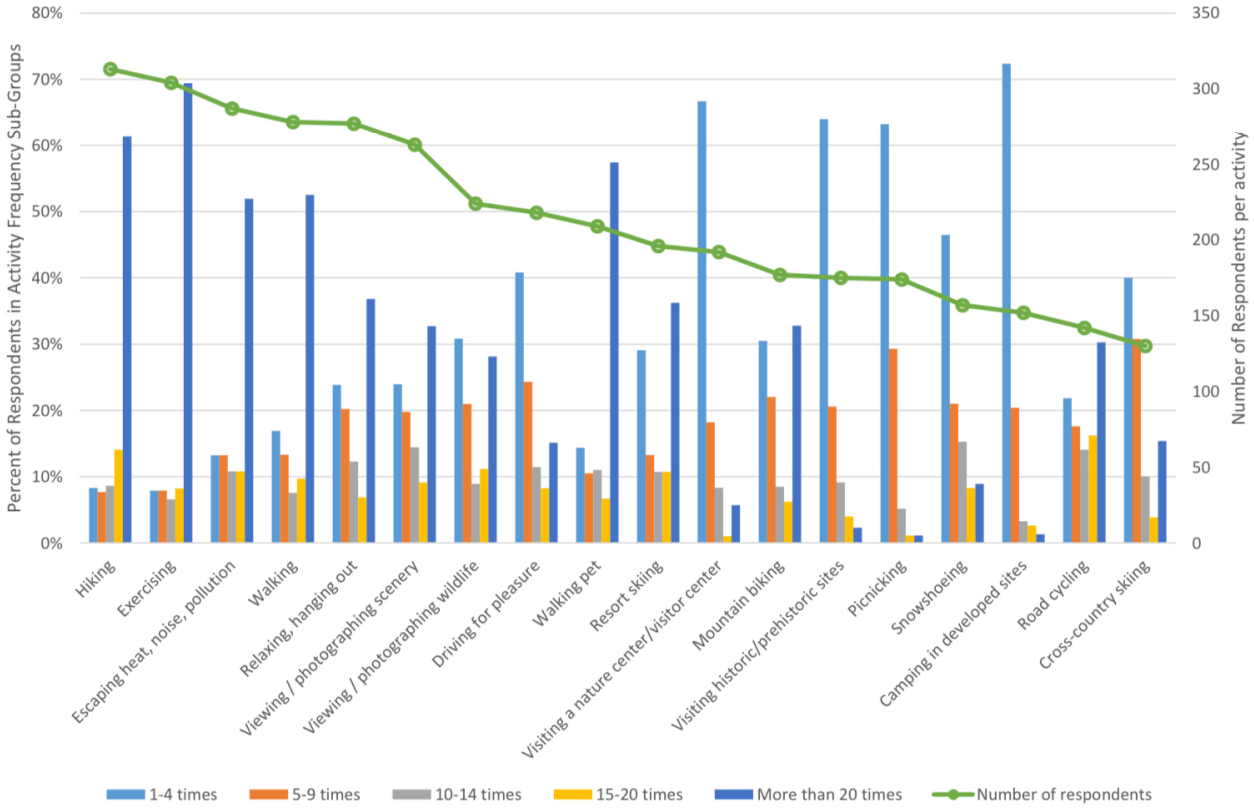
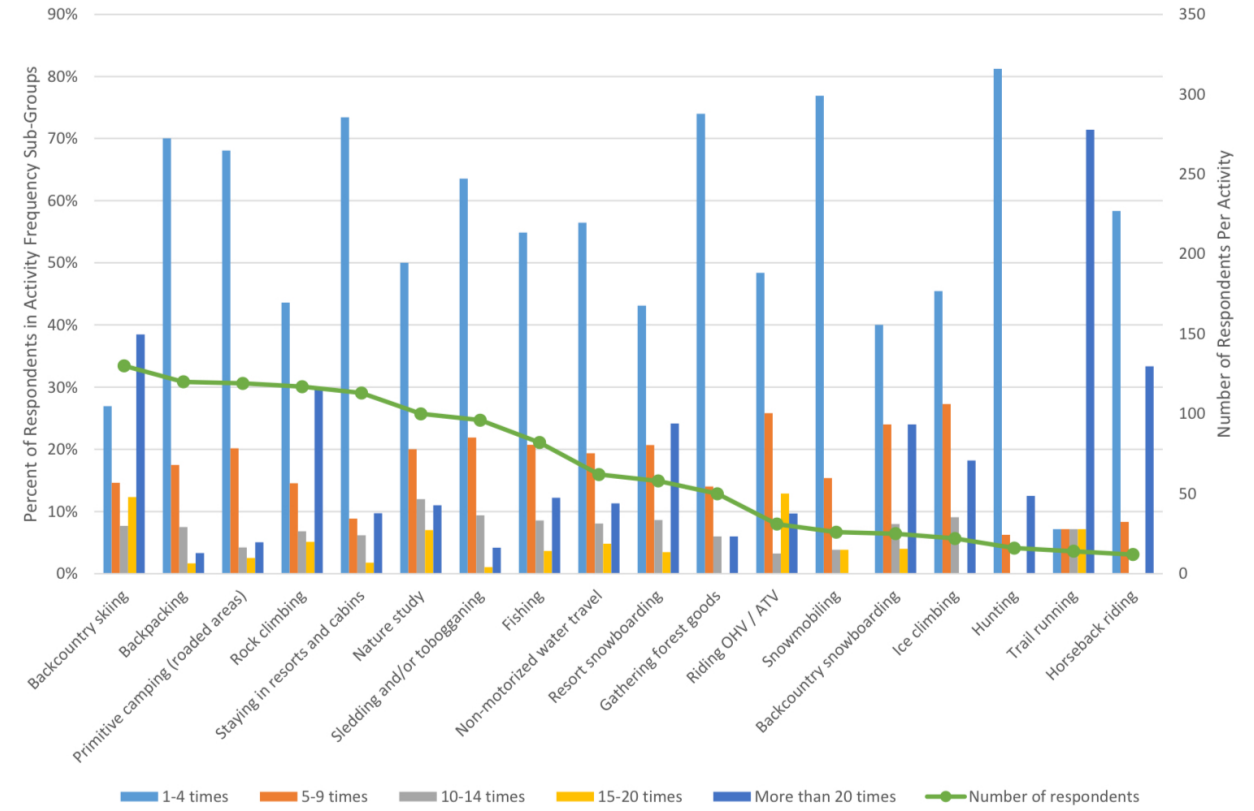


Figure 7b: Central Wasatch Recreation Activity Overview: Number of Respondents and Frequency of Visitation (N = 318)



EIS on. However, comprehensive analysis done on the region suggest that 70% of visitation to these environments are to dispersed recreation sites.

The above charts, taken from a 2015 Utah State recreation survey of the Central Wasatch (Burr, Lamborn), help to give a sample of the amenities visitors to the region are seeking. More comprehensive and seasonal analysis can be found in the quarterly reports on the project site: https://extension.usu.edu/iort/research/cw-visitor-use-study

Amenity migration is one of several factors compounding issues in our canyons. That said, how we grow, and how we move people around - *to* and *within* these canyons - is of critical importance as these environments are geographically restricted, have critical ecosystem functionality, and cannot accommodate infinite growth, and certainly cannot accommodate more cars. This is reenforced in numerous plans by the USFS, Salt Lake County and Salt Lake City, where they have all called for no more parking in these canyons, as strategy UDOT has been derelict in curtailing by failing to enforce road side parking prohibitions.

Providing transit service, accompanied by visitor management strategies to adhere to capacities, is one way to ensure we better accommodate visitation and usage, but not allowing those visitors to use a car (or at very least not a car with empty seats in conjunction with improved transit) to get to destinations could reduce the impact wild lands in the Wasatch.

We are not suggesting you stop amenity migration, rather do more to understand your role in managing, partnering with others who are responsible for managing visitation, and understanding the impact this trend has on the amenity of relevance: the Wasatch Mountains and their critical watersheds.

Economic Development and "Purpose and Need"

For over 30 years, local communities have demanded improved mass transit into our canyons, yielding a car-less experience in these vital watershed canyons. Removing cars improves both the natural and human environments, by ensuring more natural areas aren't converted into places that need to host cars (ie. Parking lots), thereby degrading water quality. While the air quality impacts of private vehicles are secondary or even a tertiary benefit of reducing car, reducing vehicle miles traveled in the region, given our non-attainment status as identified by the EPA, would certainly be a benefit. These sentiments have been captured most recently, in comments to this very EIS, by the Central Wasatch Commission who's board represents jurisdictions that are impacted by decisions in this EIS, in the Mountain Accord and its supporting documents, as well as in numerous land and resource management plans. Not one of those plans has called for accommodation of more visitation and vehicular traffic - which is an outcome of this process. In fact, many of these plans have called for innovative strategies to aid in the significant reduction of vehicles, parking, infrastructure in these areas. While this project states it will help UDOT meet its goals for SR 210 (which we question whether it actually will), it comes at great expense to legal obligations of other land and water managers, alienates non-resort users from benefitting from transit access, and acutely threatens the wild and scenic attributes of an iconic a glacially carved canyon for the benefit of private resorts. While the benefits of these alternatives are significantly lacking, one thing is clear, stewardship and management of these canyons is not a value UDOT holds for the region. Further, they show little if any care for the obligations, goals

and resources of other governments. The values driving this process are economic development as stated in the legislation that authorized funding for this process.

There has been much concern about the underlying purpose of this project being solely for economic development. When the process started, it was attempting to look at the canyon and as the Alternatives Report clearly states, the purpose is to "substantially improve transportation related safety, reliability, and mobility on SR 210 from Fort Union Blvd through the Town of Alta, for all users on SR 210." The Wasatch has four-seasons of many different uses, and to benefit all users on SR 210, which is the main access point for all users, UDOT must look at all seasons. However, as the process has progressed, UDOT has arbitrarily winnowed the broader and connected scopes to look only at winter months, and more, only looking at the top of the canyon, alienating "all users" in deference to economic development opportunities for two businesses in the canyons, notably, Snowbird and Alta ski areas.

In 2017, the Utah Legislature passed SB 277, which was eventually signed by Gov. Herbert. This bill stated,
"... proceeds from the issuance of bonds shall be provided to the Department of Transportation to pay all or part of the costs of the following state highway construction or reconstruction projects:

(b) $100,000,000 to be used by the Department of Transportation for transportation improvements as prioritized by the Transportation Commission for projects that:

(i) have a **significant economic development impact** associated with recreation and tourism within the state; and

(ii) address significant needs for congestion mitigation."

While, prioritizing only one area of the economic contributions to the area, being resort-based visitation and recreation, UDOT has completely ignored several other economic factors. If you are going to incorporate economic indicators in your decision making process, you should not pick and choose, rather be comprehensive in your analysis. Most notably excluded, quality of life considerations for the many uses in the Wasatch Mountains, impacts to water quality via induced visitation that will be passed on to downstream users to clean up, and the impacts to non-resort based recreation that comprises the majority of visitation to these areas. Not only is UDOT ignoring these impacts, they go a step further and advocate for inducing demand being a benefit of one alternative.

At a June 16, 2020 meeting with our organization and UDOT representatives, it was reported that "one benefit of the gondola would be that it could serve as a tourist attraction and generate additional revenue." This was again stated at the public meeting hosted by UDOT at approximately 7:18pm on June 23, 2020. It is highly inappropriate for the agency tasked with objective analysis pursuant to the National Environmental Policy Act (NEPA) to advocate for benefits unrelated to its chosen purpose and need. It is unrelated to the purpose and need, unrelated to the selected screening criteria, and demonstrates that UDOT is not an objective arbiter in the NEPA process for which it has been granted authority to conduct on behalf of the broader public.

Several sites of importance to our water drinking and recreating communities will be immediately and negatively impacted by these alternatives and their associated infrastructure.

Recreation spending on backcountry skiing, hunting and fishing, climbing/bouldering, hiking, mountaineering an other nature based activities are not only, not a consideration, but will be displaced. Further, every alternative forwarded to date, will result in the condemnation of property, and not for public benefit, but for the benefit of two private resorts.

As mentioned earlier, in 2015, Save Our Canyons in partnership with the USFS, Salt Lake City and Utah State University conducted a survey of visitors to the Wasatch Mountains. In it we found that about 70% of visits are to dispersed sites (trailheads, crags, boulders, backcountry ski areas, picnicking, non-resort recreation), while only 30% are to the resorts. Local spending was estimated to generate $385.87 Million locally. Gear based spending for individuals in the area is between $600 and $1,500 annually. Displacement of the activities by the alternatives could significantly affect this spending, damaging our local economy.

You can find a comprehensive list of the six relevant reports on the USU website: https://extension.usu.edu/iort/research/cw-visitor-use-study. We believe your project could glean critical information, not only pertaining to the economic importance, which is clearly of the state's highest consideration and primary interest, but to the values, uses and management strategies relevant to the project area.

Alternatives Commentary

UDOT has determined that it will carry three alternatives forward to detailed analysis in a DEIS. For efficiency these can be characterized as 1) enhanced bus w/o road widening, 2) enhanced bus with road widening, and 3) gondola. In this section we will provide comments and ask questions about the various elements of the alternatives.

Our overarching concern is that evaluation of simply running more buses without associated infrastructure (lane/shoulder widening, snowsheds, and/or berms) should be included as an alternative. This shouldn't be considered solely as an option within the canyons, but also included on the approaches to these canyons, intersecting with existing or planned canyon transit routes. We believe the best transportation improvement to implement now, especially given that UDOT is proceeding in the absence of a comprehensive regional transportation plan, is one that would improve on the present while having a comparatively modest price tag, causing little environmental impact, and being the least prejudicial to future choices. The alternative that clearly best possesses these qualities, and that distinguishes it from the other bus alternative, is enhanced bus service, without any widening of LCC highway or unnecessary avalanche sheds (more on this later).

Giving people the opportunity to get to canyon destinations (resorts, trailheads, etc), without vehicles in the first place, could yield the single greatest benefit to the roadway, the watershed and the canyon in general. With improved transit service being the clear opportunity to address regional transportation issues, it begs the question - why is a highway entity (UDOT) conducting transit analysis, which could be done by a transit entity like the Federal Transit Agency (FTA) in partnership with UTA & UDOT. As raised in earlier comments on scoping, purpose and needs, and screening criteria (all of which are incorporated by reference) we question UDOT's authority

granted by the US DOT, which is specifically tied to roadway improvements, and explicitly states UDOT does not have authority to do transit analysis.

Simply put, running more buses is a modest solution that clearly can be made to achieve a significant improvement. Even if it were eventually to be seen as not fully adequate, there is considerable value in achieving an improvement even for just a portion of the present 30-year planning horizon. Costs will have been saved (even if only through deferral), and future LCC planning efforts will benefit from consideration of then existing circumstances—and maybe even of a true regional transportation plan.

Mobility Hubs

The most critical element shared by all alternatives is the reliance on "mobility hubs." The obvious problem that these create, especially if they are fully utilized, is that they interrupt progress up the canyon, they are highly concentrated, intermediate nodes that are cumbersome and time consuming for travelers to negotiate, and they create their own congestion problems. If improvements in LCC were part of a sensible, comprehensive transportation plan, canyon visitors would migrate from many small, easily reached and negotiated nodes throughout the Salt Lake Valley.

There are also human factors that suggest that these two concentrated nodes will not function as planned. As travelers in personal vehicles approach these nodes, assuming they are willing to consider transferring to a bus (or bus plus gondola), they will frequently be put to a decision about what is optimal for them. Their uncertainty will be because they don't know if they will find parking, and, even if some technology is in place to tell them parking is not full, they still don't have a good idea of how long the transition will require, given the remaining uncertainties about the time needed to find an open stall, its distance from the bus pick up area, and whether they're going to just miss a bus and have to wait the full interval to the next one. While skipping transit and continuing up the canyon brings the potential for its own delays, travelers know that, delays being equal, driving will be faster. In the absence of reliable information indicating one mode will delay their progress more than the other, they will tend to see the risk as equal. This will naturally tip the balance toward driving, generally the faster mode of transportation. In other words, what will go through travelers' minds is, "I don't know that one will delay me more than the other, so I'm going to choose the mode that's generally faster and requiring significantly less transfers."

Of course, the bigger the difference in inherent travel times between the two choices, the greater the inducement to resolve uncertainty in favor of driving. We would therefore expect this to be a very large factor, if the alternative to driving is a gondola, given that is projected to take a whopping 63 minutes.

Further compounding the ineffectiveness of the mobility hub, which again are the cornerstone of the alternatives is location and shared use by visitors to other canyons. The larger, and arguably the most critical hub resides adjacent the mouth of Big Cottonwood Canyon. This hub, would naturally be used by those organizing carpools, visiting resorts, destinations in other canyons. One could estimate that easily 50% of the spaces would be utilized by vehicles (and thereby visitors) not utilizing one of the modes (gondola or bus) being analyzed in the EIS, unless UDOT

is somehow planning to restrict this publicly funded garage for use by resort patrons going to Snowbird and Alta only. This would further reduce the effectiveness of getting people on transit as these hubs are necessary for any of the alternatives to be successful, since request to look at improving the frequency and volumes of transit access to the mouths of these canyons (Big Cottonwood and Little Cottonwood) have been repeatedly deemed out of scope.

Simply put, in the absence of a system that delivers people to the mobility hubs without cars, the alternatives' effectiveness have a fatal flaw, which is constrained by parking, which as proposed (or even as proposed by other gondola proposals), will force more vehicular traffic on the roadways, thereby failing to address the purpose and need of the EIS. This is in part, why we have suggested repeatedly throughout the process, to make transportation effective in these canyons, we need to do more to remove cars destined for these canyons, well before they reach the canyons. It is also, why the scope and focus on Wasatch Blvd and SR210 is a disservice to the region, and thereby this project for it fails to address the inter-related nature of the canyons, their visitors, an how people utilize the region.

Trailhead Parking Expansion

The 2003 USFS Revised Forest Plan clearly states:

"Protection of watershed conditions will be a primary factor in managing roads, trails and access. In the Tri-canyon area (Big and Little Cottonwood Canyons and Mill Creek) parking capacities of canyon parking lots (ski areas, summer use homes, developed and dispersed recreation sites) will be not exceed [year] 2000 levels unless modification is needed for watershed protection or to facilitate mass transit. Mass transit will be commonly used during winter, reducing crowding and increasing safety for users of the canyons. The Forest Service will work actively with other parties to explore options for reducing private vehicular use within these Canyons."

UDOT has interpreted this to mean, apparently, that if they close down road side parking, that was happening prior to the year 2000, they can replace these stalls in formalized parking lots. Several issues exist with this logic and approach. As the paragraph from the Forest Plan states the reason and rationale for no more parking is because of watershed conditions. There is a direct impact on watershed from increasing impervious surfaces, thus the prohibition on parking is really about reducing the amount of impervious surfaces, alteration of hydrology, and introduction of pollutants to our water supply. Limiting parking is also a strategy to limit visitation in adherence to the infrastructure available at sites throughout the canyon. Bathrooms, for instance have a capacity. UDOT's failure and refusal to restrict parking on its roads has created unsanitary conditions, created threats to our water supply, created stressors on funding streams to other agencies, notably the USFS and Salt Lake City, who have had to allocate additional dollars to keep up with the overflowing visitation and unsafe condition UDOT has allowed to happen along its highways — in direct conflict with the Forest Plan. Attempting to accomplish your goals at the expense of other policies and strategies of protecting water quality is abominable and this EIS is not and should not be the forum for forcing a revision to the forest plan which arguably has higher importance and a focus on water quality. Transportation and parking should be a tool to meet other goals for this landscape, not a hostile initiative that comes at the expense of other strategies, which the state continually tries to undermine (through this and other efforts).

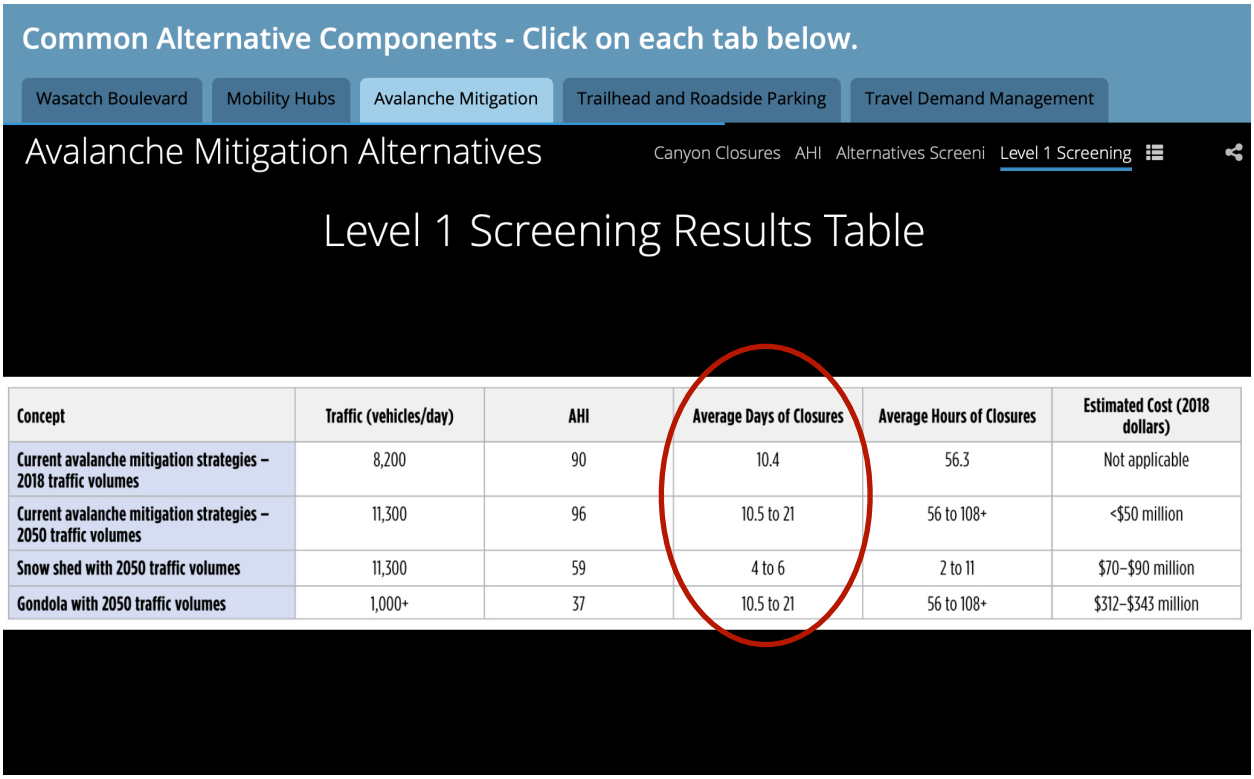
Further, the Forest Plan pertains only to the public lands managed and administered by the US Forest Service as disclosed in the plan. If roadside parking was such an issue for UDOT, it could have been addressed years ago at the discretion of UDOT by simply signing and enforcing closures to protect its infrastructure and increase safety - as noted in response to previous comments in the screening report. That said, if it couldn't take such measures, it would be because the roadway easements are not perfected, that is to say, still under the authority of the USFS. If this is the case, it would seem that this entire EIS is null and void as UDOT does not have the authority to conduct an EIS on USFS lands. This begs the question central to this entire process - who's authority does the land within UDOT's project area reside with? The USFS, UDOT, Salt Lake City, other? Is it a combination? The public deserves to understand and UDOT as the proponent, has an obligation to disclose this information to the public. It has come to our attention that commensurate with this EIS, UDOT is going through the process of perfecting some of its easements within the project area, which begs the question, if the easements are not perfected, why is the agency leading something for which it has no jurisdiction? We request clarification and transparency on these issues.

It is clear that strategies to deal with trailhead parking, capacity, access and amenities need to be revisited. This shortsighted EIS focused on the roadway, and only during the ski season, not the resource, is not an appropriate forum for this conversation. If the jurisdictions of relevance disagree, reasoning and rationale for doing an end-run on the Forest Plan need to be furnished to the public. This EIS is not a resource management planning effort, though it attempts to undertake actions that undo strategies that have been working, with the caveat that the weaknesses of the strategy lie solely with the discretion of UDOT (allowing roadside parking and overwhelming planned trailhead capacities).

Snowsheds & Berms

Included in both enhanced bus alternatives is construction of avalanche shelters, so apparently UDOT sees them as essential for any surface transportation solution. However, even a slightly careful parsing of the data UDOT presents related to avalanches cast doubt on this judgment. In particular, the data setting forth days with avalanche-related closures and hours of closure do not very well reflect the fact that the vast majority of those closure periods are for planned closures, very largely occurring at hours of the day when there is relatively little demand for the highway. What a more careful look at the data reveals is that shelters' actual efficacy, in terms of providing additional hours the highway is open to serve significant demand, is quite low. This means, given the cost of these structures, that, over the planning time horizon, the additional high-value hours the highway is open will each cost tens of thousands of dollars.

The data presented in the EIS suggests that the benefit of the avalanche sheds takes us from an average of 10 days of closure, to between 4 and 6 days of closure. This is a massive impact on the geologic magnificence, hydrology, water quality, wildlife, the glacial carving of these canyon, to name a few, for a minuscule benefit. While we understand the resorts are concerned about the economic impact of avalanches to their businesses, this condition was in existence and part of the reality of operating in these environments (not to mention the very nature of their businesses). The impact to the canyon far outweighs and benefit, and it might be a more fiscally responsible

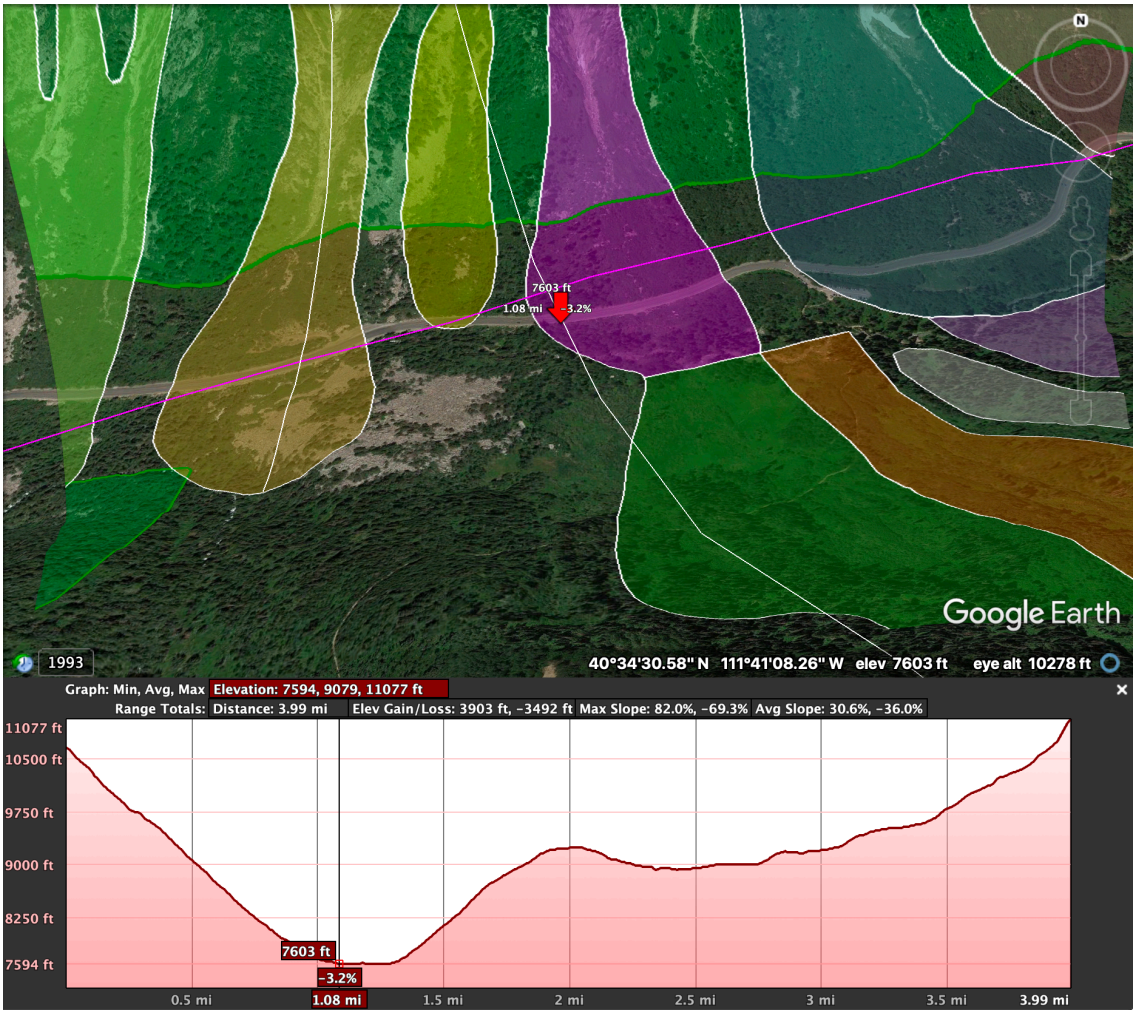


Concept	Traffic (vehicles/day)	AHI	Average Days of Closures	Average Hours of Closures	Estimated Cost (2018 dollars)
Current avalanche mitigation strategies – 2018 traffic volumes	8,200	90	10.4	56.3	Not applicable
Current avalanche mitigation strategies – 2050 traffic volumes	11,300	96	10.5 to 21	56 to 108+	<$50 million
Snow shed with 2050 traffic volumes	11,300	59	4 to 6	2 to 11	$70–$90 million
Gondola with 2050 traffic volumes	1,000+	37	10.5 to 21	56 to 108+	$312–$343 million

option to compensate them (or patrons) for inability to access these areas due to too much snow, rather than destroy a canyon to get a few more days of skiing.

Further, these snowsheds will need to be massive in order to propel the avalanches across the highway. The location of the roadway is near the foot/fan of these avalanche paths. A compounding factor is that the glacial "U" shaped nature of Little Cottonwood Canyon, means the areas in the canyon where you are looking to place the avalanche sheds, flatten out as they approach the stream. According to Mears and Wilbur, avalanche sheds require calculation of "design avalanche velocity, impact pressure and flowing height be calculated in advance." A cross-section of the canyon (below), helps to demonstrate this, with the arrow located on the roadway. It seems based on our research and experience dealing with avalanches, this type of mitigation is most appropriate where the avalanche has a high velocity, but because of the terrain and the canyon steepness, the avalanches have began to lose velocity, as noted by the fan shape that occurs near the roadway.

Our concern here is that the structure will need to be massive in order to ensure the fate that hit the snowshed on Red Mountain Pass in Colorado, where an avalanche filled the snowshed and took weeks to excavate, could be a more frequent occurrence here if the shape of the canyon isn't significantly altered. Because of the location of the shed in the depositional state of the avalanche, it will also require frequent maintenance to ensure it is effect in keeping snow moving, rather than creating a massive snow bridge. You can see most sheds exist much higher in the velocity zone of the avalanche, not the fan. Some information on the Red Mountain Pass avalanche shed failure can be viewed here: https://durangoherald.com/articles/267167



While the 56 hours of closure might sound significant, it is important to temper this with an understanding of when these hours coincide with visitation. Many closures take place overnight when the canyon sees little, if any, traffic. To better understand the cost benefit analysis, we should be better informed as to how the closures intersect with the 30th busiest hour — which is the focal point of this EIS.

<u>SR 210 Additional Lane/Shoulder widening</u>

Widening the roadway is merely a proposal to increase vehicular capacity. As we've mentioned, and will mention, all of the alternatives will most likely induce more cars. The demand for these places, far outpaces the capacity of the canyon, or the amenities to serve the visitors. At this point, UDOT should realize that additional lanes don't solve traffic problems, they just add more cars into the problem, further degrading air quality.

If we were to have a project, that proposed legitimate transportation alternatives that reduced the number of vehicles by 50% and doubled vehicular occupancy, we'd not only make headway on solving canyon visitation issues, but would improve upon environmental conditions and meet UDOTs safety goals. Sadly, UDOT believes these types of alternatives are out of scope and have ruled out legitimate transit solutions. We can change behaviors surrounding canyon access, rather

than changing the nature of these canyons, if only UDOT would listen and engage with entities who want to help you meet your goals in a less intensive and invasive manner.

Gondola

The problems with the gondola, and the data supporting it, are many.

Its most obvious problem is fundamental, as a form of transportation — it takes too long to get where it's going. By itself, this creates a large imbalance in the most basic element of the motivational system driving canyon visitors' choices of transportation. Accordingly, it would require development of a variety of strong, perhaps even rather draconian, motivational offsets to drive people to use it instead of driving private vehicles. But the time required for travel is not the only off-putting aspect of the gondola; it also requires an additional transfer between two modes of transport. This requires some effort on the part of travelers, and also serves as kind of a psychological burden to them distinct from the additional time and effort this transfer adds to the journey.

Numerous transit studies, that one wouldn't expect a highway building company to trouble itself with understanding, identify the Achilles heel of transit systems are the number of transfers/mode shifts a system introduces. This proposal forces three: car to bus, bus to gondola, gondola to destination. Not only is this a huge disincentive to use, but it also by design, eliminates the likelihood that connecting modes of transit would be used to get to the mobility hub (or even the gondola base, were it an option) as the acceptable number of transfers is exhausted by the complicated system. With a system that by UDOT's own admission (not to mention the desires of the Utah Legislature and Governor) being built primarily for tourists and economic development, patrons will be forced to not only move themselves and their gear, but assist the young and the elderly in moving themselves and their gear making transfers even more arduous.

A basic goal of all the forms of transportation UDOT has assessed is reducing private vehicle use. The data supporting the reduction achieved by constructing a gondola is either in error or grossly misleading. Table 3-4 in the Alternative Screening Report claims that, with the gondola, vehicle use will be "1,000+" per day at year 2050, down from 8,200 at year 2018 and 11,300 at year 2050 with no gondola. The only way the numbers can support this reduction is by attributing projected maximum occupancy of the gondola, or something very close to it, for 24 hours per day! If this calculation fairly considered reality — that there are peak travel hours throughout the day (these peaks supported by UDOT's own data) — the result would obviously be that many times that number of vehicles would take the highway every day. When asked in our June 16, 2020 meeting with UDOT if the gondola capacity would ever increase beyond the approximate 1,000 people per hour (30 cabins) the agency responded they would not ever anticipate needing more capacity for the gondola. The peak travel hours are between approximately 8am and 11am (east bound), and in the afternoon between 2:30pm and 5:30pm. In each of these three hour windows, the gondola would transport approximately 3,000 people and the roadway would need to hold the remaining 15,000 - 19,000 people, according to UDOT's forecasted demand of 22,000. Massive roadway failures would still exist in the gondola scenario.

As the figure above in the snowshed section shows, road closures will increase in the gondola scenario from the 10.4 days we would expect to potentially 21 days. As pointed out in the prior

paragraph, the roadway will still play a critical role in transporting at least 15,000 people. In what world is this proposal an improvement to conditions? It boggles the mind that this was allowed through what appears to be a politically motivated screen, that is riddled with holes and defies any and all logic.

Visual impacts of the gondola would be incredibly destructive to the canyon. One of the most stunning and significant features of Little Cottonwood Canyon is that it is a unique, glacially carved canyon. The gondola would be a blight on the landscape and the unique geologic character of the canyon which is appreciate by local communities and various recreationists. The visual impact to the beneficiaries of the gondola (Snowbird and Alta) are far less than to the other users and communities who see no benefit, but are going to have to bear the burdens of the system from environmental, visual, noise, monetary, and physical displacement standpoints.

What more is that the towers, load/unloading and angle stations for the gondola clearly go outside the defined project area of the roadway and undisclosed roadway easements. This should not only trigger more USFS involvement, but possibly other entities who have legal obligations for values higher than roadway travel (ie. watershed, wildlife, resources management). Numerous comments to expand the scope beyond the roadway were rejected by UDOT, as such they should be held to the same standard to only propose alternatives that reside within the project area they defined.

Even more distressing than the apparent disingenuous data supporting gondola construction is that there clearly appears to be, in effect, an undisclosed element of the purpose and need for the LCC project that UDOT considered completely outside of the NEPA process. In a video conference hosted by UDOT that I attended, UDOT stated that a factor UDOT viewed as favorable to the gondola but not mentioned in the Screening Report is that, in addition to providing needed transportation, the gondola would also serve as a tourist attraction. The precise words conveyed clearly to me that the UDOT representative speaking meant that the gondola's caché for tourism was a factor separate from its role in addressing existing transportation problems, it was not brought up in any context that suggested that the gondola's novelty would be reasonably relevant to the goals spelled out for the project. While it was disappointing to learn that UDOT had introduced a previously unidentified factor in its decision making, it also makes sense that there would be some unstated factor in favor of the gondola, because its liabilities are so substantial that it is otherwise something of a mystery how it survived to advance to detailed consideration in the DEIS.

Many others participated in that same video meeting and heard this statement and understood it just as I did. It is also my understanding that this was hardly the only occasion on which UDOT has acknowledged that it viewed the gondola's attraction to tourists as an additional favorable attribute.

Be clear: there are no "extra" or informal factors that play any role in the identification of alternatives in a NEPA process; they all must be disclosed and subjected to scrutiny within the NEPA process. What occurred in UDOT's selection of alternatives for LCC represents a corruption of this process, and it cannot easily be explained away and it will not be easily cured.

Climate Analysis

Numerous studies for this region suggest the Wasatch will become hotter and dryer as human caused climate change wreaks havoc on our already arid region. Less precipitation will fall as snow, and more of it will fall as rain. We are already experiencing this as we see rain falling at the base of ski areas during the winter months. Despite this well documented trend, UDOT seems to conclude in its avalanche closure forecast that if we do nothing, avalanche closures will increase beyond today's average, rather than decreasing as the climate trends suggest.

Canyon closures and the policies surrounding them, are not driven by climate, rather operational decisions by UDOT. The climate memo included as part of this EIS makes no conclusive nexus between climate and storms, and therefore the assumption that canyon closures will increase is inconclusive, suggesting the assumption of increasing the average days of closure is a hollow attempt to justify alternatives, in the absence of sound science. Given the research on drying, desertification of our region, and the fact that larger storms are known to be a function of lake effect (from lakes that are shrinking), one would conclude, avalanche closures would perhaps trend toward a 50% reduction with no mitigation, rather than the stated 200% increase in closures.

Given the important ecosystem services that these canyons provide, and the compounding pressures of climate change on water resources. A more thorough understanding of the impacts climate will have on this region must be contemplated as these dynamic conditions may result in significant changes not only to the environments, but to the roadway and UDOT's activities within the planning horizon. Note the recent landslide events taking place in the summer due to the over saturation of soils from major precipitation events as well, caused in part due to the instabilities caused by cut/fill slopes, which your project seek to expand. Climate change poses numerous and nuanced vulnerabilities and threats to these watersheds.

Reasonably Foreseeable Cumulative Impacts Analysis

There are a number of factors associated with this EIS that must be analyzed. A rudimentary NEPA example is that of a FS improving a road for a timber sale. Simply analyzing the roadway, without also understanding the impacts of the timber sale would be a failure to consider cumulative impacts associated with the roadway improvements. For this project, UDOT is proposing to improve the roadway for the purposes of inducing visitation to arguably one of the state's most precious watersheds. Both federal land managers and local watershed managers tasked with stewarding this resources acknowledge that increased visitation and the associated amenities needed to mitigate impacts to the watershed are the #1 threats to this area. As such, it would be an error to not assess the impact on additional visitation on our watersheds that would result from the alternatives. In order to do this, UDOT must first understand the thresholds for this canyon, and potentially for other canyons. This should be done in concert with the resource managers who are inevitably going to have to manage the herds UDOT and the ski industry induce to these watersheds.

Additionally, as it pertains to the gondola proposal, UDOT must look at the impacts of a full interconnect as it is embarking on building a phase in realizing "Utah's Interconnected Ski Industry" as laid out in SCR 10 - Concurrent Resolution Supporting Utah's Interconnected Ski and Snowboard Industry. This has an effective date of 3/16/2012. It is within this resolution that

the state "urges meaningful and balanced public involvement, in any associated planning and decision making processes regarding resort interconnections' and supports a comprehensive set of solutions to transportation problems in the Wasatch Mountains, including short and long term alternatives." The President of the Senate, and same person who co-sponsored the bill authorizing funding for this process (SB277), Sen. Wayne Niederhauser, was the sponsor of this bill. The State of Utah, being the primary instigator of the Little Cottonwood EIS, who also demonstrated its motives to be an interconnected ski industry with SCR10, means that the driver and reasonably foreseeable outcome from this EIS is to construct phase one of this vision and therefore the impacts of the entire interconnect should be evaluated as part of this EIS. This motivation has been hidden from public view and needs to be brought into the process so that they can better understand the impacts to their watershed, public lands, and recreational pursuits, all of which are at the core of the quality of life we enjoy.

New information on the project site

Throughout the comment period, new and refined information has been showing up on the project site. It has made it very difficult to respond to the volumes of information, let alone having new information popping up during a comment period. Further, some people have commented and may not have seen this information resulting in some of those comments being inadvertently incomplete. For example, new interactive GIS maps, information about gondola towers, stations, etc were released after the comment period started. People wouldn't know this information was there as it wasn't in the first week of the 4-week comment period.

Additionally, numerous reports of people not being able to submit comments, or having their comments rejected, were reported to our organization. This should warrant an extension and republication of the comment period. Public comment is at the heart of an EIS and new information and inadequate communication forms appear to be two ways that UDOT has hindered public involvement.

Conclusion

A fair analysis of a running more buses in these canyons without the addition of lanes, berms and avalanche sheds with an emphasis on increased carpooling strategies and regional transit connectivity is requested. Such a system would not only meet UDOT's goals, but would be more harmonious with the goals of other agencies and governments in the region. We recognize that analyzing transit solutions is a limitation for a highway agency and it should do more to bring transit expertise into the project. It appears to be an agency choice (or political mandate), grounded in analysis that is riddled with holes, that has lead to a more hostile approach that will be damaging to the multiple values and interests in these canyons. Good projects are grounded in good partnerships, and good partnerships beget good decisions. Those partnerships be it with us or other governments, as you are seeing in comments, are token, at best.

More, we are dismayed that the many regulatory and enforcement options available to UDOT to better manage the roadway, that could have a direct benefit to the purpose and need, have not even been attempted to be pursued. Rather, building additional infrastructure, altering hydrology and impacting the environment is the start and end point of the agency. It should be noted that

pursuit of the regulatory options would have de minimus impact on the environmental conditions, and should be prioritized, thoroughly vetted, and explored.

We have attempted to be thorough and exhaustive, but as you are learning, this landscape is important and complicated. We wish UDOT would do more to demonstrate care and be a partner in solving the root of the problems, rather than aiding the two commercial enterprises in the canyons at the expense of the numerous other values in the Wasatch. We will continue to engage, but if you have questions about some of the information we've provided, we are always available to help clarify and explain. Just because other mountainous regions have employed certain strategies, does not mean they are appropriate in these canyons. The Wasatch is simply not as vast as other areas, be it the Alps or the Rocky Mountains or the Sierra. Quite the contrary, they are incredibly compact, and provide critical resources to a huge population. Sage stewardship and management to realize a shared vision should drive this process, not economic development and enrichment of private companies at the expense of the public trust, which includes but is not limited to the lands, waters, and tax dollars, being leveraged by this process.

Sincerely,

Carl Fisher
Executive Director
Save Our Canyons
801-910-7487
carl@saveourcanyons.org

cc:
Salt Lake County Mayor Jenny Wilson
Salt Lake City Mayor Erin Mendenhall
Dave Whittekiend, Uinta-Wasatch-Cache National Forest
Lance Kovel, Salt Lake Ranger District
Laura Briefer, Director, Salt Lake City Dept. of Public Utilities
Ralph Becker, Director, Central Wasatch Commission
Carlton Christensen, UTA
Ned Hacker, WFRC