

SAVE OUR CANYONS

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

April 18, 2023

Re: Supplemental Information Reports- RACR & AQ.

Intro

Thank you for the opportunity to comment on important designations that have otherwise been ignored by UDOT in its Little Cottonwood EIS process. Save Our Canyons, a Utah nonprofit organization, has submitted comments on impacts to roadless areas which are critical in the protection of our watershed canyons, for wildlife and for high quality dispersed recreational opportunities (to name a few). While this single project not only impacts roadless areas, it also impacts a municipal watershed, riparian habitat conservation areas, 4f sites, converting our forests and watersheds to support highway purposes, rather than watershed, forestry and recreation purposes as many of the designations, inclusive but not limited to roadless, seek to protect.

The fact we are having yet another comment period after the FEIS has been released, demonstrates how disjointed, confusing, narrow in scope and predetermined the process has been. UDOT's process has failed to address impacts to special designations and uses, cumulative impacts analysis and connected actions, the concerns of other land managers and certainly ignoring the sentiment and input of local communities and governments.

Several other alternatives meet the project's purpose and needs and respect and protect the roadless designation and the characteristics the forest service's plan seeks to protect. More over, Salt Lake City and Salt Lake County's land and watershed management plans call for the protection of roadless areas. This is consistent with much scientific literature on the need to protect roadless areas which help landscapes become more resilient to the impact of climate change, drought, species extirpation, and urbanization: all of which are issues impacting the project area.

Gondola towers, snowsheds, vegetation removal, angle stations, to name a few are not acceptable uses of roadless areas. Simply running more electric buses and having more mobility hubs throughout the populated region (ie. origin of the vast majority of canyon trips) will do more to meet the needs of Little Cottonwood Canyon, both in winter and non-winter months

as the need truly is year-round, all the while protecting the environmental, ecological, recreational, scenic, cultural and societal values of the Wasatch Canyons. The USFS was very deliberative about protections of roadless areas and both UDOT and the USFS need to better protected this and other designations, which have helped improve forest and watershed health despite unprecedented pressures.

UDOT's preferred final EIS alternative is for highway purposes and therefore should not be exempt from the 2001 Roadless Area Conservation Rule.

In the new Supplemental Information Report "Assessment of the Roadless Area Conservation Rule for the Final EIS Alternatives," UDOT claims that its preferred solution of Gondola B could be exempt from the 2001 Roadless Area Conservation Rule. Its reasoning is that the gondola is not a road for motor vehicles, and therefore the necessary timber harvesting would be incidental. Eight gondola towers, snowsheds, two angle stations, and timber removal would be located in three inventoried roadless areas, encroaching upon two designated Wilderness areas.

This is a poor and limited interpretation of the RACR. The gondola system should not be exempt from the Roadless Rule simply because it is not technically defined as a road. The National Environmental Policy Act (NEPA) process being undertaken involves transportation analysis for S. R. 210, and UDOT's stated goal is to provide an "integrated transportation system that improves the reliability, mobility and safety for residents, visitors, and commuters who use S. R. 210".

The gondola would be built for road-related initiatives and is thereby inconsistent with the Roadless Rule and the 2003 Wasatch-Cache National Forest Plan. The Forest Plan prohibits road projects and recreation projects in these roadless areas, and as UDOT's final EIS states, this project is for highway purposes. Indeed, the gondola would be a permanent highway project that would have negative impacts on our watershed, plant and animal communities, recreation opportunities, and more. Inventoried roadless areas have environmental values (e.g. high-quality water and air, sources of public drinking water, habitat for wildlife species dependent on large undisturbed areas of land, diversity of plant and animal communities) that are mandated to be protected under Roadless Rule and are inherent to Little Cottonwood Canyon, which UDOT's preferred alternative would destroy.

The Roadless Rule requires protection of roadless characteristics.

Inventoried Roadless Areas offer a variety of ecological and social benefits, which we are able to enjoy today because these areas have been protected from road construction and timber harvesting under the Roadless Rule. These areas provide clean drinking water, cornerstones of biodiversity, large tracts of undisturbed habitat for wildlife (including threatened and endangered species), and opportunities for dispersed outdoor recreation that brings in billions of dollars in revenue every year in the state of Utah.

The Roadless Rule was established to protect these wild areas from the negative impacts of road construction, including habitat fragmentation and degradation, reduced water quality for wildlife and human uses, increased erosion, runoff, and slope instability, and increased human disturbances in remote areas. It is also critical to note that each of these roadless areas are connected to and immediately adjacent to two designated Wilderness Areas, noting both their outstanding ecological, watershed, roadless, visual, recreational and wilderness characteristics.

The US Forest Service categorizes management prescriptions (MPCs) by their effects on roadless values in its FEIS for the Forest Plan. There are three categories of MPCs: 1) MPCs that maintain roadless values, 2) MPCs that mostly maintain roadless values, and 3) MPCs that allow development. The MPCs in this first category of maintaining roadless characteristics are 1.5, 2.4, and 2.6. In these areas, road construction and timber harvesting is especially prohibited according to the Forest Plan.

UDOT's preferred alternative, Gondola B, would situate 8 of the 22 gondola towers, angle station, vegetation clearing, timber harvesting, and a snowshed in three inventoried roadless areas (IRA) in Little Cottonwood Canyon: Twin Peaks, White Pine, and Lone Peak IRA. These areas have roadless characteristics that must be maintained and protected.

For Twin Peaks IRA, there are 1,600 acres that are classified under MPC 2.6 that must Maintain Roadless Values, with 4,600 acres classified under MPC of Mostly Maintaining Roadless Values. Twin Peaks IRA received high values for being a source of public drinking water for Salt Lake City, fish species at risk, and heritage due to high potential for mining sites. It was also noted for its unique and renowned examples of glaciation. The Forest Plan also notes that the scenic integrity of glaciated canyons are one of the leading attributes for the management of IRAs.¹

For White Pine IRA, there are 1,900 acres that are classified under MPC 2.6, which means that no development is permitted. White Pine IRA has especially high ecological values as a source of public drinking water, offering a semi-primitive experience with glacial topography and scenic integrity in an area that "generally appears natural" (which a gondola system would mar), and scenic attractiveness. Although White Pine IRA is small in size, it is noted as having a relatively high value for its size, due to its location.²

For Lone Peak IRA, there are higher values for landscape character and scenic integrity, in part because "from an aerial section view the landscape appears intact." It also has high values for heritage resources and fish species at risk, namely a small population of cutthroat trout in Little Cottonwood Creek.³

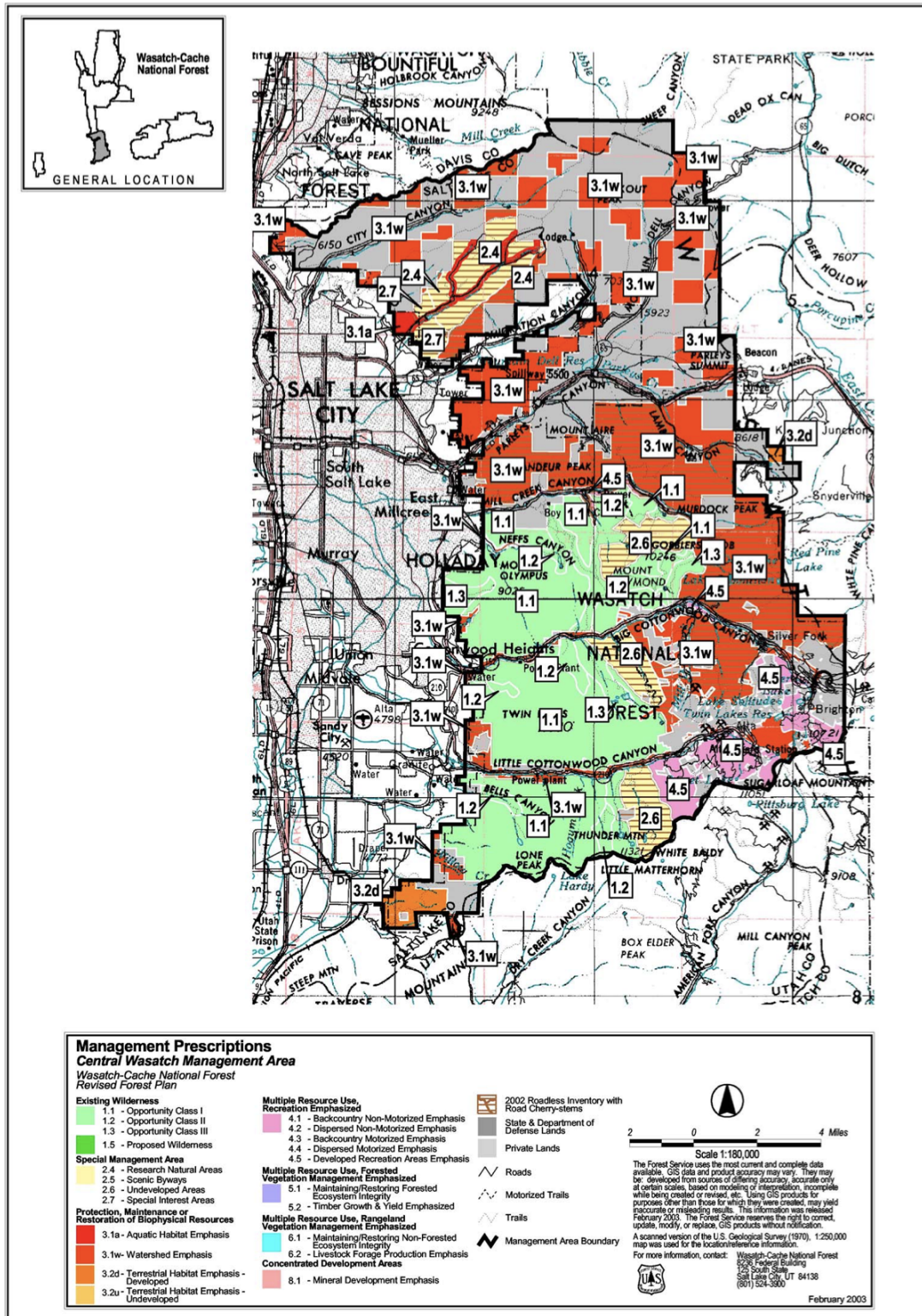
These IRAs offer tremendous unique ecological and social value that are also the backbone of the entire Salt Lake Valley, offering a clean, high-quality source of drinking water, world class views, and diverse plant and wildlife.

¹Page C2-58 from the Forest Plan FEIS

² Page C2-59 from the Forest Plan FEIS

³ Page C2-60 and C2-61 from the Forest Plan FEIS

The following map is taken from the 2003 Forest Plan and shows the management prescriptions across the Central Wasatch.



UDOT's preferred alternative would not fulfill any of the Forest Plan's allowed exemptions to the Roadless Rule

The 2003 Revised Forest Plan for the Wasatch-Cache National Forest discusses how IRAs should be protected from development, including how much of the roadless area and which roadless areas. According to chapter 3 of the Forest Plan, there are some exemptions to the Roadless Rule. However, most of these are primarily for ecological purposes, none of which are fulfilled by UDOT's preferred alternative.

Road construction and reconstruction are prohibited in most roadless areas, as is timber cutting and removal. In the instances when timber harvest and road construction is allowed in some parts of roadless areas, however, the Forest Plan states that it is to be for ecological purposes, such as to improve habitat for terrestrial wildlife (prescription 3.2D), to maintain or restore ecosystem composition and structure – for instance reducing the likelihood of uncharacteristic wildfire (prescription 5.1), and for timber production purposes (prescription 5.2). According to the Forest Plan in conjunction with the Roadless Rule, fuels treatments for wildfire mitigation is allowed, but no tree cutting is permitted for any reason in the area where the proposed gondola system's angle station would be located.

The proposed gondola system up S. R. 210 would not serve any of these ecological purposes, rather, it would be removing and fragmenting wildlife habitat through the clear-cutting of vegetation around the 22 gondola towers (8 of which are in inventoried roadless areas), the angle station, and the snowshed.

While the 2003 Revised Forest Plan allowed for some development to take place in certain roadless areas, a) it was not in any of the three protected roadless areas in Little Cottonwood Canyon, and b) it was not for the purposes of building a gondola, which detracts from, rather than enhances, the roadless characteristics of these IRAs.

UDOT's preferred alternative of Gondola B has situated much of its gondola system in potential violation of the 2001 Roadless Rule. Meanwhile, there are options that UDOT has evaluated that are cheaper, allowable in the forest, and permissible under the Roadless Rule, including the alternative of enhanced bussing with no widening of lanes.

Electric buses are a cleaner alternative, with considerably less impacts to Roadless Areas

In the "Air Quality Supplemental Information Technical Report", UDOT altered the variables in its "hot-spot" analysis to consider a scenario where all buses would be diesel-powered and at their maximum age in 2050, the year traffic for SR 210 is estimated to be at its peak. While one could easily understand why UDOT would analyze a "worst case scenario" for air quality given the project falls within non-attainment zones for PM_{2.5} and PM₁₀ emissions, it is unacceptable that UDOT continues to ignore an electric bus option.

If UDOT can adjust its analysis to consider the possibility of using higher emissions fuels like diesel, why can't it also begin to assess the impact of electric buses?

The \$1.4 billion dollar preferred alternative has negligible positive impact on air quality as it serves so few people on a roadway that isn't nearly as heavily traveled as many other roadways in our region. An electric bus option, on the other hand, has overwhelming support from local officials, citizens, businesses, organizations, and other stakeholders that have consistently requested UDOT expand its analysis to consider electric buses. UDOT should further study the sustainable fuel options that exist and that more accurately represent our nation and state's shift toward cleaner energy.

We believe that UDOT, our ski area, and the US Forest Service can and should do better in solving visitation to the Wasatch. Our communities and our watersheds deserve better than they are presently giving them. The gondola will do little if anything, yet have a negative impact on our canyons and our public coffers. We eagerly await a bold decision that brings common sense and a comprehensive approach to the Wasatch Canyons.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Fisher', with a long horizontal flourish extending to the right.

Carl Fisher
Executive Director
Save Our Canyons