



September 3, 2021

Little Cottonwood Canyon EIS Team
c/o HDR and the Utah Department of Transportation
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Dear LCC EIS Team and Decisionmakers,

Wasatch Backcountry Alliance (WBA) is the collective voice for human-powered individuals and organizations who recreate in and share a love of the natural wonders and priceless recreational opportunities in the backcountry of the Central Wasatch. Winter Wildlands Alliance (WWA) is a national alliance of grassroots organizations, environmental advocates, backcountry skiers and snowboarders, and individuals who are devoted to protecting, preserving, and sharing access to quiet places in the mountains.

We appreciate the extended opportunity to carefully review and provide actionable comments (Attachment A) on UDOT's draft Environmental Impact Statement (EIS) document and proposed/preferred alternatives, with references to the EIS itself and our comments as to the issue with that section. We also included our more general impressions, preferences and concerns as provided in this transmittal letter. Our simple, core mission and interest is to preserve and protect the beauty and wonder of the Central Wasatch, and the quality of people's access to and experiential opportunities therein, and to participate in this community effort to identify a solution that meets the stated purpose and need of the EIS for this project.

WBA and WWA firmly believe that before any transportation system is selected there must be a thorough analysis of the purpose and need of the entire tri-canyon transportation system, as well as the overall carrying capacity of the Cottonwood Canyons and Millcreek. This will help establish the volume of people that needs to be moved by the system, which will in turn help determine which transportation system best fits that purpose and need. We implore UDOT, the Central Wasatch Commission, the US Forest Service and Salt Lake County to undertake a

purpose and need assessment for the tri-canyon area in total as well as an LCC carrying capacity analysis that would be used as a baseline by the various stakeholders for decision making. As we consider the best solution to the traffic problems in Little Cottonwood Canyon, it's important that decisions are based on facts and are clear of political or private business bias. The outcome of UDOT's process will be expensive, costing every Utahn nearly \$200 each in taxpayer dollars. The wrong solution threatens to spend hundreds of millions of dollars toward an alternative that may not alleviate the current traffic issues, and in the case of the gondola, would permanently scar the canyon.

UDOT's first option is an enhanced bus service, with road widening and installation of avalanche sheds. UDOT correctly states the bus option is the best for improved mobility. The second is a gondola that stretches from the canyon entrance to Alta, includes snowsheds and road modifications, an option which UDOT says will result in improved reliability. We strongly disagree with this assertion, and think the reliability of the gondola has been overstated.

To be blunt: the gondola is not an effective transportation solution. It's a purpose-built ski lift serving to primarily boost the profits of a few private companies. By only operating during the winter ski resort season, the gondola will not help address the very real traffic issues in the summer, nor will it stop at any dispersed trailheads, even the wildly popular (and very crowded) White Pine. This means if you want to avoid driving your car to any other trailhead, take in Alta's July wildflowers or Snowbird's Oktoberfest, the gondola will sit as a mocking, idle eyesore on its 200-foot towers as you are forced to continue driving your car. As if that is not enough, it is also being touted by its supporters as a tourism tool in and of itself, which seems to have been adopted by UDOT yet was not a specific component of the original Purpose and Need.

If the goal of the EIS is to improve both reliability and mobility in LCC, travel times for each alternative is important in selecting a solution that will get people out of their cars to ride public transit. UDOT estimates the gondola will take 55 to 59 minutes to ride, as compared to 38 minutes to ride the bus, and 36 minutes for private vehicles. Limited gondola station parking and fees will force many to park at a distant parking lot to take a bus to the base station, all before stepping onto the gondola. Riding the gondola means people will arrive up to 23 minutes later than all other alternatives (even later for those who need to take the additional bus to the base station). Additionally, riding the gondola requires at least one transfer and possibly two, depending on where people park. Families with children or people with a lot of gear will see this as a major inconvenience, which will in turn deter use. This is not a commute to work for most of the intended users; it's a system used by people who have limited time to recreate and are competing for scarce resources. Therefore, adding complexity – and potential costs – to canyon travel will not necessarily incentivize them to leave their car to ride the gondola, knowing the challenges that go with it and the fact that they'll arrive 20-30 minutes later than all other options.

UDOT says the gondola is the most reliable option during high avalanche danger. However, the gondola will not run every time avalanche teams use artillery for avalanche control, and when avalanche shooting over the gondola takes place, cabins must be unloaded from cables, cables and towers must be inspected and then cars reloaded onto cables before gondola operations

resume. Further, when avalanche conditions are very high and an interlodge order is in effect (all canyon users legally required to be inside), the gondola will not run. Storms with high wind/lightning/ice events, mechanical issues/power outages may also stop the gondola. With the variety of conditions that will stop the gondola, the purported reliability advantage is eroded.

We need solutions now. Adding more buses to the existing roadway can be more quickly implemented, while providing more long-term flexibility. WBA and WWA firmly believe that buses can be successful without widening the road if UDOT employs other traffic-control methods to restrict/reduce vehicle traffic on Hwy 210. Expanded bus service that picks people up from numerous locations across the valley, ie. downtown, U of U, Olympus Cove, Sandy City, etc., that is closer to “door-to-door” would be more efficient than forcing people to park at one of two transportation nodes, and would in turn encourage use and alleviate near-canyon traffic issues. UDOT was tasked and funded by the Utah State Legislature to explore tolling/paid parking for private vehicles, yet the Draft EIS did not address this concept in detail. When UTA added more buses two seasons ago with an increase in funding from the state and the community, those buses were utilized. Tolling vehicles, adding more buses, giving priority to buses during peak usage, and more comprehensive enforcement of the personal-car tire traction policies is a combination that addresses the problem at lower costs and is a shorter-term, scalable, mutable solution that can be adaptable as citizens’ usage changes over time. Some people roll their eyes at buses, but Utah has never invested enough resources to make the canyon ski bus system truly effective. UDOT now has the opportunity to change that. And unlike GondolaWorks, UTA is not allowed to make flashy videos about bus service or openly lobby decision-makers about why their solution should be selected.

Addressing the traffic issues plaguing the Central Wasatch is a once in a generation opportunity. We thank UDOT for its efforts and consideration of input from Wasatch Backcountry Alliance and the Winter Wildlands Alliance. Please do not hesitate to contact us if you have any questions or would like to discuss further.

Respectfully,

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ATTACHMENT A¹

Tabulation of Comments with DEIS Citations and Impact on the Analysis & Decision Document

COMMENT	DEIS CITATION	IMPACT
ENVIRONMENTAL JUSTICE. The EJ and public outreach methodology used in the draft EIS is inadequate. It appears as the EJ impact analysis area missed obtaining critical input from EJ individuals and populations that use LCC, but do not live anywhere near the canyon or canyon mouth.	5.3.2	The preferred alternatives are likely to create additional barriers to LCC access by EJ populations who currently recreate in LCC. Traditional EJ analysis methodologies for transportation projects are inadequate to obtain meaningful input and data to assure new barriers are avoided.
LIMIT SKIERS. This alternative evaluates the effect of limiting skier numbers in lieu of making roadway improvements. This considered limiting ticket sales, a vehicle reservation system, a high toll, parking fees as a function of occupancy, odd-even plate days, and canyon closures as a function of parking capacity. The document states these strategies would not reduce peak-hour congestion.	Table 2.2-9	Our review could not locate sufficient details in the document to indicate how utilizing all of these strategies would have no positive effect. These conclusions are confusing and insufficient. Requesting clarity as to if the strategies were evaluated individually, or in the aggregate?
RECREATION RESOURCES IN THE COMMUNITY IMPACT ANALYSIS AREA. Acreage or miles in Analysis Area for backcountry is listed as “Not available.” The entire length of SR 210 should be listed as mileage in analysis area for backcountry terrain accessible from SR 210. The alternatives will clearly impact	Table 4.3-1.	The document is inconsistent where it relies on information from two participating agencies on the topic of a trailhead important to our dispersed user group. Which is it? Does the access exist or not? Our members can assure it does, historically. UDOT and the USFS should get together and align on

¹ These public comments have been prepared based on a multi-disciplinary, team-wide review by Board members of the Wasatch Backcountry Alliance and Winter Wildlands Alliance, in the context of its primary mission and member interests. They have also been prepared with an eye to those comments which could provide new or corrected facts, new or corrected assumptions, or to point out concerns with methodology (inconsistencies, imbalance, thoroughness) where those findings could potentially impact decisions around alternative selection and implementation. We welcome the chance to discuss or elaborate further on these comments if that would inform your analysis and decision.

<p>parking and access, as stated in the document.</p>		<p>whether there's a trailhead in upper LCC because according to UDOT in this section there is. Albion Meadows Trail (USDA Forest Service Trail 1006). This trail extends due south from S.R. 210 just west of Albion Basin Road. Access is from the paved Albion parking lot at Alta ski resort. Little Cottonwood Canyon Alta-Brighton Trail (USDA Forest Service Trail 1007). This trail extends north of S.R. 210 across from the Albion Meadows Trailhead.</p>
<p>LAWS AND REGULATIONS RELATED TO WATER QUALITY. We concur with the assertions made in previous public comments by Salt Lake City Public Utilities regarding the importance and legal precedence around the protection of our urban water supply. The DEIS presents a thorough and comprehensive presentation of all relevant rules and regulations, and lays out with conventional analyses how the preferred alternatives can be constructed and operated without impacting the water supply source.</p>	<p>Table 12.2-1</p>	<p>However, the analysis fails to adequately weigh the true importance of drinking water to this community. When compared to the winter traffic congestion issues addressed by this DEIS process, the long-term availability of potable water supplies is far more critical to preserve than any inconvenience represented by our inability to solve our traffic and parking challenges. Recent weather events and trends seem to underscore this distinction. The DEIS fails to adequately consider the indirect and cumulative effects of accommodating more and more uses in LCC, without regard to any environmental capacity limitations, such as pressures and impacts to our drinking water supply.</p>
<p>ROADWAY SAFETY. A significant factor leading to traffic congestion and reflective of the project Purpose and Need, is the importance of winter traffic flow and reliability. UDOT and SLCO have made strides in recent years with the adoption of various traction laws and requirements. The DEIS presents useful data and</p>	<p>1.4.3.2.3</p>	<p>The document acknowledges this contributory problem, but does not adequately evaluate the potential for policy and enforcement enhancements to contribute substantively toward meeting the purpose and need.</p>

<p>acknowledges the role of weather-related traffic impacts, but does not analyze for enhanced traction enforcement or related solutions.</p>		
<p>SKIERS RESERVATION SYSTEM. This section analyzed a system similar to that which Snowbird implemented in 2020. The document concludes that such a system “would not reduce peak-period traffic.</p>	<p>2.2.4.2</p>	<p>This finding is counter to that which our members observed last year. We believe this program resulted in many patrons arriving later in the morning as they knew they had a guaranteed parking spot, thereby lessening traffic in the peak-period traffic hours. Our review could not find the necessary details or related assumptions upon which this finding is asserted. Further, even though UDOT does not have the authority to require the ski areas to implement such a system, the very existence of a gondola alternative which primarily serves the ski area indicates there is a will and means to compel the ski areas to cooperate and consider a range of alternatives that would meet the common interest around the purpose and need.</p>
<p>REGIONAL. The Central Wasatch Mountains and canyons (Millcreek, Big Cottonwood, and Little Cottonwood) are a unique recreation amenity close to a major metropolitan area. A survey conducted by the University of Utah (2015) for the Central Wasatch found the following: 65% of the respondents said that recreating on public land plays a large role in their physical and mental well-being. This response represents our membership precisely.</p>	<p>4.3.2.2.2</p>	<p>The selected alternative should not create barriers that do not currently exist for access and use of public lands by dispersed users, without adequate impact analysis. This is particularly important for environmental justice user populations as mentioned elsewhere in this public comment document.</p>
<p>LAND USE. This analysis concludes that the projected demand increase will likely necessitate that developed ski areas may want to add “lift</p>	<p>20.4.2.2.1</p>	<p>By deferring any consideration of the indirect and cumulative impacts of encouraging more visitation on the ski areas, - and the</p>

<p>capacity,” “other facilities,” and “lodge capacity.” The document suggests this does not require indirect analysis, as it can be considered in later agency master planning processes. This is a clear and direct violation of the obligation to not partition projects, and avoid consideration of indirect and cumulative impacts in this decision making document.</p>		<p>resulting expansion of the ski area facility footprint - this DEIS is inherently unable to adequately consider all related impacts. The document seems to “serve up” to the benefit of the ski areas a basis to allow the USFS to approve future expansion, without the burden of considering impacts in this decision document.</p>
<p>RECREATION WINTER. This section of the indirect effects analysis, again, correctly assumes increased visitor numbers, and the predictable need and allowability (even obligation?) for the ski areas to accommodate that growth - but there is no analysis or consideration of that in the decision document. The basis for not including that - “it isn’t certain” - is an unacceptable basis for such a central item.</p>	<p>20.4.2.2.2</p>	<p>By deferring any consideration of the indirect and cumulative impacts of encouraging more visitation on the ski areas, - and the resulting expansion of the ski area facility footprint - this DEIS is inherently unable to adequately consider all related impacts. Again, the document anticipates a partitioned impact and project remedy (facility expansion) will likely be reviewed by the USFS and approved, without the burden of considering impacts in this document.</p>
<p>TOLLING. We concur that backcountry skiers would be negatively impacted in the morning (7 AM to 10 AM) for access to the upper part of Little Cottonwood Canyon since the bus service would service the resorts only, causing backcountry skiers who use the bus to walk greater distances to access trails. Our organization does not oppose tolling strategies, unless dispersed users are inequitably singled out.</p>	<p>4.4.2.2.3 and 4.4.2.5.2</p>	<p>Walking long distances on pavement to access dispersed public land areas is counter-intuitive and counter-productive to human-powered recreation. It can be done, but this impact should be avoided or minimized unless a similar barrier is presented to developed ski area users.</p>
<p>WINTER VISITATION. This analysis underestimates the projected visitation. Ski industry trends have consistently reported growth for the last several years. The reliance on 2017-2018 data is likely to result in an</p>	<p>20.4.1.2.1</p>	<p>By underreporting use, impacts, and failing to base the analysis on future growth potential, there is a risk of over-reporting the alternatives ability to meet the Purpose and Need. The fact that</p>

<p>underestimate of future projections. Further, this entire analysis disregards dispersed canyon users. Lack of data is an insufficient basis to underreport user impacts. More than 14,000 paper copies and an estimated 6,000 digital app versions of the Wasatch Backcountry Skiing Map (Achelis, 4th Ed., 2019) have been sold, among millions of dollars in backcountry tools and gear. This represents powerful evidence of the scale and value of dispersed recreationists in LCC. Our respective organizations enjoy and inform over 30,000 followers on social media and via email communications.</p>		<p>ski area user data is more readily available than dispersed user data should not result in an analysis that leads to an alternative that is arguably biased to one user group. As further evidence of the intrusion of the gondola alternative on dispersed users, one of our backcountry enthusiasts has prepared a draft map showing the proximity of the proposed tower locations to wilderness areas and existing trails used by human powered recreationists (Attachment B). Based on this map, WBA conservatively estimates that more than 30 backcountry ski runs in LCC will be negatively impacted if the gondola solution is implemented. A more thorough analysis is required.</p>
<p>The two solutions provided are focused on peak usage on weather-compromised days, despite the fact that actual peak usage on storm days are relatively rare events. This is akin to oversized parking lots to account for Black Friday and the day after Christmas. A massive public expenditure to account for these outlier events without taking into account the vast majority of “down days” has no accounting in the document.</p>	<p>Chapter 23</p>	<p>This Chapter avoids the obvious issue of “irreversible and irretrievable” loss of fiscal resources. If this community invests in either of the preferred alternatives – which arguably address traffic and mobility in only a limited scope and scale regionally – the community is in a significantly weaker fiscal position to address regionally critical growth challenges.</p>
<p>GONDOLA VIEWSHED. We concur that the gondola would “have a negative impact for dispersed recreation occurring beyond the ski areas because of long-term changes to the viewshed, that “recreating in Little Cottonwood Canyon near the gondola system (towers and cabins)</p>	<p>4.4.4.2.2</p>	<p>The document asserts – in an inappropriately equivalent manner – that some “residents” would find the gondola as disruptive to the natural setting of the area and its rural nature, while “some residents” who recreate in Little Cottonwood Canyon might see the</p>

<p>will detract from LCC views, and result in a “reduced outdoor recreation experience”.</p>		<p>location as a benefit because they would live within walking distance of the station. This statement is misleading and unhelpful to the analysis, as the number of individuals passing by this area and accessing these impacted viewsheds far exceeds the total number of residents in close proximity to the gondola access point. An impression of equivalency is suggested which is inappropriate and biased.</p>
<p>TRAILHEAD PARKING ALTERNATIVES All alternatives reduce total canyon parking available for dispersed users, and no reasonable mitigation is suggested. An inadequate number of new parking spaces is suggested at Tanners (when other access is eliminated, users will quickly overwhelm the few spaces provided). Tanners, White Pine, Coal Pit and the Great White Icicle winter climbing area are very popular and traditional access points that will be effectively eliminated.</p>	<p>4.4.2.5</p>	<p>The impact from lost access will disproportionately impact dispersed users throughout the year. Imagine if one of the preferred alternatives was installed to accommodate ski area access, and then taken away. That is the effect of these lost access points on dispersed users. This impact will be devastating to backcountry users.</p>
<p>WASATCH BLVD. & HWY 210. We share the concern and interest of community residents who place a high value on natural open spaces and the views of the surrounding undeveloped mountains. Protection of streams, natural vegetation, open spaces, and scenic views with ridgeline protection measures is important to both residents and our constituency.</p>	<p>4.3.2.1</p>	<p>The value of these views is hard to quantify, but it must be attempted in order for the analysis to be based on a fair and balanced consideration of project impacts. Evidence of this value can be found in real estate, State investments in tourism, and indirect economic impacts across ALL user groups, not just developed ski area users.</p>
<p>VISUAL RESOURCES. The visual impacts section uses several standard assessment tools to rationalize making the visual impacts of gondola alternatives and the</p>	<p>Chapter 17</p>	<p>While the document authors have cited standard methods, we are concerned that no tool exists that could adequately evaluate gondola infrastructure from all the</p>

<p>snowsheds/enhanced bus alternatives somewhat equal. This results in the perception that the visual intrusions of an aerial structure and the visual intrusions of the snowsheds plus an additional lane are roughly equal.</p>		<p>viewpoints that dispersed users do access.</p> <p>The selection of KOPs (Key Observation Points) and the interpretation of how the alternatives would affect the viewshed are subjective. This section uses a convincingly objective analysis matrix based on subjective base data to support conclusions which make the two alternatives largely equal in impact. If the gondola is favored over the enhanced bus, it could be argued – inappropriately in our opinion – that the former is no more visually intrusive than the latter. We believe the visual impact of any overhead structure as viewed from the road would be significantly greater than the visual intrusions of the snowsheds and the additional lane as viewed from the road – the perspective of most visitors at least for now.</p>
<p>VISUAL METHODOLOGY. In this section the point is made that the FHWA can affect a land transfer from the USFS to FHWA, to UDOT that would make the issue of visual standards – the USFS SIOs, moot.</p>	<p>17.4.1</p>	<p>Ownership will largely be transparent to any dispersed user from a variety of viewpoints. Visitors to LCC will be impacted by any infrastructure that is constructed, no matter where it is located and who owns the land after a transfer. A change in ownership would at the very least represent an indirect visual impact, and/or a cumulative impact, which has not been evaluated.</p> <p>The standard methods used do not appear to be designed to assess the impacts of aerial transportation systems. If mis-applied, this</p>

		<p>portion of the analysis may be flawed in that it doesn't adequately assess the visual impacts of ground to air and it can't adequately address the visual impacts of air to ground. NONE of the KOPs use an aerial perspective so that analysis is missing.</p>
<p>FOREST PLAN AMENDMENTS. USC 23 section 317 allows the FHWA to acquire right-of-ways on forest lands. This would be necessary for the additional roadway right of ways.</p>	<p>Chapter 28 USC 23 Section 317</p>	<p>We note that while conventional takings, easements and exchanges are normal and common along roadway rights of way, we are curious if the code anticipates and was intended for such a broad interpretation as to accommodate a resort/tourist amenity such as the gondola? If such a transaction is complex, the document and analysis should analyze the impacts of that more substantively for cost, policy implications, and schedule impacts.</p>
<p>HAZARDOUS WASTE IMPACTS. The presence of hazardous waste site conditions at Gondola Alternative B's La Caille location is well documented.</p>	<p>Figure 16.3.2</p>	<p>However, the document does not appear to adequately factor the potential exposure risks (air and water, temporary and ongoing) that could result from a large-scale disturbance of these impacted soils.</p>

ATTACHMENT B

Backcountry Use & Tower Proximity Map (C. Johnson – DRAFT)

