

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



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*	Level 2 Screening
<i>Gondola (3S) Alternatives – Preliminary Screening Results</i>				
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.	—	—

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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.

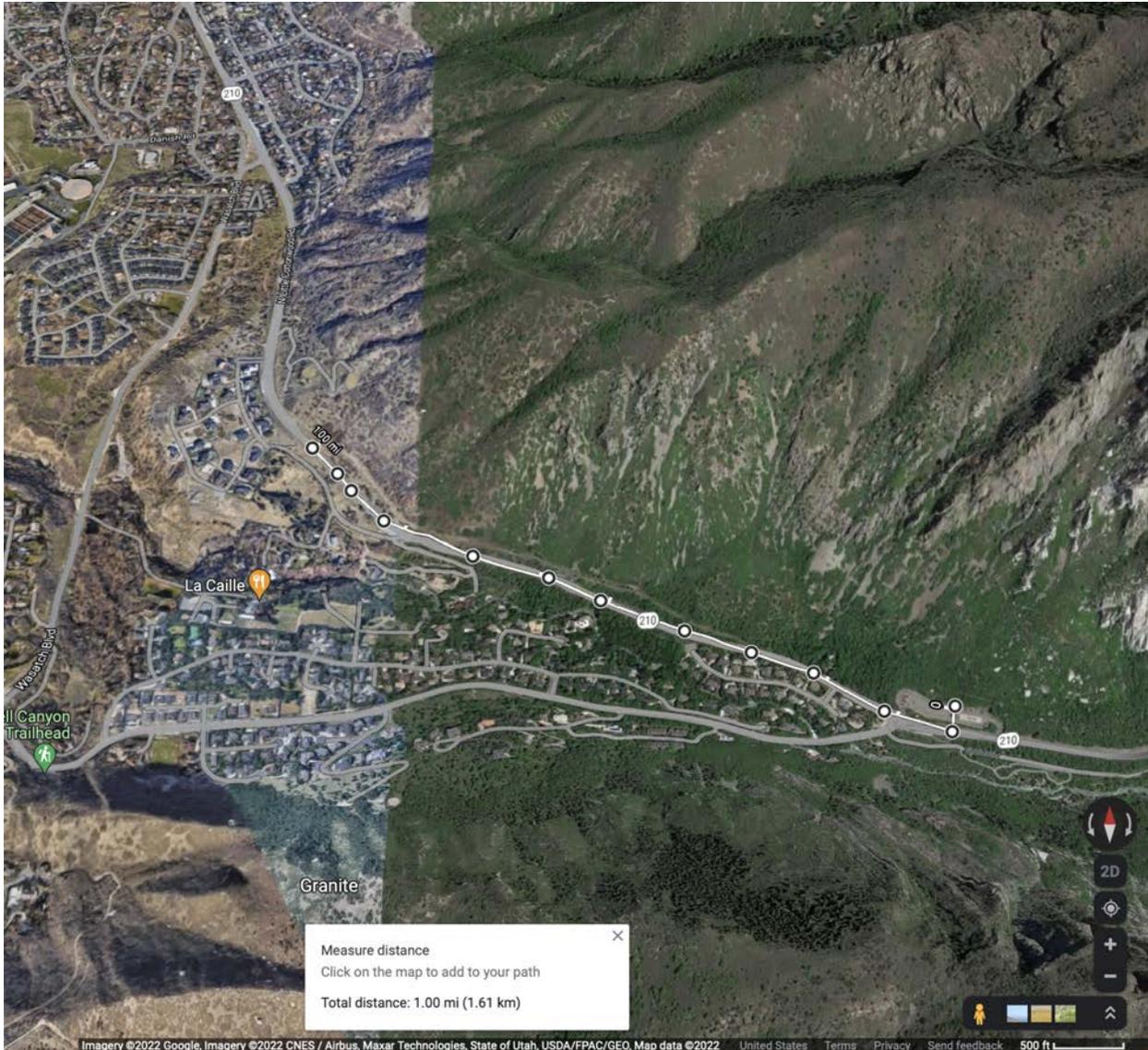


Image showing approximately 1 mile from the “entrance to the canyon.”

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

A handwritten signature in black ink, appearing to read 'Carl Fisher', with a stylized flourish at the end.

Executive Director
Save Our Canyons