

To: Wasatch Front Regional Council
Andrew Gruber, Executive Director
Jory Johner, Director of Long-Range Planning



Re: 2023 - 2050 RTP Comments

Feb. 24, 2023

Thank you for the opportunity to provide comments on the Draft 2023 - 2050 Regional Transportation Plan. We respect and appreciate the role of the Wasatch Front Regional Council.

Save Our Canyons is a local 501(c)3 non-profit dedicated to protecting the wildness and beauty of the Wasatch Mountains and has been invested in finding solutions to the issues confronting the canyons, inclusive, but not exclusive to Little Cottonwood Canyon, for 50 years. We deeply wish to find resolution to the issues that present themselves in all seasons of the year and that they are connected to in our region. We are extremely concerned that this direction of including a gondola, will not only harm the canyon, but not solve the year round issues that confront the canyon, and worse, divert precious funding resources away from projects that will actually improve regional mobility and our overall quality of life.

I will separately attach comments directly on the LCC projects. I did not want the length of that to take away from the three important points we wanted to make in this letter as you work to adopt your RTP. We felt emphasis on planning, highlighting equity issues, and giving general feedback on funding project prioritization in the RTP were of higher importance. Particularly because your job is planning, not engineering.

Planning and Environmental Linkage | RTP and LCC EIS Linkage

Metropolitan Planning Organizations play a critical role in, well, *planning* for our future. Our concern, particularly with the inclusion of the elements of the Little Cottonwood Canyon EIS, notably the gondola, road widening along Wasatch Boulevard, parking garages, avalanche sheds and tolling, is that these projects, while they are subject to a National Environmental Policy Act (NEPA) process, that is not a planning process. WFRC should know this, if it doesn't, our region is in serious trouble.

What is most concerning, is that UDOT too, knows the differentiation between planning and environmental review. They've articulated this better than I can, as part of its *Solutions Development* process.

“Coordination is a critical element of effective planning. A benefit of the Solutions Development process is the ability to streamline a future environmental study by coordinating it with activities in the planning phase, creating planning and environmental linkages (PEL).

PEL is a concept [forwarded by USDOT](#) that allows decisions made in the planning phase to be incorporated into a future environmental study (such as an EA or EIS), provided that certain requirements are met. The Solutions Development process purposefully takes those requirements into account, giving UDOT the option (though not the obligation) to use decisions made in planning and avoid duplication of effort in an environmental process.”¹

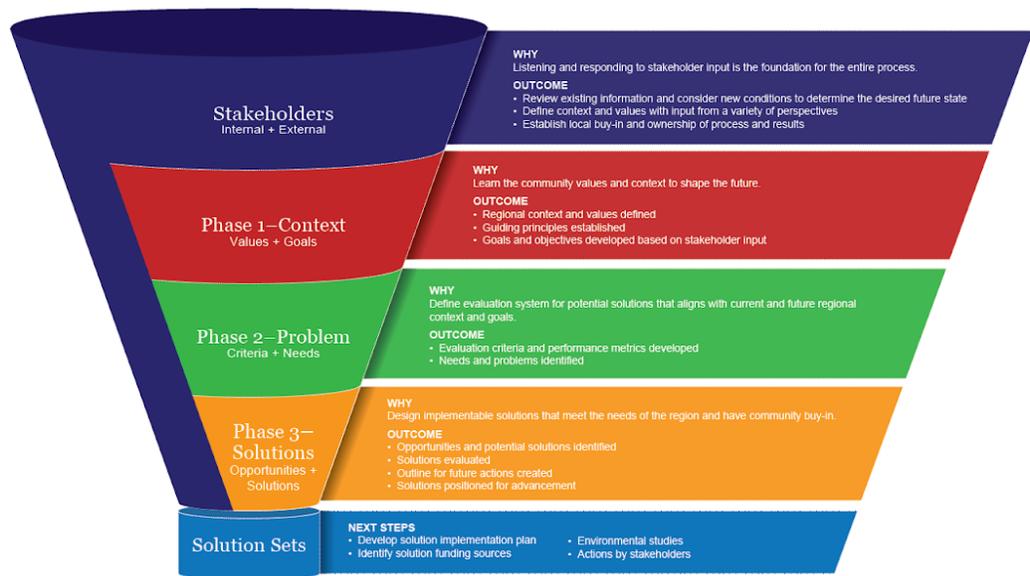


SOLUTIONS DEVELOPMENT

As part of UDOT's mission to enhance quality of life, Solutions Development is a planning process that aims to clearly understand the unique context of a focused area and develop tailored solutions that align with the community's vision and needs.

The process includes:

- Learning with a variety of stakeholders to understand goals and objectives
- Defining problems, opportunities and performance measures to inform potential strategies and solutions
- Designing custom solution sets and moving them forward toward implementation



One of our primary concerns, as well as concerns brought up by the general public, organizations, cities, counties, watershed managers, is that UDOT has not taken a comprehensive approach to looking at the problems in the Wasatch. They have looked at the operations of SR-210, but they have not conducted any planning. Because of PEL, we know they can. Due to the importance of this area, something we all acknowledge and agree upon, we should.

It is the duty of WFRC, as an MPO, to ensure that proper planning has been done on the projects, for the benefit of the public, communities, our land, air, and water resources, to name a few. Inserting a gondola and other elements of the LCC EIS into the RTP, just because a NEPA review is being conducted is not planning. PEL and *Solutions Development* are proof that NEPA is not planning.

Past projects for this very geography have been incorporated without planning as well. In 2018/19, at the request of ski resorts and UDOT, WFRC incorporated the “3rd lane” into its 2019 - 2050 Regional

¹ Source: <https://sites.google.com/utah.gov/solutionsdevelopment/solutions-development> accessed on Feb 23, 2023

Transportation Plan². This required UDOT to update the Notice of Intent in the Federal Register, triggering a revision to the LCC EIS to incorporate the 3rd lane into the EIS scope and analysis. This project was not planned. It was just inserted. It was also premeditated. UDOT is abusing WFRC and local jurisdictions by using the RTP process as a shield, to manifest the realization of unplanned projects, to coerce and steer a NEPA process. UDOT notes in the register notices to the public, however, UDOT initiated the inserting of these projects into the RTP without knowledge of the public or its partners.³

Does WFRC believe inserting projects at the last minute, that haven't been thoroughly vetted, which lack comprehensive planning and meaningful community engagement exemplifies good planning and use of public dollars? Point is, putting projects in the RTP suggests they've been planned and provides significant decision making authority and justification for a NEPA process.

What is interesting, is that the NOI prior to the aforementioned May 2019, UDOT actually included taking a more regional and planning approach.

So now, without any planning, UDOT is working to insert unplanned projects for an unplanned area into your RTP. We could debate the merits of the LCC EIS projects until we are blue in the face; we are prepared if you desire. What is not debatable – inserting these into your RTP on the basis they've been subject to a NEPA process, is bad planning. Bad planning, begets bad projects, which wastes public dollars and harms communities. In this instance, you are **wasting, at minimum, \$1,400,000,000.00**, which does not include mitigation that will surely need to be done by other jurisdictions, not to mention opportunity costs.

The Wasatch has had a number of studies - studied to death as much as it is loved to death. This is not to say there haven't been plans, but those plans are not and have not been integrated. This is not to suggest there have not been laudable attempts to do so. UDOT's *Solutions Development* process could provide a framework to accomplish that. It is important to note that the projects you are proposing to put in your plan from the LCC EIS (i.e. gondola, snowsheds, widening Wasatch Boulevard, etc.) are not found in any local, county or federal plan for this area. Furthermore, most if not all of the impacted jurisdictions are on record as being OPPOSED to the projects you are poised to incorporate.

The amount of planning and the number of plans in existence, compounded with the growing interest in this area could be a benefit. Sure, reconciliation of plans that exist for different purposes, the differing set

² WFRC 2019 -2050 Regional Transportation Plan.

<https://wfrc.org/vision-plans/regional-transportation-plan/2019-2050-regional-transportation-plan/>

Accessed on Feb. 23, 2023

³ Federal Register Notice. May 15, 2019. 84 FR 21894,

<https://www.federalregister.gov/documents/2019/05/15/2019-10009/environmental-impact-statement-little-cottonwood-canyon-salt-lake-county-utah>

"Just prior to the initiation of this scoping period the WFRC released a Draft 2019—2050 RTP which included project R-S-53, widen Little Cottonwood Canyon Road (SR-210) from 2 to 3 lanes from Wasatch Boulevard to End of Canyon. This project was not included in the 2015 to 2040 RTP. The Draft 2019-2050 RTP also included Special Bus Service in Little Cottonwood Canyon. After reviewing the Draft 2019-2050 RTP, UDOT has revised the scope of the Little Cottonwood Canyon EIS. The revised scope includes the same elements from the March 5, 2019 Revised NOI plus the addition of the Little Cottonwood Canyon SR-210 RTP projects."

of values, the different scales and planning horizons, present challenges. But, the droves of information may parlay the process too, the payoff being an expedited, of higher quality, and a more durable outcome.

We have worked to bring these concepts up, repeatedly through UDOTs EIS process, to no avail. If you look at our EIS documents, you will note these comments were deemed out of scope of their process. Herein lies the problem that PEL and UDOT's own *Solutions Development* can remedy.

Right now is the time to do this right, to potentially avoid gridlock on these issues, or worse harming the environment, the public trust and communities. People are paying close attention to these issues which stands to improve public engagement, thus the durability of the decisions that need to be made. What those decisions are, should stem from solutions based problem solving and planning, through reconciliation of community values, helping "cities respond and adapt to future challenges and changes" as your website states.⁴ The very fact that our water provider, every municipality and county, in which the LCC EIS coincides, remain opposed to the project demonstrates incorporation of those elements would fail WFRCs own stated purpose of its 2023 - 2050 Regional Transportation Plan. Is bucking local concerns helping them rise to the challenges and changes?

Your strategies and vision goals are impressive. How does the LCC EIS fit? How does it help? How will it hurt? What does it invite into our canyons? Into our communities? So many other considerations were not addressed in the NEPA process, that should be addressed in the planning process. We need more than vertical feet of towers and miles of cable, cost, and acres disturbed. Cities and counties are telling you the impact is greater than UDOT has allowed into the process. WFRC needs to be autonomous from UDOT, supplementing them and your regional partners, else it is redundant and the epitome of government waste. Rise to the check you provide to the balance.

Equity Concerns with LCC Elements

We are pleased to see that WFRC prioritizes "promoting affordable and reliable transportation options based on the needs of the populations being served — particularly populations that are traditionally underserved."

When we consider all the different types of transportation, what is considered "accessible" transportation? WFRC states that transportation is accessible when people are able to easily, efficiently, and safely reach key destinations. When evaluating this gondola proposal, it is an inequitable and inaccessible option and cannot possibly be framed as a solution for a majority of the people who live amongst the Wasatch Front.

Visitors of Little Cottonwood Canyon are comprised by a wide range of recreational users. Not everyone skis, and not everyone skis at Alta and Snowbird ski resorts. According to a 2015 visitor use survey conducted by Save Our Canyons, in partnership with the USFS, Salt Lake City and Utah State University, 70% of visits to the canyons are to dispersed sites (trailheads, crags, boulders, backcountry ski areas,

⁴ WFRC 2019 -2050 Regional Transportation Plan.
<https://wfrc.org/vision-plans/regional-transportation-plan/2023-2050-regional-transportation-plan/>

picnicking, non-resort recreation). Only 30% are to ski resorts. Since the majority of canyon users cannot use the gondola to reach their destination, how is the gondola accessible? Without any stops at trailheads or other types of destinations, this is not a public resource, and the public should not be shouldering the cost.

It's also important to note that skiing and snowboarding are relatively inaccessible sports for many people, compared to other recreational uses of the canyon. This leads us to question, which communities does this "solution" really cater to? It does not serve non-resort users (the majority of canyon visitors) and is not accessible for lower-income populations. It was recently found that the top two most expensive ski resorts in North America are in Little Cottonwood Canyon.⁵

Even for resort users, riding the gondola may be inaccessible, as noted by the last public commenter when the Draft RTP was released. A concerned Utah mom stated that she would never be able to ride the gondola, even at the extremely low cost estimate of \$25/ticket, with a family of 4 children. The cost of gear and season passes are already a huge financial barrier, without taking into consideration the cost of a gondola ride ticket. It is concerning that at this point in the planning process, the public still has no idea how much it will cost to ride the gondola. The cost of a ride ticket will be the ultimate determinant of people's willingness and ability to ride it. The exclusion of fare to ride in a transportation plan is a huge omission, because if people are unwilling (or financially unable) to ride it, then the estimated transit time will increase, defeating the purpose of the gondola.

Meanwhile, there are benefits that everyone can enjoy (and necessities to healthy living that we all rely on) from the Little Cottonwood Canyon, such as breathtaking mountain views and clean drinking water. The proposal of the world's longest gondola in Little Cottonwood Canyon risks the natural resources that everyone living along the Wasatch Front depends on, while serving an elite segment of the population.

The gondola proposal is one of the costliest parts of the WFRC's Draft RTP, \$1.4 billion for the entire phased approach that caters to a select few. This \$1.4 billion could be used in other ways to connect communities to public lands.

According to the Equity Focus Area framework that is an important input in WFRC's transportation planning efforts, low-income populations and zero-car households are two of WFRC's primary focus areas. As stated, "a lack of access to reliable and efficient transportation can be a major barrier to economic mobility."

⁵ The most expensive ski resorts in the USA & Canada. Travel Mag. Dec. 21, 2022.

<https://www.travelmag.com/articles/ski-resorts-2023/>

Most expensive ski resorts in North America in Utah, according to survey. KSL. Dec. 22, 2022

<https://ksltv.com/515389/most-expensive-ski-resorts-in-north-america-in-utah-according-to-survey/>

1. Alta \$4,181 (\$3,223 + \$958)
2. Snowbird \$4,049 (\$3,223+ \$826)
12. Deer Valley \$2,456 (\$1,068 + \$1,388)
14. Park City \$2,281 (1,003 + \$1,278)

*Cost based on 4 - night stay and pair of lift tickets for 3 days.

Minority populations are less likely to have access to a vehicle compared to their white counterparts, with Latinos nearly twice as likely to have less access to a car and twice as likely to rely on public transportation. These communities rely on public transportation to access nature.

Further, WFRC states that it will consider transportation investments in minority communities, in recognition of Salt Lake City and Ogden's history of redlining and racial segregation. With this in mind, how is the construction of a \$1.4+ billion gondola equitable for all tax payers, especially those that reside on the west side of I-15 and have experienced a lack of investment in their immediate communities? The RTP should ensure that more people have access to Little Cottonwood Canyon, whether they ski or not. For the Wasatch Canyons to be accessible for all communities, we need improved regional transit that supports people traveling to their desired destination, especially if they fall under WFRC's equity focus areas (low-income populations, minority populations, and zero-car households).

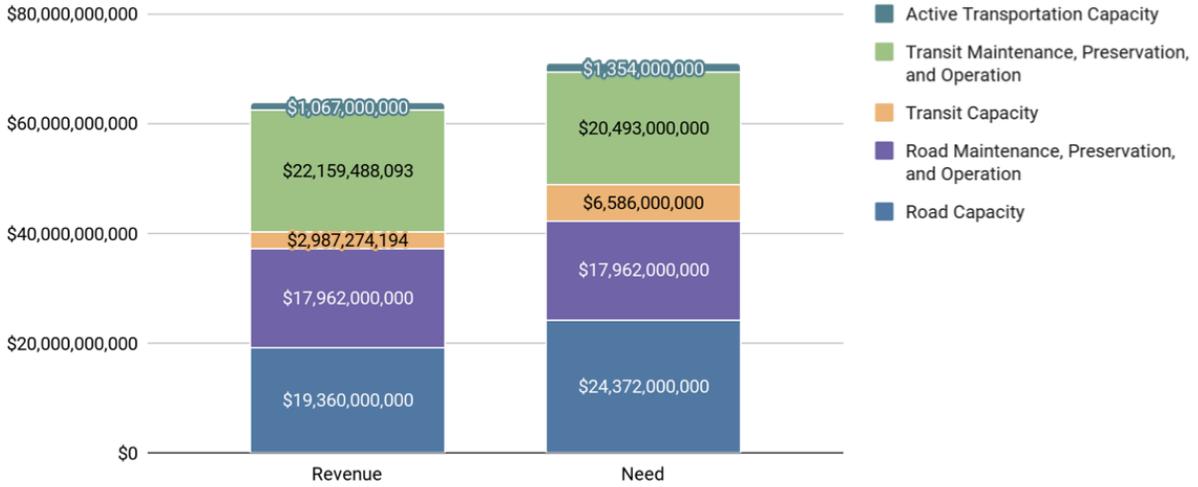
General RTP comments

From our vantage, our region is unquestionably struggling with some big issues. A dying saline lake jeopardizes our quality of life, public and environmental health for the community of life that exists in this region. We are growing incredibly fast and those pressures are challenging us too - where and how we grow and generally just figuring out how to live with more people in the salty sandbox together. We continue to struggle with air quality, access to open spaces and natural spaces. Housing prices, ugh! These are all impacted on how we grow and how we move about, how we get to work, school, to the mountain trailhead, resort, theater, grocery store, etc.

We love the freedom our cars provide, but we loathe traffic. We are traffic. And we are because we have not made the investments we need to get people to where they want/need to be without their own cars. Our President once said, "Don't tell me your priorities, show me your budget and I'll tell you your priorities." Following that advice, the RTP is investing significantly more in roads, a combined \$42.3 billion, than in transit, a combined \$27 billion.

Further the delta between the revenue projections and the need is around \$7 billion dollars. \$1.4 billion of those dollars, we do not have will be going to a gondola that will not solve any problems we are facing. Thus, it is fair to say that the gondola project is taking from needed projects that actually improve the lives of Utahns and better protect our communities and environment, while a gondola harms them.

Figure 20. Roadway, Transit, and Active Transportation Needs vs. Available Revenue, 2023-2050



Active transportation and transit are deserving of a larger portion of the funding. This will not only reduce the need for mining operations confronting our region, which will help improve our air quality, but it will also help people decrease their dependence on their cars and incentivize them to use transit. We wholeheartedly endorse the notion of free UTA service, but we think that the cost is only one of the barriers, and rather system design and operational improvements will also improve utilization of the transit system. We should also be looking at behavioral ways to improve walkability in communities making bike lanes and walking paths more welcoming than the speed limits faster.

We do appreciate the different needs of the region, from our largest – Salt Lake County, to our smaller and rural communities. Philosophically, we need to be investing more in transit and active transportation, than in roads, and more aggressively chasing transit dollars than road dollars.

Last, but certainly not least, we are very concerned about the impact these transportation, transit and active transportation would have on the ecosystems we share throughout this region. This includes our rivers and creeks, plants and animals, our mountains and lakes both the local, regional and global significance of these absolute gems we are so lucky to be the stewards of. The projects themselves will have an impact no question, but the growth they generate, the developments they facilitate, will be a compounding impact. We must fully understand and protect the irreplaceable values jeopardized by these projects. Too, impact is also being magnified by climate change.

Conclusion

Our human systems are as important as our ecosystems. In many regards, our ecosystems are even more important than human systems because those natural systems enable life in the WFRC Region. Our analysis and planning should not only align with economic systems, but needs to come in better alignment

with the ecosystem services in the land, air and water that we are reliant upon, that contribute – significantly – to our quality of life.

For the reasons stated in this letter, and really stated throughout UDOTs EIS process, most germane to WFRC’s purpose, mission & vision, is ensuring comprehensive high quality planning is undertaken in trust of the public dollars that flow to projects that exist in your plan.

Our request of you is this: WFRC should not incorporate elements of the Little Cottonwood Canyon EIS and request UDOT rapidly initiate its Solutions Development framework, with an invitation that should it come to “solutions sets” that would be appropriate in the RTP, prior to when the RTP is ripe for scheduled revision, there be an amendment process. The durable coalition you will have built can help in this realization.

It cannot be overstated how critical we believe the role of WFRC and this regional plan is to our home and our collective quality of life. We need leaders to step up, to convene and hear the interests of your communities, to conservatively and methodically understand the interactions between our natural and human systems. We don’t need mercenaries inserting poorly planned projects into our regional transportation plans at significant cost to the public and our quality of life.

We would welcome an opportunity to further explore some of what we have brought up here, in more than 60 seconds. Our mission and organizational focus is the backbone of your region. Smart growth, good planning, understanding the real, felt impacts of a project through the lens of what we need to protect, rather than just what we want to build, will better benefit our mountains and our community – your community.

For the Wasatch and the community of life it supports,

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

Carl Fisher
Executive Director
Save Our Canyons