

SAVE OUR CANYONS

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

Sep 3, 2021

To whom it may concern:

Thank you for the opportunity to provide scoping comments on the Little Cottonwood Canyon Environmental Impact Statement (EIS). As an almost 50-year-old organization dedicated to the preservation of the wildness and beauty of the Wasatch Mountains, Save Our Canyons (SOC) views Little Cottonwood Canyon (LCC) as an area of unsurpassed importance to our mission, and we therefore see it as critical that any development occurring in it be guided by careful planning designed to minimize environmental harm. We hope the comments we provide here will help in the development of such planning.

While these comments will reflect the decisions UDOT has made in the EIS process to date, our earlier comments on scoping and alternatives development remain relevant, so these are resubmitted herewith. Still, we will begin by reiterating what SOC views as the most critical shortcomings of UDOT's effort to improve canyon transportation.

The creation of the Wasatch-Cache National Forest was done with protection of the watershed as a critical element of Salt Lake City's water supply as a priority. The presence of the ski resorts, their viability, and the modes of transportation in the canyons should similarly prioritize watershed protection - congressional legislation, local ordinances and plans, require it.

Simply put, despite the number of people per hour a gondola touts, the proposition is ski area (mountain resort) expansion. It solely serves resort patrons at the expense of the multiple uses and the prioritization of the protections of our natural and watershed resources. Ski area expansions are prohibited by the 2003 Resource Management Plan, and just as the Grizzly Gulch expansion connecting to Solitude and SkiLink before it were rejected by the USFS, so too should the La Caille Gondola submitted by UDOT, CWM Corp, and GondolaWorks. The intent is the same and it is not a viable transit, or transportation system. It caters to an elite and commercial use of our canyons and comes at great cost and expense to our community needs and uses of this area. This isn't to suggest we don't believe skiing (or recreation for

that matter) isn't part of the fabric of our community, but it is to question how much of the quilt should be repurposed and dominated for this singular use... and at what costs.

Any transportation improvements in LCC should be the product of 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. To maintain a vibrant economy and high quality of life as ever more people crowd into the area, it is critical that the area be served by a convenient, efficient, and integrated regional transportation system. And it is critical that such a system be the product of a comprehensive plan that recognizes how usage of each element affects usage of the others—and nowhere is the need for this clearer than in the canyons of the Wasatch, where canyon visitors routinely make choices about which canyon to visit based on comparing expected travel delays. You seemed to acknowledge this in 2020, when you expanded the scope to allow regional planning as part of the EIS. Then it disappeared. The current project UDOT is considering for LCC is the product of no such plan. It is a fragment, disconnected from existing policies, strategies, or any broader vision or set of understandings. It is an example of a troubling pattern of one-off, shortsighted, narrowly focused transportation fixes to recurring localized urgencies—urgencies that themselves 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 (2015), Salt Lake County Canyons Transportation Plan (2012), Salt Lake City Watershed Plan (1999), USFS 2003 revised plan, Salt Lake County Canyons General Plan (2020), 1989 Wasatch Canyons Master Plan, Salt Lake County Resource Management Plan (2018), etc). All of these plans have more in common and alignment with one another than what UDOT is proposing in this EIS.

I. Purpose and Need

UDOT's purpose and need are not only problematic for Little Cottonwood Canyon and all users, but some core elements of the selected purpose and need are unsubstantiated. As stated in the Draft EIS, "UDOT's purpose is reflected in one primary objective for S.R. 210: to substantially improve roadway safety, reliability and mobility on S.R. 210 from Fort Union Boulevard through the Town of Alta for all users on S.R. 210." ¹

One of the major short-comings of this process was UDOT's failure to look at anything outside of the S.R. 210 roadway corridor. Suggestions and proposals submitted to UDOT throughout this process focused on getting people off of Wasatch Blvd, S.R. 210, the Alta Bypass Road prior to their arrival on these routes were

¹ LCC DEIS Chapter 1 - Purpose and Need. p.1-7

deemed to be out of scope rather than incorporated into the process. As such numerous strategies were simply unable to be part of the analysis. The failure to incorporate concepts such as a bus or shuttle system originating in several of the communities surrounding this project area, suggests the agency's focus was on building something (or not building something if you incorporate the No Action Alternative), despite the the word "construct" or "build" being part of the projects purpose statement.

The visitation, thus the congestion, experienced in the project's focus originates well outside the project area. Converting these visitors to transit riders, well before they come into the project area, and not building anything in a critical natural environment and watershed would have met the stated purpose, however, because these strategies occurred outside Wasatch Blvd and SR 210, they were deemed out of scope, thus requiring the agency to look at ways to mitigate impacts to a municipal watershed and treasured national forest, rather than allowing opportunity to explore alternatives that avoided impacts - which in an environment as important as this, should be a primary interest of any government, certainly, interacting with this canyon.

"All users" are ignored, yet part of UDOT's purpose and need

A key component of UDOT's purpose is to serve all users of SR 210. In 2014 - 2015, Save Our Canyons, Salt Lake City and the US Forest Service did a visitor use study with Utah State University, called the Central Wasatch Visitor Study. We not only surveyed formal and informal recreation sites throughout the canyons, but also did analysis at all four Cottonwood Canyon ski areas.

Findings of this analysis were provided to UDOT on multiple occasions, however, UDOT has decided that "all users" means patrons of Snowbird and Alta Ski area. Worse, UDOT is harming other users, arguably the majority of users, in benefit of the commercialized ski resort user. Overwhelmingly, users of these canyons are dispersed recreationists who want better access to mass transit, recognizing their auto-based access is contributing to the congestion in these canyons. For example, the report, "An Estimation of Visitor Use in Little Cottonwood, Big Cottonwood, and Millcreek Canyons"² found that 70% of visitation to the Central Wasatch was dispersed while 30% was to resorts. More directly relevant to Little Cottonwood Canyon, 8% of use goes to Alta, 9% to Snowbird, while 32% of the use is dispersed. It should be noted that these user estimates are based on traffic counts and vehicular occupancy provided by UDOT.

Moreover, the infrastructure accompanying the two preferred alternatives hurts the values, the opportunity, and the existence of many recreational opportunities in

² "An Estimation of Visitor Use in Little Cottonwood, Big Cottonwood, and Millcreek Canyons". Lamborn, C, Burr, S. 2016. https://extension.usu.edu/iort/files/Tri_Canyon_Visitor_Use_Estimate.pdf Accessed on 8/12/2021

Little Cottonwood Canyon. The primary motivations for visiting the Central Wasatch are to “Observe scenic beauty”, “Enjoy the sights and smells of nature”, experience peace and tranquility”, and “improving physical health” as the most important factors for recreating.³ Expanding infrastructure, roads and even worse, gondola towers, is at cross purposes and erodes the fundamental purpose for why visitors come to these canyons.

Safety on S.R. 210

Safety has been identified as one of the primary purposes of this EIS. To understand the causes of collisions and safety issues along SR 210, we visited the Utah Vehicle Collisions portal, to look at the causes of accidents in Little Cottonwood Canyon between mileposts 3 and 14 on SR 210.

It was interesting to note that the majority of collisions from 01/01/2016 to 12/31/2019 (when the data is available) on this stretch of road, occurs during “Clear” weather on “Dry” roads. As a matter of fact, only 22% of crashes occur on this stretch of highway during snowy road conditions. Moreover, the collision data time of day doesn’t coincide with the peaks you would normally see attributed to the opening and closing of ski lifts. See Appendix A for a snapshot of the report.

This data suggests that UDOT is using the anomaly of weather events, surrounded by hyperbole and conjecture rather than their own data. Addressing safety in this canyon requires looking not only at winter conditions, but all days, all seasons, and all likely users.

Other safety considerations have to do with roadside parking. UDOT has the ability to restrict roadside parking to create a safer roadway condition, yet it has chosen not to do this. The prohibition of roadside parking, in conjunction with other behavioral strategies (tolling, traction law enforcement, etc), would increase transit ridership — if people know that they will get cited for leaving their car on the side of a highway and create unsafe conditions, they are less inclined to leave their car parked. On the other hand, as there has been no enforcement of roadside parking and the issues both for safety and for the resource, of course people are going to park — there is no disincentive. Banning roadside parking would actually aid in bringing UDOT’s project into alignment with the forest plan, managing trailhead and resort capacity by availability of parking spaces. It is estimated that UDOT not enforcing roadside parking has increased parking in Little Cottonwood Canyon by 3,000 spaces. This is a serious resource impact whose remedy is simply enforcing the optimal condition for safety and alignment with forest and watershed planning.

³ 2014-2015 Central Wasatch Visitor Use Study: A Visitor Survey on the Salt Lake Ranger District and Surrounding Public Lands. Winter Quarterly Report. https://saveourcanyons.org/images/pdfs-doc/Winter_Report.pdf

UDOT's Purpose and Need mischaracterizes the need for and objective of the LCC project.

Describing the need for the LCC project as arising from “decreased mobility in winter during the morning (AM) and afternoon (PM) peak travel periods related to visits to ski areas,” UDOT says that the purpose of the project is to “substantially improve . . . mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210.” Unfortunately, the metrics UDOT employs in stating its objective for the project are not about the mobility of “all users,” but only about the movement of vehicles. While it claims that its goal is to “[s]ubstantially improve peak-hour per-person peak-hour travel times,” in fact this is defined as the “30th busiest hour,” and this came from a “design hour” analysis that concluded: “Therefore, for this analysis, the design hour is the 30th busiest hour in the eastbound direction of SR 210 in 2050, and the design hour traffic volume is 1555 vehicles.” Draft Vehicle Mobility Analysis, pg. 2. UDOT’s orientation toward seeing the problem and solution in terms of how many vehicles SR 210 can handle, rather than how to get people up and down the canyon, failed to confront the actual problem that exists. Having mischaracterized the problem, it was inevitably misguided in identifying reasonable solutions to this problem.

It is also confusing that UDOT sees the value of operating a Gondola in the summer months, though it says bikes will not be allowed (even though biking is a comparable activity by percentage of our population to that of skiing), or similarly the eliminated train would also operate because of their tourist appeal or “WOW! factor”, but a bus would not. The emperor has no clothes — this process isn’t really about the stated purpose and need, rather a desire to induce and support tourism in the state for economic purposes.

A bus system, year round, would have demonstrable environmental benefits, but moreover, would aid in helping people, not just locals, but summer tourists as well, understand and navigate the bus system in the summer months and train riders to ditch their cars and embrace transit. Not including bus service in the summer citing it isn’t needed (it is as there are more congestion and safety issues in the summer months - particularly with roadside parking - than in the winter), is just one of several instances where UDOT has intentionally diminished the bus alternative to elevate its predetermined political preference of a gondola.

Predetermination of a preferred alternative

The purpose and need was drafted so narrowly, it failed to grasp the complexity, the importance, and the vision of local communities. That said, political influence of state officials, pressuring UDOT to build an option appears to have been one of the most significant factors selecting one of UDOTs preferred alternatives - the La Caille gondola.

In 2017, two significant things happened. First, UDOT was granted limited NEPA Authority by US DOT FHWA and, second, then Sen. President Wayne Neiderhauser allocated \$100 million for "Recreation hot spots", prioritizing transportation 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." From the onset, UDOT's prioritization of economic development in an area that is far and away the state's most precious drinking water resource, failing to acknowledge the importance of that resource for our economic well-being has caused a ripple effect throughout the process.

Further, the former Senator, who co-sponsored the enabling legislation is now the proponent of the La Caille gondola alternative. Upon leaving the Senate, Neiderhauser began an aggressive lobbying campaign lining up letters in support from state officials, on state letterhead, directing UDOT to build a gondola. Since the writing of these letters, several of the authors have gone to several different posts within the State: head of the Governor's Office of Economic Development (GOED), Lt. Governor, for example. Also, note the support of the Senate President and Speaker of the House. These letters are attached in Appendix B.

Additionally, the Governor in a Jan. 2021 Deseret News article very publicly endorsed the gondola, stating "I'm very interested in the gondola... I will tell you that's where I've been leaning."⁴ All this in the middle of a purported objective NEPA process.

Had this been a singular incident, one might have been able to disregard it as an error. But this wasn't. Even the former Gov. Herbert and his staff in July 7, 2020 emails had conversations with UDOT about how the gondola "...moves a lot of people, and had a huge WOW! factor that will be a boon for tourism and the Utah brand." The exchange included comments from Carlos Braceras, Executive Director of UDOT, thus in charge of signing the NEPA document that was an endorsement of the Gov. "would be awkward, since UDOT is the decision maker". The thread ending, by saying they wouldn't issue a letter, rather "I suppose we can just let you know the Governor's preference." (See Appendix C).

UDOT is a division of the state, whose director serves at the pleasure of the governor, whose budget is set by the legislature. To have such coordinated lobbying and posturing by high powered elected officials, whom UDOT has to follow orders from, shows that this NEPA process has been hijacked by political cronyism and personal monetary gains.

⁴ "It's cheaper than a train, more expensive than a bus. Is it the solution to canyon gridlock? Cox 'leaning' toward gondola to relieve Wasatch traffic, but detractors worry of 'amusement park' in the mountains." Katie McKellar. Jan, 17, 2021. Deseret News. <https://www.deseret.com/utah/2021/1/17/22227607/salt-lake-ski-areas-gov-spencer-cox-gondola-wasatch-canyon-little-cottonwood-canyon-alta-snowbird>

This entire NEPA process has been a charade to build a gondola up the canyon and to structure other alternatives, attaching antiquated technology (like using diesel trains and buses rather than electrified ones) to make a gondola look more attractive. It is an affront to a public process (NEPA) aimed at protecting people, our environment and our resources. We find the economic prioritization and considerations of two ski areas and one former senator, an affront to the intent of NEPA. What political leaders are doing, coercion of UDOT, which comes at a significant cost to current and future generations, by not only degrading their public lands, thereby the public trust; our right to clean water and a healthful productive and, aesthetically and culturally pleasing surroundings; damage to the widest range of beneficial uses of our environment without degradation and risk to health, and other undesirable and unintended consequences; by harming natural aspects of our national heritage, and prioritizes a singular use rather than balancing between population and resource issues, degrading our high standards of living and the wide sharing of life's amenities. The aforementioned degraded rights caused by these alternatives, are the rights NEPA purports to protect against as discussed in Sec. 101 [42 USC § 4331].

II. Cumulative, Direct and Indirect Impacts & Connected Actions

The NEPA process requires in-depth analysis in setting the scope of environmental impact statements of the variety of effects (impacts), actions and alternatives. Repeatedly throughout this process, UDOT has stated they are only looking at the road corridor. However, this road is situated within a critical watershed canyon, established in a National Forest, formerly a Forest Reserve established to protect against over-development and unsustainable uses that lead to the degradation and destruction of environmental resources and the crippling of ecosystem services our communities are reliant upon.

For instance, USFS, Salt Lake County, and Salt Lake City plans and strategies contemplate the impact of induced visitation on our resources. Every person that goes into these canyons does so on SR 210. UDOT already has a track record of blatant disregard on resource impacts due to their dereliction of enforcement of roadside parking (introducing erosion, weeds and social trails in a municipal watershed), in deference to a hospitable tourist environment (namely for the state's insular economic purposes, much of which never comes back to benefit this community, environment, this forest or this watershed). Yet the agency (UDOT), cannot seem to understand that what it does (or doesn't do) in terms of access has real impacts on land use, water quality and quantity, forest health and stewardship, for wildlife, on a state scenic byway, for strategies in other canyons (both in Utah and Salt Lake Counties), or even for exacerbating the threat of ski lifts crisscrossing the Wasatch.

UDOT and its team will likely dismiss these concerns as not reasonably foreseeable, however, the state has made repeated, calculated efforts, toward the development of

our watersheds as a priority for nearly half a century in pursuit of a ski interconnect system and to invite harmful developments into sensitive and critical alpine environments. Take a look at SCR10, sponsored by Sen. Wayne Niederhauser, “Concurrent Resolution Supporting Utah’s interconnected Ski and Snowboard Industry” expressing the interest in constructing a massive ski interconnect.⁵ And Federally, HR 3452 - Wasatch Range Recreation Access Enhancement Act that disposed of federal lands to construct a ski lift between canyons in the Wasatch, referred to locally as “SkiLink”.⁶ And then, the same proponents and coalition of developers and consultants who initiated the One Wasatch effort similarly, albeit with different tactics and strategies, to construct lifts all across the Wasatch.⁷

These actions are not just reasonably foreseeable, they are connected actions whose impacts must be analyzed cumulatively. This legacy of damaging propositions has real consequences for our mountains, thus, any gondola proposal must include analysis on the industry who has been modifying ordinances and shopping proposals, for decades, for the financial benefit of the ski industry. These are more than concepts and proposals, they have the backing of state leaders, thus the time is now to understand the implications of such initiative in the context of an EIS, rather than another sales pitch that lacks integrity and analysis. The legal, political and regulatory framework, and context, have shifted. The USFS, for example, is allowing a highway department (UDOT) to alter its land management plan and strategy with little, if any, analysis about the implications, immediately or in the future, to our natural systems.

The DEIS fails to analyze foreseeable indirect effects

The explicit goal of the LCC DEIS is to move more people more efficiently up LCC. And, obviously, this will affect the natural environment and the experience that people come to LCC for, in part simply by the presence and activities of more people, but also from the various development pressures that will come with improved access. It is apparent that UDOT does not intend to assess any such impacts, yet it is difficult to imagine a context in which it is clearer that such indirect effects of a project must be analyzed, under 40 CFR § 1508.8(b):

Indirect effects, [are those] which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth

⁵ SCR10. Concurrent Resolution supporting Utah’s Interconnected Ski and Snowboard industry. 2012. <https://le.utah.gov/~2012/bills/static/SCR010.html>

⁶ HR 3452 - Wasatch Range Recreation Access Enhancement Act (<https://www.congress.gov/bill/112th-congress/house-bill/3452/text>)

⁷ One Wasatch proposal. <http://onewasatch.com>

rate, and related effects on air and water and other natural systems, including ecosystems.

Land Use and Development

The induced demand for development pressure from building systems that increase visitation and the number of people in our canyons cannot be underscored. In 1999, for example, when Snowbird expanded into Mineral Basin the USFS, commensurate with the expansion, included the need for expanding the summit shack as the expanded capacity was inadequate given the additional volumes of people that would be put into the area with unsatisfactory services and amenities. As we increase convenience (a function of mobility and reliability), we will unquestionably increase visitation, and that visitation will require additional infrastructure that intensifies resource impacts.

As the legislation that initiated this process stated (SB 277), the primary purpose of these projects is “significant economic development opportunity.”⁸ The potential tax revenue realized by selling a few thousand extra lift tickets, hamburgers, etc., will never pay for the gondola and the induced development is an unstated necessity for this project. It is these indirect and connected impacts that are not being analyzed in this EIS. The gondola will lead to more large-scale, up-canyon resort development, which will in turn lead to more traffic and more congestion.

Entities like Snowbird, and likely Alta, are only partially built out. As they generate additional revenues, these entities will push to expand developments (hotels, restaurants, ski area boundaries, etc) to ensure their customers enjoy a high quality of service. That high quality of service however, comes at a cost to our environment, both from a localized impact perspective, but also from a climate perspective (development, nor sustaining additional development isn't carbon neutral). Snowbird is only 1/3 built out (according to their master development plans)⁹, meaning we will see more than twice the development that exists today should their vision be realized.

Nowhere in the EIS are the implications of this additional development of Snowbird, Alta Ski Area, or the ski industry's (Ski Utah) desire to develop additional acreage, construct massive interconnects (of which the La Caille Gondola is phase 1) discussed as an impact or outcome, be it direct, indirect, cumulative or connected. With known proposals for expansion and interconnections of the ski industry, increasing both with frequency and intensity, the notion of interconnection, the impacts of development they seek to exacerbate, are indeed connected to this

⁸ SB 277 (2017). General Highway Obligation Bond. <https://le.utah.gov/~2017/bills/static/SB0277.html>

⁹ a) USFS 1999 Snowbird Master Plan - https://www.fs.fed.us/nepa/nepa_templates/examples/sampleROD2.pdf B) Salt Lake County Snowbird Master Development Plan 1999.

proposal and we demand a complete and comprehensive evaluation as part of this EIS.

III. Alternatives

UDOT failed to consider an obvious alternative.

UDOT says that, on popular ski days, many thousands of cars go up and down the canyon—up to 12,000 of them—and most in a few peak hours. In its preferred alternative selections, it states the modest goal of providing an alternative to private vehicle travel for about 1,050 people per hour during those peak times. And it also determined that, even at peak times, the average personal vehicle occupancy was 1.89 persons. Just these facts alone make it utterly obvious that some—even all—reasonable solutions for LCC “mobility” problems should include plainly the lowest-hanging fruit—measures to motivate higher vehicle occupancy, most likely involving tolling. Yet, despite this and the fact that there is most certainly considerable information available on the subject, none of the alternative actions ever proposed in this NEPA process has included consideration of any such measure. Tolling is nominally identified as a component of the preferred alternatives, but in fact it plays no actual role in any alternative. If it were an actual component of a transportation alternative, the DEIS would necessarily attribute some amount of ridership capacity to it, which is obviously fundamental to determining what the ridership levels of the other transportation components need to be to meet overall transportation needs. But the DEIS attributes no ridership to it at all. It just says that UDOT hasn’t decided what a tolling system may look like. This does not qualify as actual consideration of tolling as an element of any alternative.

Yet the potential for tolling or other such measure to meet or exceed the goals of the preferred alternatives—while potentially even actually generating revenue—is obvious. And, in the unlikely event that increasing vehicle occupancy fell short of such goals, it is difficult to imagine that a modest increase in the use of buses on the existing roadway would not fill the gap. It is as if these easy and less invasive approaches were ignored because there is an unstated element of the purpose and need — build something costing hundreds of millions of dollars.

Some simple, conservative calculations demonstrate the potential benefit of increasing private vehicle occupancy. Assume a busy ski day—something short of the 12,000 vehicles per day high end; say, 9,000 people. And assume that only 60% of those are traveling in the few—call it 2 hours—twice per day when UDOT says the majority of vehicles are heading to and from the LCC resorts. Finally, assume that canyon visitors could be motivated to carpool enough to increase occupancy by only 0.6 persons. That works out to 1,620 people per hour at peak times, several hundred more than UDOT’s objectives for the LCC project. Even if this calculation proved high by a factor of two, measures to increase vehicle occupancy should clearly be considered a major element of the overall transportation picture for LCC.

Transit vs. Transportation

For much of the public, the nuance in the jargon between transit vs. transportation is lost. Let's take, for example, the words mass transit and public transportation — Does UDOT distinguish these terms? The state? County? Cities?

At a recent Sandy City Council meeting (for one instance) where UDOT's project manager, Josh Van Jura, presented a subtle nuance, perhaps sleight of hand between the terms transit and transportation. He said transportation was what UDOT was interested in and that this project was not about transit. His explanation was that 30% of people would be on a mode (transit?) different from their personal auto to optimize the transportation system where 70% would be in their cars - never mind the impossibility and inconsistency of talking about numbers of people versus numbers of cars coupled with staggering unmitigated growth. He went on to say if it was a transit project, 70% would be in a mode different from their cars and 30% would be in their personal vehicles. While many local jurisdictions, and coalitions of jurisdictions such as the Central Wasatch Commission and its predecessor Mountain Accord have overwhelmingly demanded mass transit, public transportation options... What exactly is UDOT's vision and objective? Is it vehicular reduction or roadway optimization? These points are continually confused between the EIS and promotions of the UDOT team and its consultants. This point is further confused with a highway company attempting to design a transit system without the support of FTA who has expertise in this arena. Mass transit focuses on moving people, and UDOT's metrics of Level of Service continue to confuse and conflate objectives - not only confusing the public, but also local jurisdictions.

UDOT arbitrarily revived an alternative that failed screening

UDOT considered "Gondola Alternative 2", described in the June 2020 Draft Alternatives Development and Screening Report as follows:

"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."

This alternative failed Level 1 screening—meaning that it failed to meet the purpose and need—because, being on SR 210 at or near the base of the canyon, where traffic congestion already occurs, it would have a "high impact" on congestion.

UDOT also considered a "mobility hub" including 1500 parking spaces at what UDOT refers to as 3662 North Little Cottonwood Road. This would put it at the same location as Gondola Alternative 2, or, at most, a small fraction of a mile from that location on the same chronically congested segment of SR 210 at or near the base of

the canyon.¹⁰ This mobility hub location was also rejected because it would have a “high impact” on congestion.

In an “Addendum” to the June Report five months later, despite having clearly (and correctly) made the determination that a parking/transit node on SR 210 at or near the base of the canyon would not meet the project’s purpose and need, UDOT revived the idea of putting such a facility at this location, this time in a form of the La Caille gondola base and 1,500-car parking facility. It is apparent that the only new facts available to the agency that explain this flip flop is that influential former politicians, Wayne Neiderhauser and Chris McCandless, with strong financial interests in a La Caille gondola alternative—including substantial commercial and residential development interests connected to the gondola station—asked for it. This alternative was not something UDOT developed in response to “comment” on the original set of alternatives, as UDOT represents it, but arose after these former politicians submitted a formal 158-page proposal very shortly before the publication of the June Report—and before the beginning of the comment period for that report. And after they had a private meeting with Carlos Braceras, UDOT’s director—a meeting omitted from the list of stakeholder meetings stated in the Addendum. This was followed up by an obviously biased episode in which officials in the Governor’s office and UDOT considered having the Governor sign a letter in support of the gondola—composed by Neiderhauser, with his suggestion that the wording could be tweaked to sound like the Governor. In other words, the revival of an SR 210 transit/parking facility in the form of DEIS’s preferred La Caille gondola alternative was not the product of a rational and lawful NEPA process; rather, is clear that it is the product of a process that was hijacked by political cronyism and patronage.

UDOT does not analyze whether canyon visitors would actually use the new facilities at projected levels.

The critical challenge of both of the DEIS’s preferred alternatives is to attract canyon visitors to a form of transportation other than private vehicle, but nowhere does UDOT develop any information about how successful the alternatives will be in meeting this challenge. It observes the fact that, of course, longer travel times are less desirable than short ones. It also recognizes that riders are intolerant of being required to make multiple transfers:

In general, a “one-seat ride” (either vehicle or transit) is most preferable to users. One mode shift, or a “two-seat ride,” is less desirable but is still acceptable to many users as evidenced by the use of the existing park-and-ride lots and ski bus service. Shifting travel modes twice, or a “three-seat

¹⁰ Online searches of the 3662 North Little Cottonwood Road address yield a few different locations on SR 210, including one that is precisely where the La Caille gondola base and parking area would be.

ride,” would likely be unpopular but could be acceptable to some users if the travel time were shorter than with other available options.¹¹

Despite this, UDOT has selected a four-seat ride as one of its preferred alternatives, supported by no evidence that ridership would meet objectives. It just attributes the same ridership to shorter “two-seat” rides as it does to considerably longer and more difficult and frustrating “four-seat” rides. In other words, for an answer to the fundamental question of whether people will choose to actually use the gondola, UDOT does not rely on information but only an unacknowledged assumption: whatever it decides to build, no matter how complicated and inconvenient, UDOT asserts that “canyon travelers will come”.

Another factor dissuading people from using either of the alternatives transit facilities is uncertainty. Because driving is potentially the fastest and most convenient way to travel, and people will continue to have the option of driving, any uncertainty about whether taking transit will work better for them will motivate them toward driving. Unfortunately, there are many sources of uncertainty in both preferred alternatives. As they approach the gravel pit mobility hub, for example, travelers won’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 additional 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, and, lacking dependable information indicating that one mode will be faster than the other, they will tend to see the two unknown risks as roughly equal. This will naturally tip the balance toward driving because it’s easier—requiring no transfers—and generally faster mode of transportation. In other words, what will go through travelers’ minds is, *“I don’t know that transit will work better right now, so I’m just going to keep driving.”*

The La Caille gondola alternative compounds this confusion problem by creating two decision points where most canyon travelers confront the above-described uncertainties. And these compounded uncertainties make it yet more likely that a canyon traveler will end up driving up the canyon. This is true even for travelers determined to take the gondola because, at the first decision point, the gravel pit mobility hub, they are likely to gamble that they can save time and inconvenience by proceeding to the La Caille facility. Of course, many other travelers are making the same gamble (and many others coming from the south), filling up the parking and leaving driving up the canyon as the only acceptable alternative.

¹¹ Draft Aerial Transit Concepts Initial Feasibility Study. p. 23 https://littlecottonwoodeis.udot.utah.gov/wp-content/uploads/2020/06/LCC-EIS-Alternative-Screening-Report-2020-05-21_AppendixE.pdf

UDOT conducted inadequate analysis of demand for parking at the gravel pit mobility hub

UDOT's preferred alternatives include the construction of two mobility hubs to provide parking needed for transit riders. One of these is at the gravel pit at the base of Big Cottonwood Canyon (BCC), where there is a large unmet demand for parking for Big Cottonwood travelers. Yet UDOT undertakes no analysis of what the parking capacity is required in order to adequately serve LCC transit users, given that a significant portion of the spaces will surely be used by BCC visitors. In fact, it's apparent from UDOT's logic that the agency assumes that BCC travelers will use no spaces. Under the La Caille gondola alternative, 1,500 spaces would be constructed at La Caille, which UDOT explains is 1,000 less than needed. To fill that shortfall, it would construct "1,000 new parking spaces divided between two mobility hubs at the gravel pit and 9400 South and Highland Drive." This obviously assumes that all of these parking spaces will be occupied exclusively by LCC transit users. That is simply not going to happen. Given the demand and lack of parking, one could easily estimate 40% - 50% of the stalls being occupied by people going to different destinations than UDOT is planning to deliver them to, be it resorts in other canyons, users (climbers, bikers, hikers, backcountry skiers, etc), heading to different destinations, etc. This shortsighted planning is also not surprising, given UDOT's determined resistance to examining the interconnectedness of the transportation problems and needs associated with Wasatch canyons.

If UDOT intends to build larger parking lots than what is articulated in the EIS, it needs to provide analysis and modeling of the impacts of parking, mobility, congestion and level of service on adjoining routes and roadways to understand and disclose the impacts. On the other hand, if it is not going to accommodate for obvious behavioral and user impacts, it needs to account for the loss of efficiency in their figures due to attrition of parking spaces for users visiting immediately adjacent canyons, which are connected byway of Wasatch Blvd. Parking availability significantly impacts the mobility and reliably potential of the resort expansion gondola alternative.

It is also important to note that the parking lot for the gondola failed UDOTs own screening criteria. Inequitably, it was kept as a solution while other concepts and ideas for solving the issues our region is facing were patently dismissed and eliminated from analysis. Yet another instance that shows this process isn't grounded in objective or fair analysis, rather a process to elevate a predetermined outcome and preference of power brokers and the political elite at the expense of the public.

IV. Social Equity and Environmental Justice

If there is one section that glaringly shows UDOT does not understand these canyons, that it cannot see the forest for the trees, it is their inability to adequately do an environmental justice and social equity analysis.

The extent of this analysis was confined to census blocks within 1/4 mile of the road corridor, in one of the most high rent districts in Salt Lake County, with the conclusion that there were no impacts to “environmental justice populations.” For example, UDOT’s executive director lives in this neighborhood, likely within one of the census blocks analyzed. His annual salary in 2018 was \$163,426 in 2018.¹² Let’s juxtapose this with the 2019 median individual income in Salt Lake County of \$32,867.¹³ UDOT’s prioritization of getting well heeled skiers to ski resorts over ensuring all citizens and users have equitable access to their public lands, or ensuring people can continue to afford high quality, fairly priced drinking water is grotesque.

The Wasatch Mountains, inclusive of Little Cottonwood Canyon, are not just a local regional treasure, but a national treasure. Environmental justice analysis, at minimum, should incorporate visitors from all local zips, and particularly those zip codes/census blocks who receive their culinary water from these canyons, for it is the water rate payer who will bear the burden of increased treatment costs. It is the person who can barely afford hiking boots who will be displaced or not serviced by the proposed alternatives, yet they will be subsidizing patrons of an activity for which they are unable to participate.

In addition to the origin data compiled by Utah State University as part of the Central Wasatch Visitor Use Study, Mountain Accord as part of its *Cottonwood Canyons Short Term Transportation Solutions Tech Memo (May 2017)*¹⁴ looked at origin data as well. As it pertains to Little Cottonwood Canyon, “Origin District 5”, which comprises downtown Salt Lake City and west had the largest block of visitation (36%) much of which was “hotel based recreation”. The largest “home based recreation” (22%) came from “Origin District 2”, which comprises much of the central Salt Lake valley (Holladay, Cottonwood Heights, Murray, Midvale, West Jordan). Given this origin data, UDOT completely missed communities which would likely be displaced and significantly impacting their analysis. To look only at the

¹² GovSalaries. <https://govsalaries.com/braceras-carlos-12886565> accessed on 8/22/2021

¹³ Data Commons. https://datacommons.org/place/geold/49035?utm_medium=explore&mprop=income&popt=Person&cpv=age%2CYears15Onwards&hl=en accessed on 8/22/2021

¹⁴ Mountain Accord Cottonwood Canyons Short to Mid-Term Transportation Solutions Technical Memorandum. WSP/PB under contract with WFRC, in consultation with the Utah Dept. of Transportation and the Utah Transit Authority, and with funds from the Mountain Accord Program. May 2017. Full document in 3 links: a) [Cottonwood Canyons Transportation Recommendations: Sept-2017](#), b) [Cottonwood Canyons Transportation Recommendations: Sept-2017 \(100-170pg\)](#), c) [Cottonwood Canyons Transportation Recommendations: Sept-2017 \(171-222pg\)](#)

immediacy of the road corridor, absent the origins of people traveling on that roadway, you cannot at all, understand the use, the impact, thus the alternative selection. The issues missed here do not apply solely to environmental justice populations but completely miss the communities who use, visit and would utilize (or be displaced due to inability to utilize) the preferred alternatives.

At a recent County Council meeting, Alta Mayor Harris Sondak noted that the per skier day cost of the alternatives is approximately \$111. This is based on the assumption that the ski season is 120 days. Of course, the front end and back end of the ski season is being impacted by climate change (and Utah's love of fossil fuel extraction is only exacerbating this trend) so the cost will increase. As part of Utah State University's analysis in the central Wasatch Mountains, it was found the "mean and median household income for resort skiers both fell between \$75,000 - \$99,999." The mode was "\$150,000 or over", representing 27% of respondents. Interesting that Utah's Homeless Czar and beneficiary of the La Caille gondola development, Wayne Niederhauser, believes people making in excess of \$100,000 are deserving of this public subsidy.

While implementing fees or tolls appears to primarily be used to change behaviors or mode, one thing UDOT needs to understand is that the impacts of implementing a toll or a fee is a very complex and nuanced issue, that the DEIS has barely scratched the surface of. For instance, the Central Wasatch Visitor Use Study found a willingness to pay a fee/toll particularly when coupled with getting people onto mass transportation. Another analysis done by Utah State researchers, explored the impact of user fees, which may well be extended to tolling as well. It found that in areas where there is a cost to access, such as a toll or a fee, even as small as \$3/vehicle, low income visitors would travel up to 3 times further to avoid paying the fee, resulting in massive displacement of users by income level.¹⁵ This needs to be further understood, analyzed, and disclosed so as not to continue making these canyons a playground for the economically well to do, all the while subsidizing their activities at the expense of those who truly need the benefits provided by outdoor recreation so as to escape the reality of their daily hardships.

We will remind and note that none of the alternatives UDOT has concerned itself with are mass, or public transportation, rather resort transportation and only about 7% of the public in our region are ski area patrons. Approximately 100% of the public, however, drinks water.

Finally, the cost of riding these systems isn't known, particularly for riding the gondola. Without understanding the cost per rider, you cannot understand the impact to environmental justice communities, or any other communities for that matter. Gondola proponents often state that resort season pass holders will ride for free, if this is selected. What about the communities that cannot even afford to

¹⁵ User fees displace low-income outdoor recreationists. Lamborn, Smith, Burr. 2017. <https://www.sciencedirect.com/science/article/abs/pii/S0169204617301433>

purchase skis & snowboards, let alone a season pass? If the gondola costs \$20, it will cost a family of four \$80 to go up the canyon when today it costs nothing. They then arrive at the concrete jungle of Snowbird and the former riparian habitat and alpine meadows of Alta, that are now slabs of asphalt. They never even arrive in the mountains for the recreational activity of skiing.

When you look at the cost of these options, juxtaposed with the issues our region is facing, the inequity is glaring. This isn't to suggest our canyons and our environment and our transportation systems don't need money, they do. But the money is coming from the wrong sources, is directed at the wrong issues, and isn't going toward an actual problem confronting either our communities or the environmental services they are dependent upon.

V. Climate Analysis

UDOT's climate change analysis is wholly inadequate. The climate considerations we found in the DEIS were part of the air quality chapter of the report and were focused on greenhouse gas (GHG) contributions of the operations of the alternatives. No effort to calculate some of the downstream fabrication of the alternatives were included, steel manufacturing and concrete, for example, are some of the greatest contributors to GHG emissions in the world. One source, noting that "only the annual GHG emissions of China and the U.S. are higher than annual GHG emissions of the global steel industry."¹⁶ Additionally, while UDOT and the state have acknowledged the gondola would be a significant tourist attraction and has a big "WOW! factor", it hasn't included the GHG emissions of induced air travel to the state. Every flight taken by a ski tourist is quite literally killing the thing in which they are trying to enjoy - winter - which in turn harms our communities reliance on drinking water, in the midst of an unprecedented and prolonged drought.

Of course, GHG emissions are just one component of climate analysis. We must also strive to dynamically understand the realities and implications of the climate crisis, particularly as it relates to our water quality and quantity, forest health and wildfire mitigation strategies, pressures and stressors on ecology and wildlife, and declining snowpack, with a keen understanding of how it will affect avalanche cycles and the precious powder days the state is considering destroying a canyon for a few to enjoy.

Last month, the Intergovernmental Panel on Climate Change issued a report¹⁷, last issued in 2013 that said the climate crisis was "code red for humanity". It further reiterated that climate change was human caused and that we needed to fundamentally change our approach to projects and our relationship with the

¹⁶ Global Efficiency Intelligence. <https://www.globalefficiencyintel.com/new-blog/2021/global-steel-industrys-ghg-emissions>

¹⁷ IPCC - Sixth Assessment Report. <https://www.ipcc.ch/report/ar6/wg1/>

natural environment. The findings of this report also noted that prior projections on the implications of climate change were off and that the change initially forecasted was very conservative and the impacts we are experiencing right now are happening faster, and with greater intensity than originally anticipated. This suggests that the days and weeks our ski seasons are getting trimmed on each end may well be months on each end.

On a regional and local level, nothing is as current as the latest IPCC report, but that isn't to suggest there are no resources that cannot be incorporated into this analysis - but remember, the estimates are likely to be more conservative than anticipated. UDOT needs to incorporate more relevant science as part of its climate analysis that contemplates the implications of climate change.

Fourth National Climate Assessment

The *Fourth National Climate Assessment*¹⁸ is one such source. We know the idea of interconnect excites state leaders, inclusive of UDOT, so we will begin with that topic. Interconnected Impacts of climate change note that, "Climate change affects the natural, built and social systems we rely on individually and through their connections to one another. These interconnected systems are increasingly vulnerable to cascading impacts that are often difficult to predict, threatening essential services..." of note, are water resources.

This brings us to one of the next most important topics - water. "Rising air and water temperatures and changes in precipitation are intensifying droughts, increasing heavy downpours, reducing snowpack, and causing declines in surface water quality, with varying impacts across regions. Future warming will add to the stress on water supplies and adversely impact the availability of water in parts of the United States. Changes in the relative amounts and timing of snow and rainfall are leading to mismatches between water availability and needs in some regions...Aging and deteriorating water infrastructure, typically designed for past environmental conditions, compounds the climate risk faced by society. Water management strategies that account for changing climate conditions can help reduce present and future risks to water security, but implementation of such practices remains limited." As UDOT should be aware, many thanks to Salt Lake City's constant reminding (which doesn't suggest you are actually aware), the Wasatch's creeks and streams and lake are part of its critical water infrastructure. The investments in rigid and inflexible infrastructure in our watershed canyons, hurts our watershed managers' ability to adapt, mitigate and innovate around built and natural systems aimed at protecting our water resources. Water for our local communities and economies is arguably more important than skiing.

So the impacts to water are quite concerning. What is happening to the ecosystems and related ecosystem services from which this water originates, which this water

¹⁸ Fourth National Climate Assessment. <https://nca2018.globalchange.gov>

regularly interacts with? “Many benefits provided by ecosystems and the environment, such as clean air and water, protection from coastal flooding, wood and fiber, crop pollination, hunting and fishing, tourism, cultural identities, and more will continue to be degraded by the impacts of climate change. Increasing wildfire frequency, changes in insect and disease outbreaks, and other stressors are expected to decrease the ability of U.S. forests to support economic activity, recreation, and subsistence activities. Climate change has already had observable impacts on biodiversity, ecosystems, and the benefits they provide to society. These impacts include the migration of native species to new areas and the spread of invasive species.”

UDOT needs to do more analysis to understand the conditions of the environment given the climate realities we are experiencing. It must be reconciled with the watershed, forest and community actions plans that anticipate adaptive management strategies for protecting our most treasured and needed resources from the threat of fire, drought, and rapidly changing ecosystems and their services. Further, it must understand the implications and concerns being expressed by resource managers at the local level - who are on the front lines of the climate crisis. Rather than building the projects associated with the preferred alternatives which primarily add convenience for cars (which is a function of LOS D), UDOT must look at the data when it comes to climate. This is why so many local plans call for transit improvements for all users, as there is acknowledgement of the complex systems, a strong desire to sustain and improve upon their natural condition, necessitating investments in behavioral shifts, over construction investments, to protect our communities and environments.

Local climate change impacts and water supply

At the local level, a 2013 paper, “Planning for an Uncertain Future: Climate Change Sensitivity Assessment toward Adaptation Planning for Public Water Supply”¹⁹ explores the impacts of climate change on Salt Lake City’s water supply. UDOT, likely in coordination with Salt Lake City and others engaged in this analysis, should understand the concerns expressed in the scenarios and review their alternatives, inclusive of the erroneously eliminated alternatives (bus with no road widening, bus with regional hubs, train, etc) to see what, if any, best fit with the challenges facing our local water supply. Several of the paper’s authors, we know, would be happy to (and likely have already) share their concerns about the climate realities we are facing in our watersheds.

Again, UDOT is giving short shrift to the impacts of climate change. It constantly ignores the environment, and the importance of the environment, in which it is proposing impactful projects. Its focus on a portion of the GHG contributions pales

¹⁹ Planning for an Uncertain Future: Climate Change Sensitivity Assessment toward Adaptation Planning for Public Water Supply. Bardsley, Wood, Hobbins, Kirkham, Briefer, Niermeyer, Burian. <https://journals.ametsoc.org/view/journals/eint/17/23/2012ei000501.1.xml>

in comparison to the impacts of the projects in the climate affected environment in which these projects are proposed. In addition to understanding the resources provided in this section, several questions need to be answered.

- What are the impacts to water quality and quantity proposed not just from the construction, but from the induced visitation UDOT seeks from these projects?
- What will the viability of the ski industry look like within UDOT's planning horizon of 2050?
- How will the implications of climate change affect the return interval of avalanches as it pertains to operations along the existing highway?
- Are the dozen or so bad weather events forecast to go up or down in the winter? What types of weather events are we anticipated to have in the non-winter months and how will the modes interact with those?

With so much uncertainty, it seems flexibility is critical, not just for transportation, but also for agencies with arguably more important responsibilities (watershed, water and forest management) to respond to the very real implications of climate change. UDOT should strive to align with those agency goals, rather than coercing them to adhere to its transportation objectives.

VI. Special Resources: Archaeological, Architectural and Cultural resources, Sections 4f and 6f, and Riparian Habitat Conservation Areas

While the thrust of the DEIS disregards much of the area between the La Caille gondola terminal and the first stop at Snowbird as flyover country, there are actually many special places that exist between these areas that didn't get analysis in the DEIS. One of the most glaring oversights is that UDOT only buffered the road corridors - their defined project area - when they should have also buffered the extent of alternatives, inclusive of staging and disturbance areas, as one of the alternatives exists almost exclusively outside of their defined project area. This oversight applies not just to archaeological, architectural and cultural resources, but also to the section 4f and 6f determinations. The DEIS states the following:

"The Section 4(f)/Section 6(f) study area is generally based on a 100-foot-wide buffer on either side of S.R. 210, from north of the intersection with Big Cottonwood Canyon Road and extending southeast to the end of S.R. 210 in the town of Alta, including the Alta Bypass Road."

This corridor would miss the entire gondola alignment, so it is no wonder that the existence of 4f/6f properties is nearly non-existent. Most EIS documents we've ever reviewed include project boundary maps, not just for the project area, but the disturbance area and encompassing all alternatives. Yet again, this is a result of a carelessly narrow scope and lack of disclosure of impacts of predetermined alternatives, not to mention the general lack of care the agency has shown for this environment.

So, with inaccurate project areas that do not include the aforementioned, critical elements in the boundary, it is impossible these determinations are inclusive of the impacts these proposed alternatives would cause on these special resources.

Were UDOT to properly delineate the boundaries, investments from federal agencies and user groups like the Salt Lake Climbers Alliance have committed significant resources to improve recreation resources in Little Cottonwood Canyon. Both the Alpenbock loop and the Gate Buttress have leveraged a variety of funding sources, individual, commercial, private, state, federal and local, inclusive of US DOT sources. Hundreds of thousands, if not millions of dollars have been invested into this resource. These recreation resources are absolutely 4f sites that deserve 4f protections. If UDOT couldn't disturb a ball field, as discussed on the USDOT 4f website, they most certainly cannot, and should not, harm the climbing resources in LCC. They are far more reliant upon the innate habituation of the climbing and bouldering resources.

Across the canyon from here, there are known archaeological sites that did not receive proper evaluation under Sec. 106, which require visual analysis from cultural and archaeological resources, which are present in little Cottonwood Canyon- whether or not they fall within the project boundaries.

Still further up the canyon, you come upon Tanners Campground, one of two camp areas in Little Cottonwood Canyon that would be immediately impacted by the gondola, particularly the cables and the cars running overhead. With only a handful of camping areas in the County on national forest which by the way are booked solid throughout their operating season, the impact to this area cannot be mitigated. This is a place where children, families, grandparents go to enjoy the outdoors. Memories are made here - people's first outdoor experiences are had here. It is abominable that the state has no regard for the impact it is proposing to have on the lives and experiences of its residents and their families.

Traveling still east, brings us to the White Pine Trailhead - perhaps one of the single most cherished spots in all of Little Cottonwood Canyon. It is the launching point to access some of the most (and last remaining) incredible side canyons not yet dominated by commercial skiing. The experiences at White Pine are profound in every season. Whether ski touring up Scotties Bowl or heading toward one of the few natural alpine lakes in the Wasatch Mountains, the views up, down and across the canyon are simply breathtaking.

Suddenly, you are at Snowbird - a place devoid of natural wonder, which isn't to say the skiing isn't fun, but much of the integrity of the upper canyon is dominated by concrete buttresses appropriately called "brutalist" architecture. When it opened, it quipped that Snowbird, was embodiment of "man and nature in harmony." What Snowbird did to the canyon is unquestionably brutal - what can you expect from a Texas oilman but an overt domination of nature. That said, UDOT was so concerned with the impacts of a gondola to Snowbird's aesthetic, that it suggested putting more

attractive towers at Snowbird -- an affront to the rest of the canyon unequivocally more sublime and picturesque than Snowbird. We'd be remiss not to quote one of Save Our Canyon's founders here as he quipped about what has taken place in this part of the canyon.

"Centuries hence, archaeologists will attempt to unravel and understand the culture represented by the concrete and steel rubble that once was Snowbird. Will they enshrine the remnants as a tribute to man's ingenuity and progress? Or will they consider it, as one today considers the ancient baths of Caracalla, a monument to his decadence."²⁰

UDOT concerns itself more with the alignment of brutalist architecture and concrete hellscape, than it does with the sublime scenes of an otherwise serene canyon.

While we have not been exhaustive in our review of the many, many important sites in Little Cottonwood Canyon, we have been more thorough than UDOT (and we are not proposing to impact resources -- quite the contrary). If you wish to understand more, and you should, you should begin an exhaustive review of the many hiking, skiing, climbing and natural guides that have been thoughtfully and diligently compiled by dozens of canyon lovers transcending the generations. These canyon walls tell a history of human potential, of ecology, but also of tragedy -- we suggest you focus on the former rather than doubling down on the latter as you have thus far.

Cultural context of the Wasatch Mountains²¹

The Central Wasatch has a human history dating back at least 12,000 years by people who modern day Tribes claim to be their direct ancestors. The Shoshone People referred to the Salt Lake Valley as "Soonkhani," or "many homes" at a time preceding the arrival of European settlers. The oldest record of corn cultivation in the Great Basin dates back 3,000 years to a site located on the Jordan River in what is now the City of Draper.

Native American leaders and Tribal members insist that the Salt Lake Valley was not "available" for the taking when Mormon settlers arrived in 1847 and would like current historical accounts to reflect this fact. Indeed a great deal of damage has been caused by this omission. The Wasatch and the Salt Lake Valley were used extensively for thousands of years prior to the mid-summer day in 1847 when Mormons arrived. Ute, Shoshone, and Goshute People were forced out of the Salt

²⁰ Skiing in Utah: A History. Alexis Klener. 1980.

²¹ Native American Historical References:

Cuch, Forrest. 2000. A History of Utah's American Indians. Utah State Division of Indian Affairs. Utah State Division of History. Salt Lake City, Utah.

Janetski, J. C. (1991). *The Ute of Utah Lake* (Vol. 116). University of Utah Press.

Brown, S. K., & Cannon, D. Q. (1994). *Historical atlas of Mormonism*. Macmillan Library Reference.

Tyler, S. (1954). Lyman "The Spaniard and the Ute". *Utah Historical Quarterly*, 22, 343-361.

Lake Valley and their nearby villages by Mormon settlers and the US Calvary through displacement, resource consumption, and armed conflict in the decades following pioneer arrival. Ute, Shoshone, Goshute, and Paiute People all include Salt Lake County in what they consider to be their ancestral territories. Many other Nations also claim to have once traveled long distances for the purpose of gathering the essential mineral of salt from the Great Salt Lake and used the Wasatch and the Salt Lake Valley as a travel corridor. While this history is not often shared, the facts exist, and some of the Native knowledge that has been passed down orally regarding the Wasatch is still intact.

Native American Tribes have a rich history in the Wasatch Range that should be prominently described and demonstrably regarded in the official record of the Little Cottonwood Canyon EIS, and fairly treated in its process. At a minimum formal consultation should be conducted with each Tribal Nation that may have ties to the UDOT project area. Additional steps may be warranted as well. In 2013, the USFS released new Forest Service Planning Regulations that require solicitation and incorporation of Traditional Ecological Knowledge in the Forest Planning process. UDOT's process should adopt a similar policy to ensure that any available historic knowledge, ongoing cultural practices, or known sacred sites are considered and planned for in the preferred action alternative. An important goal of this EIS process should be that the cultural values held by Native American Tribes within the study region are protected for future generations.

Riparian Habitat Conservation Area

It is no secret that the waterways in the second driest state in the nation contain a bounty of life. Section 4f specifically calls for the protection of "publicly owned wildlife and waterfowl refuges of national, state or local significance that are open to the public..." One of the most prominent creeks in our county, surrounded by wilderness and national forest system lands, most certainly rise to this level of importance. In a canyon whose upper meadows and wetlands have been continuously degraded and impacted by ski area development, few quaint and wild water resources exist. The encroachment of infrastructure into these areas, particularly in light of prolonged drought and other impacts of climate change is simply irresponsible and detrimental to our wildlife populations, with whom we share this resource. Talus fields provide habitat and cover for terrestrial species, eddys and pools provide habitat for the aquatics. Avian species circle up above hunting for food. All of these will be impacted by the presence of towers and cableways, not to mention the constant movement of cars traveling along them.

If Little Cottonwood Canyon doesn't fit the criteria section 4f sought to protect from transportation infrastructure we don't know what does. By constructing a gondola, adding avalanche sheds, and/or widening the roadway, UDOT is actively denigrating the multiple use mandate of a national forest, thereby converting a publicly owned national resource that has critical value to wildlife, historical, and vast recreational

significance - for a singular use that continues to erode the values for which the forest was established.

Further, the complacency of the USFS is noted. They have given up, in abdication of duty, not just to this resource and its meaning to our community, but to our nation. UDOT has shown little if any regard for the amazing resources, what it means and has meant to our community, to cultures that inhabited this place for generations before us, and the wildlife that surprisingly flourishes despite the lack of care shown by the state and federal agencies.

Of course, with a predetermined mandate, UDOT does not want to disclose these impacts in an EIS, it upends their apple cart. Alas, the law requires it. It not only requires you to disclose, but for 4f sites in particular, it requires you to avoid impacts and to focus upon alternatives that cause the least overall harm. The EIS is not doing this, in particular as it pertains to the RHCA. Habitat's particularly in the arid west, in steep canyon environments are indeed refuges. And as human encroachment and development and intensification of use of the resource increase, these refuges become all the more important to avoid -- thus you must avoid by abandoning your preferred alternatives.

VII. Responsiveness to Local Jurisdictions and Plans

One of the reasons UDOT sought NEPA authority was that the state felt it could be more responsive to local communities and local concerns. Per usual, the local argument is one of the arguments Utah abuses best. Save Our Canyons has been engaged in local planning and local policies for half a century. Numerous jurisdictions have not only weighed in on this process, but have plans required by the State of Utah, some new and some old, concerning this very geography. Let's take a look at some of these plans and policies adopted by various subdivisions of the state, beginning with the state itself.

Note: There is really no way to summarize these plans, without going on for hundreds of pages. We will do our best to summarize key areas, when they are specific to the impacted area of this EIS, however, by way of the reference we are incorporating these plans into the record, thereby requiring UDOT's response to each of the components to every one of these plans many of which included UDOT's participation, state and local (sometimes federal) funding and local corroboration.

HINT: Almost every single one of these plans calls for a comprehensive transit based strategy that serves ALL users, ALL seasons. This is perhaps the #1 concern with UDOT's current process that focuses on improving mobility for automobiles and harms other users. Each of these cost significant public dollars, and time from public and stakeholder interests.

State of Utah

- *The State of Utah Outdoor Recreation Vision*²²
Ensure Balanced and Responsible Use and Development of our Public Lands. Utahns value their public lands. These lands support a range of uses, including resource development, recreation, wildlife habitat, grazing, and environmental services. With diverse uses comes some conflict. The state should approach public land issues with a proactive, creative, and collaborative approach to find the right balance among the uses, all of which are important to the state.

-Play a leadership role in convening a stakeholder process to develop specific plans for the Wasatch Canyons over the next 50 years. This process should carefully review and give appropriate weighting to all of the important issues, such as: transportation, the ski industry, backcountry recreation, watershed management, wilderness protection, and land development. Work with the White House Council on Environmental Quality to establish this effort as a pilot project demonstrating a coordinated and efficient NEPA process.

- *Mountain Accord*²³ & *Central Wasatch Commission*²⁴
The Central Wasatch Commission is the governmental entity that the Mountain Accord charter called to create. Upon its creation, the Central Wasatch Commission was tasked with carrying out projects initiated during the Mountain Accord process including federal legislation, the **Central Wasatch National Conservation and Recreation Area Act**, the **Environmental Dashboard**, and **canyon transportation improvements**.

1.7. Specifically, the signers of the Accord seek:

- 1.7.1. A natural ecosystem that is conserved, protected and restored such that it is healthy, functional, and resilient for current and future generations.
- 1.7.2. A recreation system that provides a range of settings and accommodates current and increasing demand by encouraging high levels of use at thoughtfully designed locations (nodes) with convenient access, while protecting solitude, nature, and other backcountry values.
- 1.7.3. A sustainable, safe, efficient, multi-modal transportation system that provides year-round choices to residents, visitors and employees; connects to the

²² The State of Utah Outdoor Recreation Vision. January 2013. pg 10 <https://business.utah.gov/wp-content/uploads/2018/04/OutdoorRecreationVision.pdf>

²³ The Mountain Accord. 2015. https://mcusercontent.com/d039de63a7bcadab6bef83ace/files/1f1ab8d0-54a3-464a-8587-d7c46a3f9a55/FINAL_Accord_July_13_2015_w_Sigs_and_Attach.pdf

²⁴ Central Wasatch Commission. <https://cwc.utah.gov>

overall regional network; serves a diversity of commercial and dispersed recreation uses; is integrated within the fabric of community values and lifestyle choices; supports land-use objectives; and is compatible with the unique environmental characteristics of the Central Wasatch.

- 1.7.4. Broadly shared economic prosperity that enhances quality of life and preserves natural and scenic resources and infrastructure that is attractive, sustainable, and provides opportunities for visitors and residents.

- *Cottonwood Canyons Scenic Byways Corridor Management Plan*²⁵

There are **twenty-one visitor sites** and numerous shoulder pullouts adjacent to Little Cottonwood Canyon Scenic Byway. This corridor is generally characterized by a steep, tight road corridor with few pullouts, short sight distances, and few opportunities to pass.

Existing Road Safety Concerns:

Major crash sites, major pedestrian congestion areas (park-and-ride, Grit Mill, roadside parking for visitors) and wintertime hazards (avalanche zones, road closures).

Recommended Corridor Improvements:

The Byway visitor experience can be improved with a few over-arching efforts, including:

1. Add a gateway feature to give visitors a feeling they have arrived someplace special.
2. Direct people to visitor centers, official waysides, and recreation areas with the capacity to handle more visitors and avoid sensitive resource areas.
3. Foster a year-round, first-rate transit system, and encourage carpooling to mitigate parking congestion and allow for loop trips.
4. Continue to encourage stewardship and responsible recreation through interpretation, sensitive design, and proactive resource preservation.
5. Formalize pullouts and parking areas where stopping is desired. Remove pavement or gravel pull-out at undesirable areas.
6. Refine procedures for emergencies and canyon closures to minimize risk.
7. Reduce number of signs and eliminate non-essential signs.

²⁵ Cottonwood Canyons Scenic Byways Corridor Management Plan. 2008. https://travel.utah.gov/wp-content/uploads/CMP_121608_portable.pdf

8. See additional comments in the Site Inventory in the Appendix.

Salt Lake County

- *County Resource Management Plan (SLCo)*

In 2016, the Utah Legislature required counties to complete resources management plans. Here are a few excerpts that seem relevant to the UDOT project and our Wasatch Canyons.

20.2 Desired Future State

Salt Lake County desires to provide high-quality recreational experiences for visitors and residents. To accomplish this, the county desires a recreation system that is balanced, sustainable, and provides a range of settings that accommodates for year-round outdoor recreation opportunities. The recreation system must account for heavy and increasing demands with sufficient facilities, maintenance, and transportation to support high levels of use at locations with convenient access. The system should also be capable of providing opportunities for environmental education, backcountry experiences, and cultural resource protection.

Salt Lake County desires to include a diverse range of stakeholders, including local property owners, public land managers, and business owners when planning for recreation system improvements.

Visual Resources:

24.2 Desired Future State

Salt Lake County desires to maintain or improve the visual resources within the county.

24.3 Management Objectives and Associated Policies and Guidelines

24.3.1 Management Objective

Maintain or improve scenic and appealing objects, scenes and vistas on public lands in Salt Lake County.

Policies and Guidelines

Land use goals, decisions and transportation and utility solutions should consider the impacts of development on visual resources and the overall experience the public has on public lands.[1,2]

Significant vistas and landscapes that have special visual and aesthetic qualities will be preserved and maintained.[3]

- *Wasatch Canyons General Plan*²⁶

GOAL: SUPPORT ENHANCED YEAR-ROUND TRANSIT SERVICE TO AND WITHIN THE WASATCH CANYONS

ALL-CANYON POLICIES:

²⁶ Wasatch Canyons General Plans. 2020 https://slco.org/globalassets/1-site-files/planning--transportation/wasatch-canyons/wasatch-canyons-general-plan_optimized_js.pdf

- The County supports mixed-use mobility centers, which should be located outside the Canyons, but within short distances
- Mobility centers uses should include transit, parking, daily services and be near or mixed in with residential dwellings and businesses
- The County supports rideshare parking, bus stops and electrical vehicle charging at key nodes
- The County supports increased transit frequency at key locations throughout the Canyons
- The County supports year round transit service within the Cottonwood Canyons and to Park City
- The County supports carpooling programs
- ALL-CANYON STRATEGIES:
 - The County will assist in developing parking structures for the purpose of Canyon transit and carpooling
 - The County will ensure that new and enhanced transit facilities and operations are designed to avoid degradation of watershed health and water quality

Salt Lake City

Our state’s capital city, Salt Lake City, not only has jurisdiction over these Wasatch watershed canyons and the activities which take place in them, but also have many laws and regulations mandating Salt Lake City protect this water supply and the quality of this water, for its residents and customers. Salt Lake City’s water doesn’t just go to the city, it serves the University of Utah, businesses up and down the Salt Lake Valley, residents in other cities within Salt Lake County and in some instances outside. Water is a key ingredient for life in the desert. The availability of clean water is why we enjoy the society that exists today - without it, we’d look more like Nevada. So, we can’t ignore the importance of water or the impacts present and future (with a keen eye towards what our actual future holds), because any effect on water, water quality or water supply will have devastating consequences for hundreds of thousands of Utahns.

Salt Lake City’s 1999 Watershed Management Plan²⁷ (currently being updated), opens discussing their Desired Future Condition.

“The management emphasis prioritizes water quality first and multiple use of the watershed second. The Wasatch Canyons are protected to maintain a healthy ecological balance with stable environmental conditions, healthy streams and riparian areas, and minimal sources of pollution. Existing and potential uses that could lead to the deterioration of water quality are limited, mitigated, or eliminated. To the extent that, in the reasonable judgement of the City, a proposed development or activity, either individually

²⁷ Salt Lake City Watershed Management Plan. 1999. <http://www.slcdocs.com/utilities/PDF%20Files/slcwatershedmgtplan.pdf>

or collectively, poses an actual or potential impact to the watershed or water quality Salt Lake City will either oppose, or seek to modify, manage, control, regulate or otherwise influence such proposed development or activity so as to eliminate or mitigate potential impacts.”

On several occasions throughout this process, Salt Lake City has told UDOT this project, and UDOTs failure to comprehensively analyze direct, indirect, and cumulative impacts as well as evaluation of connected actions - like the damaging positive feedback loop of ski area development and expansions driven by additional visitation these projects seek.

UDOTs failed consideration of water resources not only jeopardizes water, but places undue and inequitable economic burdens on both the city itself, its residents and its customers. It is not the skier benefitting from these projects that pays the costs (economic and health) of these projects but the rate payer. UDOT is foisting the harm it is causing onto other jurisdictions and people.

It should be noted that both Salt Lake County and Salt Lake City oppose the two alternatives being pursued by UDOT. With the stated goal of running a NEPA process to be more responsive to local concerns - UDOT is concerningly a worse steward of the NEPA process than federal agencies. It is ignoring local jurisdictions and their responsibility (oftentimes legal) to their residents, but rolling out the red carpet for speculators, resorts and developers who seek to harm the public trust, our environment and the ecosystem services they provide, for insular monetary gains.

Decades of efforts, consensus and public investment are being abandoned by UDOT's process. They aren't interested in listening to local communities, rather the notion of local input not to mention the investments made by people, organizations, businesses and governments are completely wasted and ignored by the state to a degree arguably greater than by the federal government.

VIII. Other NEPA Concerns

Away from this DEIS, but related to the NEPA process, we have several concerns.

In Nov. 2020, Save Our Canyons filed a GRAMA request to UDOT on this project. As of this writing UDOT still has not provided a complete response to our request.

NEPA requires that the public be allowed to participate in the EIS process. In order to do this effectively, public interest organizations like SOC commonly use the Federal Freedom of Information Act (FOIA) to get documents about the project to help them prepare comments that they submit to the agency. The Freedom of Information Act is often critical for organizations like SOC to participate in EIS processes effectively.

Ordinarily, it would be the federal agency—in this case the FHWA—that conducts this EIS, but UDOT sought and received permission to do it on the federal government’s behalf. As part of this grant of authority to UDOT, FHWA and UDOT signed a Memorandum of Understanding that ensures that UDOT will carry out the EIS. Because UDOT is not subject to the federal FOIA law, but because FHWA still needed to ensure the availability of agency records critical for the public involvement NEPA requires, an explicit condition for the grant of federal authority to UDOT set forth in the MOU was that UDOT would provide records in accord with the state’s records-disclosure law, GRAMA. Thus, exercising our rights under GRAMA rather than FOIA, we submitted our request to UDOT.

Throughout the EIS process there are several opportunities for public engagement. One of the most critical and substantive portions for engagement in an EIS is between the Development of Alternatives and the release of a Draft EIS. It is in this period where agencies, federal, state and local, engage with the Federally Responsible agency — UDOT in this instance — to make their decision and the justification for their decision. This is a small but important window and our ability to comprehend records and make additional requests has been completely and totally harmed.

This is not just local violation, but a violation of federal law and a violation of the MOU UDOT entered into with FHWA.

Additionally, in review of comments provided by agencies (cooperating and coordinating) we have found several issues. First, UDOT drafted letters for concurrence for the USFS, particularly surrounding 4f determinations. The USFS should have done this analysis and provided it to UDOT. We find it highly inappropriate for consultants such as HDR, who is not an objective arbiter of the NEPA process rather a mercenary for UDOT’s predetermined outcome. The USFS, its Uinta-Wasatch-Cache National Forest and its Salt Lake Ranger District have intimate working knowledge of projects, policies and activities that outside consultants could never have. Emails²⁸ obtained through Freedom of Information Act (remember UDOT isn’t responding to GRAMA requests), show some of this consultant and “political pressure” (USFS’s words not ours).

The impacts to Grit Mill, Lisa Falls, and Gate Buttress were some of the reasons (i.e. 4[f] impacts) that UDOT had originally screened-out the cog rail, but due to industry and political pressure (not FS), UDOT decided to carry the cog rail evaluation through to the DEIS.

²⁸ Jan. 21, 2021 email between USFS and Vince Izzo (HDR)

Additionally, the USFS (as did we, SLC, and many others, separately) also felt the indirect impacts were not thoroughly evaluated.

“I think we should consider the indirect effects as well. People are not going to want to camp between a highway and a railway. I would anticipate due to the indirect effects, the entire campground would be lost.”²⁹

The disruption caused by a train would be similar to a gondola traveling overhead. To have this type of interruption, is not why people venture into the forest.

“I thought the cog and gondola were going through Tanners Park but the write-up says no. However, for the cog, the alignment goes right through Grit Mill, which was just completed and cost over half a million to complete.”

The gondola alignments have changed over time, and the impact to climbing sites (See Salt Lake Climbers Alliance comments) that have received significant public investment most certainly cause this to be a site protected under 4f.

Once again, UDOT considers few but itself and the politically connected resort owners and developers that anchor the gondola proposals, with complete and total disregard for other users, other jurisdictions, and our shared community values for the forest, our watershed, its wildlife, their magnificence -- our Wasatch Canyons.

IX. Alternatives that need consideration

We have attempted to be direct and exhaustive in these comments to help UDOT understand that which it has been unable to understand in the past several years in this process. It is a public agency with little if any accountability to other governments, the communities and users, and the taxpayers that comprise its budget. These Wasatch Canyons are a gem and we collectively do not want what you are selling - you aren't improving anything, rather ruining everything.

There are much better options that simply haven't been either allowed or fairly considered into the process. Let's take for example, electric buses. Even if they aren't available today (neither is a gondola), they will be within the next several years, or one life cycle of a bus system. To look at cutting edge aerial technologies, but look at antiquated bus (and even rail) technologies is not an apples to apples comparison. This is just one example. Another example is how you look at the forest plan. Some instances you look at the forest plan as a rigid document that cannot be altered, yet when it comes to the gondola, the forest plan is a document that can be amended. This is not fair and equitable analysis, it is cherry-picking at best, but as we've seen through many other instances in the document, it is most likely political influence and outright cronyism.

²⁹ Nov. 18, 2020 email between USFS leadership

We request that UDOT prioritize looking at alternatives that focus on the root of the problem: removing cars from the roadway. This can be done by implementing multiple travel demand strategies rather than altering the canyon.

UDOT can improve safety, mobility and reliability by removing and keeping cars from entering the road. A combination of buses (express, direct, and special service), utilization of vans and/or autonomous vehicles equipped for the canyon environment, mandatory carpools (3-4 people / car) for certified safe vehicles, and tolls based on occupancy should be implemented immediately. If the technology is not quite there yet, we should invest resources in getting those non-invasive technologies there, rather than investing half-a-billion dollars in a fixed system in a dynamic (both seasonally and climatically) environment.

A phased approach implementing these low cost behavior-centric strategies will yield the greatest benefit for skiers, for the canyons, for our watersheds, our communities, for other users and our public pocket book. While implementing these, we need to begin the process of expanding upon the mobility hub concept. These hubs should not just be centered around the canyons, but should be spread across the entire Salt Lake Valley. Save Our Canyons has invested in creating a web map to help articulate this concept, which can be found here: https://experience.arcgis.com/experience/47227db0d7844ee29e1d45aa446b0d39/page/page_20/?eId=62fd0111-43ae-4b09-95d0-7eb037f5653c&eType=EmailBlastContent

Admittedly, in creating this concept we didn't fully evaluate the west side of the Salt Lake Valley, the northern entries or southern approaches to the valley. It is far more inclusive than anything UDOT has considered however. Point is, by capturing travelers nearer their points of origin and getting them onto transit service, we reduce congestion, not just in the canyons, but on congested routes that feed the canyons, thereby significantly improving mobility and reliability in the canyons without building a thing in the natural environment, while enhancing and improving our built environments. Not only could these hubs, base camps, or centers, have parking and transit service, they could also have commercial opportunities, create jobs and stimulate economic growth. Outdoor companies and shops could also exist at these hubs, allowing people the ability to service or rent outdoor equipment or buy new products. These areas could have housing for resort and canyon employees, providing them convenient access to their jobs without needing a car. Arts and cultural opportunities could also exist, enhancing the vibrance of our community while protecting the resource rather than exploiting it, bringing the culture that is inspired by our mountains, closer to our communities, over killing the goose that lays the golden egg.

If there is \$500 million to spend, let's spread it across our valleys and enhance mobility and the vibrance of our communities rather than centralizing it for three businesses. Our approach will do more for our canyons, more for our economy and

more for our overall quality of life. It will enhance life in Utah for millions of people, not just skiers and out of town tourists -- though they will benefit too. As we continue to grow, we need to expand both our definition of the problems that confront us and be more comprehensive than the narrow scope UDOT has defined.

We implore you - Think more comprehensively, understand the complexities of the issues before us and allow the issues we've addressed in these comments into the process. These issues expressed by us, other user groups, other governments and thousands of individuals demonstrate you've gone about this process all wrong. We appreciate the frustration with some of the issues, but complex issues need complex solutions.

We will conclude, with what may be obvious at this point. We expected more from this process, and expected more from the State, its leadership and its consultants. Good soldiers, do not beget good processes, but that is what NEPA requires. UDOT, on its own accord, or at the behest of its superiors (within the Department and/or the State, and/or that small group the State has endeared itself to) has tipped the scales to favor what it wants, at great cost to our community, the public trust and also to our local environment. UDOT has thus far, failed to listen to constituencies in deference to its predetermination (widening a road or building a gondola), it hasn't considered data that might tip the scales nearer equal, that bring clarity, data, and science to the importance of this environment, municipal watersheds, or other users who are being harmed by its preferred alternatives. Other options exist that would save our canyons and address the interconnected issues confronting the Wasatch.

We want to thank the thousands of people who took time to share their thoughts on this process, the governments who carefully contemplated the issues and options confronting our canyons, and the thoughtful organizations that represent our amazing community. Your job is to strive to objectively listen and be a fair arbiter of this process, on behalf of ALL USES, APPRECIATORS, AND VALUES OF THE WASATCH.

On behalf of Save Our Canyons, our community and our partners,

A handwritten signature in black ink, appearing to read 'Carl Fisher', written in a cursive style.

Carl Fisher
Executive Director
Save Our Canyons

3690 E Fort Union Blvd #101
Cottonwood Heights, UT 84121
(801) 363-SAVE

Save Our Canyons DEIS Comments

Appendix A

Summary Report

[+ Compare](#)

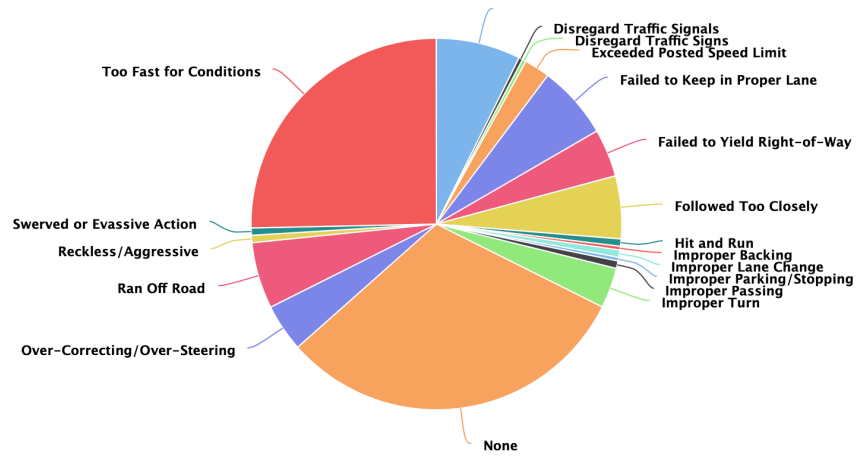
Active Filters

Milepost

Route 210 between milepost 3-14

Contributing Factors

Pie

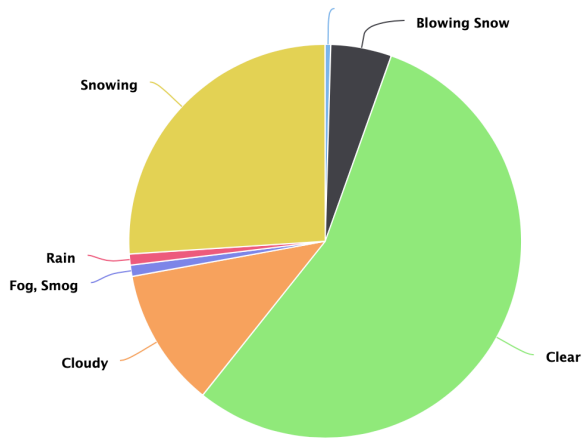


Summary Report

[+ Compare](#)

Weather

Pie 

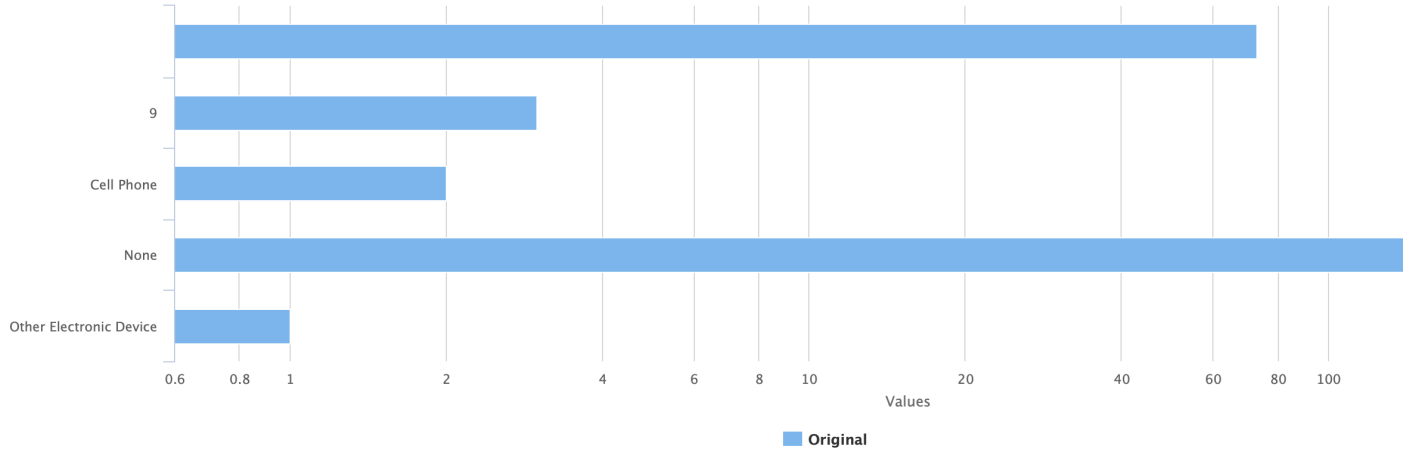


Summary Report

[+ Compare](#)

Driver Distraction

Pie

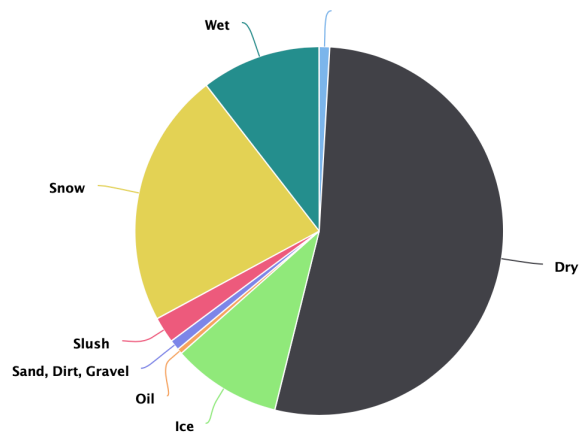


Summary Report

[+ Compare](#)

Road Conditions

Pie



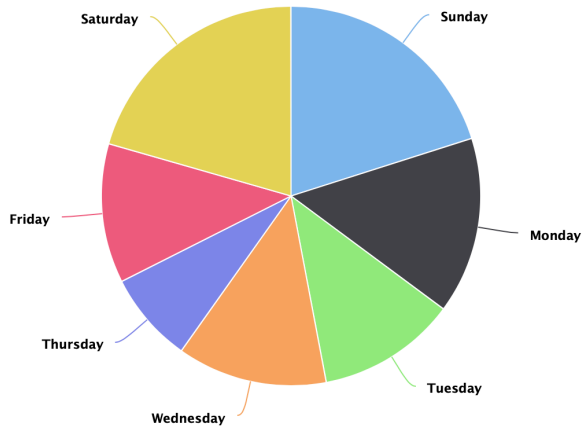


Summary Report

+ Compare x

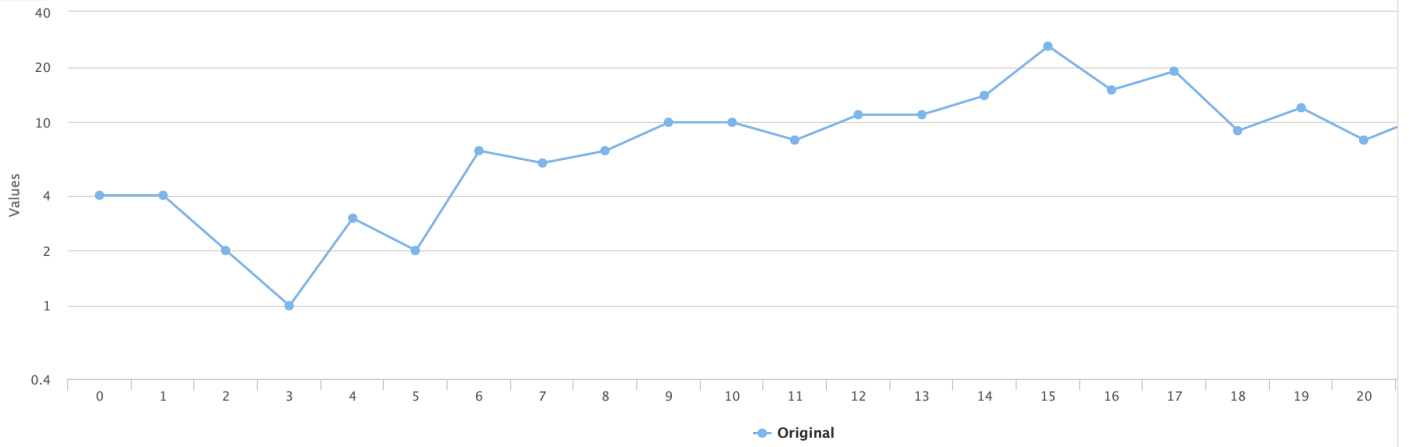
Days of the Week

Pie



Time of the day

Pie



Save Our Canyons DEIS Comments

Appendix B

#6004

SENATOR
DEIDRE HENDERSON
SEVENTH DISTRICT



462 RIVERCROSS RD.
SPANISH FORK, UT 84660
(C) 801-787-6197
dhenderson@le.utah.gov

July 10, 2020

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

To Whom It May Concern:

I would like to express my favor for the gondola option based at the La Caille station as the solution for Little Cottonwood transportation for the following reasons:

The gondola is a safer, more reliable transportation system despite the canyon weather conditions. Not to mention pedestrian-friendly access available to the gondola base station through the new trail system which decreases the immediate area's need to use personal vehicles. Reducing the number of vehicles and removing all the buses in Little Cottonwood Canyon is also an environmentally friendly option. This eliminates the need to expand Highway 210 into a larger right-of-way that would increase the vehicle count within the canyon.

In the end, the cost of the gondola system is the most cost-effective with the longest life cycle of any of the proposed alternatives. The gondola will make the canyon accessible to locals and tourists and showcase incredible landscapes. I am confident that the project will highlight recreation while solving the transportation problems in the area. I support the gondola station option for Little Cottonwood Canyon.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Deidre Henderson".

Sen. Deidre Henderson
Utah State Senate District 7

#4535

SENATOR
KIRK A CULLIMORE
NINTH DISTRICT



PO BOX 900521
SANDY, UT 84090-0521
385-867-9474
kcullimore@le.utah.gov

UTAH STATE SENATE

350 NORTH STATE STREET • SUITE 320 • SALT LAKE CITY, UTAH 84114
801-538-1035 • senate.utah.gov

July 8, 2020

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

To Whom It May Concern:

I would like to express my favor for the gondola option based at the La Caille station as the solution for Little Cottonwood transportation for the following reasons:

The gondola option provides the most economical, safe and reliable transportation for Little Cottonwood Canyon while also having the benefit of minimal environmental impact. The gondola option will also showcase a gem of the Salt Lake valley while limiting the impact on the watershed, reducing automobile traffic and emissions, and protecting the surrounding neighborhoods and communities from congestion and overuse.

A gondola will make the canyon accessible to locals and tourists while maintaining the pristine beauty of the canyon. Because it will be an attraction for all, a huge benefit for patrons and employees of the resorts, and accessible no matter the condition for skiers, the gondola option will conceivably pay for itself over time – particularly considering the decreased impact the canyon could otherwise suffer with the status quo or other vehicle options.

As a regular visitor of Little Cottonwood Canyon, an active snowboarder and hiker, and a resident just down the road from the canyon, I am extremely excited at the prospect of the La Caille gondola station option. I am anxious to help encourage state resources to a project that will bring such value to the valley while solving difficult transportation issues.

Thank you for your consideration.

Sincerely,

Kirk Cullimore

#4593



SENATOR
DANIEL HEMMERT
FOURTEENTH DISTRICT

1115 EAST 965 NORTH
OREM, UT 84097
(H) 801-226-7662
(C) 801-380-8262
dhemmert@le.utah.gov

UTAH STATE SENATE

350 NORTH STATE STREET • SUITE 320 • SALT LAKE CITY, UTAH 84114
801-538-1035 • senate.utah.gov

July 7, 2020

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

To Whom It May Concern:

I would like to express my favor for the gondola option based at the La Caille station as the solution for Little Cottonwood transportation for the following reasons:

1. It's the most environmentally friendly option as compared to the carbon-based alternatives;
2. it reduces the number of vehicles travelling up and down the canyon and can remove ALL the busses in LCC; and
3. the cost of the Gondola system is by far the most cost effective and has the longest life cycle of any of the proposed alternatives.

Thank you for your consideration.

Sincerely,

Dan Hemmert
Utah State Senate, District 14

#5858



UTAH STATE SENATE

320 STATE CAPITOL • P.O. BOX 145115 • SALT LAKE CITY, UTAH 84114
801-538-1035 • www.utahsenate.org

July 8, 2020

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

To Whom It May Concern:

Here are some advantages I see for approving the gondola solution for Little Cottonwood Canyon based at the La Caille station option:

1. The gondola is a safer, more reliable transportation system despite the canyon weather conditions.
2. Regardless of the reasons for the Highway 210/road closure status, such as avalanches, natural disasters and vehicle accidents, the Gondola will always be open for passenger transportation purposes.
3. The gondola has the smallest physical footprint versus the other transportation solutions under consideration.
4. It is probably the most environmentally friendly option as compared to the carbon-based alternatives.
5. Using the LaCaille Base Station model, the uphill passenger capacity is about 3,500 people per hour (using the LaCaille station parking garage to supplement the bus capacity).
6. The 3S gondola provides re-generation of power on the trip back into the power grid as it downloads passengers to the LaCaille Station.
7. Provides a pedestrian friendly access to the gondola base station through new trail systems decreasing the immediate area's need to use personal vehicles.
8. Further protects the LCC watershed through projected reduction in vehicles.
9. The cost of the Gondola system is by far the most cost effective and has the longest life cycle of any of the proposed alternatives.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Adams", is written over a faint, illegible printed name.

Senator J. Stuart Adams
President, Utah State Senate

Save Our Canyons DEIS Comments

Appendix C



Carlos Braceras <cbraceras@utah.gov>

Fwd: Little Cottonwood Canyon EIS deadline

4 messages

Justin Harding <jharding@utah.gov>

Tue, Jul 7, 2020 at 9:59 AM

To: Carlos Braceras <cbraceras@utah.gov>, Gordon Larsen <gordonlarsen@utah.gov>

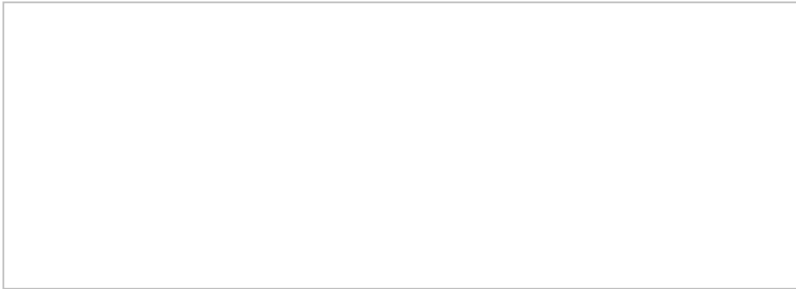
Greetings!

Wayne Niederhauser sent me this message and request. Thoughts on GRH formally weighing in?

Thanks!

Justin

Justin Harding
Chief of Staff
Office of the Governor | State of Utah
Utah State Capitol, Suite 200
Salt Lake City, Utah 84114-2220
801-538-1505 (Office)
jharding@utah.gov
Governor's Office



----- Forwarded message -----

From: **Wayne Niederhauser** [REDACTED]
Date: Mon, Jul 6, 2020 at 5:36 PM
Subject: Little Cottonwood Canyon EIS deadline
To: Justin Harding <jharding@utah.gov>

Justin,

The UDOT deadline for the comment period for the La Caille Gondola option is due on Friday. I have attached a letter that can be modified to meet the Governor's style and content. The other attachment is just some ideas that could be inserted into the letter. Would you see if the Governor is willing to submit a letter of support specifically for the gondola at the La Caille Station?

Thanks a bunch!

Wayne Niederhauser
801-558-4766

3 attachments

Email-signature-Mighty-5-final.jpg

1/26/2021

State of Utah Mail - Fwd: Little Cottonwood Canyon EIS deadline



92K

 **Gondola La Caille Station Support Letter.docx**
19K

 **Gondola Talking Points.docx**
21K

Gordon Larsen <gordonlarsen@utah.gov>
To: Justin Harding <jharding@utah.gov>
Cc: Carlos Braceras <cbraceras@utah.gov>

Tue, Jul 7, 2020 at 10:03 AM

Yeah, I'd love to have the Governor add his weight in favor of the Gondola. That's my preferred option for a variety of reasons I've discussed before—it takes a lot of people off the roads, it's the least environmentally destructive, it turns out to be quite cost effective, it moves a lot of people, and has a huge WOW! factor that will be a boon for tourism and the Utah brand.

[Quoted text hidden]

--

Gordon Larsen
Policy Director
Office of the Governor | State of Utah
(801) 538-1503 (o)
(202) 577-6355 (c)

Carlos Braceras <cbraceras@utah.gov>
To: Justin Harding <jharding@utah.gov>
Cc: Gordon Larsen <gordonlarsen@utah.gov>

Tue, Jul 7, 2020 at 10:20 AM

That would be awkward, since UDOT is the decision maker

Carlos

Carlos Braceras | *Executive Director*
4501 South 2700 West | Salt Lake City, UT 84114
Phone: 801-965-4027 | cbraceras@utah.gov



Innovating transportation solutions that strengthen Utah's economy and enhance quality of life.

Zero Fatalities | Optimize Mobility | Preserve Infrastructure

On Tue, Jul 7, 2020 at 9:59 AM Justin Harding <jharding@utah.gov> wrote:

[Quoted text hidden]

Gordon Larsen <gordonlarsen@utah.gov>
To: Carlos Braceras <cbraceras@utah.gov>
Cc: Justin Harding <jharding@utah.gov>

Tue, Jul 7, 2020 at 10:22 AM

Yeah, that's fair. I suppose we can just let you know the Governor's preference.

[Quoted text hidden]

1/26/2021

State of Utah Mail - Fwd: Little Cottonwood Canyon EIS deadline

--

Gordon Larsen
Policy Director
Office of the Governor | State of Utah
[Quoted text hidden]