



September 1, 2021

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Utah Department of Transportation (UDOT)
c/o of HDR Engineering
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cc: via email
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Re: Little Cottonwood Canyon Environmental Impact Statement (EIS) Preferred Alternatives S.R. 210 – Wasatch Boulevard to Alta

Dear UDOT Project Team:

Thank you for providing Salt Lake County the opportunity to act as a Participating Agency in the EIS process. As representatives to the Central Wasatch Commission for Salt Lake County, the undersigned (Mayor Jenny Wilson and Councilman Jim Bradley) have spent over two years studying and analyzing this complex subject matter. We now further appreciate the opportunity to offer the following comments to the Draft EIS that was issued on June 25, 2021 (DEIS), including an assessment of the two preferred alternatives, i.e., the Enhanced Bus Service in Peak-Period Shoulder Lane Alternative (Enhanced Bus/Shoulder Lane Alternative) and the Gondola Alternative B from the La Caille base station (Gondola Alternative)¹.

Based on our analysis, we have significant concerns about the exorbitant cost to the taxpayers presented by both of the DEIS's proposed preferred alternatives and their impacts on Little Cottonwood Canyon (LCC).

Of the two alternatives, however, our distinct preference is for the Enhanced Bus/Shoulder Lane Alternative, but with a phased implementation approach (Phased Approach) that entails a delay of the road construction while other initial techniques are implemented that support the reduction of cars in LCC but are less costly and environmentally harmful.

¹ This letter reflects the opinions of Mayor Wilson and Councilman Bradley, and not necessarily the opinions of other County elected officials.

This Phased Approach will provide an opportunity to measure the effectiveness of these initial techniques over a two to three-year period², with the understanding that UDOT would only then move forward with the road expansion if sufficient gains had not been made during such time period.

Phased Approach Investments/Techniques

- Construction of mobility hubs at the Gravel Pit and 9400 South/Highland Drive locations.
- Investment in the enhanced bus system described in the DEIS.
- Travel Demand Management (TDM) strategies such as tolling and carpooling (see further detail in Appendix A).
- Technology, such as “real time” travel information channels to assist travelers in mode choices (e.g., parking availability).

The Phased Approach will serve to inform policy makers prior to investing significant resources in a *permanent* infrastructure mode, and it will also allow for a broader assessment of issues related to the entirety of the central Wasatch Mountains.³ The remainder of this letter provides an overview of the considerations that led to these conclusions.

Additionally, we oppose the implementation of any transportation system without the corresponding passage of federal legislation (the Central Wasatch National Conservation and Recreation Area Act). As noted in the “Pillars Document” recently issued by the Central Wasatch Commission, this coupling of federal legislation to transportation is appropriate given the important tenets of the Mountain Accord agreement.

Recognition of the Original “Problem”

The “Project Purpose” of the EIS has been defined as the provision of “an integrated transportation system that improves the reliability, mobility and safety for all users on S.R. 210 from Fort Union Boulevard through the Town of Alta.” With that definition in mind, we ask UDOT to reflect upon the underlying circumstances that originally led to the need for the EIS. In our opinion, the primary reason was to solve what is essentially a traffic congestion problem. In an effort to solve that “problem,” the DEIS has analyzed the various alternatives in light of how well they meet the Purpose and Need elements of “mobility, reliability and safety,” with the goal in mind of achieving a “stable flow of traffic” by 2050. It is important to remember that the main goal of the EIS has never been to remove all (or even most) of the vehicular traffic off the road. Rather, the target has been to remove roughly 30% of projected traffic by the year 2050. *With that perspective in mind, the Enhanced Bus/Shoulder Lane Alternative stands out as the more “practical” approach given its ability to easily meet the 30% threshold, while providing additional benefits beyond merely ski traffic transportation and avoiding potential pitfalls posed by the Gondola Alternative.*

² We recommend a 2–3-year period, with the understanding that it may take a year or so for tolling to be fully operational given the need to address “equity” concerns by providing travelers an affordable option to access the portions of LCC above the toll gate (e.g., through an expanded fleet of buses and the construction of the mobility hubs).

³ We note that UDOT’s “Project Overview and Draft EIS Alternatives Summary” contemplates the consideration of “Phased Implementation.”

Cost and Flexibility

The Enhanced Bus/Shoulder Lane Alternative has a lower construction/start-up cost (\$510M) than the Gondola Alternative (\$592M) (for a total cost differential of \$82M). Although, the lower operational cost of the Gondola Alternative results in a roughly equivalent “life cycle” cost for the two alternatives, we believe the significant upfront savings (particularly when present value considerations are taken into account) warrant a preference for the Enhanced Bus/Shoulder Lane Alternative. Another advantage of the Enhanced Bus/Shoulder Lane Alternative is that it allows greater flexibility and the ability to “pivot” as circumstances change, including the possibility that projections for future increase in visitors to the canyon prove incorrect due to changing conditions and demand (e.g., changes due to climate issues or otherwise). The “fixed” nature of the Gondola does not provide that flexibility. Additionally, the Gondola infrastructure is an approximately 50-year asset, versus buses that will be improved over time and can scale appropriately. Based on that analysis, we encourage UDOT to conclude that the Enhanced Bus/Shoulder Lane Alternative is the more cost-effective option.

Cost/Benefit Analysis

Both of the preferred alternatives require a massive expenditure of public funds. As with any public project, it is critically important to consider the resulting “public benefits” in order to justify the costs. On this issue, the Enhanced Bus/Shoulder Lane Alternative prevails based on the following factors:

- The Enhanced Bus/Shoulder Lane Alternative provides “*year-round transportation benefits*,” particularly for cyclists and pedestrians who will be able to use the shoulder lanes, thereby increasing safety, active transportation opportunities and the visitor experience during non-winter months. In addition, although the DEIS does not contemplate expanded bus service to dispersed recreation sites (e.g., trailheads), the Enhanced Bus/Shoulder Lane Alternative could conceivably be expanded to include stops at additional locations in the canyon, *and we encourage UDOT to further explore the viability of additional dispersed recreation sites*. The Gondola Alternative does not have the same flexibility given that it only travels to two ski resorts (and cannot reasonably be modified to include additional stops).
- There is also a larger “*social equity*” concern related to the cost of the two alternatives. The Gondola Alternative serves a limited population – visitors to the resorts in LCC. This begs the question of: “*What do our residents-- including non-skiers and residents from all areas of the valley -- get for this enormous public investment?*” In contrast, although the geographic scope of the DEIS is limited to S.R. 210 and portions of Wasatch Boulevard, one can easily envision the Enhanced Bus/Shoulder Lane Alternative becoming part of a larger, *integrated* transportation system that benefits other areas of Salt Lake County. With that possibility in mind, we ask UDOT to explore the idea of “*micro mobility hubs*” at regionally dispersed sites throughout the valley. This type of system could entail an investment in the broader community by expanding ridership (and economic development opportunities) to other areas. An expanded hub system could also further incentivize transit by locating hubs in closer proximity to where people live. *The bottom line is that a hugely expensive transportation system that only benefits a limited number of users and a narrow population is difficult to defend based on a cost/public benefit analysis.*

Potential to Overload the Canyon

An uncontrolled increase in the volume of visitors to LCC could result in a scenario where the canyon becomes “overloaded.” The Gondola Alternative poses this risk due to its ability to “scale up” to an increased capacity. UDOT has based its DEIS assessment of the Gondola Alternative on the assumption of 1,050 visitors per hour during peak periods. The Gondola Alternative, however, could conceivably expand to accommodate as many as 4,000 visitors per hour⁴. The Enhanced Bus/Shoulder Lane Alternative does not pose that same risk given its inherent capacity limitations⁵. Currently the capacity of the canyon is naturally limited by the number of parking spaces available in the canyon, particularly at (and around) the resorts and trailheads. *A high-capacity transportation system could lead to overuse given its ability to pack more visitors up the canyon at a dramatically increased pace. This, in turn, could potentially result in degradation of the canyon’s fragile ecosystems, as well threaten the quality of the visitor experience*⁶.

Transit Incentives

An underlying goal of the EIS process has been to incentivize transit as a means to obtain a “stable flow of traffic.” We believe that the Enhanced Bus/Shoulder Lane Alternative, coupled with TDM strategies (such as tolling), will incent transit more effectively than the Gondola Alternative for the following reasons:

- The DEIS favors the Enhanced Bus/Shoulder Lane Alternative on the subject of “mobility” for an obvious reason: ***It transports riders by as much as 19-23 minutes faster.*** Speed of travel and the assurance that a bus will be available approximately every 5 minutes (coupled with disincentives such as tolling) will provide a strong motivator for riders to opt for transit.
- The number of required transfers is also a critical consideration when assessing a rider’s willingness to take transit. In all instances, the Enhanced Bus/Shoulder Lane Alternative will require a single transfer (i.e., one transfer from a vehicle to a bus). In contrast, the Gondola Alternative will require two transfers when passengers park at either of the mobility hubs. This is due to the fact that, in order to meet the goal of a “stable traffic flow” through the year 2050, approximately 1,000 vehicles will need to be removed from the road and parked at one of the mobility hubs⁷. This means that the passengers in approximately 1,000 vehicles will be required to transfer first to a bus and then to the Gondola. *The inconvenience caused by multiple*

⁴ It should be noted that, in order for the Gondola system to increase capacity to something like 4,000 visitors per hour, the additional riders would need to find a place to park other than the Gondola base parking garage given the capacity limitations of that structure.

⁵ Utah Transportation Agency (UTA) has indicated that the bus alternative cannot reasonably be expanded beyond the capacity currently contemplated by the DEIS on account of the inability to decrease the “headway” timing (currently assumed to be 5-minute headways).

⁶ We encourage UDOT to further consider this risk of overuse, particularly in light of the NEPA requirement to consider “cumulative impacts” of the alternatives, i.e., impacts on the environment resulting from incremental impact of the alternative when added to other past, present, and reasonably foreseeable future actions.

⁷ This is due to the limited capacity of the Gondola base station parking structure at 1,500 stalls.

transfers could very well be a deterrent for riders, particularly for young families and first-time skiers⁸.

The Existing Road and Buses Will Remain Part of the Gondola Alternative

There appears to be a misconception within some stakeholder circles regarding the expectation that the Gondola Alternative (as contemplated by the DEIS) will remove all (or even a significant amount of) vehicles off the existing LCC road. That is simply not the case. The DEIS only contemplates removing roughly 30% of vehicles off the road as of 2050. *That means that a significant number of travelers will continue to use the road under the Gondola Alternative scenario -- everyone from skiers who are willing to pay a toll, to back-country skiers, hikers, and others headed to locations other than the two ski resorts.*

It should also be noted that buses will continue to be a necessary part of the Gondola Alternative given that there is limited parking at the Gondola base parking structure. With only 1,500 parking spots available in that garage, those spots will likely fill quickly and require another 1,000 or so Gondola travelers to first take a bus to get to the Gondola boarding station. We find it interesting that some Gondola proponents appear to be dismissive of a “bus option” by suggesting that “people don’t like to ride buses.” That point of view misses the point that the Gondola Alternative *will require buses in order to be successful*. The view also assumes that the buses that will be utilized in the ultimate transportation solution will look and feel like “today’s version” of a bus. With both preferred alternatives, however, there should be an incentive to employ a “better version” of a bus, i.e., one that is smaller, more comfortable, offers wi-fi and has dependable frequency. *With that in mind, we ask the question of why not invest more fully in “better” buses, and send those improved buses up the canyon, rather than building an expensive Gondola system on an entirely new transportation corridor that does not eliminate the need for travel on the existing road?*

Environmental Protection: Critical to NEPA

As with any NEPA process, a thorough analysis of environmental issues – such as air quality, watershed, visual and noise impacts – is critically important.

- Air Quality.

The DEIS currently contemplates the use of diesel buses, while the Gondola system will be run by electric power. Although the Gondola Alternative appears to be a better option from an air quality perspective on “day one,” it is our understanding that electric bus technology (or a different non-emitting source), that is capable of operating on steep canyon terrain, may be available within a relatively short amount of time (and it is possible that the technology already exists). As a result, UTA could incorporate more sustainable buses into its fleet as technology evolves, *and we encourage UDOT to continue to explore whether electric buses are a viable option for LCC*. Given the real possibility that non-emitting source buses are (or will be) an option, we do not believe there is a significant difference between the two alternatives

⁸ It should also be noted that the DEIS contemplates that there will be a charge to park at the La Caille base station parking structure, while the two mobility hub parking areas will be free. Although that arrangement might provide an incentive for people to choose to park at the mobility hubs as opposed to the La Caille location, this raises yet another “social equity” question for us in that provides an optic that the convenience of the La Caille station is intended for those who “can afford it.” This fee structure is different than other “fee for parking” policies that resorts like Solitude have experimented with recently, i.e., everyone pays the same amount to park.

regarding the impact on air quality, particularly given that vehicles (perhaps as many as 70% of the traffic load) will remain on the road with both alternatives.

- Watershed.

Watershed impact is a critically important issue given the highly dependent nature of a large portion of our valley on the canyon's water resources for drinking water supply. To be clear, both alternatives pose risks to the Little Cottonwood Creek watershed and water resources. However, with this issue, there has been a difference of opinion among various stakeholders regarding which alternative poses the greater watershed risk. Although some stakeholders emphasize the risks posed by the expanded road, particularly given its construction footprint, impervious surface and its proximity to riparian areas, other stakeholders, including Salt Lake City Public Utilities, are equally (if not more) concerned with risks posed by the increase of unmanaged crowds on account of a second transportation corridor in the canyon that includes a high-capacity system like the Gondola Alternative. This is especially the case given that the Gondola Alternative will be *additive* to the road for recreational access.

At this point, we support the water experts who consider the risk of overuse as the more significant threat to the long-term protection of the canyon's watershed, which in turn presents a risk to the drinking water supply to more than 450,000 people. *As a result, we encourage UDOT to continue to explore these types of "indirect" risks to our watershed (particularly given NEPA's requirement to consider "indirect" as well as "direct" impacts).*

- Visual.

The number and height of the Gondola towers is perhaps the most problematic aspect of the Gondola Alternative. The DEIS contemplates as many as 21 towers, each measuring anywhere between 131-262 feet. *As a point of comparison, a tower the height of 215 feet would be as tall as the Salt Lake City Hotel Monaco, with attached wires interrupting the pristine vistas up and down the canyon.* It is also our understanding that Federal Aviation Administration (FAA) rules may require *flashing lights* to be installed on any tower taller than 200 feet in order to mitigate against air traffic collision. S.R. 210 is designated as a State Scenic Byway. *It is our sincere hope that UDOT will elect to respect that designation and honor LCC's intrinsic aesthetic value by eliminating the alternative that creates the more significant negative visual impact.*

- Noise.

The overall difference in noise impacts between the two alternatives is relatively small (a total of 3 fewer instances of noise impacts out of a total of approximately 230 impacts). As a result, we do not find noise levels to be a significant distinction between the two alternatives.

Human Impact

We have also focused attention on the human impacts of the two alternatives.

- Impact to Neighboring Communities. The La Caille base station will result in a significant level of traffic continuing to travel on Wasatch Boulevard and S.R. 210 in densely populated residential portions of Cottonwood Heights, Sandy, and Unincorporated Salt Lake County areas at the base of the canyon. There is also the possibility of increased "commercialization" of this residential community, particularly given that the La Caille base station/parking structure might not be subject to local zoning authority if it were to become a state-owned asset. We acknowledge the

legitimate concerns articulated by many of the local residents (including those who live in the LCC “Triangle” area) regarding the risk of excessive business development in what is now primarily a single family home residential setting. *The potential loss of local zoning authority only heightens the risk of those residents losing their “voice” regarding the future development of their immediate community.*

- Historic and Recreational Resources. We also sympathize with concerns articulated by residents and visitors regarding potential damage the Gondola Alternative could cause to historic and recreational resources that lie at the base of (and within) the canyon.

Reliability/Wildlife

Much has been said about the higher reliability factor of the Gondola Alternative on account of the Gondola’s ability to operate during snow events, while the Enhanced Bus/Shoulder Lane Alternative is more susceptible to travel delays on account of vehicle slides or accidents. However, we have concerns regarding the possibility of the Gondola not being able to run on account of high winds, or otherwise being incapacitated on account of mechanical issues. If that were to happen, the entire system could conceivably shut down. In contrast, an issue with a particular bus would not necessarily shut down the entire system, and a single bus that breaks down could be replaced with a back-up bus. *As a result, we encourage UDOT to explore the possibility (and potential frequency) of Gondola service interruptions.*

We also note that, although the DEIS suggests that the road expansion will negatively affect wildlife on account of the risk of animals crossing an expanded road, we encourage UDOT to explore the equally concerning risk of aerial wildlife (e.g., birds) conflicting with the Gondola towers and wires.

Consideration of Community Goals

NEPA also requires a consideration of “community goals.” As a result, it is important for UDOT to continue to evaluate the proposed alternatives in light of their consistency and compatibility with local and regional plans, including the Wasatch Canyons General Plan (WCGP), the Salt Lake County Resource Management Plan (SLCoRMP) and the State Scenic Byway Plan. In particular, we would like to draw your attention to the following portions of the WCGP and the SLCoRMP that we believe support the Enhanced Bus/Shoulder Lane Alternative.

- **WCGP Provisions**
 - Transportation Vision
 - “Support and prioritize projects for transit, bicycles, pedestrians, and improve mobility, air quality, safety, while connecting to the regional transportation system.” (Page 33)
 - “Character: Promote context appropriate transportation modes and projects that are appropriate for each canyon’s unique context.” (Page 33)
 - Environmental Vision
 - “Promote programs that improve watersheds, air quality, vegetation, wildlife ecosystems, and scenic quality.” (Page 31)
 - “Air: Protect and improve air quality for protection of public health, environmental health, and scenic visibility.” (Page 31)
 - All Canyon Polices

- [Support] “increased transit frequency at key locations throughout the Canyons.” (Page 129)
 - [Support] “... roadway design that increases mobility.” (Page 129)
 - Year-Round Transportation
 - [Support an] “...enhanced year-round transit service to and within the Wasatch Canyons.” (Page 129)
- **SLCoRMP Provisions**
 - Recreation and Tourism -- 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 system should also be capable of providing opportunities for environmental education, backcountry experiences, and cultural resource protection.” (Page 78)
 - Visual Resources – Desired Future State
 - “Salt Lake County desires to maintain or improve the visual resources within the county.” (Page 90)
 - “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.” (Page 90)
 - “Significant vistas and landscapes that have special visual and aesthetic qualities will be preserved and maintained.” (Page 91)
 - “Encourage the enhancement of the aesthetic beauty of our built environment.” (Page 91)

Summary⁹

Both of the preferred alternatives have legitimate “advantages and disadvantages,” however, our analysis has revealed that the Enhanced Bus/Shoulder Lane Alternative is the alternative that, *on balance*, presents the better choice to solve the traffic congestion problems that have plagued LCC over the years. As a result, we support an Enhanced Bus/Shoulder Lane Alternative as the more *sensible* solution to the original problem, particularly when you consider the potential unintended consequences posed by the Gondola Alternative on account of it being a high-capacity system with operational challenges that is capable of shuttling massive amounts of people, while still relying on the use of the canyon road. The Enhanced Bus/Shoulder Lane Alternative avoids those potential pitfalls and is simply the “*better fit*” to address this historically complex problem.

As noted above, however, although we greatly prefer the Enhanced Bus/Shoulder Lane option between the two alternatives, the high cost of the road expansion (and its impacts to the canyon) have led to a recommended Phased Approach with an investment in transit, technology, tolling and other TDM strategies in a first phase of that approach. This Phased Approach will also allow time to obtain and process the “Visitor Use Study” that has been commissioned by the Central Wasatch Commission. By

⁹ Although this comment letter focuses on an assessment of the major topic in the DEIS, i.e., the selection of the ultimate Preferred Alternative, we also welcome the opportunity to provide input regarding the sub-alternatives set forth in the DEIS. See [Appendix A](#) to this letter for those comments.

taking this approach, we can learn what works, identify gaps, and then have a more informed basis for making a long-term decision. ***Let's commit to "non-permanent" tools in our toolbox first, before taking a step that could negatively and irreversibly affect this priceless natural resource.***

In summary, thank you for providing us an opportunity to share our thoughts regarding the two preferred alternatives in the DEIS, together with the suggestions regarding the sub-alternatives articulated in Appendix A. We sincerely appreciate your ongoing commitment to this vitally important subject.

Very truly yours,

Jenny Wilson
Salt Lake County Mayor

Jim Bradley
Salt Lake County Councilmember

DRAFT

Appendix A – Comments on Sub-alternatives Evaluation

1. S.R. 210 – Wasatch Boulevard Alternative– (Imbalanced-lane Alternative/Five-line Alternative)
 - a. We support the City of Cottonwood Heights’ pursuit of its Wasatch Boulevard Master Plan (July 2019). Thus, to the extent the Wasatch Boulevard alternatives is consistent with that Master Plan or any subsequent master plan, we are prepared to support the alternative as well.
2. Mobility Hubs Alternative (located at the Gravel Pit and 9400 South/Highland Drive)
 - a. We support the location of mobility hubs at the Gravel Pit and the southeast corner of 9400 South/Highland Drive, as contemplated by the DEIS. In addition, we recommend the following concepts for any future planning of such mobility hubs:
 - i. The hubs should seamlessly integrate different modes of transportation in order to maximize connectivity and access for transit riders.
 - ii. The hubs should be amenity rich and focused on “place making.” For example, the hubs should provide bike parking, real-time travel information, storage lockers, space for shared mobility services, bike storage and repair facilities, wi-fi service, retail, restaurants, and cafes to create a robust array of options to incentivize transit ridership.
3. Avalanche Mitigation Alternative – Snow Sheds with Realigned Road Alternative
 - a. We would prefer that UDOT *eliminate* the Snow Sheds sub-alternative from the final Record of Decision. We are particularly concerned about the sheds’ size, visual impacts, and environmental impacts.
4. Trailhead Parking Alternatives
 - a. We support the trailhead parking alternatives set forth in the DEIS. We particularly appreciate the following goals: i) enhanced roadway safety, ii) mitigation of traffic conflicts between motorized and nonmotorized transportation modes at the trailheads, and iii) reduction (or in some cases elimination) of roadside parking to improve safety and operational characteristics of S.R. 210. In general, formalized parking helps to reduce vehicle-pedestrian conflicts, congestion, and crowding, and we support those efforts.
 - b. We also support the alternative of the Trailhead Parking Improvements and S.R. 210 Roadside Parking within ¼ mile of trailheads. We acknowledge that this Sub-alternative will reduce parking in LCC by 17 spaces, from 528 to 511, but the overall refinement of the parking system is appropriate, particularly due to the increased safety measures.
5. No Winter Parking Alternative
 - a. We also support the improved safety measure of eliminating winter roadside parking (roughly 230 spaces) adjacent to the ski resorts. This change will improve mobility and reduce friction between parked vehicles and vehicles in the travel lanes. The plan also allows for improved winter snow removal operations since snowplows would not have to navigate around parked cars. It should be noted that parking on the side of the roadway poses a risk of degradation of sensitive resources and watershed, so this measure will also have a positive environmental impact.

Other Observations

The following comments include additional thoughts on ways in which the Sub-alternative analysis could be expanded upon.

1. TDM Strategies
 - a. We support TDM strategies set forth in the DEIS, including:
 - i. Tolling during winter on-peak use dates when congestion levels are high. Toll gantry should be placed below Snowbird Entry 1 in an effort to address socio-economic concerns.
 - ii. Vehicle Occupancy restrictions, e.g., restricting vehicles to two or more people per car.
 - iii. Peak hour restrictions (e.g., limiting vehicle traffic at a particular place or time) - in particular, we support restrictions in LCC in ski season during peak hours (7:00 am to 10:00 am) on busy ski days to encourage the use of transit.
2. We also request UDOT to explore other TDM strategies that could further promote the use of transit and a reduction of single occupant vehicles¹. Such strategies include:
 - a. Charging motorists for parking at the ski resorts.
 - b. High occupant vehicle (HOV) priority.
 - c. Carpooling programs and rideshare parking.
 - d. Multi-modal navigation tools, e.g., real time information to assist in making travel mode choices.

¹ We note that the Wasatch Canyons General Plan supports the use of TDM strategies, such as the use of carpools and rideshare programs.