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Utah Department of Transportation
John Thomas, PE Little Cottonwood Canyon Project Manager, UDOT Region 2
2010 South 2760 West
Salt Lake City, UT 84104-4592

Brandon Weston, Environmental Services Director, Environmental Services Division, UDOT
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Salt Lake City, Utah 84114-1265

Re: Environmental Impact Statement: Little Cottonwood Canyon, Salt Lake County, Utah

Dear Mr. Thomas and Mr. Weston,

After having been involved in numerous planning studies for the Central Wasatch, we the undersigned are encouraged by the opportunities to improve transportation and transit via the Little Cottonwood Canyon (LCC) Environmental Impact Statement (EIS). The signatories of this letter have been meeting regularly, as a group with you and the project team. With a collaborative spirit and desire to promote efficiency, we are consolidating our public scoping comments for this phase of the LCC EIS. We (each signatory) retain the right in the future of this EIS process to make independent comment.

It is our understanding from project meetings that this EIS will build on previous studies. The timeliness of this EIS dovetails well with the signing of The Accord and formation of the Central Wasatch Commission. This project is viewed by many as an extension of the Central Wasatch Commission and another means of achieving the goals of The Accord. These two planning efforts should work in sync to build upon the consensus found in existing planning documents, prioritize the goals and objectives of existing plans (vetted through collaborative community engagement), and integrate those policies and guidelines to achieve a broadly supported desired future condition.

The purpose of the NEPA analysis is to inform the decision maker and the public about the consequences of a potential action. It is the time for some serious analysis of the future and the likely needs and problems that will arise in the future. How will the decision made affect the situation 20 years in the future? What future decisions could be excluded or precluded by the current decision? What future options will be foreclosed? How will the project fit into future transportation planning in the immediate area as well as a more regional consideration of the
entire southeast section of the valley? These are all questions that should be answered in the analysis. Future needs should look at mass transit possibilities including where the transportation hubs will be located. It is possible that land several miles west of the canyon would be appropriate for a hub with access to Trax and the freeways. It would be good to make such plans now while it may remain possible rather than postpone such thoughts to a future that may foreclose such possibilities.

**Purpose and Need**

In the Notice of Intent (NOI) that was published in the federal register the word “transit” appeared numerous times throughout. Since that time, and through the development of the website materials, the word transit no longer appears. We strongly believe that transit, like buses, needs to be incorporated into the purpose statement for the project. The trajectory of the project to date appears to be incongruous with the stated intent of the NOI.

An appropriate and representative purpose statement for an “Environmental Impact Statement” should prioritize protection of the environment. Including natural and scenic resources, with the highest priority given to water quality, supply, and watershed health is a foundational to the project. Considering this, the purpose of this project should be to protect the environment and improve the canyon experience for residents, visitors, and businesses through improvements to our transportation and/or transit systems approaching or within the SR 210 corridor. The lack of such language would result in a flawed strategy that we encourage you to correct. We are providing edits to the draft purpose and need statement provided on project’s website that we believe help accomplish this goal. Our suggestions are underlined for easy identification.

The purpose of the LCC project is to provide an integrated transportation system that improves the convenience of multiple transportation modes, and substantially improve the reliability, mobility, and safety for residents, visitors, and commuters who use S.R. 210. Through transportation and/or transit improvements, the project would strive to mitigate congestion on S.R.210 and improve recreation and tourism experiences for all users of Little Cottonwood Canyon. The transportation improvements will maintain or improve the watershed health, water supply, water quality and other natural resources. They will also consider the character, diverse uses of the canyons natural resources, and importance of the existing contiguous natural landscape of Little Cottonwood Canyon and adjacent canyon ecosystems upon which much of the Salt Lake Valley residents’ livelihood depends.
These suggestions are rooted in the stated values on the LCC EIS website, and should take a more prominent role in your purpose and need. The stated values are: 1) water resources 2) ecosystem of plants and wildlife 3) year-round economy 4) local economy and 5) natural landscape.

Also, as a tool to create a shared vision and goals for the Central Wasatch Mountains, Mountain Accord’s four system groups (economy, environment, transportation, and recreation) vetted and agreed to “purposes” that include but are not limited to the following. These purposes should weigh heavily if this study is truly going to build on previous work.

1. Protect watershed health, water supply, and water quality.
2. Reduce avalanche-related risks and delay in Little Cottonwood Canyon.
3. Reduce auto use and congestion in Little Cottonwood Canyon.
4. Provide competitive transit service to a range of recreation destinations and economic nodes.
5. Protect or enhance the natural and scenic resources of the Cottonwood Canyons.

In light of the rather limited budget, prioritization of the purpose and needs must be done. Highest priority needs, such as public safety should be analyzed such that other needs can be addressed in subsequent projects. Taking the phased approach ensures the transportation system can be readily used by future mass transportation methods that reduce cars in the canyons.

There is also an introductory project statement on the project’s website. Here are suggestions (underlined) that bring the values stated above into this statement:

To provide a balanced, integrated transportation system for residents, visitors, and commuters in Little Cottonwood Canyon and surrounding areas, the Utah Department of Transportation (UDOT) is conducting an Environmental Impact Statement (EIS) on Little Cottonwood Canyon Road (S.R. 210) and the S.R. 210 Bypass Road. The EIS will evaluate potential improvements that reduce peak congestion and improve recreation and tourism experiences in Little Cottonwood Canyon. These improvements include managing the number of vehicles on the road system, improving vehicle mobility, and improving roadway safety and reliability for all users, while maintaining or improving the integrity of the current viewshed, airshed, watershed and ecosystem functions of Little Cottonwood Canyon. The EIS will also include a public involvement process so UDOT can proactively work with all stakeholders in a transparent and inclusive process.
Visitation and Impact
Visitations to the Central Wasatch Mountains present the largest impact to the region from an environmental and experiential perspective. This visitation, coupled with low vehicle occupancy rates, are creating vulnerabilities to our water supply, water quality, wildlife populations, native plants, and the quality of our natural environment. We therefore seek to significantly improve transportation operations that increase vehicular occupancy, enhance safety, and provide reliable solutions to mobility that reduce congestion along sensitive canyon corridors. We must both consider options within the S.R. 210 corridor, but perhaps more importantly consider options that dramatically change our behaviors in getting to this corridor. Space to accommodate parking cars within or immediately adjacent to the canyon is extremely limited, hence the need to connect people to the canyons without reliance upon their personal automobiles.

Through analysis completed in the Mountain Accord, it was figured that there are about 5.7 million annual visits to the Wasatch. It was also approximated that about 50,000 people on high use days, are inside the roughly 200 square miles (appx. 130,000 acre) study area. It was further calculated that about 145 acres are consumed by parking areas, and the USFS plan states that parking should not exceed levels approved in 2000. We know that within the area there are high density nodes (ie. ski areas) and low density nodes (ie. Wilderness areas), however our regional visitor density is about 2.6 people per acre on the highest use days. The density in our parking areas on those days is about 350 people per acre.

The effect of a decision that increases the number of people that can visit the canyon also needs careful analysis. The number of people visiting the canyon now is somewhat limited by parking. Both our question and our concern is: to what degree are we going to increase our visitor density? The single biggest impact on the environment is use. It is use and development that have led to the extirpation of native species (both plant and animal), and use and development that have led to the introduction of non-native species. Our watershed managers have noted the impacts to water quality, and quantity, because of human activity, use and development. Moreover, the USFS Plan states:

“The ecosystem management principle of humans as ecosystem components entails tailoring recreation uses to be compatible with other values and sustainable over time. The land has a limited potential to provide recreation opportunities, within a desired experience and social setting. That potential varies, in actual numbers of people, depending on how those people interact with each other and with the environment.”

(WCNF 2003 Revised Forest Plan, pp 2-14, 2-15)
So, while reduction of vehicles in the corridor (and canyons) is a goal we are supportive of, the increase in use that may arise from increased vehicular occupancy or certain modes of mass transit is concerning and should be evaluated. This is because increased number of people at one time will be cause for increase capacity for amenities (from bathrooms to beds or other services). This increase comes at an expense to the natural environment and the experience, and while the USFS Plan supports mass transportation, it is not supportive of additional parking areas on public land. Mass transportation carries with it the potential for greatly increasing visitation. Currently, the Forest Service is conducting a pilot program that allows the Alta Ski Area to take over management of the Albion Basin in the summer due to pressing numbers of visitors. Alta Ski Area plans to run a ski lift on weekends and holidays when parking in Albion Basin is full. Depending on the speed and loading occupancy the number of visitors able to access the basin could far exceed the previous system of using shuttles.

In developed areas, such as ski resorts, we are concerned about increase in visitation driving development. While numerous studies and surveys have found that increased development is undesirable (Wasatch Canyons Tomorrow 94% of people want to see no more development, Salt Lake County watershed survey 64% want less than already exists, 26% want no more development), the current USFS plan suggests that increasing visitation could result in additional development. “Development and modifications at the resorts will continue to be designed to balance the comfortable carrying capacity within each resort, based on latest technologies, use patterns, and existing facilities, within the capabilities of the natural environment and transportation infrastructure” (WCNF Revised Plan, p. 4-161). Will this project facilitate more development in our watershed canyons?

Parking
Some of the actions discussed in meetings have considered creating new parking within the National Forest. It is unclear if these are to be located on or off public land. As mentioned, limiting of parking has been a controlling faction in visitation. The USFS plan currently states, “Protection of watershed conditions will be a primary factor in managing roads, trails and access. In the Tri-canyon area (Big and Little Cottonwood Canyons and Mill Creek) parking capacities of canyon parking lots (ski areas, summer use homes, developed and dispersed recreation sites) will be not exceed 2000 levels unless modification is needed for watershed protection or to facilitate mass transit. Mass transit will be commonly used during winter, reducing crowding and increasing safety for users of the canyons. The Forest Service will work actively with other parties to explore options for reducing private vehicular use within these Canyons” (USFS Revised Plan, pg. 4-160). We believe this is an important land management factor, and are concerned that upending this policy will lead to undesirable conditions and environmental ruin. We support exploring transit, but as we will discuss in the section below,
we feel any additional parking to aid in mass transit, should be located miles away from the mouth of the respective canyons and be analyzed in concert with the desired capacity.

**Geographic Focus**
The scope of the analysis to look at improvements on S.R. 210 is perhaps the greatest missed opportunity. The aforementioned peak demand is being fed by residents and visitors coming from outside the study area. Currently, the vast majority of visitors utilize personal vehicles to access the area. It is unreasonable to think that the current number of cars can be accommodated within or immediately adjacent (within ¼ mile of the corridor) because of the unavailability of land and the requirements to maintain a high visual aesthetic of the mountainous areas (ie. building vertical parking structures are incongruent with local ordinances and plans governing the entrances of the canyons). This dilemma suggests that the greatest benefit to the canyon environment, experience, not to mention our airshed, would be getting people to Mile 0 of SR-210 (at the intersection of Fort Union Blvd and Wasatch Blvd), without use of their automobiles. Simply increasing the frequency of buses, which currently only deliver approximately 200,000 visitors on an annual basis (at a cost of $1 million) may very well be the most beneficial use of funds and provide the greatest environmental benefit as it relies on the utilization of existing infrastructure.

Some may question the avalanche hazard, however, according to UDOT’s own study (2006 S.R.-210 Study) the increase in the Avalanche Hazard Index (AHI) is tied directly to the stopping of vehicles in slide zones. If we can connect people to Little Cottonwood Canyon, without the use of a vehicle, on a bus, we can remove approximately 26 vehicles from the canyon per bus, thus reducing demand on parking within or near the canyons. If we increase the frequency by allocating $10 million per year and expand bus service year round, it seems the environmental benefits realized and impact to the region might see the greatest “bang for the buck.” Simply put, it seems our transportation issues originate miles away from the mouths of the canyon and this appears to be the root of the issue that needs to be addressed in this EIS. Reducing the number of vehicles on the highway, will help keep traffic moving, thus reducing the AHI.

It is our understanding that the Mountain Accord did substantial analysis on routes that people used to access the canyons, and S.R. 210. It is along these feeder routes that it might be most important to locate parking lots, so in the instance transit is not available from your point of origin (home, hotel, etc), there are several opportunities for you to leave your vehicle and either carpool or utilize transit options.
NEPA Process

It likely goes without saying, but it is critical that all appropriate permits, licenses, and approvals be identified and obtained for an action alternative including but not limited to all city, county, state and federal plans and regulations.

A final observation on the process. The submission of these comments marks the closing of the scoping period. As such, there is not currently a purpose and need. However, a number of alternatives have been published on the project website and in scoping meetings held by the project lead. This is concerning because in the NEPA process actions and alternatives should be developed by the purpose and need, not have the alternatives drive the purpose and need. This may have biased the process, and perhaps is why the transit options since the publishing of the NOI have fallen by the wayside. Not one of the concepts presented represent a transit alternative and are extremely car centric (see images below).
We are appreciate of the time and openness of the project team and we all look forward to continuing to work with you to help ensure we steward this resource for current and future generations, working to meet the demands we put on this iconic landscape, but not at the expense of water quality, wildlife, plants and the sense of place of these unique canyons. We can’t stress enough, that for over 30 years now, local organizations, users, ski areas, adjacent communities have all demanded the simple solution of improved and year round bus service. We hope that this process will give that a fair analysis, and deliver a win that all agree is a necessary step for our respective interests, but also for the integrity of the Wasatch.

Sincerely,

Chris Adams, President, Wasatch Backcountry Alliance
Roger Borgenicht and Ann Floor, Co-chairs of Utahns for Better Transportation
Jennifer Clancy, Executive Director, Friends of Alta
Carl Fisher, Executive Director, Save Our Canyons
Will McCarvill, Chair, Utah Chapter Sierra Club
Ann O’Connell, Natural Resources Chair, League of Women Voters of Salt Lake
Mary Pendergast, Ecologist and Conservation Biologist, Wild Utah Project