

Comment Number	COMMENT	Comment Source
1	The plan to stop using the lot at the base of Little Cottonwood Canyon for buses will make it much harder for those of us who live south of the canyons to use UTA buses to access the canyon.I am very disappointed by this decision.Please reconsider.	Website
2	UDOT needs to move away from vehicle level of service as the end-all, be-all for planning. By all appearances, that's what continues to happen despite the PR push saying that UDOT is now committed to moving people and not just cars. If there's any new roadway space up LCC, it needs to be dedicated to transit, period. There should be frequent transit service to the canyons from population centers. While they're private lots, the resorts should implement paid parking (ideally with a free option to really incentivize carpooling). Stop destroying our landscapes with wider roads that attract more motorists that create traffic and lead to more widening. Uphold the mission of moving people, not cars.	Website
3	As a resident of Salt Lake City, I will continue to advocate for this project to prioritize improved public transportation in the canyons in favor of increasing capacity for private vehicles. Additionally, I think that those improvements in access provided through public transportation should make use of existing infrastructure as much as possible (i.e. improving bus service on the existing highway) rather than building new infrastructure (i.e. trains, chairlifts, tunnels, etc.)	Website
4	As a family who usually gets the Alta/Bird pass, we would love to see more focus on mass transit rather than increased parking and road area. A light rail to the Alta area would be a big initial investment, but it could save so much in maintenance costs in the long run, and be so much more efficient than increasing the canyon's roads and parking every few years, as the valley's population continues to explode.	Website
5	There needs to be a transportation solution for the Cottonwood Canyons. Tolls only punish local skiers and drive the cost of already expensive skiing way too high.I propose a "Disneyland" approach, by making the resorts closed to traffic (except property owners, suppliers, employees, and emergency personnel), with a properly designed shuttle system and parking area (below the mouths of the Canyons) that will accommodate skiers/snowboarders, their equipment and toilet needs.That is the only practical solution that will preserve the Canyons, without adding more cost.	Website
6	Just make the current roads in good condition.People who want to sit in traffic jam make their own choice to do so.I never go into the canyon when traffic is terrible.	Website
7	I am 100% opposed to a gondola system from park city. This will only increase skier congestion and have minimal on traffic. It is a marketing ploy by Alta and should be recognized as such. Increased trailhead parking is essential. The back country skiing population is exploding and does not seem to get the attention the ski areas do in terms of political support. The White Pine TH needs are going to explode if Alta is successful in closing grizzly gulch. It is already overflowing most weekends and powder days. Any increase in public transportation on the road should definitely include a stop at White Pine TH. Some consideration should be given to bus top or pull out parking where Maybird Gulch is perpendicular to the road. Many back country skiers come back to the road there. In fact building a bridge across the creek and adding substantial parking could have a large affect on reducing traffic further up canyon as hikers would have a new access point. There was a comment that plowing the TH parking lots is not part of the scope. How can you discuss mitigating road parking with parking space increases but not plow the parking areas. Seems counter productive. Speaking of parking, any mass transit that starts at the mouth of the canyon has to include parking if it is to be fully utilized. If a toll system is to be implemented I favor a rolling toll that varies with time of day and number of occupants.	Website
8	In 1.4.1.1, thank you for pointing out that Bengal Blvd is a connector to residents. Bengal traffic is increasing at a rate higher than resident growth. Bengal should remain a residential connector and should not be increased as a state highway. In 1.4.2.2, the report fails to list running as a recreational activity. The report states hiking, but trail running is an increasingly growing sport. Road running participation continues to increase as well. LCC is a major location for trail runners to train. Occasionally there are big groups of people running on the shoulder of LCC road. Consider allowing a dedicated part of the shoulder for road running / walking. This study and plan needs to be in collaboration with organizations building trails. This project may alleviate the road traffic problem, but without increased trail infrastructure, the canyon will remain overcrowded. Charge tourists for accessing LCC, but do not economically burden locals with road tolls or trailhead fees. Residents chose to live near LCC so they can frequently use the canyon. Residents pay taxes for this purpose and do not need additional fees.	Website
8	1.4.2.3 -- there is nowhere to park to use the current public transit during busy days. The tiny parking lots fill up in the early morning. In the summer, perhaps just on weekends, buses should be frequent and should quickly stop at trailheads. 1.4.2.4 -- bicycling in LCC on the weekends, to put it bluntly, is basically a deathwish. There is too much traffic, distracted drivers, and cyclists need to be on their brakes constantly on the decent because they're behind cars driving erratically and slowly. Often times the shoulder of LCC contains too much gravel, which forces cyclists to ride in the lane. General comments: Good job with this study, and thank you for the thoroughness. It's important to note that often times valley residents go into the mountains because of poor air quality in the valley. Steps being taken to improve valley air quality are not dramatic enough. Lastly, has anyone considered moving or closing Alta and Snowbird? While a dramatic question, perhaps they shouldn't be there and the canyons should only be public land without economic incentives.	Website
9	I was disappointed to review the 63 pages and find the only reference to a toll booth and fee to enter the canyon was the one word "tolling" on the very last page.I hope that this will receive better consideration in the next phase.	Website
10	I am a Salt Lake City resident and frequently visit our canyons. We need solutions that do not put cars first. There are too many people and cars are too inefficient, require too much space for parking, and have a huge negative environmental impact. We need efficient and environmentally friendly solutions. We also need solutions that allow people to access our canyons even if they do not own or have access to a car. Expanded Bus service that connects to local and regional bus routes and transit makes the most sense. But for this to work we cannot have cars clogging our canyon roads (road widening will not fix that problem). I would like to see a bus or train/tram focused solution. We should also create a safe protected (meaning physical barriers) space for cyclists and others who want to enjoy our canyons. Thank you.	Website
11	I believe that any updates to the canyon should be in hopes of Mass transit solution. Train, gondola, dedicated bus lanes, etc; move people into the canyon without vehicles. There's already too many	Website
12	Please take the focus off the road. No matter the number of Avi Sheds or how wide you make the road, it will always become a mess one it gets slippery. Rubber tires, snow and ice do not mix. I don't care if it is busses, or passenger cars use of rubber tired modes of transportation will never work well in LCC. Please look outside the box at a gondola or some other means to move a large number of people utilizing another means than the road.	Website
13	I do not support any plan that would increase the number of private vehicles in Little Cottonwood Canyon. I do support a massive increase in public transportation in Little Cottonwood Canyon.	Website
14	The wisest and most effective way to address traffic in the Cottonwoods is adding public or shared transportation options. Highway widening has been proven over and over again to make congestion worse over time (induced demand). Given the unique natural, scenic, and ecological unique values of our canyons, more suitable solutions include more frequent buses (including electric buses), smaller shuttles or subsidized ride sharing, or one can dream about a train option (like in many places in the Alps).	Website
15	DO NOT widen the road, increase public transportation and limit overuse.	Website
16	I'm writing to oppose road widening. It's not a sustainable solution. It's not in the spirit of the canyon.	Website
17	Widening roads in the canyons will not solve the problem long term. It will have negative impact on the experience of canyon users. Opt instead for a shuttle program for bcc and lcc. Shutting down private auto traffic during peak seasons	Website

18	Please don't widen the roads. That's a short-term solution. I would much rather have paid entrance or making it shuttle-only w/ the exception of handicap vehicles.	Website
19	Please do not widen the roads in the canyon. Adding lanes has been proven over and over to not ease traffic. It only creates more use. We must protect our canyons. You have 100 MILLION to make sure you don't harm our canyons or communities. The flow can be controlled at the base of the canyons and that is what we should be looking into. Adding more lanes will cause more harm.	Website
20	Widening the road in the canyon is not a sustainable solution. Please do not ruin the canyon by replacing the natural beauty with cars.	Website
21	I am for widening Wasatch Blvd. (in the valley), as the current road can easily become overcrowded and dangerous. Part of this could include better signage for Ferguson Canyon Trailhead (and any future Deaf Smith access) at little extra expense. However, expanding the roads in Little Cottonwood Canyon itself is problematic. It could not be done without wrecking a lot of the forest in the area, and possibly contaminating the creek. Moreover, it would simply encourage more vehicles and more traffic congestion, much like on I-15 in the area. More cars means more exhaust which the Salt Lake area simply cannot handle. Air quality in winter is already extremely poor. Let's not exacerbate it. Additional parking at the mouth of the canyon would be helpful, especially if combined with restrooms/services that could accommodate people during traffic congestion/stoppages. A better alternative would be more (and likely cheaper) public transport up the canyon, possibly with discounts in conjunction with ski passes from resorts to encourage ridership. If new construction (like needed for a new lane) is deemed necessary, alternative transit options like a dedicated rail (or similar) service would at least lessen the burden on air quality and reduce the number of vehicles in the canyon by being a (hopefully) more enticing option than a bus.	Website
22	I grew up at the mouth of the canyon and don't live too far now. I am glad to see so many transit based options being considered. The short version is if there is any outcome that let's more cars up the canyon we have failed ourselves and future generations. After living many other places including Denver whose canyon access is a disaster with a large freeway being the solution, we chose to come back to Salt Lake. If we can't solve for the pollution or at least not further perpetuate it with more lanes for cars we will effectively destroy this valley and the magic of our beautiful canyons. I beg of this group please put aggressive transit options first.	Website
23	<p>The Utah Department of Transportation (UDOT) has released the Draft Purpose and Need Statement and the Draft Transportation Alternative Screening Criteria Report for the Little Cottonwood Canyon EIS. The public comment period is now open and will end December 13, 2019. Public engagement is a vital component throughout the phases of the EIS and UDOT encourages the public to take a moment to review the documents and submit all formal comments through the project website and email.</p> <p>The Purpose and Need Statement is an important step during the National Environmental Policy Act (NEPA) process as it establishes why the project is being done and lays the foundation for developing the criteria to screen alternatives. This statement defines transportation related goals and objectives that the Little Cottonwood Canyon EIS will address and identifies existing and future conditions that need to be improved in Little Cottonwood Canyon.</p> <p>Along with the Purpose and Need Statement, UDOT released the Draft Transportation Alternative Screening Criteria Report. This report identifies (1) the criteria that will be used to screen transportation alternatives and (2) the methodology of the screening process. Typically, a screening process involves identifying a broad range of potential transportation alternatives and then applying a standard set of evaluation criteria to eliminate alternatives that do not meet the purpose of and need for the project or that are otherwise found to be unreasonable.</p>	Website
24	<p>Hello,</p> <p>The area fro 6200 South to Wasatch blvd is setting the tone for road rage and destroying the suburban area it leads to, it also is very hazardous.</p> <p>The speed limit should be lowered to 35 - 40 miles per hour, ALL of wasatch blvd should be lowered to 35 - 40 miles per hour.</p> <p>This is an area where people are trying to gain access in and out of their neighborhoods, enjoy the beautiful scenery among other things and you have set the pace for people speeding and road rage thinking its part of the freeway. This is also a shared road for bikers, and walkers and is extremely dangerous with road rage people.</p> <p>I pulled out onto Wasatch Blvd going south, there was a car a mile behind me, going who knows how fast, passed me on the shoulder of the road to get by, only to run not stopped traffic ahead.</p> <p>Keeping this area slow, safe and urban is only going to advance the prosperity of the SLC, Holiday and Cottonwood Heights area plus make it more beautiful for tourists during winer and summer months. No one expects to have a freeway system all the way to the canyons. People that need a freeway should take Union Park or 9800 South down to the freeway. 215 was never intended to be a super highway.</p> <p>All of Wasatch Blvd, speed should be 35- 40 miles per hour, slow down the 6200 South/ Wasatch Blvd breezeway, freeway access road.</p> <p>Thanks,</p>	Email
25	<p>Hello,</p> <p>The area fro 6200 South to Wasatch blvd is setting the tone for road rage and destroying the suburban area it leads to, it also is very hazardous.</p> <p>The speed limit should be lowered to 35 - 40 miles per hour, ALL of wasatch blvd should be lowered to 35 - 40 miles per hour.</p> <p>This is an area where people are trying to gain access in and out of their neighborhoods, enjoy the beautiful scenery among other things and you have set the pace for people speeding and road rage thinking its part of the freeway. This is also a shared road for bikers, and walkers and is extremely dangerous with road rage people.</p> <p>I pulled out onto Wasatch Blvd going south, there was a car a mile behind me, going who knows how fast, passed me on the shoulder of the road to get by, only to run not stopped traffic ahead.</p> <p>Keeping this area slow, safe and urban is only going to advance the prosperity of the SLC, Holiday and Cottonwood Heights area plus make it more beautiful for tourists during winer and summer months. No one expects to have a freeway system all the way to the canyons. People that need a freeway should take Union Park or 9800 South down to the freeway. 215 was never intended to be a super highway.</p> <p>All of Wasatch Blvd, speed should be 35- 40 miles per hour, slow down the 6200 South/ Wasatch Blvd breezeway, freeway access road.</p> <p>Thanks,</p>	Website
26	<p>It's good to remember Wasatch Blvd runs through Cottonwood Heights. People live here and its prosperous because of the proximity to the beautiful mountains and the mountainous outdoor feel. One thing Cottonwood Heights promotes and asks of its residence is low impact lights. The last the Cottonwood Heights residence need or want ar freeway lights or any kind of lights installed along Wasatch Blvd. This would destroy the star watching people live here for. You wouldn't run lights down little or Big Cottonwood canyon, we don't want them here either.</p> <p>Thanks,</p>	Website
27	<p>People come to Utah to ski because of the beautiful outdoors, not to just ski down a hill. If you destroy the natural low key beauty of SLC and the surrounding areas people will go somewhere else to ski, more remote and you will destroy the tourist and ski industry of SLC, Big and Little Cottonyons. No one expects to have a freeway all the way to the resorts. All of the beautiful outdoor areas are fed by 2 lane country rural roads except some disgusting areas in LA. People expect and want rural country mountainous roads. Please don't turn Wasatch Blvd into 215.</p> <p>Thanks,</p>	Website

28	<p>The by pass lanes south of Union Blvd was initially put in for people to exit the upcoming hotel and 7-11. It is being used as a road rage speed area. The outside lane on 6200 S. /Wasatch Blvd. should be turned into a right turn only lane and Wasatch Blvd after Union Park Blvd should be turned into a 2 lane road. Making the outside lane into a merge lane for 7-11 and the hotel again being a right turn lane going to Bengal Blvd. Becoming a merge lane for people turning right onto Wasatch from Bengal Blvd going south. This would stop so much road rage, slow down traffic in an urban area. Additionally making it much safer for bikers and walkers.</p> <p>Thanks,</p>	Website
29	<p>On snow days, it seems before the roads are closed, traffic should be stopped before the base of the canyons, averted into parking at the current vacant gravel pit on Wasatch, 9800 South, Bengal Blvd. and Union Park. Close the roads earlier then sitting along Wasatch Blvd.</p> <p>The cars could even be stopped along the larger pre-existing roads that are two lanes and already made for more traffic, just having them pull over, allowing cars to get by, 9800 South, Wasatch Blvd. south of 9800 South, Bengal Blvd. 3500 South, Union Park, 6200 South/ Wasatch Blvd corridor.</p> <p>The police should take a role in this and maybe the ski resorts should pay the expense? You will have massive road rage of people trying to retain their place in line is my fear. Maybe do a car count of when the parking lots are full, start going tickets for people parking along the roads, ask the skiresorts to build underground parking?</p> <p>Thanks,</p>	Website
30	<p>I believe the ski resorts need to come to terms and the canyons and decide what is capacity for the canyons. All of the beaches do this. There are numerous feeder roads getting to the canyons, a few ski days with the canyons shut down for an hour is just what pole have to deal with. Don't live near the mountains if you don't want a snow day, and don't destroy our city making freeways through our neighborhoods. People expect to sit in traffic, there are numerous feeder roads. Keep SLC, Cottonwood Heights & Utah Beautiful!</p> <p>The original Cottonwood Heights plan is the best, I would follow their plan.</p> <p>Thanks,</p>	Website
31	<p>Strongly advise that Signalized Intersection at Kings Hill Drive and Wasatch Blvd be the chosen alternative for performance and safety of the intersection.I believe it will continue to be difficult and dangerous to exit and enter Kings Hill Drive without a signal, notwithstanding improved line of sight,due to speeds and amount of existing, and more so future, traffic on Wasatch Blvd.Additionally, drivers making a right hand turn from Kings Hill onto Wasatch frequently must/choose to use the wide road shoulder that runs in front of fire station as a speed ramp/runway as a means of merging into Wasatch more safely, BUT FOR the possibility of pedestrians in that space and fire trucks exiting the fire station.Have you considered these things?Respectfully, Angel Kosovich</p>	Website
32	<p>Canyon roads should NOT be widened. Widening roads is NOT a long term solution to congestion, it will instead make it worse. Long term solutions include: trams, Bus Rapid Transit, light-rail and congestion pricing. Give the public good alternatives and you'd be surprised the amount of people that will be more than willing to leave their cars at home.</p>	Website
33	<p>I would be against widening the roads leading into Little Cottonwood as well as widening Little Cottonwood Road. Shuttle buses to me are the best and most efficient solution. Perhaps even limiting the amount of people allowed into the Canyon on any given day.</p>	Website
34	<p>I do not support any widening of lanes or increase of vehicle traffic in the cottonwoods. It is wild land and should be kept as such. I support snow sheds for avalanche mitigation and increased busing options including more parking at canyon mouths, more trailhead stops (preferably stopping anywhere a rider wants up canyon, not down). I support overhaul and increased trailhead infrastructure to accommodate wilderness usage increases. I support taxing the resorts to pay for these improvements to busing, the road, and anything they directly benefit from.</p> <p>Please please don't go down the interconnect road in any shape. Please stay away from increasing vehicle traffic.</p> <p>We love our Wasatch and its wilderness as it is.</p>	Website
35	<p>no interconnect of any kind. No increase in vehicle traffic. Better busing only. Build snow sheds for avalanche mitigation.</p> <p>Thank you for listening.</p>	Website
36	<p>The only way I would support widening roads or additional space for parking in the canyons would be to add a dedicated bus lane, bike lane, or rail line. Any additional parking added should be at the park and ride lots at the mouth of the canyon. The only way to reduce long-term canyon congestion is going to be to discourage vehicle traffic by making other options more attractive. Adding additional lanes for private vehicles is short-sighted and a mistake</p>	Website
37	<p>Please add "person throughput" into the purpose and need and as a level 1 screening criteria.</p>	Website
38	<p>Do NOT widen the road. More transit, fewer cars!</p>	Website
39	<p>I have been skiing in the Cottonwoods for 33 years and have seen the changes. Clearly the traffic situation in both Big and Little Cottonwood is bad and only going to get worse. For LCC I think avalanche sheds are absolutely necessary. This would allow to the canyon to stay open during most avalanche control operations. Using GasX control, UDOT could blast more frequently without closing the highway, making slides smaller and less dangerous.</p> <p>I think three lanes along the entire length of Hwy. 210 is a great idea. In winter, the center lane should be a reversible one-way for buses only. In the morning, buses use the center lane to get up the canyon but use the outside traffic lane to get down. Reverse this for the afternoon. The challenge will be merging in and out of the center lane with bumper to bumper traffic.</p> <p>For BCC, the traffic tie ups are at Cardiff Fork (tubing area) and Solitude. I am not sure what to do about them. They are still manageable right now. The Spruces parking lot needs to be expanded, probably doubled. This could be done by plowing more of the summer campground.</p> <p>Thanks for you efforts and I hope some of this makes sense to you.</p>	Website
40	<p>One more comment, the White Pine trailhead parking lot needs to be doubled in size and better sight lines down canyon are desperately needed. I am amazed that we do not have more accidents caused by uphill traffic hitting cars pulling out.</p>	Website
41	<p>We need long-term vision and problems solving, not 20yrs but long term. The question is how to move enough people at 0800-0945.Folks are attracted to trams, but how many can you move between 0800-0945? Insufficient numbers, so that means people pile back in their cars.The only high-volume solution is train.A trip to Zermatt is highly needed order to see how this can work.Buses can't move sufficient numbers and so also aren't a long term solution.The current ride lots aren't an answer either.The other problem is that Solitude is charging for parking.instead of the funds going to the transportation system for solutions, they end up in Deer Valley's hind quarters and what is the chance they'll give up those dollars?nada.when tolling starts, They'll say exclude their paying customers.The other resorts will follow to achieve higher revenues/margin.We need tolling to start pronto to abort what otherwise is going to be a free-for-all of running to the parking payment system and then we won't be any closer to a transportation solution, rather, we'll actually be farther away.</p>	Website
42	<p>Please install a signalized intersection at Kings Hill and Wasatch.It makes the most sense in my informed opinion as a developer who has worked much with traffic engineers and local and state jurisdictions.It will assure a desired LOS will be accomplished.It will provide the greatest safety for all.I believe an alternative, including extending the line of sight for an intersection lacking a signal will leave much of the difficulty and danger inadequately addressed and perhaps permanently so.This may be the 1-time opportunity to make the improvement that is reliably and certainly best for all drivers, not to mention pedestrians, cyclists and the fire station now somewhat compromised by drivers exiting Kings Hill to headnorth on Wasatch.The broad shoulder in front of the fire station is used as a speedway and merge lane into Wasatch as cars drive so fast on Wasatch.</p> <p>Respectfully,</p>	Website

43	<p>I have only been in SLC since 2005, however, I have been a regular user of the cottonwoods the entire time, logging about 50-60 ski days per season, mostly backcountry travel. This has allowed me ample time while plodding uphill and looking at the road below to consider road issues. I have given up on solutions for ski resort traffic that involve continued operation of all the ski resorts. Your study that was linked to the comment email nicely shows that the road traffic CANNOT be accommodated by buses - 10,000 vehicles per day (divide by two for up/down = 5000) with avg 2 per car equals 10000 people that all want to get up the canyon between 8 and 10. If a ski bus can handle 50 people, that's 200 buses. That's a bus every 40 seconds or so to get everyone up by 10am. Not going to happen. Gondola? Total joke. Train? Maybe. . . are we going to spend that?</p> <p>Close one resort per canyon and I suspect you will find an easy solution to your traffic problem with MINIMAL impact on government revenues and job loss while preserving the beauty of and access to these canyons.</p>	Website
44	<p>Busses should have a dedicated lane to encourage ridership. Don't plan to get more cars up the road b/c there is not enough parking in the ski resorts. It should be easier to take public transportation than drive. Bring back the ski bus stop at Foothill Village.</p>	Website
45	<p>The goal of the project should be to accommodate a rising number of humans visiting the canyon. It should not be to accommodate a rising number of vehicles. The humans should be encouraged to leave their vehicles near major arterial roads such as I-15 or I-215, with direct frequent bus service to canyon destinations. Tolls would reduce traffic and enable the bus to travel up the canyon near posted speed limit. Any attempt to add a lane in the canyon would fly in the face of actual data on how well adding lanes reduces congestion. Please don't spend the state's money building a useless extra lane. Build or lease parking and coordinate a better bus system.</p>	Website
46	<p>Get a train!!!!</p>	Website
47	<p>Build a high speed train please! The traffic is beyond excessive!</p>	Website
48	<p>As a frequent visitor of the study area, I encourage UDOT to prioritize mass transit solutions to the transportation issues in the Wasatch-Boulevard to Alta area. Private vehicles create air and noise pollution. A light rail extension, gondola, or shuttle system similar to the one in Zion National Park would be better solutions than widening roads. Widening roads also creates the problem of induced demand. A user fee for a mass transit system could cover some of the cost.</p>	Website
49	<p>As time goes on it seems that the best and only solution is to not allow any vehicles at all into the canyon. The only exception would be emergency and safety vehicles; not employees or special guests, etc. Setting a toll or other restrictions still would be as damaging to the environment as the situation is today. I ask you to consider no vehicles at all, relying instead on a gondola or a train, for example.</p>	Website
50	<p>Part of the solution needs to be to widen Little Cottonwood canyon to three total lanes. During high volume times use two lanes up from 1am-12pm and two lanes down between 1pm-12am with a one hour transition when there would be one lane open in each direction. During low volume times and when Alta/Snowbird winter operations are over use one lane in each direction for vehicles and use the third lane for bike/foot traffic.</p>	Website
51	<p>I don't ski, but I use both Cottonwood canyons for hiking. Parking at the hiking trailheads is always awful. There are a few small parking lots, and if you arrive after about 6 AM you must park on the narrow shoulder. Parking often stretches over half a mile from each trailhead and it's dangerous to walk to and from a parked car with canyon traffic only a few feet away. If the UTA bus service that already runs from the park and ride lots at the base of the canyon had stops at the hiking lots, nobody would have to park in the middle of the canyon.</p>	Website
52	<p>Please include summer bus service in big cottonwood canyon in the little cottonwood canyon eis. The USFS will not recommend summer bus service in Bcc until an eis is done. Please add big cottonwood canyon summer bus service in the little cottonwood canyon eis. Thank you.</p>	Website
53	<p>PLEASE extend the EIS over into Big Cottonwood so that we can do future planning there and have the EIS already done. The 2 canyons are linked in most ways</p>	Website
54	<p>As a resident of Big Cottonwood I think any action taken in Little Cottonwood should take into account its effect on Big Cottonwood.</p> <p>The situation last ski season in Big Cottonwood was a mess. There are people parked all over the road... some times in the road... and a parade of skiers stumbling down the middle of the road. It's a public safety issue. Someone is going to get run over.</p> <p>I don't understand why the canyon road is allowed to be a public parking lot for private ski resorts.</p> <p>Obviously with more visitors than Yellowstone the canyon needs more bathrooms... so people don't go to the bathroom in the watershed... but public utilities won't approve water use for a BATHROOM... save our canyons don't want bathrooms... or a crosswalk at Donut Falls... they don't approve of a gondola to alleviate traffic... problems is the canyons being trashed while they draw some idealistic line in the sand... compromise.... maybe?</p> <p>The canyon is being trashed. After years of surveys and dumb comment boards like this NOTHING EVER DONE.</p> <p>I'm glad we now have the town of Brighton now so we have some recourse and some agency in OUR COMMUNITY</p>	Website

55	<p>Hello John,</p> <p>I have been doing some reading and thought of something that may be able to alleviate the congestion we see both at the national parks as well as up Big and Little Cottonwood Canyons. The wonderful thing about this issue is that the peaks for these locations occur at different times of the year. Park Visitation at Zion's last year was 86,000 in January but spiked up to 600k in July. Any fix designed to address a spike like that will obviously be underutilized for half of the year. My proposal is that we look at these together and it flattens out quite nicely as December-March are the busiest times of the year for the canyons with the resorts being so popular.</p> <p>My proposal is a program that would coordinate with the National Parks Service and UTA to simply share buses. It isn't revolutionary but it has some major benefits when it comes to costs as both problems could be addressed for a fraction of the cost of buying all new buses for both locations. As it would be roughly 4 months out of the year that they would be used by UTA I would propose that UTA shoulder roughly 1/3 of the cost of the new buses with the National Parks shouldering the other 2/3. Both would be substantial discounts for both groups. I would like to point out that this may not even require the purchase of new buses even, if both groups already have additional capacity that could be shared.</p> <p>The biggest issues I see with this proposal are the following</p> <ol style="list-style-type: none"> 1. Orchestrating this with the federal and state groups. I am not sure how well they work together. Hopefully the benefits would be enough to bring everyone to the table on it. 2. Difficulties arising from having seasonal bus drivers. Some drivers may be okay with this arrangement but likely not ideal for most. Others may be okay working with both groups but those will probably be rare. 3. Parking may be difficult and may require multiple routes for pickup on the Canyons as well as around the national Parks. At least for the Canyons we could probably designate some of the Frontrunner parking lots as the pickup locations. <p>Benefits</p> <ol style="list-style-type: none"> 1. Obviously less congestion and hopefully less accidents making a more pleasant experience for everyone. 2. Reduced cost of buses for both organizations as they would be shared. 3. Reduced emissions due to both efficiency of using a bus as well as no idling as traffic crawls. 4. Potentially higher capacity in both regions which could even bring in more in fares for UTA and even taxes for the state from tourism. <p>I know this issue has a lot of different factors impacting any decision but I hope that you will at least consider mine. Thank you.</p>	Email
56	<p>While eliminating on-road parking will certainly improve mobility and safety, if combined with the option to not increase trailhead or ski area parking we'll end up doing a great disservice to all users of the canyon year round who seek to recreate in patterns not supported by our anemic bus system (despite the recent promised increase in frequency on a few routes). We need both a road system and a transportation system that serves us and sadly the combination of possible alternatives produces more variants that does not serve us but rather serves the producers of the system in ticking their boxes and meeting their paper goals.</p>	Website
57	<p>I feel it may be easiest and cheapest to simply have more buses to, from, and in the canyon and restrict drivers through something like month-based registration restriction. Additionally, public transit needs better promotion. The purpose and need document mentions a bus running in the summer, but through extensive searching I was unable to find any information on it. This is just one example of how information on transportation that should be common knowledge is never mentioned to the public, and thus they're left not knowing how to conveniently get around without creating excessive traffic.</p>	Website
58	<p>I propose a 3 lane road from Fort Union to Alta ski resort. A north and south lane and a middle FLEX lane for canyon closure traffic backed up during avalanche control. Intersections to be kept clear (signs..do not block) From the mouth of Little cottonwood will be two lanes up in the morning and two lanes down in the afternoon. From Big to little cottonwood ,The center lane will be for cars stopped and backed up because of avalanche control in the morning. This will allow north and south bound traffic free of back up. Make Wasatch Blvd similar to Wasatch south of 9700 south . A 35 MPH beautiful meandering road filled with trees and landscaping . Out of town skiers will make this a special area for the rest of their lives. We have a great opportunity to do something special. Please don't waste it on a high speed road that is dangerous and ugly.</p> <p>You may take my house in this process of widening Wasatch and building a bike and pedestrian road, I will understand. However I would like to maintain my residence on the east side of Wasatch. Just find me a place similar or better and we have a deal.</p>	Website
59	<p>Before expanding the road for increased auto traffic, UDOT needs to create real bike and pedestrian infrastructure for the canyon. Little Cottonwood Canyon is a premiere recreation area for the Salt Lake Valley but we only have the chance to enjoy a fraction of it due to lack of bike and pedestrian walkways. UDOT should create a path, parallel, but separate from the road, to accommodate both bikers and pedestrians. This feature could be enjoyed year round. For additional benefit the path could be groomed for cross-country skiing during the winter months. Provo Canyon provides an excellent example of this type of infrastructure. The canyon has a path that is a great amenity for all residents to enjoy in the canyon. It's important that this path be separate from auto traffic so users can enjoy it without the stress of dangerous traffic. This would also be a great economic boost for the canyon as it would attract new users and make the canyon an example of great recreation for all.</p> <p>Ski resort traffic may be reduced by improving bus service and expanding park-and-ride parking availability at the base of the canyon. If needed, UDOT should also consider a dedicated, bus-only lane to expedite bus movement and incentivize use.</p> <p>Adding another standard lane will not fix the current traffic problems. I repeat - a new lane will not fix traffic problems. In fact, it will likely only make the problem worse by inducing greater demand. I know you already know this. Please be deliberate in your decision making and do what you know is right for the good of us all. You have my support for doing what's smart.</p>	Website
60	<p>I feel the best solution is to make more busses available, especially during ski season. Also access to those busses needs to be increased.</p>	Website
61	<p>The canyon needs to become car-free (or at least for the most part) and be either a shuttle system from a few trax stations located from downtown to Sandy or a train connected to the trax system. Otherwise this problem will just continue to worsen.</p>	Website
62	<p>The root problem here is the number of people recreating in an extremely sensitive canyon. Solving traffic and other roadway problems is not addressing the root problem! If traffic, parking, and other issues are resolved using the methods proposed, it will simply lead to another issue – overuse on the mountain. The mountain will become overrun. The trails will become crowded, lift lines will be excessive, and most importantly, the mountain will suffer the consequences of the impact of countless people.</p> <p>Please do not add more parking lots, a gondola or tram, a third lane, or more buses. Please come up with an alternative solution that addresses the REAL problem – the number of people. Forcing the ski resorts to abandon the Ikon and other multi-resort season passes would be a good start. A cap on the number of cars allowed up the canyon at one time would be a great option. A lottery or permit system to enter the canyon might also be necessary. Please consider the true root cause. This is not just a transportation issue!</p>	Website
63	<p>I like the snow shed idea. I would be glad to ride the bus a free locker we're available at the Mtn. At 65 hauling boots, a back pack , skis and poles onto the bus is a little much. Last, why is no one talking about cars that only seat 2 people? if I have 2 people in a 2 seater car, why should I get penalized when I can't have 3 people in my car(in relation to carpooling).</p>	Website

64	<p>Thank you for the opportunity for the public to comment on this important issue. Being a lifelong resident of Salt Lake City, and being an avid user of both Little Cottonwood and Big Cottonwood Canyons year-round, I have a significant interest in the handling of transportation amenities and roads in and near these canyons. I have a few concerns and recommendations for UDOT.</p> <p>1) Expansion and further development of transportation options in the Cottonwood canyons must be done with a great deal of restraint. This is due to the following reasons:</p> <p>a) Avalanches in these canyons are persistent and dangerous. The more traffic allowed on these roads (by adding lanes) puts more people in danger per avalanche. b) Road widening in such narrow canyons will significantly increase erosion as well as road maintenance costs. c) Due to recent, persistent warming weather patterns (especially in the winter months) over the past 20 years, it is prudent to consider that these canyons will eventually have too little snow to support our major ski resorts. We will see in another 20 years that there will no longer be a need to expand government-funded transportation in order to meet the need of ski resort patrons. Traffic projections should only include non-winter months to show the true needs of the public.</p> <p>2) Expansion and further development of roads outside of these canyons should be less restricted,</p> <p>3) In order to alleviate traffic up the canyons, large parking structures need to be constructed at each canyon mouth to encourage use of the UTA bus system, and also to encourage carpooling. There is no reason for canyon visitors to drive up the canyon alone in a car. In light of this shift to encourage ride sharing, expanded bus service needs to be implemented, as well as restricting parking lot sizes at the ski resorts.</p> <p>Thank you for your time.</p>	Website
65	<ol style="list-style-type: none"> 1. The EIS should include the need to determine the optimal and maximum number of people which LCC and BCC can comfortably accommodate. (ie what is the saturation number of folks in the canyons?) The principle objective of the EIS should not be only how to get more private autos into the canyons. 2. The use of private autos should be discouraged by the use of disincentives like tolling, with reduced pricing for more passengers; and fast tracking public transport, like giving buses preferred rights of ways to pass private vehicles. Having less cars on the road would make more room to accommodate shuttles on the roads. Shuttles or buses used on existing roads are infinitely more flexible with regard to schedules and routes than fixed modes of transportation like trams and trains. 3. Additional transit corridors, besides the road, would be devastating to the character of both canyons due to their narrowness. Adding these features to the canyons would essentially cut the canyons in half or destroy the viewsheds or both. This consideration should be recognized when choosing preferred alternatives. The use of an overhead gondola system should be considered an additional transport corridor, as well as one for a train. In addition there is no suitable location for a bottom terminal for either at the mouth of LCC. 4. The EIS should have the authority to explore mobility hubs, served by public transportation, away from the portals to the canyons, like use of the Cottonwood Corporate Center's empty parking lots on the weekends or of the excess parking capacity in the 9400 So. Sandlot Shopping Center in Sandy, or certain Trax Stations in Midvale, Murray and Sandy. 5. Widening of the Canyons' roads and placement of snow sheds to protect roads are acceptable. 6. Utilizing immediate, short term solutions to the traffic problems on 210 and 190 is encouraged. 7. The EIS should consider methods to reduce the commuter load, which contributes to overall traffic problems. Suggestions like completing Highland Drive across Dimple Dell Park, in the least intrusive method possible, could be suggested to reduce that load on Wasatch Blvd. 7. The Gravel Pit mobility hub should be developed as soon as possible, no more extensions of the lease on that property should be allowed. 8. Any enhancements of ski area expansion or ski area interconnection should not be in the scope of this EIS. 9. Thank you for allowing me to comment on this excellent process. Best luck with these difficult decisions. 	Website
66	<p>The canyons are over used, over crowded . We do not need to expend the road . We need to charge user fee to limit number of people in the canyons. We do not need to expend transportation capacity that would speed up the ruin of the canyons.</p>	Website
67	<p>Some of the information on the website comes across a bit confusingly. As the final EIS doesn't occur 'til 2021, it's not clear what might happen before then (actually things WILL happen to increase safety and mobility).</p> <p>Also, Level 1 Screening Criteria (Factsheet) suggests that reliability, etc. will improve by 2050. This implies that improvements might not occur til then, when in fact this isn't true. Don't turn off the public by not sharing with them some of the early fixes, and explain what's meant by 2050.</p> <p>In the need for improvements to Wasatch Blvd Level of Service, UDOT's goal (in the box)-D says that UDOT's goal is a noticeable delay on a section of Wasatch above the high-T. It seems absurd that this would be UDOT's goal.</p> <p>Current Avalanche Hazard Index. If LCC AHI is 90 (high), how can you have a number like 7304? What does this mean?</p> <p>Purpose & Need: p. 1-6, Fig. 1.1-1, what does wide turquoise line represent?</p>	Website
68	<p>canyon impact should be viewed when systems (such as the highway) are not working according to plan. For example: what is the impact of traffic when there is an accident and the roadway isnt working as planned. Or, what happens if a the unexpected happens. Unfortunately, with effect of increased traffic any issues are amplified.</p>	Website
69	<p>I applaud the progress that has been made to date on the Little Cottonwood Canyon plan. I have just a few comments. It appears that several projects of the planned improvements aren't funded until Phase 3 and that is too late. The current traffic and resultant delays and impact on the mouth of the canyon neighbors and skiers is a today issue. I recommend moving two key highway projects forward, even if they are only partially funded or partially completed in phase 1 or 2. Those two projects are the widening of S.R. 210 (R-S-53 and Snow sheds over S. R. 210 (R-S-216). No matter how much you improve the path to the canyon, the bottleneck will continue when all the traffic hits the single lane canyon road or a major snowfall and avalanche risk shuts down the canyon road. Phasing in some widening and snow sheds in the most problematic areas in Phase 1 & 2 will potentially improve the situation or at least lessen the congestion, and possibly get more public buy-in on further improvements. The additional buses service in Phase 3 won't make things better if the road is not already improved with the widening and snow sheds. A tolling system for the canyon and parking fees at the resorts should be implemented now to assist with earlier funding to move these two projects into Phase 1 or 2.</p>	Website
70	<p>PLEASE reduce the speed limit on Wasatch Boulevard between Big and Little Cottonwood Canyons. I worry about my wife's and my safety every time one of us has to leave our neighborhood. It's absolutely ludicrous that it's 50mph in this stretch when it's only 40 on stretches of Highland or 1300 East. There is no logical reason for it to be such a high rate of speed when there are blind corners that have people pulling in and out of.</p>	Website

		Website
71	<p>November 21, 2019, Kirk Nichols review of: Little Cottonwood Canyon Environmental Impact Statement (LCC-EIS) Draft Purpose and Need Statements</p> <p>The purpose of my comments is to recognize the inadequacies of the Draft LCC-EIS now, while there is time to change the draft proposal, in this early stage, to meet the requirements of the National Environmental Policy Act (NEPA) and the Council of Environmental Quality (CEQ) regulations. Pausing and fixing now will save time later. Until the purpose and needs statement and study area are accurate, the future chapters of the LCC-EIS hold no meaning or credibility.</p> <p>NEPA and Interdisciplinary team requirements. The impression to the public is that UDOT as the lead agency has reduced the input of other members and disciplines of the interdisciplinary team rather than utilizing them to the fullest extent possible -- as required by NEPA. UDOT has removed themselves from the Central Wasatch Commission. The October 30, 2019 chapters of the Draft LCC-EIS read like engineering documents rather than an environmental assessment. The Purpose and Need Statements are about engineering -- which UDOT does well. However, an Interdisciplinary team represents far more domains than just engineering. Many domains are absent, for this example -- Recreation Planning and Recreation Ecology are among the disciplines missing. With greater numbers of visitor on the federal land (the purpose of streamlining transportation) the carrying capacity of the land for elk and mule deer is reduced and is anyone at UDOT an expert on wildlife or recreation ecology? Without a strong interdisciplinary team, too many major and significant effects go unstudied. Considering the requirements of NEPA and the regulations of the Council of Environmental Quality (CEQ), UDOT's proposal is inadequate in such components as study area, connectedness, similar, and cumulative actions. Stronger input and funding for disciplines other than engineering are required by NEPA.</p> <p>The excerpt from NEPA on the requirement of an interdisciplinary team and missed values when an assessment is too unilateral: "Sec. 102 [42 USC § 4332]. The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall (B) identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by title II of this Act, which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations;" (emphasis added)</p> <p>Excerpt from the October 30, 2019 UDOT Draft 1.1.1 "The study area used for the Little Cottonwood Canyon Project extends along State Route (S.R.) 210 from its intersection with S.R. 190/Fort Union Boulevard in Cottonwood Heights, Utah, to its terminus in the town of Alta, Utah, and includes the Bypass Road (Figure 1.1-1). UDOT developed the study area to include an area that's influenced by the transportation operations in Little Cottonwood Canyon and to provide logical termini for the project. Separate impact analysis areas have been developed for each environmental resource evaluated in this EIS."</p> <p>The LCC EIS Study Area is inadequate to meet the "connected" requirements of NEPA. The proposed transportation alterations or actions, designed for delivering more people to the federal land, will have major and significant impacts extending far beyond the S.R. 210 road right-of-way and the ski resort boundaries. The public will not accept that increased public spending on transportation and road improvement are only allowed to feed the volume of use at the commercial ski resorts. The public is demanding that all transportation improvements also include improved access to all sections of the canyon for example, trailheads, campgrounds, and picnic areas.</p> <p>NEPA, in the CEQ Regulations printed below, and supported by case law, Thomas v. Peterson, requires that any action that itself would require an EIS and that is triggered by an action in an EIS, be studied together with the triggering action. Therefore, any significant increase in use, with direct and/or indirect effects onto the federal land throughout Little Cottonwood and Big Cottonwood Canyons, brought about by the proposed improvements in the narrow corridor of the road right-of-way, must be studied at the same time as the roadway improvements.</p> <p>Excerpt from: Thomas v. Peterson "A. CEQ Regulations 1. Connected actions The CEQ regulations require "connected actions" to be considered together in a single EIS. See 40 C.F.R. § 1508.25(a)(1) (1984). "Connected actions" are defined, in a somewhat redundant fashion, as actions that (i) Automatically trigger other actions which may require environmental impact statements. (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously. (iii) Are interdependent parts of a larger action and depend on the larger action for their justification."</p> <p>The CEQ regulations (i) and (iii) must be addressed, and soon, during scoping and while preparing the draft EIS alternatives, not later during a Supplemental EIS. Save time, start it now. Do not blame NEPA and the federal regulations for a delay later; the regulations are clear now. "(i) Automatically trigger other actions which may require environmental impact statements." Each traffic pull-out or stop, where proposed improvements within the transportation corridor will spread the effects of increasing the numbers of visitors and are actions that require additional EIS studies. These studies must follow the impacts beyond the pavement and out onto the federal land, up the trails, out to the lakes, and ridges studying the significant impacts on soils, air and water quality, wildlife, and visitor experiences. "(iii) Are interdependent parts of a larger action and depend on the larger action for their justification." The undeniable larger action here is to improve transportation for the purpose of delivering people to recreate on the federal land. Big and Little Cottonwood Canyon traffic is connected, inseparable. When there is a blockage to one canyon, many visitors will immediately switch to the other canyon. People hike from one canyon to the other, requiring a vehicle shuttle between the two canyons. These two canyons are inseparable. These two canyons are geographically connected, the effects accumulate. Therefore, both Big and Little Cottonwood Canyons must be studied as one larger, interconnected project studying the effects of increased visitation on the federal land throughout both canyons, rim-to-rim.</p> <p>FULL COMMENT AVAILABLE IN ATTACHMENT</p>	Website
72		Website
73	Speed limit on Wasatch should be no faster than 40-45 MPH. Otherwise it's too fast.	Website
74	Speed Limit on Wasatch should be 45mph or less!	Website
75	The speed on Wasatch must be reduced to 35 miles per hour. It is so dangerous at the intersection of Golden Hills Dr. and Wasatch. The cars going north drift into the turn lane for a head on and are so fast that turns from a stop are very dangerous and T-bone wreck fatalities are quite possible, particularly at dusk and after dark. Curbs need to be installed to keep cars in their lanes and speed must be reduced. High speeds on 2 miles of road are not going to get commuters to their destinations much faster anyway. Some of us want to make sure we get home and our families get home on this incredibly dangerous intersection.	
76	I really appreciate the higher speed limit on Wasatch Blvd. It is a big help with my work commute. Please do not bent to the pressure of a few that want the speed limit lowered. Thanks	Website

77	<p>Within the environmental impact statement, it emphasizes "Integrated transportation system that improves the reliability, mobility, and safety for residents, visitors, and commuters who use S.R. 210". As a resident who lives next to the high T intersection above Wasatch, I want to emphasize that in no way do I feel safe on Wasatch for a few reasons. 1.) The reconstruction of the High-T intersection is incredibly dangerous for commuters and especially residents who drive this area the most. As mentioned, I live in the neighborhood just above Wasatch in this area. When turning left onto Wasatch at the high T intersection to head north, I have to quickly merge with cars going 50 mph after just being stopped, to then quickly merge and stop to turn right into my neighborhood. This can be TERRIFYING! 2.) 50 mph on this road is TOO FAST as it surrounds residential neighborhoods and people biking and walking on Wasatch (not safely on sidewalks because there are none.) When I am heading home going south on Wasatch right before the high T intersection, I turn left to turn into my neighborhood and must face two lanes of oncoming traffic on a sloped hill to turn left. I never feel safe and am always terrified someone will drift over the lane and run head on into my car. This speed limit is way too fast. Wasatch heading towards Sandy is 35 mph and is a great speed, especially as wildlife frequently crosses the street. I don't know why it reaches 50 mph in Cottonwood Heights. Its VERY DANGEROUS AND I DO NOT FEEL SAFE AS A RESIDENT. Please listen to all of the residents who are voicing this concern as many residents do not feel safe due to the high T and speed limit. In addition, it is in within the statement listed that Wasatch aims for the safety of residents - you are failing in this section as I do not feel safe turning out of my neighborhood or coming home into my neighborhood. PLEASE PLEASE PLEASE lower the speed limit and change the High T intersection. Its incredibly dangerous and myself and my neighbors fear for our safety on this road. Please address this. Thank you.</p>	Website
78	<p>Managing the safety and traffic flow from Ft. Union (Big Cottonwood) to Little Cottonwood on Wasatch Blvd. is critical. All surrounding neighbors discuss this constantly. The only way to ensure improvement is to install traffic lights at Prospector Drive, Kings Hill, and at the mouth of Little Cottonwood.</p>	Website
79	<p>Make Wasatch Blvd a nice 2 lane with turning lane(s) like Wasatch extension. Do not make it 4-5 lanes!!!LOWER the speed limit. Those of us who live off of this part of Wasatch are scared enough with the excessive speed of traffic. Trying to get out of Golden Hills. No red light coming down North Little Cottonwood (northbound) is insane. It worked so much better before the new high T. Also no right on red coming from Wasatch Blvd to N Little Cottonwood Rd. is stupid, except hen trying to empty LCC on a busy day. All of this would be less of a problem if their was some birth control in this valley. Avalanche sheds also would help many of the issues on snow mornings</p>	Website
80	<p>35 MPH MAX....on Wasatch Blvd from Big Cottonwood to High T or mouth of Little Cottonwood. From Big Cottonwood south, on Wasatch Blvd, you are traveling through the neighborhood of Cottonwood Heights. We have children, residents handicapped and families in this area. Safety is # one.</p>	Website
81	<p>I'm suggesting a three lane road, from Big to Little Cottonwood canyons. Center lane is a Flex lane. Made for Backed up traffic during avalanche control. Three islands , 8400 south, 8575 south and 8700 south Wasatch. There is room for this. Football shaped with large pine trees in center and on east and west of Wasatch. This is the Gateway to the Best Powder Skiing in the world. Road splits around islands , first two lanes on one side then two lanes on other side. With a curved road,Slow traffic from 50 + to 35 to enjoy the Gateway to skiing. Tourists will say.."what a beautiful experience."</p>	Website
82	<p>Thank-you for this opportunity to address missing NEEDS in the draft LCC-EIS document as written October 2019. Addressing these needs early, in the draft EIS stages, will save time and money, and agency and commission reputations later. UDOT LCC-EIS "1.2.2 Need for the Project" Once the purpose of the projects in Little and Big Cottonwood Canyons is understood, then an interdisciplinary team can assess the NEEDS for attaining the purpose of this project which is to efficiently move more people off the transportation system and onto the federal land. (See my previously submitted comments on the Purpose and Study Area portions of the LCC-EIS.) The current purpose statement for the LCC-EIS reads as if the canyon visitor rides up one side of the canyon and down the other side in one continuous loop with no side trips that significantly affect the environment – which is simply not true. Studying only the UDOT road right-of-way is inadequate to capture all the significant beneficial and harmful, cumulative and connected effects of this Cottonwood Canyons' project. UDOT focuses on the technical considerations of the purpose (and does that well), that of efficiently moving people off the transportation system, but UDOT has not employed or distributed funds for the necessary natural and social science experts on the significant impacts of the visitors once they have been efficiently moved onto the connected federal land. NEPA requires "...the integrated use of the natural and social sciences and the environmental design arts in planning..." and that NEPA studies "...will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations;"* Excerpt from NEPA: **Sec. 102 [42 USC § 4332]. The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall – (A) utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment; (B) identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by title II of this Act, which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations;"</p> <p>Additional Needs beyond those listed in the LCC_EIS Draft Purpose and NEEDS: Due to increased efficiency of moving people onto the connected federal land, these are among the cumulative needs to be addressed in the Cottonwood Canyons' EIS by an interdisciplinary team: Vegetation: Threatened, Endangered, and Sensitive (TES) Species, vegetation loss, species mix alteration, invasive species; at the trail heads, on the trail, at the lakes, and other destinations... Wildlife: Threatened, Endangered, and Sensitive (TES) Species, birthing mortality and winter mortality due to escaping the presence of humans, disproportionate population increases due to human food trash, spread of pathogens... Soils and geology: multiple trailing, trail entrenching, compaction, soil loss, water channeling onto trails, increased sedimentation into creeks... Water Quality: invasive aquatic species, pathogen count, sedimentation, temperature, dissolved oxygen... Air Quality: Carbon monoxide, ozone, particulates... Crowding and congestion: acceptable/not acceptable number of encounters by zone, day of week, holidays, time of day, by destination site... Conflicts: physical conflicts (accidents), different user types, mechanized, not mechanized... Human waste presence... Changes in acoustic environment: unlawfully modified mufflers, large group voice noise... Damage to cultural environment: vandalism, theft... Criminal activity: burglary, home invasion, assault, arson... Visitor Use Management: studies are needed on how to more sustainably distribute visitors among sites, harden trails and access areas, place limits where and when needed (capacity)... Capacity Study: Usually done in" "zones of low, medium, and high impact locations. Increased costs to private property owners in the canyons. Increased business development in the canyons, which increases traffic. Increase in visitation due to latent demand that will be immediately released with more efficient transportation flows. These needs are not address in the October 2019 LCC-EIS Purpose and Needs. Far better to include these early rather than wait to be forced to do so in a Supplemental EIS.</p> <p>Kirk Nichols Big Cottonwood Community Council CWC Stakeholder Council as President of Evergreen HOA CWC Environmental Dashboard Steering Committee Assistant Professor, Department of Health, Kinesiology, and Recreation University of Utah</p>	Website

83	<p>If you would like to comment. I believe Eric is correct at 35 MPH MAX speed. From Big Cottonwood to Little Cottonwood on Wasatch Blvd , you are driving through a neighborhood . It is Cottonwood Heights. We live here, we have children, handicapped, Families, pets, that travel from east to west.</p> <p>My Suggestion on the Wasatch Blvd improvement project: Three lanes. Center lane is a Flex lane , for back up during avalanche control, and left turns. 35 MPH max speed. Three island, football shaped , with pine trees and pine tree east and west of Wasatch. Make like a tunnel through the pines. Approx 8200 south, 8575 so and 8700 s. Curve Wasatch Blvd to slow traffic. Two lanes on one side then two lanes on other of islands. This will be a beautiful Gateway to the Worlds Greatest Snow. Visitors will say "What a beautiful place" Copy and Paste from Ron Schroeder.</p>	Website
84	<p>I think Kim was talking with Bri about this service last night.</p> <p>Monitoring air quality throughout the day and determining peak times, idling times (road closures) and their impacts on air quality might be of great interest in appropriate action for Wasatch and LCC road.</p> <p>https://www2.purpleair.com/</p> <p>I know UDOT is in agreement with STRAVA to get data - I know the physical location of the monitors in the map of this area is not 100% accurate (for security reasons). But perhaps UDOT and partner agencies can pu</p> <p>Thank you,</p>	Email
85	<p>Figure 1.4-2 Figure 1.4-3 The city boundary lines in the figures are very difficult to read as the legend is a grey dash overlaid on a map that is grey. Consider changing the city boundary identification to an alternative color that is more visible in the map.</p>	Website
86	<p>page 1-31 - which attract more skiers. Consider using a different, broader term, beyond skiers. All types of winter recreationalists travel up the canyon including snowboarders, skiers, snowshoers, photographers and people driving up to see the snow.</p>	Website
87	<p>To try to go north or south on wasatch blvd from kings hill drive is extremely dangerous. With the high volume of traffic and high speeds through this urban segment..a car cannot safely pull into wasatch blvd. The curve on the south is not blind, but when a vehicle tries to enter the blvd..a car already in the 55 mph lane speeds around the corner and is abruptly slowed down by the car just entering the lane safely...without seeing the oncoming driver. It is not a blind spot.. it is clear until the car from the canyon stays at that speed and abruptly comes up behind the vehicle just entering that lane. We need sustainable 35mph speeds for safety and noise control</p>	Website
88	<p>For the most part, I like what I'm seeing in the lists of "acceptable concepts" that appeared in the Alternative Screening Criteria Factsheet of which I assume may be incorporated into alternatives, with some exceptions. First of all, however, I want to address the ones that I think should definitely be eliminated--1. I can only agree of adding just one more lane to the canyon road itself--totaling 3, where one should be a bus only lane, which could be reversible. 2. I can agree that some road improvement work should take place, such as extra-guard rails, an adequate shoulder lane, and possibly some straightening of some bad curves. 3. Although tunnels might be nice, but I think the amount of surface disturbance required to construct such structures would be counterintuitive to preserving the natural character of the canyon. 4. Provide White Pine Trailhead bus stop all year round, but perhaps not during peak winter morning or afternoon hours (i.e. as a back country cross-country skier/snowshoer, I wouldn't mind waiting until 9:30 AM to get a bus that will stop at the White Pine trailhead, and maybe waiting until 5:30 for a bus to stop on the way down in order to allow the resort skiers/snowboarders the peak afternoon times when the resorts close. Concepts I really like: 1. Greatly expand bus service and frequency, 2. electric buses soon, 3. separate bicycle path (but not to require huge amounts of surface disturbance to construct--but still be safe from vehicular traffic), incentives to reduce automobile traffic (i.e. single-passenger vehicles pay a toll), 4. mass transit hubs, especially at mouth of canyon and to include a ski bus from 3900 South/Wasatch Blvd. in order to serve people living in the north of Salt Lake Valley, 5. no road side parking in canyon, 6. Add parking at canyon mouth, 7. multi-level parking structures at resorts (built at the resorts' expense which could be garnered from increase in lift passes) and of course at the canyon mouth (possibly putting much of the structures underground), 8. black ice warning systems in place so as to decrease the number of accidents on the canyon road, 9. maybe reducing huge development projects at the resort which seem to only add to the number of people desiring to get into the canyon--however, I'm willing to be agreeable to more resort base development as along as the resorts are willing to trade their undeveloped "on the slopes" property for more "prime developable" land at their bases, adding to a net gain in public undeveloped land that could remain fairly natural. In short, it seems the greatest economic beneficiaries to all of this, are the resorts as they attract thousands of people each winter. I'm hoping that they are willing to financially help the public to "foot the bill" (via a higher tax than just the average state taxpayer) to make any of the above-mentioned improvements to the Little Cottonwood Canyon transportation system. Thank you for your attention.</p>	Website
89	<p>In "Table 1. Level 1 Screening Criteria", none of the "Improve safety and reliability" measures apply to Wasatch Blvd, only SR210. Consideration needs to be given to balance the "Improve mobility" criterion. Many suggested alternatives appear in Table A-1 with the comment "Will be part of road improvements alternatives." However, if only mobility is taken into consideration it is unclear how any would pass Level 1 screening. In other words, without some criteria related to safety applicable to Wasatch Blvd the screening process is not acknowledging potential trade-offs between mobility and safety.</p>	Website
90	<p>If this is at all possible I think The gateway 3 lanes on Wasatch is much more desirable to the community as well as the state. Our mountains area a beautiful place to recreate at the same time our safety above and below Wasatch Blvd is a necessity for our community.</p>	Website
91	<p>It doesn't make sense to widen Wasatch if Little Cottonwood is only two lanes. You will just be creating a larger parking lot.</p>	Website
92	<p>Please ensure that we have a gateway - NO FREEWAY!!!</p>	Website
93	<p>I think that instead of continuing to expand the road up LCC, we should charge for parking in the lots of the ski resorts and charge a fee to drive up the road from the intersection of North and South Little Cottonwood Roads (i.e. where the Park and Ride resides). People that carpool (perhaps a minimum of three people in a vehicle) would be exempt for the fees in an attempt to encourage people to drive together or utilize the excellent public transportation that already exists.</p>	Website
94	<p>As a resident along Wasatch Blvd, I would like Udot to please seriously consider lowering the speed limit to 35mph and utilizing a public transport lane vs adding several more lanes of traffic. Gateway not Freeway!</p>	Website
95	<p>PLEASE change this corridor to 35 MPH and 3 lanes total (max - 3rd lane as a flex/ turn/ bus lane - 1 dedicated lane each direction) with trees and natural boundaries to visually enhance the area, reduce the pollution and noise, and deter the high speed of travel. As most of the other major corridors throughout the valley have a max speed of 35 - 40 MPH, especially where there is traffic into, and out of neighborhoods, I am pleading that UDOT reduce the speed along Wasatch for the safety of all bike riders, pedestrians, vehicle traffic, etc., etc. Residents should not have to gamble on their lives (and the lives of their family members) each time they enter or exit their neighborhoods due to the high speed at which cars are traveling.</p> <p>Increasing the number of lanes will only serve to further increase the speed at which cars are traveling, road and noise pollution, and further increase the potential for catastrophic accidents. PLEASE listen to the community and do what is best for the SAFETY, satisfaction and usability of all. Thank you!</p>	Website
96	<p>Wasatch needs a Gateway, not a freeway to help ease traffic. The number of wildlife killed on that road every year would surely increase with freeway speeds and lead to more citizen deaths.</p>	Website

97	I really think this process needs to take the long view and not push a third lane up Little Cottonwood Canyon. For now increasing the busses is the way to go with express busses to the resorts and others hitting trailheads both summer and winter. Maybe the Solitude approach with a graduated parking fee for encouraging ride sharing. The long view would include light rail along the east bench which has been needed for some time on I 215 and Foothill Dr! Other transit. improvements to the mouths of the Canyons also needs to be addressed for relying on parking at the mouths is not practical unless the gravel pit finally is no longer viable which seems now to be far off in the future! Then a cog railway needs to be built up Little Cottonwood. Switzerland has been using these types of transports for a hundred years and they are a proven technology, and clean electric! The goal is to eliminate cars al together and preserve our watershed. UDOT has proven that road construction and the increased road cuts without proper retaining is not the way to go. Again Switzerland has preserved their mountainsides with proper retaining and natural vegetation rather than the angle of repose common in this country with Neve ending rockfall and erosion, not good for the watershed! With this system inplace we also need affordable transportation passes to encourage people out of their cars!	Website
98	Please don't build a freeway on Wasatch. It is a neighborhood	Website
99	Making the wasatch corridor into a larger road won't help the situation, it will only make things more dangerous for those of us who use it for recreation. Without a sustainable solution in the canyon, increasing speed and lanes on wasatch Blvd only ruins more of our environment and gets people to the line faster	Website
100	No large road or freeway or stroad or arterial. We need a "Gateway to the Canyons" Narrow winding tree lined road, 35 miles per hour maximum speed, no more than 3 lanes, one being for backup when avalanche work is being done in the Canyon. We have free flowing traffic except for an exceptional few days. Keep Wasatch attractive and rural and do not cut off the neighborhood on the foothills to the East of Wasatch. Make the entrances safe with curbs keeping traffic in turn lanes and speed 35 and under.	Website
101	Need a comprehensive plan. Transportation center for parking. Continuous shuttles up to the resorts with dedicated lane. Provision for residents, commercial traffic, employees, and emergency vehicles. Also consider a solution like Zermatt Switzerland. Train with service road for commercial traffic using limited sized vehicles.	Website
102	I bought my house four years ago had I known there was going to be a freeway type of road built on wasatch boulevard I wouldn't have bought this house. We already have enough noise and pollution from the mine on wasatch. I understand the need for a better flowing road but please don't build a freeway type of road just add a few lanes and keep it the same speed limit. I realize just like everything else money talks and the ski resorts with the big money will get their way but at least try to consider the people who live in this area.	Website
103	I am against building 4-5 lanes of road from Ft Union Blvd to 94th south. That will not solve the problem. A good solution would be a designated lane for skier traffic, 3 lanes. Congestion would greatly be improved if Highland drive was completed to Draper.	Website
104	Please do not do another "freeway" It is not necessary. A gateway more than meets the needs of the community and if the ENVIRONMENTALLY friendly plan. GO GREEN! Use public transportation minimize number of cars on the road. Thank you!	Website
105	We do NOT want or need a freeway-type road to replace Wasatch Blvd between Big and Little Cottonwood Canyons. We need significantly increased transit options, a daily cap on individual vehicles, seasonal/weekend tolls for private vehicles based on capacity, and significant upgrades to the park and ride lots at the mouths of BCC and LCC, along with others at strategic locations near or along 9400S, Ft Union Blvd, Wasatch Blvd. Think vertical, not flat. Also significant upgrades to parking at major trailheads (White Pine, Mill B, Mill D South, etc) in both canyons would help. A road will only increase traffic along SR-210 and turn the area into a major artery that increases pollution and noise for local residents, all to continue packing people into a very fragile area that suplyls the one thing our valley needs -DRINKING WATER. I do not support a road any larger than the one in place when we can take steps to lower the impact instead of raise it.	Website
106	No freeway! This will ruin this area! I would like to see a gateway 3 lane road instead ?	Website
107	I live one block off of Wasatch. It's a beautiful gateway to our canyons. Please lower the speed limit and plant trees and keep both our canyons--and the transportation to them-- beautiful.	Website
108	I support mass transit and do not believe widening Wasatch Boulevard is in the community's or the city's best interests, nor is it logical when it will only exacerbate the problem of too much auto traffic in LCC and BCC.	Website
109	Hi, in excited to hear the possibility of a freeway type transformation of Wasatch Blvd. This is a needed improvement to bring better access to both Big and Little Cottonwood canyons. Thank You	Website
110	I do not think a freeway is the answer to traffic problems on wasatch blvd. I am in favor of more public transit and/or a gateway.	Website
111	As a resident just west of Wasatch around 90th South, I do not want another freeway. Rather, make specific ski solutions the priority with ski lanes that still allow the flow of local traffic without expanding Wasatch into another big high speed freeway through our quiet neighborhoods. Thank you.	Website
112	I live one street east of Wasatch Blvd. along the stretch of Wasatch that is under consideration. I would like UDOT to take into consideration that 95% of the time the current road design is sufficient to handle the north and southbound traffic. The only time we face congestion on this street is when folks are heading to and from work and during heavy ski days ~ especially when Little Cottonwood Canyon is closed and cars sit (and idle) on that stretch of road waiting for the canyon to open. What we really need is a third middle turn lane and a speed reduction. This stretch of road leads to some of the most fantastic ski resorts and mountain landscapes in North America. It should be designed and landscaped to show off this natural beauty. And remote parking and mass transit strategies should be explored to reduce the number of cars using this stretch of Wasatch and then heading up the canyon. Please avoid anything that encourages MORE vehicle traffic (additional lanes, high speed limits). Thank you ~	Website
113	I think the avalanche tunnels with vegetation on top is a really good idea	Website
114	We live just off wasatch. Please please do not make it a freeway! There are families with kids and pets. Elderly folks. Tons of deer. A gateway would be so much better!	Website
115	I definitely prefer A gateway instead of a highway on Wasatch Blvd to the resorts. The center lane could be bore Rio AK depending on the time of day.	Website
116	A multi-car tram may be the best option to help alleviate some of the traffic problem. A train would be too expensive and require too much excavating work.	Website
117	To the need for this project I suggest adding the following: 1) vehicles without proper traction equipment are often found in the canyon in winter driving conditions congestion traffic and creating accidents - solutions that prevent this from occurring are needed 2) there is no emergency ingress or egress options for the canyon should the road be closed due to an avalanche during a storm period. In regards to potential solutions please include construction of an avalanche bypass road as an alternative that is explored. It seems to have all the benefits of snow sheds and more. An avalanche bypass road would allow more traffic to move up and down the canyon when both roads were open and allow traffic to keep moving when the mainline is closed. It would also allow the closure of one road for plowing during midday while keeping traffic moving on the other and then open the plowed road and close the other for plowing. There are other benefits that can be specified. Just asking it be included as an alternative that is explored. Thank you	Website

118	<p>Hello John, I keep reviewing the documents to formulate a comment that I will post at UDOT's website. But I have a question that I keep on forgetting to bring about in the past 3 meetings we have had (my bad). I have reviewed the Purpose and Need document and even searched carefully for any mention of the word pedestrian. While there is mention of pedestrian needs up in the canyons, there is absolutely no mention in this document about pedestrian current conditions and/or needs within the residential segment of Wasatch Blvd. Has UDOT conducted any studies to this end?</p> <p>Because in the presentations that you have conducted you have stressed how mobility is more than moving cars, I think it is imperative that this type of mobility needs are established as early in the process as possible.</p> <p>I have included Ms. Mercedes Maestas from the SL County Health department, who is an expert in Walk/Cycling audits and someone that could help create a study of pedestrian conditions if need be. I would assume there are other people that could be brought over to look at this particular issue - Safe Routes to School, Move Utah, etc. That is up to your discretion and the best abilities of your team. Meanwhile I will include a comment related to this issue before the deadline of December 13.</p> <p>Thank you,</p>	Email
119	<p>I vote no to a freeway going through Cottonwood Heights. I like what Millcreek has done and we should have a fee station during the winter months, this would eliminate many of the drivers who do not have proper snow tires to go up and down the canyon and will help with the flow of traffic. I think this a great alternative them adding a freeway. Plus if we end up getting a train system up here and more transit to haul people up and down the canyon that would help eliminate the car problem and the pollution issue. Why not get trax on this side at the moth of the canyon, we already have a park and ride, why not add trax.</p>	Website
120	<p>As a 35yr resident it is heartbreaking to read/hear what could drastically change the landscape of Cottonwood Heights and the access to our beautiful canyons. I recognize the need for some adjustments but strongly urge UDOT to minimally change this entrance and maintain the charm of this beautiful city.</p>	Website
121	<p>I am in support of the following alternatives as they relate to improving traffic flow in Little Cottonwood Canyon.</p> <p>Encourage mass transit Improve mass transit by substantially increasing bus service. Add a third traffic lane for one directional bus travel during AM and PM peak periods. Expand park and ride lots to accommodate increased bus service.</p> <p>Discourage car traffic Currently the greatest problem is during the ski season. Use financial incentives to encourage carpooling and/or use of improved mass transit. Graded charge based on the number of vehicle occupants for ski area and trailhead parking (similar to Solitude's current plan).</p> <p>Improve parking Expand trailhead parking and eliminate on-road parking at the trailheads. Eliminate or reduce on-road parking at the ski areas.</p> <p>Improve avalanche mitigation Use of snow sheds and/or other structures to improve safety and traffic flow (less down time for avalanche control work).</p>	Website
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123	<p>I am strongly opposed to creating an expansion of Wasatch Boulevard that would turn it into a freeway! It is already difficult to get in and out of side streets from our neighborhoods. If anything is going to be done to this roadway, it should be turned into a gateway—a 3-lane road with the center lane for Canyon back up during avalanche closure with planted trees along the roadway and a 35 mph speed limit. This would be the ideal entrance for skiers proceeding up the canyons. Highland Drive should be the access in this area for north-south traffic; not Wasatch Boulevard!</p>	Website
124	<p>NO FREEWAY!!! Please do not put a giant freeway down this beautiful stretch of road. There has to be a better way to do this than to put something like Bangerter Highway there. How could you possibly put that many lanes from Ft Union to the High T? That's not even 2 miles and then what? Back down to a 2 lane road? This whole idea makes no sense!!</p>	Website
125	<p>I am opposed to more lanes, wider roads and more cars going up the canyons. We need a public transportation system that is environmental friendly. There are plenty of examples from which to draw. We do not have to think and act like we're in the 20th century for transportation.</p>	Website
126	<p>Please consider putting a railway up both canyons. I was recently in switzerland and i was blown away by their public transport. Not once did I have to get in a car. The trains and buses went everywhere! Yes, it may cost more up front but in the long run it seems like the best solution for our projected growth.</p>	Website
127	<p>I would like the speed limit lowered to 35 mph. We don't need a Bangerter Highway running along bench that ends in a two lane road heading south into Sandy, a two lane road heading east up the canyon, and a two lane road heading west down 94th south. Absurd! Why not use the Highland drive/94th south corridor, establish park and ride lots along 94th, (the abandoned Shopco perhaps), and bus up the canyon to the ski resorts? Turning a short section of Wasatch into a 7 lane freeway that ends in 2 lane roads is not a solution, and ruins Cottonwood Heights.</p>	Website

128	<p>I have a home near Wasatch and I am very concerned about public safety on Wasatch Blvd. The speed limit used to be 35 mph before it was raised to 50 MPH (people often exceed this by 10-15 mph). It is unsafe for people to walk or bike on or across this road. It is dangerous and difficult for people to get out of their driveways in Bengal because people come around the corner accelerating and running the red light. It is difficult for residents to exit neighborhoods without getting t-boned. Please lower the speed limit back to 35 MPH on Wasatch for all of our safety.</p> <p>Please do not add additional lanes for commuters driving to Sandy and Draper. Finish Highland Drive as it was originally intended. Wasatch is the gateway to our beautiful mountains so let's make it pristine and calming rather than an unsafe raceway. Provide a good experience for residents and tourists alike. Think traffic calming. There is no reason to have a 50 mph highway that dead ends into a canyon that can't support it (I.e. Not enough lanes or parking). Furthermore the road slows to 35 mph when it hits Sandy so let's keep it consistent.</p> <p>Align mass transit with the philosophy of traffic calming and provide an experience that encourages people to ditch the cars.</p>	Website
129	<p>I have a home near Wasatch and I am very concerned about public safety on Wasatch Blvd. The speed limit used to be 35 mph before it was raised to 50 MPH (people often exceed this by 10-15 mph). It is unsafe for people to walk or bike on or across this road. It is dangerous and difficult for people to get out of their driveways in Bengal because people come around the corner accelerating and running the red light. It is difficult for residents to exit neighborhoods without getting t-boned. Please lower the speed limit back to 35 MPH on Wasatch for all of our safety.</p> <p>Please do not add additional lanes for commuters driving to Sandy and Draper. Finish Highland Drive as it was originally intended. Wasatch is the gateway to our beautiful mountains so let's make it pristine and calming rather than an unsafe raceway. Provide a good experience for residents and tourists alike. Think traffic calming. There is no reason to have a 50 mph highway that dead ends into a canyon that can't support it (I.e. Not enough lanes or parking). Furthermore the road slows to 35 mph when it hits Sandy so let's keep it consistent.</p> <p>Align mass transit with the philosophy of traffic calming and provide an experience that encourages people to ditch the cars.</p>	Website
130	<p>This project should be a gateway rather than a freeway.</p>	Website
131	<p>Obviously, more lanes are needed between Big Cottonwood Canyon and Little Cottonwood. And certainly a freeway would be extreme. The other extreme would be a 35 mph speed limit. There are already some who drive at 35 and the traffic backs up immediately from the High-T to north of Bengal Blvd. Something needs to be done for residents to enter Wasatch Blvd. but the backup for a 35 mph limit would be nearly impossible.</p>	Website
132	<p>Whatever you do, DO NOT make Wasatch Blvd. a 4 or 5 lane freeway!</p>	Website
133	<p>I am very disappointed to see the solution seems to be more cars rather than supporting a train. More cars will not help our air quality.</p>	Website
134	<p>Adding lanes and busses are not the answer. The road gets too much snow to fast and rubber tires don't mix well. The canyon needs to be more progressive and use an tramway like a 3s that can move 5000 people an hour. That is the only logical thing that will work and have almost no impact on the environment</p>	Website
135	<p>With geologic and meteorological factors along the Wasatch Front which trap air pollutants and the current information we now know that "fresh" car exhaust is more toxic than exhaust toxins from farther away, it is imperative that Wasatch Blvd have no more than one lane in each direction w turning lane in center AND a speed limit of no greater than 35mph. Because BCC to high-T intersection of Wasatch presses up against neighborhoods, keeping car exhaust to a minimum by focusing design featuring transit NOT individual cars AND speed limit to 35mph for a lower decibel noise level and to reduce danger from high speed T-bone accidents which are most lethal. Finish Highland Drive as a main commuter artery FIRST. Only expand Wasatch in 2040-50 timeframe if transit is not adequately accommodating mobility needs.</p> <p>Plan and design for moving people, not cars.</p> <p>For health and safety of the population living in neighborhoods on either side of Wasatch Blvd mitigate current and future air, noise and light pollution levels by preserving existing trees, improve but do not expand Hwy 210.</p> <p>Design and implementation should be based on minimum of 75% of funds for transit.</p>	Website
136	<p>We need fast and frequent public transit in Little cottonwood canyon. Most major ski areas in other parts of the world have access via train especially when near major cities. I recently visited Toroko National Park in Taiwan and they had cut a tunnel for a road to parallel the original scenic road through the park cutting travel time significantly. Other countries have found solutions to the problems we face and we should look to those places to solve our problems.</p>	Website
137	<p>Big and little cottonwood canyons need to car free. Bus service should be mandatory for everyone unless you live or are staying overnight in the canyon. Bus service should be mandatory from December 1st to April 1st. Our winter traffic problem is so severe that we need to take drastic measures in order to solve the issue. If we do nothing to solve the traffic problem, skiers will opt to go elsewhere and the ski Utah reputation will be greatly tarnished. Thank you</p>	Website
138	<p>The main need to address is how to accommodate current volume and future growth. In my opinion, trains are the only ways to address this as you can add cars for peak season/times allowing for bike lanes up and down the canyon without increasing roadway widths and further damaging the canyon. A gondola from Park City in addition would accommodate people coming from that side of the mountain. The need for cars going up and down the canyon, except for local traffic, is over. It's time to start thinking long term. Short term solution are no longer the answer.</p>	Website
139	<p>If I could take a train from downtown, to the canyons, then up to the ski resorts, I would never drive.</p> <p>Having a trax line along Wasatch Boulevard would have the additional benefit of connecting cottonwood heights to the existing rail lines, dramatically improving transit options.</p>	Website
140	<p>Just get more busses going up and down regularly! You have to understand that most drivers trying to get up canyon in their own car are simply doing it because they had one bad experience like most of us, where the ski bus was full and standing room only which is miserable and therefore, never again will they ride the bus!!! You people are not going to solve any traffic problems until you mandate everyone take the bus and Sony have more buses. You will argue that only once or twice each day is your bus full with standing room only but get a clue that all of have had that happen more than once and it only takes once and from then on, we will drive our own car regardless of what parking fees you decide to add on. Because of your lack of buses and refusal to get more buses at key times in 5he morning, I had to cancel my ski tour programs for retired people who would stay with us at Hampton Inn in Millcreek because last year, your buses were full by the time you got to the Hampton and our retired folks in their 70s and 80s could barely get on the bus and had to stand which is impossible for the long amount of time it takes to get up to the resort's, or the bus was so full, we couldn't even get on! Younger people would not give up their seats because they too didn't want to stand! I heard them all say they will never take the bus again and just drive their own car from now on. All of my tour groups rebelled and said Utah was now their least favourite ski destination because of the miserable bus rides and refused to come back to Utah fir my ski programs so I had to cancel them. Because you didn't listen to all of us before, thus would have solved the problem you caused by not getting more buses on holidays and busy times. You made way too many people have that miserable standing room only bus ride and this made more people drive their own cars and these card were the ones who ignored the snow tires, chains and 4-wherl drive signed and they slid off the road which closed the canyon too many times! It was not the buses who slid off the road. Just last ski season, I had 3 different tour groups who were standing room only already when it was snowing and because you didn't stop cars at base of canyon with no 4-wheel drive or chains, they slid off the road and you closed the canyon and the bus had to turn around on 1 occasion and two occasions, they couldn't go past the parking area at the base of the canyon! You made my old age tour groups have to stand through this whole ordeal 3 different times and they would not enroll in my ski tours again so they all got canceled and you put me out of business because of your lack of listening to all of us beforehand to get more buses at key times and stop letting traffic up canyon who should have been on the bus. You probably won't believe me that I heard everyone on the bus who were locals say they will stop taking the bus because it was too crowded, took too long, and they are the ones now sliding off the road closing the canyons. Making them pay a huge parking fee will not solve the problem. People have money, they will pay parking to have the freedom to come and go when they want in the comfort of their own car! They will still slid6ofc the road on storm days, the canyons will still get closed and not even the buses can then get up canyon. You simply needed to build bigger parking lots (another reason people will no longer take the bus because there was no room to park in your parking lots)! I just wished you had listened to me and others for the past several years and you wouldn't have been in this mess. Whether I spoke with UTA, the resort's, the highway patrol, I always was told it's a cist and budgeting problem why there were not more buses put on at key times and you never restricted personal cars going up the canyon because you made the ski bus so uncomfortable and crowded and ruined many ski days. Will you finally listen to me and many others now? Probably not because you think making people pay to park will make them want to ride the bus, but you never worked on the crowded bus situation adequately, made bigger parking lots, put more buses on the road at key times, and never stopped personal cars from sneaking past the warning signs at base of canyons!</p>	Website

141	<p>I live in NH but ski 12-14 days a year at Snowbird and Alta. Several 3-4 day trips a year. The entire LCC situation regarding snow removal, parking and the lack there of and the new "law" regarding snowtires is seeming being dealt with but people who do not get it.</p> <ol style="list-style-type: none"> 1. You need to charge for parking. Period. The "locals" who love to say they are "local" do not realize that SLC is the fastest growing city in the USA and with or with us tourists you need to solve this issue. Every sporting event I attend cost \$40-\$50 to park. You should charge \$40 before noon and \$25 after noon. Save that money and build PARKING GARAGES. At Gadzoom and Collins. Massive 3-4-5 story garages. With retail on top. It is needed. 2. Stop letting cars up the road. PERIOD. 3. How are tourists going to rent vehicles with snow tires? It is selective enforcement as it is and the stress of getting in and out of that road is unbearable. Can we ski? is the road open? All wheel drive? Snow tires? Should we leave at 2 pm while its dumping so we do not have to wait in the red snake for two hours. Honestly its the best skiing in the USA and the worst to get to and enjoy. 4. Ikon passes? Really? Who that that was a good idea? Raise the prices.This was the single most absurd decision made by these organizations. 5. THINK BIGGER. -We (TOURISTS) are not taking the bus. I do not have time. I fly out on Thursday night and home on the 5pm flight. The stress of that road is enough to drive anyone crazy. Its not practical for a family to take the bus. Lugging everything around. Finding lockers? Its ridiculous. 6. BUILD A TRANSPORTATION CENTER. A TRAM. Like Whistler. ALL THE WAY UP THE HILL. A FUNICULAR like they have at St. Moritz. 7. Build a tunnel, cover the road. Etc. <p>What you are doing today is the equivalent of NOTHING. It is a waste of time and the old guard LOCALS need to realize its not a private mountain. THINK BIGGER!!!!!!</p>	Website
142	I'm trying to understand the logistics of widening Wasatch Blvd from 2 to 5 lanes [R-S-163]. It would seem to create a bottleneck at the electric sign.	Website
143	I live downtown and work in Cottonwood Heights. Having a train from downtown to Cottonwood Heights would help not only with winter-time congestion but it would also help the many people who commute from CH to downtown (or the other way around, like me) to do so without needing to own a car. I'm in favor or anything that reduces the number of single-passenger vehicles, or reduces the need for parking lots. Thanks!	Website
144	<p>Widening the road will certainly encourage more in-canyon traffic. Two major comments:</p> <ol style="list-style-type: none"> 1. Avalanche sheds would greatly reduce the effort needed to keep the LCC road open and the need for avalanche control; 2. autonomous driving electric vehicles could be used to reduce congestion. These vehicles could work in coordination with each other. The absence of crossing traffic makes autonomous electric vehicles a reasonable way to reduce the traffic load and number of accidents. 	Website
145	Our issues require immediate attention and we need to implement as many alternatives to alleviate our problems as soon as possible! We need to have immediate solutions not another or continuous discussions. Many problems need to be addressed NOW!!	Website
146	<p>Increase parking availability at the bottom of LCC concomitant with a significant increase in bus travel - Zion is the full extent of possibility with this experiment. Combine fee gates at the bottom of the canyon that cost more than the price of bus fare and offer annual pass options (like Millcreek). Create snow sheds at White Pine Chutes, White Pine, and Little Pine avalanche paths.</p>	Website
147	<p>No to light rail, no to trains, no to Gondolas. Let the ski resorts provide transportation to their resorts via their own solution, ie.. parking lot in the valley and their own shuttles or busses up the canyon.</p> <p>The carrying capacity of the canyons are not infinite. Soon the soup is ruined for all if we have mechanisms to flood the canyon with too many people.</p>	Website
148	I have attached comments on the draft pupose and need statement	Email
149	<p>I agree on occasions LCC does have congested access to the resorts.The road is narrow and snowfall is unpredictable. However, roads are not always congested, as with my commute to Alta on Dec 7, 2019. We can't alter or control the weather. I don't believe the road could be safely widened, nor would it be of much value in a snow storm as during these times current 3 lane sections are self limited to 2 lanes by the commuters. Public buses actualy slow the flow of the traffic, too. several years ago UTA published a study stating the fastest and most efficient and economical means of transporting people up the canyon was by personal automobiles.And, this method has less taxing to local people, as we locals heavily subsidize our transit system. In our quest for the almighty tourism dollar we often overlook the local resident's desires to use lands in our backyards,National Parks have similar issues but they are subsidized by the tax payers. Ski resorts aren't subsidized. Road widening and parking lot expansion are not feasible if we are to maintain the integrity and beauty of our canyons. Remember the landslides after the widening of Provo canyon. I would suppose this issue would be greater in LCC as the canyon is steeper. And, do we want 'gunnite' to the peak of Mt. Superior? If you want to improve safety place a guard rail up most of the canyon. Levy fines on vehicles without proper tires and 4 wheel drive. Don't force resorts to absorb too many skiers, as that greatly affects safety on the slopes, as well as quality of the experience. As an expert skier and health care provider, patronizing LCC resorts, I see resort over crowding as a major concern to skier health. A full resort creates safety concerns when the resort is operating at peak capacity. However 'powder' days rarely results in a resort running at full capacity due to avalanche dangers.Thus, resort parking lots are a self limiting tool to overcrowding. Limited public transit does provide a need for some. I don't believe many out of state visitors use public transit, in fact their rental cars and inability to effectively drive snowy roads contribute to the problem. Overall, our resorts up LCC are quite small geographically compared to Colorado and Tahoe. If there is a need to accommodate vastly larger numbers the the only solutions is to vastly expand the resorts. Many don't like that idea. When the stadium is full, so to speak, do we really want to create standing room only? And, I believe any form of 'tolling' will most largely harm the local residents. We pay for the roads, let us use them. Thank you.</p>	Website
150	I have long been impressed with how well SLC and Utah are administered, and how good are infrastructure is. However, over the past few years, I have been increasingly dismayed by the slow response of officials to the transportation problems in the canyons. Administrators and other stakeholders have certainly been too slow to act, and now canyon traffic is often a disaster. Please take a very strong, bold, multi-modal approach to improving canyon traffic. We should be using more ride share apps. We need to dramatically increase the number of buses in the canyon and improve the schedule. A long gondola with one stop at Snowbird and one stop at Alta would be amazing for everyone. There could be small business hubs at the bottom and at the stops (eg ski shop, cafe, pub, etc) to help fund it. Thanks.	Website
151	I saw in the repost The Alaskan Viaduct, WA is costly, but it needed replacing, that was included. Maybe look to Colorado's ski train from Denver to Winter Park, the tunnel is 4.5 miles long. Also Loveland pass. A train or rail is better than gondola for moving people up a mountain road.Next please keep the bicycle and walkers lane. Keep in mind a mountain bike trail along LCC creek. Also, if Snowbird would put in a parking garage in house that could serve all since their staff and clients use White Pine parking. Thank you.	Website
152	Let the resorts fix their own problems.	Website
153	<p>There should never be in consideration to widen our roads in any of our canyons. That would be as sensible as bulldozing over our mountains to improve access to the top of the canyons. We should have in the near term - more buses stopping at the trailheads, and serious restrictions on the number of cars allowed up per day and fees that will encourage people to carpool. Later we should have a cog railway like they have in Europe, and no buses.</p> <p>Elizabeth Chipman</p>	Email
154	Please no Wasatch Boulevard. A gateway is preferable but not desirable.	Website

155	<p>One area that has not been discussed much is how the roads are actually being plowed. One of the Cardiff Fork member brought up with me about considering having a plow truck drive up each canyon half way, and then turn around and go back to the bottom of the canyon. As it may take an hour or longer to go up to Brighton or Alta and back to the bottom. Having them go part way and then back down may help keeping the roads in better condition, not only from the time it takes to go up and back, but also that the worst conditions in the canyons are usually in the lower to middle part. That is generally where temperatures can fluctuate and it may be rain, changing to snow that is usually the most greasy. It still may make sense to have two other plow trucks with wings that could continue up to the ski resorts and then come back down. It would allow the first plow truck to go back up the canyon and work on clearing out the pullouts and parking areas.</p> <p>We are having some difficulty in Cardiff where they push the snow in the South parking lot from the West end to the East side and pile the snow up close to the toilet facility. The problem that is created is that with the salt that is put down, and in early spring the snow melts down from the parking lot onto the bridge in Cardiff. (We have discussed this issue with Beckee Holze because this is a FS bridge) With the snow and ice build up, covering the drain holes, the water pools on the bridge. This makes walking on the road where it crosses the bridge quite difficult as well as the potential damage it can cause the bridge over time. The remedy in our minds would be to have the DOT plow the snow from the East side of the parking Lot by the toilet facility (so it does not pile there to melt back down to the bridge) to the west side, where it would be dealt with or left to melt in place. Hope this might be helpful.</p>	Website
156	As a 25 year resident of Cottonwood Heights it is disappointing to see so much effort on increasing cars and traffic along the roads instead of a real plan to move more people while decreasing the traffic. A real plan would accomodate this.	Website
157	There is a need for year-round increase in public transit to several highly trafficked trailheads as a way to decrease private vehicle noise and pollution along with increasing safety and protecting our watershed.	Website
158	The overuse and crowds in our canyons is an unfortunate bi-product of the growth in Utah. As a 54 year old Utah native I've seen a dramatic change in the overall use in our canyons. I recall a time when these spaces were serene, pleasant and relatively easy to access. Now you cannot even access trails even you get up before dawn! We need some form of transport that will take large amounts of people up and down our canyons with several stops in-between. Is there no option for some knid if light rail system or is that too destructive? Frankly, if we do nothing, the shear amount of excess people will destroy the surroundings more than rail construction ever would.	Website
159	Please increase public transit services versus any focus on individual driving.	Website
160	In peak season, only electric, or natural gas buses should be allowed in the canyon. It works for Zion park, it should work the LCC.	Website
161	I have driven the cyn (Hwy 210) since 1977, the best and main solution must be an Aerial cableway, if not that then a surface people mover with Avvy sheds. Both of these solutions are seerate from aany others involving rubber tiredd vehicles such as more buses or more highway lanes. Rubber tired vehicles are the problem. Last week a major traffic jam was caused by a bus sliding off the road.	Website
162	<p>From a back-country skiers perspective; I have never understood why public transportation costs so much, and with such little service, where's the incentive? Anyone car-pooling can save money and be less inconvenienced, maximizing your fun time. Like many Cities, if you want people to ride your bus, you make it cheap, then get the benefits of less traffic and cleaner air. Win Win! LCC and BCC both deserve dedicated bus lines (for the winter months), not city routes that also accommodate the canyons - plus with increased service. I have been passed by with full bus's many times, stranded for a long while until the next full bus comes along!</p> <p>Now, here's the kicker - the ski resorts should subsidize this service (in addition to, and in cooperation with the City)! Make it FREE (or at least cheap), and often, then skiers will use it! EVERYONE will use it! Win win!</p>	Website
163	<ul style="list-style-type: none"> -Reduce speed on Wasatch to 35 MPH like Sandy -Do not widen Wasatch unless it is for a transit only flex-lane. It makes no sense to widen Wasatch only to squeeze everyone into a single lane up LCC. -If possible, add a flex-lane up/down LCC. -Study European cities who have already done this - rail, tram - why reinvent the wheel?? -Use \$13M designated by state legislature to work on Gravel Pit transit hub NOW in the north side of the gravel pit. Approach the developers/owners NOW about purchasing the land. We cannot wait until the south side of the gravel pit is ready for development. -Kudos on removing bus stop at mouth of LCC. -Do not build any park and rides on Wasatch between Ft. Union and 9400 South -Have dedicated busses for each resort - Solitude, Brighton, Snowbird, Alta - to get people up and down more quickly 	Website
164	My comments are in regards to traffic during the Ski season. We need more park and rides near the mouth of the canyons. There needs to be more buses running during busy times. Then uphill traffic needs to be stopped from about 10am to 3pm to force people to take the bus to the ski resort of their choice. All this talk about Trams and trains up the canyons is non-sense. The ski resorts should also be doing their part to help relieve the congestion. I know Snowbird use to at least include a bus pass with a season pass. Not sure if they still do, but all the Ski resorts should be doing this if they are not already.	Website
165	I strongly support transportation solutions that will minimize environmental harm while allowing access to visitors of the Wasatch. It makes a lot of sense to run buses YEAR round up both Big and Little Cottonwood canyons as well as charge an entry fee for parking in the canyons.	Website
166	<p>Having worked year round up LCC from 2004-2015, I've watched the traffic grow. I'm still a year-round user of the canyon, but I'm up there less frequently. My family have season passes to snowbird and 2019-2020 is the 4th winter season I've purchased a parking pass to guarantee a parking spot @ Snowbird. I strongly believe that the only solution to the woes hwy 210 experiences is less, or ZERO cars. People can't handle it, plain and simple. UPD doesn't staff the road when its restricted as they should which adds to the problem. There's inadequate parking, limited roadway, and way too much demand. I think ALL cars should be banned a forced implementation of a series of tiered mass transit options needs to be provided. If not everyday, then high volume days.</p> <p>I've ruminated on this subject for well over a decade. The gravel pit at the mouth of BCC is the only site I see as a feasible transit hub. I think this should be turned into a large parking facility w/ structures and open air areas and buses, light rail, and ride shares (paid and mass) should depart from there. The public has repeatedly demonstrated its inability to handle the privilege of operating private vehicles to and from the ski resort so that option needs to be removed from the table.</p>	Website
167	The currently published material focuses on meeting the demand for access anticipated between now and 2050. I have not seen any mention of evaluating the carrying capacity of the canyon. Are we sure (or do we care) that increasing the amount of visitation could significantly degrade the user experience and resource conditions? Where is the justification for the assumption that unlimited increase in access is a desirable goal?	Website
168	<p>The EPA appreciates UDOT incorporating most of our recommendations on the March 2019 Purpose and Need and Alternatives Screening Methodology Chapters. The changes that were made in the November 2019 version of these chapters resolved many of our concerns.</p> <p>There is one issue that remains unclear. In May 2019 we recommended that the screening methodology report clarify that the first step in Level 2 screening will be to evaluate alternatives for practicability pursuant to the Guidelines. A footnote was added to the bottom of Table 2, Level 2 Screening Criteria, that states UDOT will not use the criteria listed in this table to eliminate alternatives from detailed study in the EIS before considering whether the alternatives would comply with the Clean Water Act Section 401(b)(1) Guidelines. However, it is unclear looking at Section 5.2 and Table 2 how the other Level 2 screening criteria are being applied. Each alternative that passes Level 1 screening should be evaluated individually regarding cost, existing technology and logistics before the other criteria in Table 2 are considered. We continue to recommend the Level 2 screening methodology state that evaluating practicability does not involve comparisons among alternatives, including comparisons of cost or impacts to the natural or build environment. For the purpose of clarity, we also recommend it is explicitly stated that the first step in Level 2 screening is to evaluate alternatives for practicability pursuant to the Guidelines.</p>	Website
169	I support the option of year-around public transit to Little Cottonwood Canyon. In terms of preference for public transit, I support (1) buses; and (2) light rail.	Website
170	The top priority should be to protect the land, water and wildlife. Then, produce a plan that values those three elements. I am against a train, as it could cut off wildlife from stream access, while permanently changing the aesthetics of the canyon. I support emission free shuttles (public and private) that are used year round. Albion basin needs less traffic and more options to get people to the trails, possibly adding more lott space. Shuttle stops throughout the canyon would be nice.	Website

171	I am a huge proponent of using public transit, esp clean energy vehicles, to be the only vehicles allowed on our canyon roads. Our canyons are a precious part of our ecosystem, and in this time of climate crisis, we need to do whatever we can to preserve them. We can keep the Wasatch Front from becoming uninhabitable by taking bold steps to clean up our dirty habits. Thank you!	Website
172	I live south of the mouth of Little Cottonwood, and am disappointed to hear that buses will no longer stop at the LCC park and ride lot. Please keep those of us who live to the south in mind when making transportation plans.	Website
173	Please focus on a more effective transit system rather than attempting to increase road capacity. The last thing Little Cottonwood Canyon needs is more cars. A direct bus line to Alta (that does not take an hour to get through Snowbird while stopping 20 times) would greatly improve the palatability of taking a bus up the canyon.	Website
174	Lots more busses in the canyons to the ski areas is great! Please make sure those busses also serve the intermediate trailhead stops (maybe even with small shelters) as well. It just isn't the resorts that are problems.	Website
175	We need a year-round increase in public transit to several highly trafficked trailheads as a way to decrease private vehicle noise and pollution along with increasing safety and protecting our watershed	Website
176	Public transportation needs to be the primary focus of any impact study done in the Cottonwoods. I am also a big supporter of capping the number of cars that are allowed in the canyons. Simple, count the number of spaces canyon wide then have a monitor at the bottom of the canyon closing them to uphill traffic until cars come back down. One down equals one up. Trying to shoe horn as many people as possible up the canyons is not what canyon users want. No one wants to be on a trail or on a ski run that is packed solid with people. With the amount of traffic up the Cottonwoods trails, runs and roads are becoming more and more dangerous. It behooves everyone to limit the number of users in the canyons. Its a safety matter at this point. Just like a restaurant with an allowable patron number from the fire marshal, the canyons have a capacity and its maxed out year around.	Website
177	The perpetual delay of any actual traffic improvement is very discouraging. 3-5 years of mtn accord. Throw that out. Now the CWC on another 3-5 year delay. Now years of EIS which when completed will be out of date and probably have to start all over. The implement it now (yesterday would have been better) solution is a new lane up LCC dedicated to public transit (buses). Dedicated to Up in the morning, and down in the afternoon. You can decide on avy sheds in the future - just get the basic one lane improvement done ASAP(aka yesterday). As for where you want to put the parking lot(s) - it doesn't matter to me - just pick it and make it happen. As for toll booth at the mouth - only if it's necessary after getting the dedicated bus lane. If it's necessary I'm ok with it. The biggest problem you've got is nothing is being implemented. Yes study for the optimal solution is great, except when you'll never get to optimal because of the politics.	Website
178	Save Our Canyons has long voiced a need for year-round increase in public transit to several highly trafficked trailheads as a way to decrease private vehicle noise and pollution along with increasing safety and protecting our watershed. I agree with this.	Website
179	We are fortunate that there is a single public access point to the Little Cottonwood Canyon. We must begin to plan NOW for the near future when we will have to limit human access into the canyon. The Forest Service must begin the process of determining the "carrying capacity" of the canyon's finite resources. Plunging ahead with plans to increase without limit the numbers of humans entering the canyon is insane. Zion and Yosemite National Parks learned this lesson long ago, and Arches is trying to learn it right now. We should begin to think about electronic links between the canyon's mouth and some of the crucial access points, such as trailheads, resort parking lots and avalanche barriers. There IS a LIMIT to the tourism that the canyon can entertain without serious degradation of its special, and precious, characteristics. More buses and fewer cars might be a satisfactory stop-gap solution, but eventually there must be limits to visitation. We are told of predicted Salt Lake Valley population increases of 50%. It must be obvious that Little Cottonwood Canyon cannot support similar increases in visitation. So we need to begin to plan NOW to find the policies and practices that will be activated to preserve the "Wildness and the Beauty" of Little Cottonwood Canyon.	Website
180	I support a free shuttle bus system that makes regular trailhead and ski resort stops. I support paying for this by allowing private cars access by purchasing a daily or seasonal sticker. Residents would be entitled to a free sticker.	Website
181	Please make wasatch blvd between fort union and the T a gateway and not a freeway.	Website
182	Only public transportation should go up the canyon	Website
183	EIS covers a lot of things, but I'll make a few points having skied Alta for 50 years. Plows should be more pro active and not wait for problems to develop. And same with Police. They would rather deal with slide offs and accidents instead of checking for all wheel drive and good tires. Be pro active! Some people will still drive their own cars, but make it easy as possible for people to take the bus. Also provide more express buses to Alta! Thanks	Website
184	This study focuses too narrowly on the Wasatch Blvd - Alta ski resort and much to little on sustainable use of Little Cottonwood Canyon. The goal should not be to see how fast we can get the most private vehicles up to the ski resorts. It should focus much more on providing comprehensive public transit from the Salt Lake Valley to destinations within the canyon, promoting ride sharing and limiting impact on destinations to include trailheads along with ski resorts. Limiting pollution from private vehicles is important year-round. Additionally, waiting time due to avalanche conditions should not trump impact on the canyon environment. Waiting time is a short-term impact while environmental impact is long-term and difficult if not impossible to reverse.	Website
185	Don't allow more overcrowding. Limit car access up-canyon. Have shuttle busses to the trailheads and resorts. Limit further residential development. Don't let ski areas expand on public land. These points all support protection of our threatened, precious watersheds. With our climate warming, these watersheds become more precious than even before. Our ancestors protected watersheds. They saw watersheds as sacred. Let's do the same! I'm watching what you do, and will vote accordingly. This issue matters very much to me.	Website
186	Purpose should include improved local residents access. Solutions should include paying for parking at resorts with discount for car pooling and adequate bus service and lockers. No parking/ waiting on 209 and 210.	Website
187	Need more parking area at base of canyon if people are to carpool or take public transportation. The one at the base of Big Cottonwood could be relined with more spaces added. The one at the side of the road on the north side of Fort Union could be better maintained and enlarged. and maybe use some of the land to the south of the gas station at the corner for parking.	Website
188	Traffic is killing LCC. A phased approach to the problem, with car tolls, buses and trains as the primary players, initiated and expanded at appropriate intervals, would seem to be a part of a rational solution. Personally, I was a heavy LCC user until about 3 years ago, but now I rarely use it in the winter due to traffic issues. Thanks for the opportunity to contribute to the EIS.	Website
189	To Whom It May Concern: Please find attached Sandy City's response to the Little Cottonwood Canyon Environmental Impact Statement (EIS) Project. Please call with any questions. Respectfully, Matt	Website
190	I strongly encourage you to address the issue of transportation in the Cottonwood Canyons by greatly increasing public transportation and greatly reducing the fare. I propose charging a per vehicle fee to users of the canyon and using revenue to make public transport free.	Website

191	<p>Provide incentives or free parking for 3+ more, Charge people to enter the canyon similar to millcreek (this will also allow to enforce traction / tire laws), create bus lane to bypass traffic in key area's (wasatch / mouth of the canyon, etc). Make the bus fast than cars. Provide more parking. Already seeing the need with the small change solitude implemented.</p> <p>Basically, Need a central transportation hub at the mouth of the canyon with efficient transportation to and from there and up the canyon (Can take public transit to the hub from SLC....and lots of public transit options up canyon from here)</p> <p>DON'T JUST ALLOW MORE CARS UP CANYON. Provide public transit alternatives. Air quality should be considered</p>	Website
192	<p>As a lifelong resident of the Salt Lake Valley I feel I bring a perspective to this discussion that has a long arch. Any plan brought forth must have a very long timeline. A solution for decades not years. Back in the 60's and 70' and even 80's the majority of the population along the Wasatch Front ignored Big and Little Cottonwood Canyons. Of course back then there were so few people living along the W.F. that it was no surprise that this was the case. Remember when Solitude Resort went out of business for a few years? The solution I favor is cost effective and low impact. I favor removing all private traffic from both canyons. Requiring all visitors to use mass transit. Providing increased lodging at existing hotels in the canyon. For example the SnowPine Lodge. While I am not a big fan of this "remodel" it does allow more skiers at Alta with less traffic. Also NO MORE PARKING in the canyons. Period. You want to expand your hotel fine. Your guests will come via mass transit. Just like Zermatt, Switzerland. Mass transit will run 7 days a week and stop at many trailheads. People with verified homes in the canyon will be allowed to access their property with private vehicles. Ski resorts will fund the transit system and the snowplow operation with a fee assessed from each lift ticket and seasons pass sold. Snow sheds will be built to protect the highway. This to me just makes sense and should have been done last century. The county will obtain and maintain public parking near the mouth of all canyons. I have been involved with Save Our Canyons since its inception. SOC has seen this problem coming for decades. While this is late incoming it can no longer be ignored. There is really no other solution that is viable and quick to implement. God help the Cottonwood Canyons.</p>	Website
193	<p>Dear John,</p> <p>Attached please find comments from the Town of Alta on the UDOT Purpose and Need and Alternatives Screening Criteria reports. Thank you for continuing to engage with the town as the EIS proceeds, and we look forward to continuing to work with your team on this important project.</p>	Email
194	<p>Please include vehicle, bust, bike and ped mobility on 9400 s Highland to and up LCC as well as from BCC/Wasatch to LCC.</p>	Website
195	<p>I think it is important to look into alternative transit solutions for the canyons year round, while continuing to maintain the nature surrounding these areas.</p> <p>Thanks</p>	Website
196	<p>I think there should be a toll, like millcreek canyon. Pay on the way out of the canyon. Have 2 lanes so those who buy an annual pass can pass through without stopping. Have a arm that goes up and down and you scan your pass. I think having more buses is key. Have a shuttle system like in the national parks for hiking trails. Have a fee system to park. Something to incentivise people to use the bus. However, if people are taking the bus instead of driving up, the bus needs to be FREE. It is the only way to incentivise people. Because if you have a family of 5, you won't pay for everyone to ride the bus. If you could build a bus lane, that would be awesome. But I don't think it is possible.</p>	Website
197	<p>I want more year round public transit options for both canyons , it's our responsibility to protect these areas for future generations. We need a train that runs regularly or a tram and then permits for private vehicles limited numbers of them.</p>	Website
198	<p>My concern is that widening the road will make the mountain unstable, and slides will occur, as happened when the road up Provo Canyon was widened: slide after slide until the mountain was coated with concrete or whatnot. LCC is beautiful. I do not think that people's convenience in ascending the canyon should trump the preservation of that beauty. Widening the road, digging away at the side of the canyon itself will do that (and worse if slides occur and the mountainside must also be made stable through concrete).</p> <p>I firmly disagree with the proposed actions in LCC. If anything, create more parking at the base so that more people can take buses up. Put the money into more buses, consistently--every 10 minutes in the winter (from 8-10 am, then downhill from 1-3 pm). Similarly, add more busing on summer mornings and evenings.</p> <p>Do not ruin the mountain for the sake of a few whiny people who get stuck in traffic. Instead, fund better avalanche programs, start the blasting of snow slide areas (and clearing of the road) earlier in the morning to avoid skiers waiting to get up the mountain.</p> <p>Try a few more tactics that can be altered before committing ourselves to irreparable damage for the sake of convenience.</p>	Website
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201	Please help alleviate congestion and reduce the number of bad air quality days by investing in better public transport, more carpool parking spaces, and more education.	Website
202	Parking, Prioritize Bus Lanes/Busses, Bicycle options/transit - Funitel for independent use w/o road quality requirements. But try something - there has been no visible action to road users. We have nearly nothing to show for (?) 70 Million from the legislature in 2018? Never mind previous studies..... Also would be worth considering adding (addendum) UT 209 as that is a feeder (you know this). Intersection blocking/poor tires (or poor drivers - even one) affect 1000s of individuals. There needs to be enforcement of tires/requirements for users of the 201 road from the mouth of LCC (209 intersection) up. Earlier opening w/o the huge traffic buildup also a goal - but weather and avalanche dependent. Avalanche sheds? Would have been built years ago in Europe.	Website
203	A focus on alternatives to personal vehicle travel is imperative to creating a sustainable transportation plan for today and the future. I would like to see focus put on implementing a railway, avalanche tunnels/bridges, and more efficient and reliable bus systems. An aerial tram would take away from the beautiful nature of Little Cottonwood Canyon, so please do not focus on that transportation alternative.	Website
204	It is very important to me that we choose ways to reduce impact on the environment, as a first parameter. Nothing else should play a bigger role in our choices. We have an amazing wild corridor that is in danger of being ruined. Water is a key issue. It is also important not to let money, and greed sway decisions. Thank you	Website
205	If buses got skiers up the mountain faster than cars, then most skiers would ride the bus. Buses need to be given priority in the canyon. There are not too many people, there are too many vehicles.	Website
206	Single occupancy vehicle in canyon should be banned. I think an elevated rail transport would be amazing. Multiple shuttles running along it with passing points built in so during peak hours shuttles can be sent every 10 minutes	Website
207	We need an Alta Express bus from 20th E, 9400 S directly to Goldminers and back	Website
208	I'm a property/home owner in Big Cottonwood Canyon, Little Cottonwood Canyon was well as the "Wedge", the mouth of Little Cottonwood Canyon. My comments concern the Little Cottonwood are primarily. Please make at least 3 lanes on 209 (Little Cottonwood Road) so as to allow residents access in and out during high traffic days - ie, a dedicated uphill lane up to the stone bridge on 209 that is NOT allowed for skier use. Multiple times we are blocked from getting home mornings, have had medical issues without the ability to travel to the hospital and general annoyance at the gridlock. In years past the County issued us passes to cross when canyon was closed. A dedicated lane for the neighborhoods would partially solve this. The main canyon road - 210- also needs 3 lanes the entire way. 2 for uphill traffic mornings and 2 for downhill traffic evenings. Obviously Wasatch Blvd, needs to be expanded/additional lanes from the "high-t" to the freeway which I believe is already planned. Finally, even in transportation throughput is enhanced, it will simply move the congestion to the resorts who do not have sufficient parking areas. This concerns me as when I operate my business in the valley, I am mandated/forced to provide sufficient parking for my patrons. Clearly the resorts have been exempted from similar requirements based on customer numbers. Not fair. In the end, there is a finite amount of space available leading to, going through and at the end of the canyons. Total vehicle numbers need to be regulated/limited to the actual capacity the parking areas at resorts can absorb. Thank you for your time and attention, it is a thankless job you have and no matter what is instituted, folks will be angry. Chin-up and carry on for the common good!	Website
209	The latest storms remind us that the current means to keep the canyons open aren't working, as we are again having people in vehicles sliding off the road with not that much snow on the road. This is a public safety concern as emergency vehicles etc cannot get into/out of the canyons. Here is my latest thought on this: 2 large highway signs at mouth of each canyon. Color coded with different levels of equipment requirements from green to yellow to red. Green= no restrictions. Yellow=4WD/AWD and snow tires advised Red flashing=4WD and snow tires OR 4WD and chains on the tires only to enter the canyon. Solid Red=canyon closed Signs note a strong penalty for violations, e.g., maybe say min.\$1,000. If want another category, add "Orange." If want the ability to show conditions are expected to change, then can use flashing lights. The above could be coded onto either a bumper sticker or license plates with either 1-time fast inspection or with the annual vehicle emissions inspection to designate at least the 4WD/AWD capabilities and snow tires (?) Long-term the only solution that can move sufficient numbers of people is a train. A tram can't do the job (how many people can cram on a tram at 0800 for the 0900 lift start times (?) A train is also less visual impact as it isn't aerial. Buses can't handle these numbers and buses can't handle the snow (as gets repeatedly demonstrated, like the recent snowstorms...think what would happen with 2-3x the numbers of buses on the road).	Website
210	Hello! Thank you for taking our input! 1. Models to predict future traffic: what is the growth rate of traffic? 6k people moved here in 2016, many of which are canyon users, compared to 2k in 2015. 2. How will safety be measured? Adding additional lanes does present additional risks 3. Will cost be evaluated per canyon passenger accommodated? 4. What are the weights of the criteria for level 1 and 2, i.e is cost as weighed the same as impact to acres of floodplain? Looking forward to improved canyon traffic in the winter :) We appreciate your time and effort	Website
211	I am a resident of Big Cottonwood Canyon who faces very similar problems to LCC. I would like to see year round traffic issues addressed in the canyons. Summer has become almost as busy as winter, only the traffic is dispersed throughout the day. I would love to see more busing services. I think the buses should run year round and come more frequently. For this to work I think we need large scale parking areas at the bases of the canyons. I would also be in support of a fee for use structure with a toll booth at the mouth not each canyon. It could be incentivized by cheaper or free rates for carpooling. Thank you for working hard on this tough problem!	Website
212	John: Please accept the attached letter from the city as official public comment from the city administration for this round of public comments on the EIS. Thank you,	Email
213	Too many people are driving up to these ski resorts. We need more people to take the bus and carpool. It is ridiculous how many people are driving up each weekend. I think that we should have a 5 dollar fee to drive up the canyon. There could also be a "season pass" for 50 dollars to drive up the canyon. This might not be the best idea, but all I know is that we HAVE TO DO SOMETHING!	Website

214	<p>The following comments relate to the Draft Purpose and Need for the Little Cottonwood Canyon EIS.</p> <p>Section 1.2.1. An additional secondary objective should be included: To avoid impacting populations of individual wildlife species. One of the secondary objectives includes the phrase: "minimize potential long-term transportation system impacts to water quality." This objective should be amended so that it is clear that water quality will in no circumstances be degraded below primary and secondary federal drinking water standards, and that water will remain suitable for wildlife. A blue highlighted box should be added that defines primary and secondary objectives.</p> <p>Section 1.3.1. Table 1.3-1. The legend should define what is meant by a Needs Phase of 1, 2, or 3, and a Funding Phase of 1, 2, or 3.</p> <p>Section 1.4.1.1. Aspects of UDOT's traffic demand model should be summarized in this section. In particular, the most important model inputs should be identified and uncertainties discussed. There should also be a discussion of the extent, if any, of model testing and validation that has been performed, as well as the degree of confidence in and uncertainties associated with the model's conclusions.</p> <p>Section 1.4.1.3. 2050 No Action Conditions. In evaluating the conditions that will be present in 2050 if the project is not implemented, climate change should be explicitly incorporated. In particular, snowpack projection models should be utilized, along with (but not necessarily limited to) the implication of the model results on the number of ski days, and on avalanche control.</p> <p>1.4.2.4, last paragraph. This paragraph should clarify that bicycling associated with the Snowbird Hill Climb and the Tour of Utah do not affect the Purpose and Need, as the canyon is closed to motor vehicle traffic during these events.</p> <p>Section 1.4.3 - Current and Future Transportation System Needs. This section should incorporate the effects of climate change, especially on Days of High Traffic Volume (Table 1.4-4) and Avalanche Control and Related Traffic Congestion. For example, in the last paragraph of Mobility, 2050 No Action Conditions, estimates of road use based on future population growth were incorporated. As climate change alters the snowpack, that information should be accounted for.</p> <p>The reason for adding the impacts of climate change is that it is important to understand the magnitude and duration of the issues identified in this document. For example, if the risk of avalanches significantly drops over the next 30 years, that may alter the control measures that are most appropriate. Similarly, if in the future only January and February are likely to have skiable snowpacks, that will also change visitation projections, the number of days with traffic congestion, and potentially the nature of the most appropriate solution (e.g., one that would address 10 to 20 years of traffic problems versus one that would address indefinite and growing traffic problems).</p> <p>1.4.3.2 – Summer Parking. It is stated that a safety hazard is created when cars are parked along the road, forcing people to walk or cycle in the travel lane. Documentation of accidents or near misses should be provided. If this is a theoretical risk without known accidents, that should be stated.</p> <p>The following comments relate to the Draft Alternatives Development and Screening Methodology and Preliminary Concept Report for the Little Cottonwood Canyon EIS.</p> <p>Section 2.3.3, Table 1, Level 1 Screening Criteria (Purpose and Need). The criteria listed in this table are improve safety and reliability in 2050, and improve mobility in 2050. In the Draft Purpose and Need, there is no reference to the year 2050 in the primary objective. Projects that only have a short-term benefit should not be ruled out at this stage of the process.</p> <p>Section 2.5, Level 2 Screening. Effects on wildlife populations and effects on existing recreation should be added to Table 2 (Level 2 Screening Criteria (Impacts)). Some of this will be obvious, but for example, there is no explicit criterion related to effects on the trail user's experience.</p> <p>On page 10, regarding "The overall process for Level 2 Screening will be:" and "Compare Impacts and Costs to Benefits", a methodology for evaluating qualitative factors should be explicitly included, as otherwise these are de facto given a zero weight.</p> <p>Under "Estimate Impacts to Resources", this should not be limited to the GIS evaluation identified in this paragraph. Where impacts (e.g., visual or audio) cannot be appropriately assessed in this manner, other methodologies should be utilized.</p> <p>Section 6.0, Tools Used. A tool should be identified to evaluate changes in snowpack depth throughout the year related to climate change.</p> <p>Appendix A – Preliminary Evaluation of Alternatives/Concepts. Table A-1 carries forth many alternatives that only respond to a portion of the Purpose and Need; e.g., adding a traffic signal at Kings Hill Drive. It is indicated that these alternatives will be carried forth into Level 1 Screening. However, no discussion is provided about how combinations of these alternatives will be evaluated, such that the Purpose and Need is achieved. The efficacy of these alternatives will likely vary depending on what other measures they are combined with. At the same time, there are too many measures to consider all possible combinations, or even a small portion of the possible combinations. It may be advisable to put forth alternatives that consist of a batch of measures, and then allow the public to add combinations of their own choosing. Admittedly, that could also result in an unwieldy number of alternatives to evaluate. Regardless, although the process will undoubtedly be imperfect, it should be described.</p>	Website
215	<p>As an avid skier and trail runner, I spend a lot of time in LCC throughout the year. As a public place, I believe everyone should have an equal opportunity to enjoy this beautiful canyon. However, addressing the current issues, namely traffic, is critically important.</p> <p>I am grateful that UDOT is already looking into the issue and offering solutions like increasing buses. Still, I think that we need to understand the Purpose and Need of what is being built before anything is approved. Following research, it seems completing a comprehensive capacity analysis should be required before any big changes are made so that all community users of the canyon are heard. Furthermore, I strongly believe we should tread lightly and create a plan that has the least impact on the natural environment of the canyon, which is already stressed by the increase volume of traffic. Therefore, I support using infrastructure already in place and am strongly against an interconnect from Park City, but am open to other ideas depending on the result of the study. Thank you.</p>	Website
216	<p>I love LCC and agree the traffic is a problem.</p> <p>I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
217	<p>Why hasn't the idea of suspended rail systems been implemented in Utah? It works in Germany and does any amazing job of reducing liability for accidents not only with humans but also with wildlife</p>	Website
218	<p>Whatever solutions are chosen, preserving water quality and safety of visitors are critical. Expensive eyesores such as gondolas that are largely marketing gimmicks should not be priorities. Instead, parking should be better delineated (ie park here, but do not park here), mass transit that is quick and easy (minimize stops so if you want to go to alta you don't stop 10 times and add 15 minutes on the trip; also frequency, cost, etc...), benefits to carpooling vs. solo drivers (tolls, parking fees, restrictions banning solo occupancy vehicles during peak hours, etc...), facilities at the base of the canyons (mass transit center with facilities, shops, capacity, etc...) will do a lot to help. Summer and Big Cottonwood Canyon use needs to be addressed as well as the S-curves and Cardiff fork area are scary to drive through in the summer with all the cars parked and people running across the street. Also in the winter I have seen kids walking in the road 1/4 mile to get to Solitude on snow days with uphill traffic whipping by them at 50mph because the only parking is on the shoulder of BCC road. It is terrifying to watch as kids could so easily get killed just trying to get too or from the ski area.</p>	Website

219	<p>As a Cottonwood Heights home owner and Avalanche Professional, who's professional and recreational activities are centered in LCC I am glad UDOT is seeking solutions to the traffic problems. A few points I'd like to mention.</p> <ul style="list-style-type: none"> - With regards to proposed snowsheds, are the snowsheds intended to eliminate the need for explosive mitigation in those avalanche paths, or will these just reduce the frequency of mitigation missions? In addition, with much of the mitigation work required for ski resort ops, and protecting existing structures, will snowsheds significantly reduce the need for active mitigation or will it simply reduce a few control missions on certain slopes mid canyon. We know that snowsheds come with their own set of drawbacks, and with the amount of snow LCC receives combined with the traffic issues, will snowsheds simply create more problems than they are worth in LCC. I believe due to the continued need for road closures, and control missions even with snowsheds, that implementing snowsheds needs to be very closely looked at. - With regards to Tolling, I believe a toll on both LCC and BCC is not only justified, but essential if we are to continue to allow the general public to access the canyon with their own vehicles. Tolling stations would not only serve as a checkpoint for proper 4x4 and tires, but also deter the under estimated amount of people who drive up LCC and BCC to simply turn around. Joy ride if you will have it. - With regards to restrictions, I believe that the 4x4 and chain restrictions should be implemented everyday from November through May. Too many times have I seen cars with inadequate tires and traction get stuck either because of unforeseen weather, and or driving up on a day when it was dry roads and then trying to drive down on a storm day. - With regards to proposed trailhead parking, I would welcome more established trailhead parking, but do not think there should be a large parking area at the Lisa Falls turn. More suitable parking can be found on a more safe section of road with a trail connector if people wish to access Lisa Falls. In addition, parking on the road during winter months should be banned and full parking lots should serve as limiters to help save our vital wilderness zones and watershed from overuse. - With regards to long term transportation solutions, I believe required mass transit will be the best solution to LCC and BCC traffic issues. Multiple transit centers near the base of the canyons and in the valley, can provide parking and a transportation options for all recreational users and non-essential canyon employees. Short term solution is aggressive bus use, followed by a long term solution of light rail, and or a trail running in a circle loop with a tunnel between LCC/BCC. The Wasatch Gravel mine would serve well as it would eliminate traffic from the highways affecting residents of Cottonwood Heights. - Overall, while we need to make the canyons accessible for as many users as possible, our valuable resource of wilderness, water, and outdoor recreation will be threatened if we implement any measures that allows for more users to access the canyons, and especially with their own vehicles. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. <p>Thank you for all the work.</p>	Website
220	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p>	Website
221	<p>I would like to see a multi solution approach that includes electrified public transit, strong incentives to carpool or take public transit and a gondola/tram would be pretty cool, too. In the realm of a "moonshot," it would be really cool to have a hyper loop (Elon Musk's invention), but I get that's not the most realistic solution.</p>	Website
222	<p>The increase in bus support to the ski resorts is great and on the right track. UDOT money going forward should be directed at parking for additional bus services. Money should not be spent on increasing vehicle traffic. Why not use school parking lots for bus pick up/drop off on the weekends? Also a pick up/drop off should added at the White Pine trail head.</p>	Website
223	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
224	<p>I have a cabin in Brighton. Increasing the vehicle capacity is counter productive. I feel that a toll that encourages ridesharing is a good first step, ie high toll for one occupant reducing to zero for four or more. Gondola , monorail , tram or train ultimately. Thank you</p>	Website
225	<p>I am a strong advocate of increased bus service in both summer and winter at lower cost. The 4.50 each way cost is far too high for folks to give up the conceived advantage of a private car. I, personally never took the bus until I became a season pass holder and now I always do. If ridership was free or close to it and fees were charged for parking the congestion would remarkably lessen. UTA will have to be compensated, for certain, but part of the price of a ski ticket could be designated to fund this transit service. I do NOT support aerial trams etc bringing people from BCC or all the way from Park City. They will simply increase the number of visits to LCC without reducing the congestion on SR 209 to any significant degree. Likely not at all. Trains etc up LCC have no advantage and are less flexible than bus travel. Perhaps buses with special design for easier and faster loading are available. If collecting fees were also streamlined then the delay inherent in a bus system could be minimized.</p>	Website
226	<p>I used to live in Salt Lake and ski at Alta 5 days a week. I can't believe the difference in the past few years in the traffic and cars in the canyon. I don't think any connectivity to Park City will decrease this issue. I think the number of skiers at Alta is actually quite low and would strongly encourage you to study this.</p> <p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
227	<p>Hello - I'm a frequent visitor to Little Cottonwood Canyon in all seasons for the incredible beauty and recreation opportunities. I also realize it's being loved to death, especially in the winter. I think its important to find a solution to the issues, and in doing so identifying the purpose and need for the options before anything is approved. thank you-tommy</p>	Website
228	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website

229	<p>LCC traffic on big snow days is a huge problem and needs to be addressed in a comprehensive but data-driven approach. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p> <p>It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
230	<p>It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
231	<p>I love LCC and agree the traffic is a problem.</p> <p>I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p> <p>It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
232	<p>As a wasatch enthusiast and environmental advocate I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p>	Website
233	<p>Date: December 11, 2019</p> <p>To: Little Cottonwood Canyon EIS Planning Team</p> <p>From: LeagueofWomenVoterofSaltLakeCity</p> <p>Re: LITTLE COTTONWOOD CANYON EIS Comments on Draft Purpose and Need, and Screening Criteria</p> <p>Dear Sir/Madam:</p> <p>Thank you for the opportunity to present comment on the Draft Purpose and Need, and the Screening Criteria for the Little Cottonwood Canyon EIS.</p> <p>After reviewing the documents, the League of Women Voters of Salt Lake is concerned that the importance of the natural environment and the critical resources of the canyon, on which we rely, are given inadequate attention in both the Purpose and Need and the Screening Criteria.</p> <p>Regarding the Purpose and Need Statement:</p> <p>The Purpose and Need Statement focuses solely on the transportation/traffic/mobility issues and does not address the underlying cause of all of these problems — over-use due of the natural environment, the important recreational resources available in the canyon and their close proximity to more than one million people. We believe strongly that the Purpose and Need statement should include language specifically directed at protection/conservation of the natural resource and environment in the canyon.</p> <p>An additional bullet-point might include:</p> <ul style="list-style-type: none"> • Sensitivity of the natural resources and environmental quality in the canyon, most particularly water quality and quantity, wildlife habitat and migration patterns, sensitive soils and species, and the overall character and qualities of the canyon. <p>Regarding the Screen Criteria</p> <p>Level 1 Screening Criteria most obviously leave out any reference to the environment issues or quality. Environmental issues are mentioned in the Level 2 Screening Criteria, but we "believe that their importance to the broader community and users of the canyon should require a higher level of scrutiny that is appropriate in Level 1 Screening Criteria.</p> <p>An additional Level 1 Screening Criteria could include:</p> <p>No net loss of environmental and natural resource quality.</p> <ul style="list-style-type: none"> • Impacts related to the Clean Water Act and other local water quality standards and policy. • Impact to natural resources: acres of sensitive habitat, acres of floodplain and wetlands, acres of critical wildlife habitat and migration routes, acres of disturbed/revegetated/restored landscape elements. <p>The League of Women Voters is a nonpartisan political organization that encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy. Several relevant</p> <p>League Studies have concluded with consensus positions on issues related to the canyons. One of those issues is addressed in the League of Women Voters of Utah Water Study (September 2009) which addresses the full range of water issues and water sources in Utah. Another is our position on good planning in all of the canyons along the Wasatch Front.</p> <p>Again, thank you for the opportunity to provide comment.</p> <p>Respectfully, Katherine Biele President, League of Women Voters of Salt Lake"</p>	Email
234	<p>I've submitted comments in the past so these are for the most part a repeat of previous comments. Ski season is just one part of the year when public transportation into the canyons is needed. Convenient and frequent bus service to hiking trailheads is needed year round not just in winter. The most common reason my friends do not use the bus service is because parking lots fill up, buses are crowded and not frequent enough throughout the day to meet needs, so they end up taking their vehicle. Even friends who care about the environment find the bus system to be sorely lacking.</p> <p>Once you get up to Alta by bus, you're forced to either head down at 1:00 or wait until 3:00 because there is a gap in service between 1 and 3, another reason many don't use the bus. It takes much longer to get to Alta via bus than car due to the many Snowbird stops, another reason why people won't use the bus.</p>	Website

235	It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website
236	I've been a resident of SLC for 25 years, I love LCC and agree that traffic is a huge problem. I have been unable to ski LCC over the past few years due to traffic. I am elated that UDOT is studying this problem and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the local residents and resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use the existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined. While this study is being implemented, something needs to be done in the short term; such as a toll at the base of LCC. We can't wait until 2050 for action. Thank you for reading my comments.	Website
237	I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website
238	DO NOT GIVE CONTROL OF THE LAND TO THE SKI RESORTS!!! Please STOP developing Little Cottonwood Canyon. That abomination at the base "T*****" is an example of poor planning and development. STOP BEING SO GREEDY AND JUST LET THE LAND STAY PRISTINE. That is what attracts people to our state. You cannot get back ecological diversity.	Website
239	I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website
240	I use little Cottonwood canyon. There is definitely a traffic and congestion problem that need to be seriously looked at and addressed. This includes environmental impact of additional infrastructure vs using current infrastructure. Ideas such as limited private vehicle, increased and affordable public transportation, fee based use (such as in millcreek). How can any or all of this help our situation? I appreciate and support UDOT's efforts to look into this.	Website
241	I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website
242	I'm a local mountain guide and work in the Central Wasatch. I believe traffic is one the biggest problems in my profession. A capacity analysis would benefit all users of LCC, including the resorts. I fully support a comprehensive study that focuses on protecting the environment and the recreation industry. I'd love to see improvements with the dysfunctional public transit now in place. Thank you,	Website
243	I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website
244	The LCC-EIS is a well researched document, and the new term "mobility" is a refreshing new focus. I have commented previously about supporting cableway gondola scenarios. During the Mountain Accord process there was a presenter from Garavents Austria who made a good case for the cableway option. There has been no presentation since then to support the option or to dispel the negative impressions about the gondola option. Could the public hear a better dialogue about this. The obvious benefits would be moving people, and reducing car traffic, safety, convience and esthetics. It would be vastly less expensive than trains and would be financially viable in a much shorter time frame. The objections seem to be viewscape degradation, which is admittely valid, but no less so than the red snake, possibly to slow or doesn't move enough people. That can be refuted by the Gondola manufacturers. A gondola option creates a linked transportation solution, gives a emergency exit option to the canyon cul de sac problem. I would like to see the gondola idea given a specific public presentation and debate.	Website
245	1) I love LCC and agree the traffic is a problem. 2) I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. 3) This can only be done with a comprehensive capacity analysis for LCC. 3) A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. 4) It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined. 5) Safety considerations are needed for non motorized travel ensuring that vehicles stay in their travel lane	Website
246	I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website

247	<p>I love LCC and agree that traffic congestion is a problem.</p> <p>I am glad UDOT is studying this and think that we first need to understand the ROOT CAUSE of this traffic problem. Without identifying the root cause, effective corrective action cannot be implemented. A big part of the increase in winter canyon use is the introduction of the Ikon and Mountain Collective passes. These were created by people who do not live here and without consideration of the environmental impact increased ski area use would have. The Colorado Front Range has this same problem, which started when ski areas there started offering super cheap season passes. Environmental impact on the I-70 corridor has been insane ever since and there is no apparent mitigation. Let's learn from that situation and not let ski area greed supersede the requirement to maintain the Wasatch Mountain ecosystem forever.</p> <p>Identification of the root cause of traffic congestion will lead to a clear definition of the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. LCC is a relatively small canyon and cannot withstand an increase in human use without substantial negative environmental impacts. Rather than trying to figure out how to get more people into the canyon, efforts should focus on how to sustain current usage. Or perhaps even decrease it.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation, environment, and economic.</p> <p>It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, or interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
248	<p>I love LCC and agree the traffic is a problem.</p> <p>I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p> <p>It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
249	<p>I love LCC and agree the traffic is a problem.</p> <p>I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p>	Website

250	<p>The Wasatch Mountain Club (WMC) is a local organization focused on outdoor recreational activities and preservation of our environment. The WMC has over a thousand members and will be celebrating its centennial next year in 2020.</p> <p>We are pleased to participate in the Little Cottonwood Canyon Environmental Impact Statement activities and happy to provide our comments to the Draft Purpose and Need Statement and the Draft Transportation Alternative Screening Criteria Report.</p> <p>The WMC agrees with UDOT's intention of improving the "commuter, recreation, and tourism experience" for all users in the canyon. We are concerned however, that nothing be done in this process that could limit or degrade the recreation activities WMC members currently participate in.</p> <p>We believe the long-term transportation solution for LCC must focus on mass transit to the maximum extent possible. The alternative screening process must prioritize this goal.</p> <p>We also believe there are short and intermediate steps that will accommodate current needs and ensure easy implementation of that long-term solution.</p> <p>We support proposals to improve parking at existing trailheads and other locations to enhance safety, allow additional recreational opportunities, and protect the environment. With the funding UDOT received through SB277, these projects are likely a once in a lifetime opportunity to improve current conditions and facilitate long term strategies.</p> <p>Solutions may need to be implemented in stages. Mass transit requirements need to be implemented soon to alleviate traffic on weekends, holidays, and ski days. Otherwise, at least in the short to intermediate time frame, cars should be allowed to access trailheads and dispersed areas, during mid-week and off-peak times. This includes roadside parking necessary for many dispersed activities.</p> <p>All users have seen growth of use in LCC and experienced crowds at busy times. Efforts to restrict access to areas within LCC make no sense until we actually know what the capacity is.</p> <p>There is no information on capacity of trails, off-trail backcountry use, or roadside and creek-side use.</p> <p>We believe efforts to determine carrying capacity of the Wasatch mountains needs to be accelerated - especially of back county users and undeveloped areas users. This must be done to sustain this type of recreation, and transportation solutions must enable these uses.</p> <p>Document specific comments: "Draft Purpose and Need Chapter" There is currently a need to expand and improve parking and facilities at trailheads to support users, and continued use of roadside parking for dispersed activities. Although the long-term goal should be for mass transit to these points, in the near-term we need more parking. These enhancements may be used for quite a while in fact, and need to be as useful as possible.</p> <p>Throughout the document, but especially in section 1.2.2 "Need for the Project", roadside parking is called on-road parking. This is a misnomer. In most places where recreationists park, there is a shoulder to park off the road. Calling it on-road parking is inaccurate, purposely misleading and should be corrected throughout the document. The document only mentions the cons of roadside parking and none of the pros. It is not necessarily a bad thing and it is legal. WMC members and the public utilize roadside parking for hiking, climbing, fishing, bird-watching and many other legitimate activities.</p> <p>The WMC cares very much about the environmental consequences of various uses in LCC. We care about maintaining water quality. We care about the quality of the viewshed. We care about sustainability of wildlife habitat. We also care about the overall health of the ecosystem in LCC. But the authors need to be careful about making statements about roadside parking causing erosion, invasive weed spread, and other environmental degradation without any mention of data to back up those claims. For example, when I asked UDOT recently about map data depicting the informal "spider-web" trails mentioned in the document, they told me they have no such data. Various unsubstantiated claims are made throughout this chapter with no apparent way to back them up."</p> <p>"Section 1.4.2.3 "Transit Routes" describes the value of UTA bus routes for winter recreation. They acknowledge "there is no summer transit service with stops at trailheads in the canyon". Unmentioned is the fact that there is no transit service to access parts of LCC not served by a trailhead, and there are many of those. Many of the route climbing and bouldering areas do not have formal trailheads. Some of the classic hikes including Tanners to the triple traverse, Coalpit to North Thunder, etc do not have formal trailheads. Figure 1.4-3 depicts "Little Cottonwood Canyon Recreation Destinations" but leaves out many. Figure 1.4-18 better illustrates LCC recreation destinations. This map depicts where people actually park to utilize their desired destination. Before roadside parking is eliminated, transit to these points must be created.</p> <p>This section also identifies the fact that no current trailheads even have UTA stops. Development of stops at trailheads and frequently used areas must be a priority for all future transportation spending. There should be no parking area expansions or improvements without including construction of a bus stop and necessary support facilities.</p> <p>The section titled "Roadway Safety" acknowledges the inadequacy of the current road design. In some locations the shoulders are less than one foot wide. This situation is further developed in the "Pedestrian and Bicycle Safety" section. This section describes the poor condition of shoulders and the potential danger of cyclists. This causes an extreme safety hazard for cyclists and must be remedied. Many WMC members are cyclists and their safety is of upmost concern. Everything that can be done to ensure both their uphill and downhill travel safety is necessary.</p> <p>The section titled "Summer Parking" further decries roadside parking with no data to back up their claims. At least in the short-term, there must continue to be a way for users to park along roadside where necessary and recreate in these areas. Authors of this EIS must recognize current uses and needs of citizens and accommodate to the extent possible. Parking on the side of the road is currently legal and should remain so until satisfactory transit solutions are developed. Parking depicted in Figure 1.4-18 illustrates the current need for" "dispersed roadside parking. These dots represent legitimate legal users that must be accommodated with some sort of parking or mass transit options.</p> <p>FULL COMMENT AVAILABLE IN ATTACHMENT</p>	Website
251	<p>I love LCC and agree the traffic is a problem. I think the main source of our traffic is too many single occupancy vehicles on the road. I'm strongly opposed to any solution that aims to get more single occupancy vehicles up LCC faster.</p> <p>I am glad UDOT is studying the current issues and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p> <p>I strongly advocate for using existing infrastructure to deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined. I also strongly advocate for preserving backcountry access, wildlife habitat, watershed quality, and the natural beauty of the canyons, and doing whatever we can to help our abysmal air quality, rather than prioritizing adding vehicles to our already crowded canyons.</p>	Website

252	<p>As a regular little cottonwood user for the past 15 or so years, I can attest to the frustration with the mounting problems of a confined space and growing population. As with most precious wilderness areas, the useable land size is staying the same (or shrinking in some cases) while numbers of users are rising, sometimes drastically.</p> <p>Moving forward with this problem, I hope the purpose and need chapter is heavily considered and in this heavy consideration, all user groups are consulted. All user groups being, but not limited to, local recreational users, tourist/visiting recreational users, ski area employees/users, etc. To not give one of these groups a voice and fair consideration would be a travesty in itself.</p> <p>As it stands now, any mandated exclusion or paid access will severely change what local users have had the benefit of enjoying. With the state of Utah feeling a lot of outward pressure on prices from outside I think it is unfair to further burden local users with any financial penalty for using what our tax dollars go to. In that circumstance, if indeed Alta and Snowbird are having exponential profits, it is only fair to have them contribute more financially to solving the problem. With lift ticket prices inaccessible to most common locals, other financial levies have to be considered.</p> <p>Please extend an organized format for consulting all users groups before making any drastic changes.</p>	Website
253	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
254	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
255	<p>I please encourage you to maintain the canyons as a place of refuge as much as possible. Connecting all the ski resorts will only further degrade people's ability to have a more natural experience with less people all year around. More public transportation and methods and incentives of encouraging using it or ridesharing should be the priority. Water quality and quantity is also critical. Maintaining ecosystems for wildlife and not "fencing" them off from wider areas due to additional roads etc. is very important. As the population grows we will have to find ways of limiting the quantity of people at given times, just like we do with some national parks. We do not want to turn the canyons into some kind of "theme park." There is so much more at stake here. Money and development to make more money should not rule the day. Please, please, protect these precious places. I use them often all year around. Thank you.</p>	Website
256	<p>1. My family and I spend a lot of time in Little Cottonwood Canyon (LCC) and agree the traffic is a problem. 2. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. 3. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. 4. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
257	<p>SLC will continue to grow and we need to preserve the areas that draw people to this special city. would A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p>	Website
258	<p>Create a bus hub where that gravel pit is. Make buses free and consistent. Incentive the buses by only allowing buses to use uphill and downhill lanes at certain hours. Implement fees for single occupancy vehicles. Keep parking and personal cars out of the canyon. And PLEASE do not buy into the ski resort's marketing rhetoric that chairlifts and trams are good transit solutions. That is a disaster. Keep Grizzly and the rest of the undeveloped Wasatch wild.</p>	Website
259	<p>This report seems to overlook the importance of widening the lanes of SR210 going up LLC. Making the entire road 3 lanes would be a better solution than anything that's currently proposed.</p>	Website
260	<p>1. I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
261	<p>Create pull out at White Pine Trail Head for buses to stop to drop off and pick up back country skiers, snowshoe & hikers.</p>	Website

262	<p>UDOT -</p> <p>Thank you for the opportunity to comment on the UDOT Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Little Cottonwood Canyon Environmental Impact Statement Wasatch Boulevard to Alta dated October 30, 2019. I have reviewed reviewed this document and wish to provide the following feedback:</p> <p>1. Section 1.0 Introduction and Figure 1 (geographic scope) – The report should specify that the geographic scope could, potentially, be considerably larger than what is specified in the introduction and what was specified in the May 15, 2019 Notice of Intent as specified in the Federal Register (Vol. 84, No. 94 21894). If the scope is not expanded certain alternatives now being considered (Table A-1) might be forced out of consideration by additional Level One Screening that will be conducted. Cooperating and participating agencies could very well use this geographic scope issue to dispute inclusion of certain alternatives. Certain interest groups could use the geographic scope issue to successfully challenge the Record of Decision by UDOT. I recommend that the geographic scope be expanded to include both cottonwood canyons as well as adjacent lands in Summit and Wasatch counties.</p> <p>2. Section 2.3 Alternatives Screening Level 1: Purpose and Need – The purpose statement in subsection (2.3.1) should be broadened to clearly incorporate alternatives that might address mobility on SR-210 but might not physically occur on that highway or within the proposed study area. Further, the purpose should reflect objectives from recent transportation studies conducted to increase general mobility to and between the seven/six Central Wasatch ski resorts. I suggest UDOT consider the following revised purpose statement:</p> <p>Substantially improve safety, reliability, and mobility on SR-210 from Fort Union Boulevard through the town of Alta for all users on SR-210 and to facilitate safe, convenient, reliable and sustainable year-round access (and emergency egress) to and within the Cottonwood Canyons for diverse user groups, including recreationists (hiking, skiing, rock climbing, mountain biking, sightseeing etc.) and local residents</p> <p>The above purpose statement is commensurate with the direction provided by the state legislature through SCR-10, what was proposed by Salt Lake County in its November 2012 Mountain Transportation Study, as well as the Mountain Accord Transportation Study completed by Parsons Brinkerhoff in 2017.</p> <p>3. Section 2.5 Level 2 Screening (Table 2) – Consistency and compatibility with local and regional plans – I believe screening for consistency and compatibility with local and regional plans is a major concern. The Regional Transportation Plan (RTP) was prepared by the Wasatch Front Regional Council (MPO for Salt Lake County) and submitted to UDOT in May 2019. UDOT revised its NOI in May 2019 to incorporate the RTP into the EIS process. S-R-53 was included in the RTP (adding a third lane to SR-210). I don't believe GCC had anything to do with including the third lane proposal into the RTP. Further, it is my understanding that GCC fiercely opposes the third lane concept. Also, I don't believe that either Summit or Wasatch counties, or Park City included any mention of a need for a transportation connection between Summit County or Park City with the cottonwood canyons. I am concerned that EIS participating and cooperating agencies could oppose certain alternatives to S-R-53 because they could be seen as inconsistent with the regional and rural plans already submitted to UDOT. As you know, GCC has been specifically left out as a cooperating or participating agency so it would have no input with these internal screening deliberations.</p> <p>4. Section 4.0 Agency and Public Involvement – I believe the Granite Community Council Transportation Committee has special expertise in the realm of transportation needs for residents in much of Little Cottonwood Canyon. Up till now it has been left out of the transportation needs process other than to provide public input. Specifically, Granite was not asked to contribute to the Regional Transportation Plan developed by the Wasatch Front Regional Council. What was contained in that plan for Little Cottonwood Canyon was completely contrary to the stated needs of the residents of the Granite community. I am concerned that unless Grantit is recognized as a cooperating agency in the UDOT EIS that someone else, again, will speak for our residents and potentially against our best interests.</p> <p>Vaughn Cox</p>	Website
263	<p>Traffic delays in the Cottonwoods caused by bus traction problems during Thanksgiving week illustrate the fact that municipal buses are not well suited to the winter road conditions in the Cottonwoods. In past winter seasons there have also been problems due to inadequate bus traction. A better alternative may be to use 4x4 vans, such as the ones used by Canyon Transportation and Alta Shuttle. A large number of such vans would allow starting from a much larger number of points of origin and going non-stop to the various canyon destinations; the greater reliability, speed, and convenience would attract more riders.</p>	Website
264	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. Without carrying capacity included as a level 1 or level 2 screening criteria, many of the proposed alternatives would result in increasing the numbers of people transported into LCC with long term negative consequences for commuters, recreationalists, and tourists not to mention degradation of the watershed. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. Failing to do a capacity study also makes the project look like an egregious subsidy to the resorts. The resorts are a major factor in the problems and need to have their impact quantified. Finally, it would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, etc..., but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
265	<p>Please acquire the gravel pit north of the Fort Union/Wasatch Boulevard intersection. Whether by negotiated purchase, eminent domain, zoning restrictions or long term lease that property is the lynch-pin to future transit. In reading the plans many are in a phase 2 or 3 time frame but businesses are more nimble and once the property is gone that opportunity will be lost.</p> <p>I'm in favor of adding a 3rd lane for BRT, shuttles etc that can provide an alternative to often ill equipped private vehicles alternating up or down depending on prevailing flow. Individuals need a place to park and the gravel pit location provides access from/to freeway.</p>	Website
266	<p>It's impossible to take on Little Cottonwood Canyon with a more systemic perspective of the two Cottonwood canyons. Moreover, it's impossible to only discuss only "mobility" without discussing bicycle and pedestrian safety (e.g at Split Rock or the Notch in BCC), the need for more toilets to support the additional population and protect the watershed, the future need for summer busing or mini-vans (perhaps self-driven) to stop at various trailheads and alleviate the traffic problem in BCC, the need for HAWKS of some kind for safety at the S Turn and the campgrounds in the lower BCC, using aerial trams to connect LCC, BCC and Park City not only for moving lots of people but, also, for egress for the canyon residents in case of wildfire and earthquakes and to economically connect the canyon ski resorts in order to compete with Colorado for business and jobs. While UDOT, The Forest Service, UTA and SL County are all talking to one another, much more needs to be done to bring them together for future planning. I'm grateful UDOT is taking the lead. Thank you.</p>	Website
267	<p>Aerial solution. GONDOLA. TRAX to GONDOLA. High speed detachable GONDOLA from a transportation hub. Quiet, clean, modern, scalable, Winter, Summer, thrilling views, an adventure! Low impact, takes traffic off the road. Avalanche proof. Traffic jam proof. Safe. Affordable. C'mon! Get with the program! Let's build a GONDOLA!</p>	Website
268	<p>My background: I am a resident of Cottonwood Heights and a transplant in 2012 from Northern Illinois via Salt Lake City proper. I ride bikes (MTB and road), trail run/hike, and have a real interest in seeing the quality of the area be maintained or bettered. I have skied in the Cottonwoods, but do not any longer because of the congestion. I have asthma and air quality will probably be the only reason I will ever leave the area, but if it gets too congested with cars that might also be another reason. I am not an engineer or a city planner, just a concerned resident that loves the Salt Lake area and UT generally.</p> <p>Problems & Solutions: Focus on user numbers (not vehicle number) in conjunction with focusing on changing user behaviors with regards to recreation transportation. I would be in favor of a plan that improves the roads that currently exist in terms of safety and throughput of people on the same footprint, but that limits the total number of vehicles traveling to or in LCC. My preferred travel would be by way of using electric/hybrid buses or train-variant so we can quietly protect our air and water. More Park N Rides farther away from the canyons will likely be necessary for this in order to carpool or load more bus users and I would be willing to live near one. Only solutions that keep the canyon completely and safely open to human power should be considered, which means protecting bike lanes from parking and drivers.</p>	Website
269	<p>The cottonwood canyons are being overrun and overwhelmed with visitors, both local and out of towners. As much as I hate to suggest it because inherently unfair to a certain segment of the population, we need a pay to play plan that will seriously reduce the human impact on this vital resource. This could certainly include scaled tolls. Even better would be to get all the cars out of the canyons. It is completely ridiculous how many cars are allowed up the canyons on any normal day, let alone a powder day in the winter. We NEED to limit cars as much as possible and MAXIMIZE public transit (i.e., buses) that includes dramatic increases in park and ride locations that can be scattered around the city. Lastly, we cannot give free reign to the ski areas to just keep increasing their skiable terrain through more chairlift accessible terrain and their development footprint with an ever increasing number of lodges, buildings/housing, as well as the carnival atmosphere of zip lines and roller coasters. I lament that this will limit my ability to access and enjoy our wonderful canyons, but these canyons and their integrity are much more important than I or any other individual or group of people are. Alta is NOT for locals anymore, if it ever was, and they can all go fuck themselves.</p>	Website

270	<p>GONDOLA. This transportation mode needs to be assessed because:</p> <ol style="list-style-type: none"> 1. Least infrastructure impact on watershed and forest. 2. Least carbon footprint compared to cars and busses. 3. Reliable, safe, and scenic. 4. Provides emergency egress for both Cottonwood Canyons. 5. Year-round service to both canyons. 6. Reduces need for cars and busses (less noise, better air, no traffic jams) 7. Best funding possibilities from partnerships with State, County, Ski Resorts. 8. Reasonable timeline for a transportation solution. <p>Please include a GONDOLA as one of the transportation alternatives in the LCCC EIS Study. The public deserves a look at this idea.</p>	Website
271	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
272	<p>Fully support the point below developed by Wasatch Backcountry Alliance. I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
273	<p>The alternatives need to focus on ways to reduce the number of vehicles going up the canyon by first aggressively going after low-hanging fruit. The easiest and cheapest way to do this with the minimum amount of environmental impact is tolling, added parking garages at the base, and free 15-minute buses. The entrance of BCC and LCC should have a tolling station that charges for going up the canyon with a fast-pass/EZ-pass type system. The toll will be increased until traffic is reduced to a manageable amount. The fewer people in the care means the higher the toll. Then, there will be parking garages with free parking at the base. Currently a developer is trying to put high-rise condos and a retail space on the part of the gravel pit north of the BCC but the land is full of fault splays of the Wasatch fault and isn't appropriate for residential/commercial use. A parking garage would be great here because there would be minimal loss of life when the earthquake hits. The toll funds will be used to pay for the additional parking and free buses. The buses must be free to all, not just season pass holders. This is cheaper and less impact to the sensitive mountain environment than widening the road. Widening the road will just allow for more cars to reach the ski resorts. The current proposal appears to be driven by the ski resorts who just want more people to come to them. Widening the road will make parking and runoff to the watershed worse, not better. The creek is already impaired via the Clean Water Act, widening the road will just make it harder to get out of impairment. The rock is heavily mineralized (hence the mining legacy) so additional construction of a road will expose more of those minerals to weathering and erosion further pushing the creek into impairment by the Clean Water Act. Tolling for cars and free buses is the only answer. I know Utahns don't like taxes but this is the obvious way to reduce the number of vehicles going anywhere. I'm surprised to see "tolling" and "One direction travel on existing road during the AM and PM peak periods" at the bottom of the mobility list. These should be the easiest alternatives to implement. I'm sure the poor ski resorts don't like a toll because it might mean less people coming to their resort and more going to Park City and Snow Basin, well I'm sorry Alta and Snowbird, this isn't about you.</p>	Website

Attention: Director Carlos Braceras
Utah Department of Transportation

December 12, 2019

Comments on Little Cottonwood Canyon, Environmental Impact Statement:

- Draft Purpose and Needs Chapter; and
- Draft Alternatives Development and Screening Methodology and Preliminary Concept Report.

Dear Mr. Braceras,

Thank You for the opportunity to comment on the aforementioned sections of the Little Cottonwood Canyon Environmental Impact Statement.

As we have understood the documents, you have changed and increased the scope from what was a very narrowly focused project and budget to a much more comprehensive scope. Although we are supportive of low-cost, short term solutions, we want to be assured that they do not impair, restrict or preclude a more viable and more cost effective long term solution. We applaud your effort in thinking broader, but, we believe that there are significant weaknesses in your proposed approach. Let us elaborate.

With your expanded approach, we believe that you should be incorporating more stringent EIS planning tools and guidelines than you appear to be using. Little Cottonwood Canyon and the Wasatch Mountains are a unique transportation environment and have significantly different transportation planning processes. For example, your limited study area consists primarily of ALL external trips. It is difficult to use traditional processes and thinking in such a limited access confined project scope and area. As most trips come from outside the study area, one would expect NEPA to more heavily examine and focus on these external demands.

On page 1-31 of the Purpose and Needs Chapter, there is a project growth rate of 1.2%. As this valley grows and continues to heavily promote our abundance of health based outdoor recreational opportunities, it is difficult to imagine that these rates are believable for the canyons. One would arguably expect a much higher growth rate as our population continues to advance tourism, economic development and overall mountain related activities. Please consider techniques used in our National Parks. As you know, visitation in the Canyons is higher than most of our National Parks.

On page 1-21 of the Purpose and Needs Chapter, it states that bus transit represents 7% of total trips. As you point out in your report, peak trips are the key. We believe that UTA carries 25% of the peak traffic in the canyons.

Utah invested heavily in the Mountain Accord Process which was designed to accommodate these legitimate broader goals. Those four key goals were:

1. Protect the environment and natural resources;
2. Ensure high quality recreational experiences;
3. Enhance regional transportation; and
4. Strengthen the regional economy.

We believe that the current EIS should follow these recommended and approved goals as articulated in the Mountain Accord Process.

In addition, one of the key transportation actions in the Mountain Accord included:

Transportation improvements for the Cottonwood Canyons focused on increasing transit use, biking, and walking and decreasing single-occupancy vehicle use, using Sustainable transit choices connecting people, communities and mountain destinations.

We don't believe your current purpose and needs cover these issues. It appears that your new and expanded focus should address and accommodate these points from Mountain Accord.

As an example, the impacts of your broader scope must address water quality issues. On page 1-9 of the Purpose and Needs Chapter it says that Salt Lake City water quality issues are secondary to the transportation solution. Adding more cars to the canyon will not help this issue.

We also believe that traditional work based travel demand modeling will satisfy the accurate projections for most of the trips in the canyon. We appreciate that you are developing your own model to reflect this, and we would like to offer our assistance and team of experts whom have decades of experience in mountain travel based"

"demand modeling.

Our review of the 1,200 +/- comments as part of your initial EIS scoping record indicates that there is an extremely high level of public interest in high capacity, high quality public transportation in the canyons. We think you need to address this.

Stadler is the world leader in the manufacture, and delivery of mountain transportation systems, including cog railways. In fact, Stadler was just awarded the contract to build the cog railway at Pike's Peak next to Colorado Springs, Colorado. As an expert of mountain transportation systems, we believe that a train could add the following values to our canyons:

- Capacity: More efficient transportation system within the narrow canyon corridor;
- Life-cycle costs (LCC): Over the lifetime of a typical rail system, the total life-cycle costs are lower than other modes of transportation.
- Managed growth: Potential for improved land-use management;
- Environmental sustainability: Reduced carbon footprint;
- Air quality: Reduced Greenhouse Gas Emissions (GHGs);
- Traffic congestion relief: Reduced dependency on single auto occupancy;
- Reliability: Highest degree of reliable service.
- Showcase for the Nation: Integrated economic development initiative.
- Olympic nexus: Supportive of future Olympics endeavors.
- Solving broader traffic challenges beyond the canyons: Exemplifies public and private partnerships.

One of the key outstanding issues from the Mountain Accord process was the poor initial capital costs of a proposed Mountain Transit Railway. We were extremely disappointed in the traditional approaches that were applied to address the associated design and associated costs. We are proposing a different approach.

As you know, the State Legislature has passed legislation and has given you the Authority to accept Public Private Proposals (PPP). In the spirit of this legislation we have developed an initial PPP to address the capital costs. We have shared this with you in the past. We believe that the funding of a rail transport system in the Canyons is financially feasible and would result in significantly lower life cycle costs when compared with more traditional bus based transit systems."

"In summary, and in the spirit of working together, we would offer to work with you and your team. We are able to produce detailed engineering design and accurate cost estimates that you could use as part of your Alternatives Development and Screening process. We believe this to be a more realistic design cost estimate based on our experience and qualifications as the world's foremost leader in mountain railway development.

Sincerely,

Mr. Martin Ritter
President & CEO – Stadler US, Inc.

274

Website

275	The only meaningful solutions are ones that help to decrease the number of cars going up the canyon. Tolls, buses, public transportation. I like the idea of avalanche sheds too, as they would probably pay for themselves after a few seasons. Thank you.	Website
276	No tram no interconnect no trains We need a capacitor study	Website
277	Have gondolas been consider as one of the transportation options? Please investigate and include in reports	Website
278	I believe that closing the canyons to cars and having an easily accessed, frequent express bus service to Alta/Snowbird complemented by a "local" bus for backcountry skiers is the way to go. I believe the best solution is an underground parking lot /large bus station in the current abandoned area of the gravel pit. Express buses should leave every 10-15 minutes throughout the day for Alta; it would also serve the Park City and BCC resorts and backcountry. Let's get this done!	Website
279	I'm new to commenting. Just checking in to see what plans are to expand parking for the bus service. I didn't see any mention of expanding parking at the park-n-rides. Maybe I missed it? Or will it be covered in a subsequent document? Any thought to using high school parking lots for weekend park-n-ride? I live by Skyline H.S.: Enormous parking lot and empty on nearly every weekend winter day. thx for working to solve this problem with congestion in the Canyons	Website
280	What about a gondola to allow visitors to go from Park City to Little Cottonwood??	Website
281	I understand you are not considering a gondola as an option to help with traffic up little cottonwood canyon, due to special interest groups. I would like to ask you not to DO a gondola, but to look at it.. consider it! if a gondola for example cuts down on cars driving from park city into LCW, why wouldn't that counteract any environmental impact of putting some posts in the ground on a mountain? There is more to this story, and I for one would like to see it considered and if rejected, rejected in public for valid reasons..	Website
282	Not sure what would be best but do believe easy access and usage of more hopefully electric buses would be a good start. Timing of buses and easy accessibility is key.	Website
283	1. As you know, WBA thinks that LCC is a critical area of the Central Wasatch from a recreation, environmental, economic and watershed perspective. 2. There is no doubt that traffic/congestion is an issue in the canyon year-round and that solutions must be thoroughly reviewed and considered before any decisions are made. 3. WBA thinks the Purpose and Need cannot be fully understood until a comprehensive capacity analysis has been conducted for LCC. Until we understand how many people we want to have in LCC at any one time, we cannot fully understand what the purpose and need of any solution for traffic/congestion should look like. 4. A comprehensive capacity analysis will benefit all users of LCC, including the two ski areas. Failing to do this before decisions are made could have irreversible negative impacts on LCC in terms of watershed quality, recreation/environmental impacts and continued economic viability into the future. 5. In the absence of such a capacity analysis, WBA thinks that it would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran or InterConnect from Park City. All of these other options have environmental impacts that will negatively impact the canyon, so no decisions regarding these options should be considered until the Purpose and need are more clearly defined and understood.	Website
284	We need to make sure that the streets exiting onto Wasatch at Kings Hill and 8350 South as well as Daneborg Dr., Little Willow circle have lights that turn to red when residents are wanting to turn left onto Wasatch Blvd like there is where 3500 South connects to Wasatch. This would serve to slow and break up traffic, thus eliminating the need to drop the speed down from 50 miles per hour. Realistically, Wasatch is a commuter road, and speeds need to be kept up for traffic flow. During the bulk of the rush hour, traffic is currently well below the 50 mph posted speed due to volume. During rush hours, the speed of 35 south of 9800 South is vastly ignored, so it is silly to impose that speed. Pretty benches and landscaping is not going to change the fact that Wasatch is and will remain a commuter corridor. I live on the corner of Wasatch and 8350, so I regularly see the traffic flow issue and experience the danger of getting out left onto Wasatch during rush hour. Thank you for your consideration.	Website
285	I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.	Website
286	Hello John and project team, I'm writing to share with you the CWC's formal written response and comments to UDOT's October 30th release of the Little Cottonwood Canyon Environmental Impact Statement Purpose and Need and Screening Criteria chapters. The CWC is grateful for the opportunity to provide comments during this process. We look forward to continued collaboration. Attached is the CWC's formal comments. Please do not hesitate to reach out if the project team has any questions or needs further clarification. Thank you. Blake Perez	Email

287	<p>Hello</p> <p>I am a resident of Salt Lake city.</p> <p>I appreciate that UDOT has reached out to the community on this.</p> <p>My points on the EIS: You clearly have identified the purpose: to alleviate traffic issues in LCC. Is the biggest "need" the ability to get "everyone" up the canyon as fast as possible? Does "everyone" mean 10,000 people/day, or 100,000? Without a capacity study to even begin to understand how many people the canyon can accomodate winter and summer your efforts and the resulting taxpayer dollars spent would be ferocious waste of effort, time, and money. Adding a third lane seems to me to be a preferred option, and I think that jamming more cars up there more quickly – to more-quickly fill the already-limited parking – without acknowledging that limitation would be an inappropriate use of taxpayer dollars. I think that UDOT effectively leaving out the "need" to protect the watershed and it's various elements in any efforts to move people up the canyon is an egregious omission. I appreciate that UTA stepped into the void of action for this year, and hoped to see more creative solutions associated with further partnerships in the EIS. Snowsheds would not only improve the avalanche control work/time, but also have no snow on the roadway, so more of those seems like it would be an effective way to improve speeds and safety (which affects speed). Referencing monorails and sky trans - which barely exist outside of airports - particularly in mountain environments – indicates to me that UDOT is simply borrowing buzzwords from other DOTs around the world without coming up with more creative, local interagency-supported solutions. I understand that this is the first phase of this process and the EIS was tightly confined, but I hope to see more thoughtfulness and – particularly - more regard for the impacts of what improved transportation options have on the ski resorts, the trailheads, the users, and the watershed in your future moves.</p>	Email
288	<p>Please do not allow a few interests create a Wasatch Interconnect that serves only the ski resorts and doesn't fix the transportation problem. We have traffic from the Wasatch bench up to the canyons, not from around PC to LCC or from BCC to LCC.</p> <p>Tolling and/ or closing both canyons and making public transportation mandatory is worth a look, with only emergency personnel - UDOT, Avalanche Control workers, essential ski resort employees, and residents allowed to drive.</p>	Website
289	<p>Thank you for your continued work on the Little Cottonwood EIS. Wasatch Backcountry Alliance submits the following comment regarding the process:</p> <ol style="list-style-type: none"> 1. As you know, WBA thinks that LCC is a critical area of the Central Wasatch from a recreation, environmental, economic and watershed perspective. 2. There is no doubt that traffic/congestion is an issue in the canyon year-round and that solutions must be thoroughly reviewed and considered before any decisions are made. 3. WBA thinks the Purpose and Need cannot be fully understood until a comprehensive capacity analysis has been conducted for LCC. Until we understand how many people we want to have in LCC at any one time, we cannot fully understand what the purpose and need of any solution for traffic/congestion should look like. 4. A comprehensive capacity analysis will benefit all users of LCC, including the two ski areas. Failing to do this before decisions are made could have irreversible negative impacts on LCC in terms of watershed quality, recreation/environmental impacts and continued economic viability into the future. 5. In the absence of such a capacity analysis, WBA thinks that it would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran or InterConnect from Park City. All of these other options have environmental impacts that will negatively impact the canyon, so no decisions regarding these options should be considered until the Purpose and need are more clearly defined and understood. <p>Respectfully submitted by the Board of Directors Wasatch Backcountry Alliance</p>	Email
290	<p>John and Vince,</p> <p>Attached are Metropolitan Water District of Salt Lake & Sandy's comments on the Little Cottonwood Canyon EIS Draft Purpose and Need and Draft Alternatives and Screening Methodology. We appreciate the opportunity to provide comment. If you have any questions about the attachment please let me know.</p> <p>Sincerely, Eric Sorensen Environmental Services Specialist</p>	Email
291	<p>Traffic seems to be the only issue addressed without concern for environment and wildlife.</p>	Website
292	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. I agree that this can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
293	<p>This is vital watershed and wilderness protection land. You are proposing to turn more of that precious land into roads and parking areas? No.</p> <p>Begin a toll charge for private vehicles.. It works in Millcreek Canyon. It will work as well in the Cottonwood Canyons.</p> <p>Instigate a large shuttle system, with many shuttles scheduled at close intervals both winter and summer.</p> <p>Buy as much of the quarry land (the quarry is soon to close) as possible to establish a huge parking system at the bottom of the Canyons for those many people riding the shuttle. Hurry. That land is already being spoken for.</p>	Website

294	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p> <p>Thank you for your hard work on this</p>	Website
295	<p>I am a frequent traveler in LCC who drives the canyon 2-3 times/week in peak seasons for skiing and hiking. My winter use is strictly for back country skiing (never to the resorts). I mostly park at the White Pine parking lot and also on the roadside parking at the end of SR 210. My summer use is for hiking, and I also park at those same places in summer as well as roadside parking on SR 210</p> <p>I am IN FAVOR OF:</p> <ol style="list-style-type: none"> 1. Increased and improved parking spaces at the White Pine lot and at the end of SR 210 in Alta. I would also support increased and improved parking spaces at the other trailheads suggested in UDOT's proposals I saw in workshops though I rarely would use them. 2. Pedestrian walkways with warning signal lights at the trailhead parking areas on SR 210 down canyon from Alta. 3. REDUCED SPEED ZONES NEAR THE TRAILHEAD PARKING LOTS on SR 210. Often exiting the White Pine lot to go down canyon, especially in Winter, is an accident waiting to happen at speeds vehicle travel at. 4. Tolling vehicles is OK with me, and it should be based upon # of occupants, time of the day and season. Tolling should not require that cars stop at a toll booth, rather like Millcreek Canyon, but use technology to check or collect toll payment. Something like a season pass should be available. I would be agreeable that users of trail head parking should also pay a fee, tolls could also be based upon the destination, for example going to the White Pine lot rather than Snowbird and Alta. 5. Adding an uphill lane for buses only. 6. MANDATORY CHECKING OF ALL VEHICLES DURING TIMES OF RESTRICTED TRAVEL IN THE WINTER. A recent Salt Lake Tribune article quoted Unified Police officer saying "If we were to stop every car and do a spot check. This makes no sense to me because just one of those cars could end up blocking traffic for hours as well as risking serious injury to its occupants, other vehicles and emergency responders. I have twice experienced Unified Police or UDOT could certainly do the same in LCC. <p>I am OPPOSED to:</p> <ol style="list-style-type: none"> 1. Large scale transit such as a railway, gondola, cable car, or monorail. My reasons for opposition are: <ol style="list-style-type: none"> a. Destruction of the terrain, watershed, and animal habitat in the right of way b. Such transit modalities would require huge parking lots at the bottom of the transit line (as exist in many places in Europe). UTA and UDOT currently haven't been able to provide sufficient parking for bus transit, and the more massive transit systems would require even greater parking capacity c. The cost of such transit projects would be beyond the capability of state and local government, 2. Connections to LCC from BCC via a tunnel or from BCC and Park City via lift systems. 	Email
296	<p>UDOT,</p> <p>Having observed the increase in traffic over the last 45 years in Little Cottonwood Canyon (LCC), this study is long overdue. You have put forth many alternatives to provide solutions for the many problems. Winter avalanche closures, parking, powder mania, inadequate restrictions on vehicle types to name a few.</p> <p>Snow sheds protecting the avalanche paths with a added lane in the canyon to allow for 2 lanes for A.M. up and 2 lanes down for P.M. down would help alleviate most but not solve all of the winter and summer high peak traffic flow problems.</p> <p>As bad as I hate to propose it, the parking issues could be solved with improved inexpensive winter and summer public transportation, along with an automatic toll system could help finance transit and road improvements.</p> <p>Wasatch Boulevard at the very least needs exit and entry lanes for the residents.</p> <p>Thank you for the opportunity to commit on this very important study.</p>	Website
297	<p>It is premature to be making decisions on the transportation infrastructure and transportation strategies before making decisions on the human carrying capacity of Little Cottonwood Canyon. We should decide if we want to preserve a balanced natural environment and a clean and adequate water supply. It is obvious that to support those goals human visitation and use will need to be limited. Decisions on that policy and the consequent human use numbers must be decided first before transportation infrastructure, etc can be addressed.</p>	Website
298	<p>John,</p> <p>Please find attached the comments concerning the Draft Purpose and Need and the Draft Alternatives Development and Screening Methodology.</p> <p>Thank you,</p>	Email
299	<p>I enjoy LCC and agree the traffic is a problem. This last year I moved further away now in Weber Canyon in Oakley and enjoy less traffic and better air quality. I find my self NOT wanting to travel to LCC because of the traffic issues. I work in the ski industry and have held a pass at Alta for 13 years since moving to Utah, but NOT this year. I much rather be spending my time skiing or with my family and dog than in the traffic jam of LCC and BCC canyons. I truly love Alta, but think until a true analysis and solution is completed I will find other places to recreate.</p> <p>I am glad UDOT is studying this and think that we need to understand the purpose and need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC.</p> <p>A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts.</p> <p>It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the purpose and need are more clearly defined.</p> <p>Thanks,</p>	Website

300	<p>I am a long, time year around user of Little Cottonwood Canyon. However, I recognize that the transportation status quo is untenable. I believe that even though a capacity study is outside of the scope of the EIS no major infrastructure changes should be made without a complete picture - articulating what the canyon can withstand and including the potential impacts on critical resources for residents below, chiefly water. I suggest you only look at Zion Park as an example of the unintended consequences of too narrow a view that only considered the need to efficiently move people from point A to B.</p> <p>I support measures to improve the status quo while the bigger questions are (hopefully) addressed. The focus should be on making a better road within the existing footprint (grade, curve radius, etc.) and looking at utilizing that roadway in creative ways to move people efficiently. Efficient uses might be AM/PM directional travel, more mass transit, tolling, etc. all of which I've seen used effectively elsewhere. I would also support improvements on Wasatch Boulevard recognizing that there are impacts on ingress/egress to Little Cottonwood and local residents.</p> <p>I believe that avalanches are a serious public safety risk on the road and passive measures (i.e. sheds) would be appropriate for the three large slide paths below the White Pine trailhead and complimentary to UDOT's avalanche mitigation program.</p> <p>I have mixed feelings about the expanded trailhead parking, however in the absence of a viable alternative (i.e. better year around mass transit for example) it's probably a necessary step. Certainly more restrooms, better entrance and exit patterns, and the addition of a bus stop at trailheads would be useful steps. The current use of roadside parking is a safety issue and another source of congestion.</p> <p>Ultimately road improvements are a band aid. I am adamantly against expensive, intrusive, and potentially ineffectual alternatives like the gondola and sky train. I think the damage to watershed would be significant and the aesthetics of Little Cottonwood Canyon would be forever compromised. These ideas seem particularly absurd when cheaper alternatives, relying on current and enhanced infrastructure, haven't been tried. Ultimately we can't build our way out of the impacts of sustained and relentless growth. Difficult choices are on the horizon and we must be prepared to make thoughtful decisions, or be willing to sacrifice this beautiful and unique landscape to a litany of irreversible assaults.</p>	Website
301	<p>Dear Mr. Braceras,</p> <p>Thank you for the opportunity to comment on the UDOT Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Little Cottonwood Canyon Environmental Impact Statement Wasatch Boulevard to Alta dated October 30, 2019. The Granite Transportation Committee (GTC) which is a subcommittee of the Granite Community Council (GCC) has reviewed this document and wishes to provide the following comments and requests:</p> <p>1. Section 1.0 Introduction and Figure 1 (geographic scope) – We believe that the geographic scope described in the Draft is not adequate. The report should specify that the geographic scope will likely be larger, and possibly considerably larger than what is specified in the introduction and what was specified in the May 15, 2019 Notice of Intent statement in the Federal Register (Vol. 84, No. 94 21894). Further, the UDOT letterhead on all EIS documents clearly specifies the geographic scope as being Wasatch Boulevard to Alta.</p> <p>If the scope is not officially expanded, certain alternatives now being considered (Table A-1) might be forced out of consideration by additional Level One screening. Cooperating or Participating agencies could use this geographic scope issue to dispute the inclusion of certain alternatives. Antagonistic groups could use the geographic scope issue to challenge the Record of Decision by UDOT.</p> <p>GTC recommends that the geographic scope issue be addressed now and be expanded to include both Big and Little Cottonwood canyons as well as adjacent Summit and Wasatch Counties.</p> <p>2. Section 2.3 Alternatives Screening Level 1: Purpose and Need – GTC believes that the purpose statement in subsection (2.3.1) should be broadened to clearly incorporate alternatives that might address mobility on SR-210 but might not physically occur on that highway or within the proposed study area (SR-210 corridor). Further, the purpose should reflect objectives from recent transportation studies conducted to increase general mobility to and between the Central Wasatch ski resorts. GTC believes UDOT should consider the following revised purpose statement:</p> <p>Substantially improve safety, reliability, and mobility on SR-210 from Fort Union Boulevard through the town of Alta for all users on SR-210 and to facilitate safe, convenient, reliable and sustainable year-round access (and emergency egress) to and within the Cottonwood Canyons for diverse user groups, including recreationists (hiking, skiing, rock climbing, mountain biking, sightseeing, wildlife viewing, festivals, and music, etc.) and local residents.</p> <p>The above purpose statement is consistent with the direction provided by the Utah State Legislature via SCR-10 (2012), what was proposed by Salt Lake County in its November 2012 Mountain Transportation Study, as well as the Mountain Accord Transportation Study completed by Parsons Brinkerhoff (2017). Little Cottonwood road improvements would fit better into this broader purpose of facilitating transportation improvement to connect the Central Wasatch ski resorts.</p> <p>3. Section 2.5 Level 2 Screening (Table 2) – Consistency and compatibility with local and regional plans – Screening for consistency and compatibility with local and regional plans are of major concern to GTC. The Regional Transportation Plan (RTP) that was prepared by the Wasatch Front Regional Council (MPO for Salt Lake County) and submitted to UDOT in May 2019. UDOT revised its NOI in May 2019 to incorporate the RTP and R-S-53 was included in the RTP (adding a third lane to SR-210).</p> <p>Not only was the third lane project not proposed by the Granite Community Council (GCC) most of the members specifically oppose it. Further, it is our understanding that neither Summit or Wasatch Counties or Park City provided written input to UDOT to include a transportation link between the cottonwood canyon ski resorts in their county or city transportation plans provided to UDOT.</p> <p>We are concerned that EIS cooperating and participating agencies could oppose certain alternatives to R-S-53 because they are inconsistent with these regional and rural transportation plans. For whatever reason, the Granite Community Council has specifically been left out as a cooperating or participating agency, thus preventing our input with these internal EIS deliberations with UDOT. While GCC is left out, it appears that other agencies (who might not have GCC best interests at heart) are included. UDOT should reconsider including GCC as a cooperating or participating agency to ensure that local voices are heard.</p> <p>4. Section 4.0 Agency and Public Involvement – The Granite Community Council (GCC) and the Granite Transportation Committee have special expertise in the realm of transportation needs for residents in much of Little Cottonwood Canyon. Up till now, The Granite Community Council has been left out of the transportation needs process other than to provide public input. Specifically, GCC was not asked to contribute to the Regional Transportation Plan that recommended the third lane that was developed by the Wasatch Front Regional Council.</p> <p>We believe that what was contained in that plan for Little Cottonwood Canyon was contrary to our needs. Further, members of the Granite Community Council are concerned that unless it is recognized as a cooperating agency in the UDOT EIS that some other entity will, once again, speak for our residents and potentially against our best interests.</p> <p>Once again, thank you for the opportunity to contribute and comment on this important process.</p>	
302	<p>I've written numerous comments for the EIS regarding little cottonwood. We should give priority to buses. The chain law should be in place for 12 hours PRIOR to a storm. A bus only lane would do a lot to encourage people to take the bus up. Closing up hill traffic on peak times when people are leaving to allow more traffic flow. Tolling the road for single riders and using that money to pay for year round buses . I would like to see public transportation take priority on whatever options are presented. We should be trying to get people into buses rather than more cars into the canyon.</p>	Website
303	<p>Until it is cheaper for people to use buses to go up the canyon, nothing will ever change. If I have a car of 2 or even 3 we will not take the bus because it would cost 30\$ to take the bus. People will only do what is cheaper and more convenient.</p>	Website
304	<p>Please find attached comments from Save Our Canyons and associated attachments.</p> <p>To whom it may concern: We submitted our comments earlier today. A few documents were referenced as attachments and files sizes were large enough that I didn't want it to bounce. Those documents are attached to this email.</p>	Email

305	<p>Maximum lanes should be one in each direction with a center flex/turning lane. Sound walls will NOT work on a slope. Communities above Wasatch Blvd will be ruined. Thus, maximum speed limit should be 35MPH for both safety and to keep sound decibels acceptable as car traffic increases in coming decades.</p>	Website
306	<p>Being that it can take hours on a bus to get up and down the Canyon (it took 6 hours to get down BCC recently counting waiting on a bus), I'd like to suggest the following things so buses are more attractive alternatives. How about a parking garage at the bottom of the canyon and much more frequent bus service to all trailheads and resorts year round?</p> <p>Also, make UTA publish their schedules with clear verbage for when there are holiday or special schedules. Then, have UTA follow those schedules with drivers that can drive on snow and will use chains.</p> <p>Also, have UDOT keep plows running so they can keep the road clear during a 5" storm, if not 10". Also, have tow trucks deployed at strategic places ready to help. Don't let semi's and inappropriate cars in the canyon when there is POTENTIAL for snow.</p> <p>Improve social media communication so more frequent bus status and road conditions are communicated. UTA and UDOT are slow with this. Share this with employees at resorts who will communicate it to us when our phone batteries die after standing outside waiting on a bus for 3 hours.</p> <p>UTA's CSR's are terrible at knowing stops in the canyon. I've tried the bus and it's a horrible experience frequently because UTA drivers can't stay on the road, UDOT can't get plows on the road and UPD can't check cars' traction compliance or update and communicate the traction law status frequently enough. There is sooo much room for improvement. Thanks for reading this.</p>	
307	<p>I am an Alta resident and I have lived here for the past twenty years.</p> <p>Gilles Duranton of the University of Pennsylvania and Matthew Turner of Brown University posit a "fundamental law of road congestion": unless road space is priced appropriately, new capacity reduces the cost of driving, thereby inducing more of it, leading, eventually, to renewed congestion. -The Economist, May 11, 2019</p> <p>Purpose: What is the purpose of transportation in Little Cottonwood Canyon? To accommodate as many people as want to visit the canyon at any one time? Protection of the Canyon itself should be a higher priority than moving as many vehicles as possible through the Canyon. UDOT should recognize Town of Alta Resolution 2019-R-14, which calls for a visitor capacity study of the Canyon. Respecting the mission of UDOT to facilitate transportation, it does not require expansion of roadway capacity without a vision of the purpose of the roadway itself.</p> <p>Need: The EIS process must anticipate the coming changes in networked and autonomous vehicle tech. One thing that will change is the need for parking – it will be much less. One thing that will not change is the need for pavement – the vehicles of the future will run on asphalt. Another thing that will not change is the need for avalanche protection on Highway 210. We should use the limited available money for road improvements and avalanche protection – which will be needed no matter what forms transportation takes – not on increasing the current vehicle capacity.</p> <p>The biggest problem in the canyon is too many vehicles. The solution is fewer vehicles per person. The path toward that solution is carpooling and new transit tech. Transit tech will evolve in ways that we do not yet fully understand. Carpooling, however, is something we can understand now. We should make carpooling incentives such as tolls, preferred parking, carpooling networks and apps, and easy carpooling pickup and drop off locations. Carpooling improvements are light on infrastructure and will offer a great return on investment. For the near future, adding surface parking capacity in Sandy and at the Big Cottonwood Canyon gravel pit would help with transit and carpooling.</p> <p>Improvement of existing parking lots and access lanes would also offer good returns.</p> <p>More trailhead parking is needed; this is an immediate safety issue. Within the Canyon, the road should be three lanes: one uphill, one downhill, and a third lane separated with hard barriers. May through October, the third lane should be a two-lane dedicated bike path. Bike lanes could become an attraction instead of a hazard, and with the evolution of e-bikes, could become a viable summer transportation option for more people. November through April, the third lane should be a reversible lane for transit and emergency vehicles only. This will require significant tech. Passing lanes and pullouts should be added and improved. Slow vehicles delaying five or more cars should be required to pull out.</p>	Website
308	<p>Speed continues to be a problem on wasatch blvd, at 50 mph I witness crashes and near crashed daily at the 7-11 entrance at the mouth of little cottonwood canyon.. flashing lights for red lights, , block off the 7-11 entrance or dedicate a turn lane , all residents want slower speeds</p>	Website
309	<p>Oppose toll roads. Resorts should incentivize carpool with preferred parking for vehicles with 3 or more occupants or discount on pass. Preference lane for 3+ Riders in carpool /bus lane. Do not build acres of asphalt parking at the mouth of the canyon. Start transfer /transport hubs at freeway exits and mid-valley points at transportation centers.</p>	Website

310	<p>I have submitted various concerns to various requests for comments from WC, UDOT, AND Cottonwood Heights.</p> <p>I am going to skip through various issues I have repeated, as concern for my house at the high T intersection, for neighbors notified about plans to take their houses for highway widening, about full disclosure on the rumors and reach and plans of the CWC and UDOT to turn this project into sprawl all the way from Sandy, Draper. and a south valley belt route, all funneled past my living room window toward salt Lake City. Or perhaps to make my home unlivable, too close to a major highway widening..</p> <p>I have concerns for losing my own house which is carrying medical debt and debt from having to shut down my business over health issues, the recession and government shutdowns and providing me a specialized modified home for my disability and a little potential income from an inlaw apartment. And after 25 years, a network of neighbors who help me survive. I doubt I would find another place to live in my own house on my own terms. There is no such thing in Salt Lake County as a care facility that can legally allow a queen size waterbed, although my doctor agrees that is keeping me free of tremendous pain and further paralysis.</p> <p>I have concerns about my neighborhood, divided as it is by the recent increase of the speed limit, which makes it unsafe for trying to get onto Wasatch Boulevard from the homes and streets trapped by it.</p> <p>I have had a very bad week from exactly the refusal to lower the speed limit to 35, and direct the gridlocked and idling traffic at the high T down to Sandy's Quarry Bend parking and mall, and facilitate people with local residences getting in and out, as well as people with jobs serving this community. I have the best home health Company in Salt Lake, and had a wonderful aide. I take pills 3 times a day, at the same time, with food. My aide gets my breakfast food and pills, helps me with toileting, and bathing and dressing. He makes sure my bedside cooler is stocked with food for lunch, and water. He is organized, and familiar with my issues and my house. This despite I cannot sit up or take the first step away from my bed unassisted. He was kind and gentle, and strong enough to lift me if need be.</p> <p>And the prospect of another winter dealing with the traffic up here sent him thinking about leaving for another job despite being loved here.</p> <p>The problem is, most insurances, agencies, etc. have adopted the Medicare standards for payments of home calls. They pay a set amount for one hour only, nothing for commuter time or expenses, and the aides are expected to use their own cars. The agency is supposed to bill that way, and pay for their operation and their employee hour's hour. They can try to schedule a couple easy and close runs to help catch up, and I know this company pays some extra for tough situations. It is the same for home visits for therapists and nurses. But the situation in cottonwood heights is too extreme. An aide, and the company, doing their best, has grudging clients all day long when they can;t catch up on their appointments.</p> <p>This situation is the same for any delivery, repair, and service call.</p> <p>Local businesses are also affected. I have neighbors who have quit coming out of their houses until spring. I have an 80 year old friend who used to come over once a week and bring lunch but she has decided to never try to get across the road to the local Smiths deli or the fast food places, and back to the east side of Wasatch.</p> <p>I've been an attorney, owned businesses, employed people, been put out of business after 37 years by things beyond my control: recession that never ended for some people, government shut downs. The signs are not good when employees give up on working in our neighborhood, when the City Weekly doesn't even have a rack at Smith's anymore and when its pharmacy says its waiting until next week's delivery for a common drug. Are they behind in payments? But another Smiths pharmacy in sandy has it.</p> <p>The social fabric is being strained. There is an LDS chapel on my east side. There were cross the Wasatch members and relationships. Come a snowy Sunday, who will deal with crossing that road?. And there is another whole congregation on the other side of the road sharing our building. Their church .got burned out by vandals so badly they have no home for at least a year." "I got very sick this week, going Sunday with a clueless aide and none on Monday. Monday aide is new, terrified of the roads and needing new tires. Then she had an accident on black ice down near SLC, leaving me wondering if she would be back.. I have wasted this past week in pain, chills and fever, nausea, and kicking everything out of my body. I woke up this morning not getting better, worst pain of all. and spasms, backed up by today's aide. Took most of the day to get the doctor to order a home health nurse to come change the catheter and take a specimen.. I suffered for days being told to drink plenty of fluids to flush out any germs. When they finally changed the catheter, I instantly felt better. The aide who came to help, stayed long enough to help me into a clean gown. In that short a time, the new catheter let out 700 ml. More aides and nurse calls than they will get paid for in a week because lives all over this valley are being disrupted by this road this winter..</p> <p>The idling makes me sick and weak every winter--I'm already on oxygen. The black tail pipe soot is going straight up the mountain I (hot air rises) over our houses, falling on them and the snow pack. that rushes melting and increases likelihood of flood water rather than better serving our valley's fresh water supply.</p> <p>I like the wildlife. I prefer to continue a dark night sky and quiet nights for the sake of the wildlife. Also, the natural trees and native trees and grasses on the road side allow the migratory patterns of the wildlife down lower toward Dimple Dell etc.--deer, coyotes, occasional cougars or bears, moose, rabbits, skunks, rattle snakes, eagles, owls. badgers. They typically avoid humans and slip across the road at dusk, night, dawn. They are part of a healthy ecosystem.</p> <p>I don't think there are Cottonwood trees here anymore. I know the water table on the east side is very high. Those trees thrive where the waterways shift. They like to be dry sometimes, and flooded sometimes to drop pods and start new trees. Trying to control the waterways as we have is against the nature of the area. There are two houses, on Alpen Way against Wasatch Boulevard near Golden Hills that were destroyed by water taking out their foundations and making them uninhabitable. You can spot them, rebuilt with modern water" "proof materials and fort t like walls around the lot. The swamp It is called that because the water moving down the mountains--and maybe out of them as well tends to lay on top of the old lake bed materials, Could the whole mountainside slide onto the new road?</p> <p>And all this is bad for the skiers. Idling for hours in grid lock and pollution is not a friendly experience. No bathrooms for hours. It has a world reputation for world's greatest powder. And there seems to be no plans for a skiers welcome center which would allow some to park at the gate, turn off their engines, find a bathroom, hot drink, wif they would probably be willing to ride share with the problem of no bathrooms solved. you know people open both passenger doors and go on the roadside. Ending that would be good for the water shed.</p> <p>there's more. I'm following the legacy Highway.</p>	Email
311	<p>Please seriously consider these ideas that would drastically improve LCC access, use and help improve the environment (in order of ease of implementation):</p> <ol style="list-style-type: none"> 1. Place a kiosk at the bottom, similar to Millcreek Canyon and charge a reasonable fee for day use. All funds after expenses to go toward upkeep of the canyon. Local residents excepted. Local businesses allowed discounted annual passes. 2. Take funding - from the entrance, bonding and elsewhere as available and widen the road to allow for a separate/edged off lane for public transportation only. It could be one lane with pull offs to allow transit vehicles to pass one another. 3. NEVER! exchange lands with any of the businesses in town for parking. If parking is absolutely needed, lease the land, with sunset requirements unless renewed with all proceeds to go toward maintenance and upkeep of the canyon. 	Website

312	In case the earlier email did not get thru, the best thing you can do in the short term is to set up a kiosk at the bottom of the canyon, similar to Millcreek, and use all proceeds to upkeep and improve the canyon, including the creation, eventually, of a third, separated lane for public transportation only with pull-offs to allow for expanded and efficient public transportation.	Website
313	I believe widening Wasatch Blvd. will only increase the traffic pressure in the areas leading to and in the Canyon. Neighborhoods east of Wasatch are already greatly impacted by the traffic in both Summer and Winter. The speed limit on Wasatch as it approaches Kings Hill Drive from the south is supposed to drop to 40 mph around the BLIND CORNER. However, it is not enforced and anyone trying to go south on Wasatch from Kings Hill Drive has almost no warning or visibility of oncoming traffic. Going North is almost as bad since it is impossible to get up to speed from a stop before you are tailgated by vehicles travelling at well over 50 mph. The 40 mile speed limit needs to be enforced with radar and the 40 mph limit should continue until after the stop light at 3500 east. I suggest members of UDOT need to experience trying to turn South on Wasatch from Kings Hill Drive during morning rush hour in order to fully appreciate the danger involved.	Website
314	I believe widening Wasatch Blvd. will only increase the traffic pressure in the areas leading to and in the Canyon. Neighborhoods east of Wasatch are already greatly impacted by the traffic in both Summer and Winter. The speed limit on Wasatch as it approaches Kings Hill Drive from the south is supposed to drop to 40 mph around the BLIND CORNER. However, it is not enforced and anyone trying to go south on Wasatch from Kings Hill Drive has almost no warning or visibility of oncoming traffic. Going North is almost as bad since it is impossible to get up to speed from a stop before you are tailgated by vehicles travelling at well over 50 mph. The 40 mile speed limit needs to be enforced with radar and the 40 mph limit should continue until after the stop light at 3500 east. I suggest members of UDOT need to experience trying to turn South on Wasatch from Kings Hill Drive during morning rush hour in order to fully appreciate the danger involved.	Website
315	I am opposed to any expansion of the existing roadway 210. Enforcing chains/4x4, car pooling, tolling and other measures are preferred to limit the number of vehicles on the road at any time. No trains, trams, or any other transportation methods should be considered for LCC. All solutions should encompass the existing roadway.	Website
316	Dear John, Attached please find comments from Salt Lake City Department of Public Utilities for two Little Cottonwood Canyon Environmental Impact Statement documents, including 1) the Draft Purpose and Need Chapter; and 2) the Draft Alternatives Development and Screening Methodology and Preliminary Concept Report. We appreciate the opportunity from UDOT to comment and to provide expertise as a Cooperating Agency to this process. Please do not hesitate to contact me if you have any questions or need any clarifications from our department. A hard copy of these comments will be mailed to you as well. Sincerely, Laura Briefer Director	Email
317	I believe there is a fatal flaw in the draft EIS purpose and need chapter. That flaw is the lack of recognition that SR-210 is a dead-end canyon. As such, it can not be a thoroughfare where traffic is mobile, moving through with safety, reliability and fewer and shorter delays. Instead, traffic must turn around somewhere and return out of the canyon. I think it is critical to consider that increasing mobility by enhancing flow into the canyon does not equate with movement within the canyon, nor in the Town of Alta, at the terminus of the canyon. Minimizing traffic congestion along Wasatch Blvd., and at the trailheads, will improve travel for residents, visitors and commuters, a stated goal. However, because the goals fail to consider the terminus and traffic moving there, or adequacy of parking or capacity, the purpose and need fall short. Secondly, local traffic plans, are said to be given secondary consideration. Instead, local considerations must come first, at least in Alta. There is nowhere for the traffic to go; moving vehicles quickly into a closed system simply delays the congestion, putting the burden onto the municipality and its resources. How will the vehicles and pedestrians be handled at the terminus, where will they park, where will they turn around, where will they wait? Failure to consider not only SR-210 roadway capacity, but the capacity of the environment surrounding that roadway is also a fatal flaw. Wilderness areas, the national forests and the private properties are not unlimited; sustainability requires establishing a limit before improving travel to more "mobile, reliable and safe traffic." To what end? Consideration must be given to not only population increase forecasts, forecasts of climate changes, and frequency of possible climate extreme events must be considered in the purpose, need and evaluation of potential alternatives if the EIS has any hope of meeting needs in the future.	Website

318	<p>Please include the alternative of an avalanche bypass road in the EIS for Little Cottonwood Canyon.</p> <p>The concept is as follows:</p> <p>Create an avalanche bypass road that starts below Maybird Gulch slide path and travels up the South side of the canyon outside of the avalanche slide paths and joins the main road near Entry 1 of Snowbird. Widen the road below Maybird Gulch to a three or four land road. Some design work has been previously done as a proposed mid-canyon realignment of State Highway 210. Alta Ski Area has a copy of the design work previously done if you would like a copy.</p> <p>Benefits of this alternative include the following:</p> <p>The capacity to move vehicles in and out of the canyon in normal conditions would be doubled! This would significantly reduce congestion entering and exiting in the canyons and in the neighborhoods at the mouth of the canyon during peak visitation and use times.</p> <p>The junctions near Maybird and Entry 1 could be designed to route traffic to both the mainline and the bypass road or to use only one of the roads at a time. This would provide a variety of options, such as:</p> <p>Rather than shutting down the main line for a midday shoot, the main line could be shut down and the bypass road would stay open and allow traffic to keep following. This would eliminate many of the congestion problems exiting the canyon created by midday shoots.</p> <p>During heavy snow storms, one road could be shut down and plowed while the other is being used and then shut the other road down and plow the one that was being used. This would result in better road conditions during heavy storms and better traffic flow.</p> <p>In the event of an accident or issue on one road, the other road may be able to be kept open to keep traffic moving</p> <p>At the end of the day, Entry 1 & 2 traffic could be fed into the bypass road and the mainline used for Alta traffic allowing more balanced travel times for visitors exiting the canyon</p> <p>At times the bypass road may be able to be kept open while Avalanche mitigation work is done above the mainline. Especially if RACS come into play in the future.</p> <p>This would provide an alternative ingress/egress route if the mainline were closed due to a rockslide as we saw last summer or avalanche in the winter.</p> <p>During the summer months, one of the roads could be closed for events such as bike races while the other road could still be open.</p> <p>It seems that a bypass avalanche road provides all of the benefits of snowsheds and more.</p> <p>Thank you, Michael Maughan, Alta Ski Area</p>	Email
319	<p>Hi,</p> <p>First of all, I apologize as I only just discovered this comment period and can't read through all the documents. Please take what feedback is applicable. As a community member, here are the components that are important to me.</p> <ul style="list-style-type: none"> - I'm opposed to the SkiLink, One Wasatch, or whatever it's called these days connecting Park City and the Cottonwoods. This clearly favors a few resorts as the ONLY recreational users of these mountains. I am skeptical of it's impact on driving, as Utah is growing substantially, it would seem a majority of the traffic is from people on the Wasatch Front. This link also damages areas for other recreational users. - The National Forest is meant for all, not just the businesses of the ski resorts. They place such a huge part of our economy, however other users are relevant as well. We need to be able to provide opportunities. This means roadside and parking lot access for hikers, snow showers and back country skiers. - To be honest I think the best way to mitigate all the delays would be to not allow traffic that isn't employees or residents. However with that, we need to incentive/provide parking, and an efficient system that allows users to enter/exit at a multitude of stops. How to do this, I think is a grand challenge. <p>I apologize for the short response and try to be better about keeping an eye out about this matter.</p> <p>Thanks,</p>	Website
320	<p>I am a long time Snowbird skier and former employee. The bus service up LCC needs to be expanded in the middle of the day. I frequently go up in the am and come down between 12:30 and 1:30. There needs to be a constant shuttle up/down LCC at least Fri-Sun to help eliminate traffic and parking problems. Currently there is a break of over an hour and a half to get back down in the middle of the day. So I have had to stop taking the bus and drive (so that I can get back down in a timely manner).</p>	Website
321	<p>In its role as a Participating Agency, Salt Lake County has been involved in determining the Purpose and Need for the Little Cottonwood Canyon (S.R. 210) EIS. We support the identified need for the project that will improve safety, reliability, and mobility for all canyon users. The proposed alternatives/concepts to be included in the Level 1 screening process are well matched to the Purpose and Need.</p> <p>Salt Lake County understands that the preliminary evaluation of the concepts/alternatives is for the purpose of determining how well the alternative/concepts generally matches the project's Purpose and Need. As the alternatives/concepts are refined and move into the Level 2 screening for environmental impacts, the County would like to see analysis for the impacts of various alternatives on air quality, protection of the watershed, as well as the ability of the alternative/concept to provide modal options to reach a desired location within Little Cottonwood Canyon in a reasonable amount of time that reduce single occupant vehicle usage.</p> <p>Since Little Cottonwood Canyon is an important resource to Salt Lake County for watershed, tourism, recreational experiences, we will be actively involved in the Environmental Impact Statement process through its completion. A key value for the County is improve Little Cottonwood's transportation access for all users.</p>	Website

322	<p>Vince,</p> <p>Here are comments from UTA. Please let me know if you have any questions. P & N Section 1.3 Regional Transportation Planning (p1-11) · Recommend removing this section, moving information into Section 1.4.2 Table 1.3-1 (pg 1-12) · The Funding phase for "Little Cottonwood Corridor- Special Service Bus should be "unfunded", not "3". · To assure we are talking about the RTP the Limits of the Little Cottonwood Canyon Park and Ride should be "SR 209 and Wasatch Blvd" instead of blank because everyone will think it's at the mouth. Figure 1.4-8 and 1.4-9 (p1-30) · Road capacity line should be added the figures. Summer vs. winter traffic · Need a better description of the anticipated travel pattern for summer vs. winter recreation, projected to 2050. This is particularly important if we are to improve mobility for winter recreation and not for summer recreation (Example: no transit in summer). Based on Figure 1.4-9 and growth rate of 1.2%, the July 4th traffic would be around 1000 vehicle per hour (congestion condition). Expected future demand · It would be good to extrapolate data to estimate people/hr for 2050, since that will be the demand that we would need to design for to address mobility. Length of document · Considering the recent focus to make NEPA documents more concise, specifically 150-300 pages for major infrastructure projects, has UDOT provided guidance on the expected length of this EIS? P&N + Methodology = 50+33 = 83 pages. Methodology Table 1 (p8) · Improve mobility in 2050 - Meet peak-hour average total person demand on busy ski days in Little Cottonwood Canyon. --- What is this number? Please define and quantify in P&N Chapter.</p>	Email
323	<p>Autumn Hu</p> <p>35 MPH speed limit mlm) 2. 1-lane in each direction with 1-center lane for BRT (high-speed, direct buses), HOV & left turning</p> <p>3. Design road expansion around existing old growth trees. Preserve the nature that filters car exhaust pollution and mitigates noise.</p> <p>4. None of UDOT's informational materials nor EIS bring up future costs, both financial and health wise, to taxpayers. Maintenance of these expanded roads and highways and the toll on human health for associated air pollution from car exhaust & petroleum-based tires, noise and light pollution to surrounding neighborhoods from the widened roads and highways.</p> <p>5. Solid, well-managed Transit plan</p> <p>6. 2050 Level of Service (LOS) D target should be attained through funding: 75% for transit and 25% for expanded or new roads</p>	Website
324	<p>Vince,</p> <p>Attached are the Forest Service comments on the UDOT LCC EIS Draft Purpose and Need Chapter and Alternative Screening Methodology Report.</p> <p>Please do not hesitate to contact me with any questions. Lance Kovel</p>	Email
325	<p>Some items are indisputable: Little Cottonwood Canyon highway is a dead end road. At the end of it there is very limited parking. Any action that speeds up the flow or increases the capacity of that road will only fill the parking faster. Those actions are folly. The only sensible action is to reduce the number of vehicles using the road. There are a number of solutions to that such as, even/odd license plates, metering, tolls, car pool incentives, more attractive bus service, combinations of those or others. It boils down to this: It is not the road that is the problem, it is the number of vehicles on the road that's the problem.</p> <p>Another indisputable is that humankind is in the midst of a very significant change in our climate due to the increased concentration of atmospheric green house gases. Any environmental assessment of transportation MUST take that into account, not just from a vehicle emissions standpoint, but what global warming will do to the destination of travelers up our canyons.</p> <p>Finally, the Wasatch range has a finite ability to absorb the impacts of human presence. But we don't know what that limit is. An EIS must address not only the impact of the transport of humans, but their impact on the destination. Facilitating increased use of the mountains degrades their ability to sustain that use.</p>	Website

I agree with Unite for CH-W
Unite for CH's official comment can be found here: <https://bit.ly/2RIHWgl>

My Personal COMMENTS.

As a regular user of SR-210 over the decades, I have seen changes. But one thing I haven't seen changed, is mother nature's ability to constantly surprise us. The weather in the canyon is predictably unpredictable. This causes many traffic concerns due to snow and traffic mitigation on the canyon roads during winter.

In my experience over the decades, the difficult traffic is a result of the weather patterns. Snow and ice create unsafe roads that are then closed, limited, or dangerous. Many vehicles must wait for the road to clear, and movement may be slow once allowed. Single file traffic is slow by definition, yes, but that is how it works in dangerous conditions, NO matter how WIDE or how MANY lanes are there.

Bottlenecks occur due to canyon closures and conditions.

Safety is the biggest concern. We can help mitigate snow concerns, but more efforts need to be in place to discourage "driver error".

Many accidents occur because of human error. Driving too fast for the conditions, visibility issues, inexperienced drivers, poor tires, lack of 4x4, or inadequate vehicles. This leads to increased slowing and traffic backup, and even further accidents.

The amount of cars traveling the canyons is independent of the width of the road.

—Widening does not solve the problem.

More efforts should be implemented to discourage higher speeds, inexperienced travelers, non-HOVs, and substandard/ill-equipped vehicles from traveling on these roads.

The viability of SR-210 for commuter travel is highly questionable.

It is unreliable due to the sudden and severe weather conditions, accidents, neighborhood use, tourism, and ski traffic. It is impractical for higher speeds because of those same reasons, and the important inclusion of Cottonwood Heights residential areas. The speed, traffic and noise are not conducive to residents right to peace and restful relaxation in their own homes. It impedes the safety, health, and welfare of the citizens not only living there, but also those attempting to enjoy the neighborhood, the canyons, and its recreational aspects and beauty.

The pollution is increased by cars idling in wait. A wider road will provide a larger and more ample place for those same cars to sit, idle, and wait. —That is not a solution to pollution.

Widening the roads to increase travel for commuters also increases the pollution, noise, and risk of accidents. More accidents are likely with the severe weather changes, ice and snow that arise.

Travel needs to be open to all forms of mobility, not just car-centric. However, cars can hinder the ability for other modes of transportation and recreation to co-exist. That may further limit our growth toward our city and states sustainability and environmental goals.

We need to protect our canyon road for use, and for the protection of the natural floral and fauna that exist there. Our canyons ecosystem is a priority that doesn't seem to be addressed in these equations. These mountains, the plants, animals, migratory patterns, breeding, food source, and water have been in existence long before we inserted a road. However, our road has been taking a toll on its predecessors.

Economically speaking, changes to SR-210 will be costly. But we are not just talking dollars and cents to build it.

This area is vital to both Cottonwood Heights (and surrounding cities) and the Sate of Utah's tourist revenue. The natural and untouched feel of the canyons is key to its appeal. People come from far and wide, and across continents to be here.

This is a respite from the urban life and crowded cities our modern world have provided us. It is a needed and highly valuable Source of beauty, relaxation and recreation.

The progression of this project needs to ensure the protection of our natural attractions and left as untouched and unhurt as possible. A road can be built at any time, in many locations, but a natural beauty, mountains, flora, fauna, and ecosystem can never be replaced by man. No matter how hard he tries.

Let's focus and integrating our needs into the needs of the canyon and ALL that reside in or use it. Let's slows it down, be eco friendly, encompass alternative modes of transportations, recreation, reduce noise and pollution, and create the most effective and pleasing access to the canyons and neighborhoods as we can. If we choose to build, let's be thoughtful in design. Let's build for today, to improve our future.

Let's make this an example of what can be done in this modern day and age to create a fusion of our human wants, and economic concerns with continued education and observance of our natural environment.

Let's tread carefully. This decisions made in the boardroom have a lasting and irreversible impact on many lives.

326

Website

"to substantially improve safety, reliability, and mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210." ~ UDOT.

I'd like to base my comments on the above quote from the document of Purpose and Need and measure the Documents against this particular statement.

1) Mobility: About half the daily trips within the Wasatch Blvd segment of S.R. 210 is generated by local traffic. That is, people that live in residential neighborhoods within the limits of this segment of S.R. 210. The word "MOBILITY" is defined in your document as: "ability and level of ease to travel along a highway facility." "ALONG" as expressed by UDOT, identifies only those people that enter and exit Wasatch Blvd segment and misses to provide and identify the needs as well as potential solutions to a significant number of users that travel across, and turn in or out of, rather than travel along the full distance of this roadway. This proves to be a major blind spot throughout the entire document, which fails to mention the need to improve conditions for pedestrians, cyclists, and even car travel that cuts across, starts, and terminates, within this segment of the roadway. Or to what purpose improvements to this type of users could benefit the overall efficiency and capacity of the segment of road. Example; If 15% of all car traffic in Wasatch is from people on the east benches going across to the west side of Wasatch to go to school, stores, or other small errands, perhaps we could estimate that 75% of these small trips in 30 years could be done by means other than the automobile if the facilities to do so provide a convenient and safe alternative. Such a study would provide a cost benefit analysis in long term investment of protected bike lanes, sidewalks and traffic design that promote such behavior.

2) Reliability: Perhaps the section that I have the most difficulty with is the reliance that this document shows on LOS and Safety information, both used in conjunction to show present deficiencies of the roadway as it pertains to move cars as fast as possible "ALONG" Wasatch Blvd. While I am now aware of any requirement other than a self-imposed goal to retain a Level of Service of D or "better, such accommodation goes contrary to many comments made by Mr. Thomas – as well as other individuals that have presented information to the public regarding how mass transit can benefit from preferential movement while cars are enjoying an LOS environment of F. Road widening is being justified by utilizing WFRC Choice 2050 RTP plans that show a 5 lane configuration. An LOS of D in 2050 would imply – by any methodology I can find– an LOS of B or A along the entire roadway in the next decade. Allowing such favorable car conditions would make it absolutely impossible for mass transit to ever become the preferred method of travel for any users of this roadway; cementing car dependency in our community. Which takes me to the point of how much information is shared about car travel and yet there are absolutely NO studies presented within this document stating present conditions for mass transit, cycling, and pedestrian users nor any mention of any target goals for these type of users. This is a MAJOR BLIND Spot of this document that should be rectified as soon as possible if the intent is to improve reliability and safety in this corridor for "ALL USERS". Moving on to safety – Historical data is a terrible source of information when it comes to show the level of safety of a roadway, intersection, etc. the LAW OF PROBABILITY would dictate that 2 unrelated events have an identical rate of probable outcomes regardless of how many times that event is repeated. Like flipping a coin, no matter how many times you flip the coin, there is a 50% chance it will land heads. Same concept, but in this case each time a person turns left to access Wasatch Blvd there is a probability that an accident might happen regardless of previous results. Further, there is well documented data that can predict the outcome of that accident based on factors of speed and direction. Example; a broadside collision of a car traversing an intersection at speeds equal to or below 30 mph results in low likelihood of serious injury; something in the single digits. Increase the speed above 40 mph and the likelihood of serious injury is above 85%. For every occurrence of a car moving across that intersection the probability of catastrophic accidents is fixed by the speed at which the roadway is designed to allow cars to travel. Which is why, increasing the number of lanes that a local user needs to traverse to access Wasatch, and the speed at ""which cars will be travelling present a clear and quantifiable safety hazard. As I stated above – about half the daily trips in this segment of the road are trips that turn and cross the flow of traffic along Wasatch. For this reason I find it of great concern to read in this Notice of Purpose and Need the necessity to increase visibility, clear zones, lane width, number of lanes, and re-aligning the road to make it straighter. These are all elements that allow for vehicles to flow at speeds that increase the likelihood of serious injury to occur and make travelling in and out of my neighborhood unreliable.

3) Mobility – Much has been made about how the expansion of Wasatch blvd is a long established plan that is present in regional planning documents. I would like to point out that the WFRC's Choice 2050 has determined specific goals for our region that are not mentioned in UDOT's documents. Individual improvements based on such plans should inch our communities towards the attainment of these goal:

- *Healthy and Livable Communities
- *Access to Economic and Educational Opportunities
- *Manageable and Reliable Traffic Conditions
- *Quality Transportation Choices
- *Safe User Friendly Streets
- *Clean Air
- *Housing Choices and Affordable Living Expenses
- *Fiscally Responsible Communities and Infrastructure
- *Sustainable Environment
- *Ample Parks Open Spaces and Recreational Environment

Again, other one goal listed above that UDOT, through the mandate of the state legislature seems to zero in is Manageable and reliable traffic conditions, as measured through LOS and car capacity. But by taking on the WFRC plans I fail to see how UDOT is taking account and measuring present conditions and future improvements in quality transportation choices, clean air, Safe user friendly streets, sustainable environment that will enhance the vision that the WFRC has set out for our communities. There are no studies that show if there is a meaningful impact on the quality of air, or noise, or safety under present conditions and how any improvements will impact these issues. Studies show that reducing speeds from 40 to 30 mph reduces the noise level by half. Nothing here shows that - and therefore I find it incompatible to adopt"" goals from the WFRC and not take in account the larger goals of this organization, and instead reducing it to a narrow minded state legislature mandate.

It is no accident that the community advocates a speed limit no greater than 35 mph for Wasatch Blvd. And I find it baseless to dismiss this requirement as an operational rather than strategic goal. Safety, health, and overall welfare of the community are best served by setting design and goals through design a safe level of speed. As I mentioned to Mr. Thomas at a neighborhood meeting, electric grid networks do not send high current electricity through neighborhoods, they step down the current to increase the level of safety. As such, when traffic traverses through the residential area of Cottonwood Heights, it is imperative to lower the speed.

I hope my comments help in any shape or form the creating of improvements alongside my neighborhood that will reflect the excellence of the team at UDOT as well as enhances the quality of life and recreation experience of all those that find themselves in it.

Thank you,

Eric Kraan.

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Website

To view online: <https://bit.ly/2RIHWG1>

Unite for CH ~ Wasatch Blvd
November 27, 2019

Public Comment with regards to the Purpose and Need UDOT Document (Little Cottonwood EIS)

On November 4th, 2019 UDOT released a Purpose and Need document in relation to their Little Cottonwood Canyon EIS. Because this project will determine the function, design, safety, and operation of Wasatch Blvd within city limits, U4CHW has gone through the effort to review and present to this document to UDOT as our collective public comment, as well as to disseminate this information among residents of CH with aim to help the public understand, formulate and submit a better informed comment to UDOT.

UDOT is accepting public comment through December 13, 2019. We hope our effort helps empower citizens to share their concerns in a constructive manner, as well as assist UDOT in how best determine the improvements of this project for the benefit of all. You can view UDOT's documents and enter your comments at their website:

Summary of our overall impression and relevant content

Overall Impression:

Unite for CH-Wasatch finds with deep regret, and to the great consternation of local residents, that new standards of planning and design are NOT being adopted and utilized by UDOT as presented by their official documents. THEREFORE WE ASK ALL RESIDENTS AND CONCERNED CITIZENS TO UTILIZE YOUR OPPORTUNITY FOR PUBLIC COMMENT TO DEMAND OF UDOT A HIGHER LEVEL OF EXCELLENCE.

Summary:

UDOT recognizes 3 different segments of S.R. 201 with distinct elements and character. UDOT was charged by the state legislature in 2017 to make transportation improvements at tourist and recreation destinations within the state with significant economic development impact. UDOT determined to focus mostly in Little Cottonwood Canyon "because of its high recreational use and economic benefit from tourism to the State."

UDOT consequently determined that for transportation improvements to be effective, they would have to reconfigure more than just the canyon road itself, therefore expanded the project's scope from the intersection of Ft. Union Blvd. and Wasatch Blvd. to the City of Alta. While UDOT welcomes public input and input from the City of Cottonwood Heights, they make it clear that these are secondary recommendations.

We have identified major blind spots within this project, The purpose and need document continues to make scant mention of current air quality conditions, fails to mention any detrimental impact to human and wildlife from roadway noise, and avoids any mention of negative impacts to human and wildlife as a result of current operating speeds along this corridor.

UDOT seems to justify widening plans for Wasatch blvd (from 2 to 5 lanes) by adopting the Wasatch Front Regional Council's (WFRC) Regional Transportation Plan (RTP), but fails to take into context the broader goals that guide the WFRC Vision 2050 document. It should be requested, by both the public and the WFRC, for UDOT to adopt a balanced approach to improvements in order to further the goals of the WFRC: "Healthy and Livable Communities, Access to Economic and Educational Opportunities, Manageable and Reliable Traffic Conditions, Quality Transportation Choices, Safe User Friendly Streets, Clean Air, Housing Choices and Affordable Living Expenses, Fiscally Responsible Communities and Infrastructure, Sustainable Environment, Ample Parks Open Spaces and Recreational Environment." ~ Wasatch Choice 2050, Goals and Strategies.

UDOT has publicly acknowledged adopting "a new way" for this project, a more progressive approach to mobility as well as unprecedented collaboration with other entities. Yet, the Purpose and Need document does not reflect such resolve and retains old patterns that contradict voiced opinions by project director, Mr. John Thomas.

First and foremost, this document acknowledges the use of a rigid and antiquated road classification system which categorizes Wasatch Blvd as a Principal Arterial. This classification equates freeway conditions, i.e.; I-215 and by doing so it limits the range of solutions that can be employed for the benefit of mobility of ALL users of Wasatch Blvd.

"The two main shortcomings of the Functional Classification System in an urban environment are that it does not consider other modes of transportation and does not consider roadway functions outside of access and mobility." ~ Urban Roadway"

"Classification - Before the Design Begins, GERRY FORBES

Predictably, UDOT continues to utilize automobile LOS as the one and only measurable form of mobility within the corridor; so far as to provide current count of cars, future estimated travel demand, and even establishes a minimum requirement of Level Of Service (LOS) of D as a long term goal.

There is very little mention of current bicycling conditions and no mention at all of a target level of service once improvements are completed. There is a brief description of how poor mass transit currently performs, but fails to measure any current LOS of this particular form of transportation; further, any attempt at determining a specific long term LOS goal for it is sorely missing. Much more troubling is the absolute absence of pedestrian conditions, present or future, along Wasatch blvd.

The public should also feel disappointed to learn that UDOT treats safety as a historical element through the use of VMT (Vehicle Miles Traveled) rather than utilize the more progressive sustainable safety guidelines consistent with Vision Zero and systematic safety guidelines. In essence, the difference lays in the understanding that the risk for accidents with serious injury has no relation to past events, but each new interaction among users of Wasatch Blvd presents an independent, measurable, and therefore preventable level of risk. ALTA Planning + Design summarize this new approach best:

"The foundation for reducing speeding-related crashes is setting and designing to a target speed that is appropriate for the context. Our job as transportation professionals is not to defend past practices (i.e. how a street was previously designed or how to set speed limits), it is our job to evolve our practices to reflect the new societal needs/cultures, new environments, changes in land uses, or changes in a community or corridor. It is our duty to re-evaluate all the factors, which often times warrants new approaches to address the complex needs of today. Designing "self-enforcing" streets that force people driving to slow down and pay attention to their surroundings is critical to reducing speeding-related crashes." ~ Alta Planning + Design

A more detailed look at UDOT's Purpose and Need document

1.1.1 Description of the Study Area

UDOT states in this chapter the boundaries of the study from Ft. Union"

"blvd to the town of Alta as an area that is influenced by the transportation operations of Little Cottonwood Canyon. Further, it distinguishes 3 distinct segments of S.R. 210 for clarity each for its own character, function, and separate environmental conditions (Land Use, community, destinations). Wasatch Blvd; between Ft. Union to the Split to La Cañe (High-T intersection) is the first segment enumerated in this document, and the one we will concentrate in.

1.1.2 Environmental Impact Statement

As a chapter that describes the area, UDOT talks about the wilderness preservation aspects in the canyons, the watershed value to the communities in the valley, and the proximity to an ever growing valley and the value to the state's economy due to recreation activities in the canyon, parking needs, and the directive from the state legislature to fund transportation improvements that have a significant economic development impact associated with recreation and tourism, that are impacted by traffic congestion. What this chapter fails to mention is the poor air quality the valley experiences due mainly by excessive car dependence b local communities, the existing noise levels the current operation of the road generates within the residential as well as the and wilderness areas S.R. 210 traverses and the safety concerns to people and wildlife by speeding traffic in this corridor.

1.2.1 Purpose of the Project

UDOT states its primary objective as: "to substantially improve safety, reliability, and mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210.

We find the lack of definition of "all users" in their objective somewhat perplexing. In the side-box next to their objective definition, UDOT defines Mobility as the "ability and level of ease to travel along a highway facility." But not ALL users of S.R. 210 move along Wasatch; many of them traverse, cross, enter, and/or exit at different intervals of the roadway. Therefore, while the elements UDOT is considering from the CHWMP (Cottonwood Heights Wasatch Master Plan) will be used to refine, but not eliminate alternatives from consideration. U4CHW feels that mobility, as defined by UDOT, is inaccurate and excludes about 50% of all users (Local traffic that originates or terminates within the residential streets connected to Wasatch Blvd) in conflict with the stated goal of

"improving conditions for ALL users of S.R. 210.

At the end of this chapter, UDOT again proposes to review and minimize, rectify, or reduce potential impacts to the human and natural environment, but fails to enumerate a large number of impacts; such as air quality impacts, noise levels, animal fatalities, etc. for which no baseline is provided, no study has been conducted, and therefore we cannot make an educated assumption as to what the future conditions might result from the improvements that might be performed.

1.2.2 Need for the Project

A list of 5 needs is presented to the reader at this point, along a definition of peak periods. Peak periods UDOT explains, are" the periods of the day with the greatest amounts of traffic... Peak periods are looked at by transportation analysts when examining the need for a project." In plain speak UDOT is saying that at some points of the day, or by seasonality, there are too many cars to fit in the road. Careful consideration about peak times should be evaluated due to the fact that over-emphasizing LOS is often used to justify overbuilt roads that are inhospitable to pedestrian or any other road user not moving along passenger cars, thus further inducing more car miles driven, more traffic, and more need for greater expansion of the road. U4CHW seeks to terminate this vicious cycle and use this opportunity to make qualitative rather than quantitative improvements. Further, we are concerned about the fact that UDOT is using the term "Travel Demand" as "a single number of transportation trips in an area." Travel demand is a multi-faceted

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Website

329	<p>1 - One of the primary considerations when evaluating transit options should be user-friendliness. A really user-friendly bus system, for example, could reduce traffic and parking congestion in Little Cottonwood. Many skiers don't use the current bus system in Little Cottonwood because it isn't user-friendly. A dedicated bus station at a ski resort, for example, would help in this regard. It could be located away from the main congested parking areas and could have a heated building with an indoor waiting area including ample seating and ample lockers for people to store stuff during the ski day. Such a facility could include a ticket office for the ski resort as well. A short two-way ski lift or a covered conveyor belt could move skiers between the transit terminal and the base of the ski lifts. Similar user-friendly facilities could also be located at the big transit hubs being considered at the gravel pit and on Highland Drive, possibly including restaurants where people could enjoy breakfast or an after-ski snack. A user-friendly bus system, once in place, could be actively promoted by the ski resorts in their advertising materials.</p> <p>2 - Evacuation of the upper part of Little Cottonwood Canyon in the event of a prolonged road closure is an important consideration from a safety standpoint, and this should be included in any analysis of alternatives. A high-speed aerial system or even twin aerial systems could connect between Alta and the resorts Big Cottonwood. Maybe one between Alta and Solitude and another between Alta and Brighton. Coupled with an aerial transit connection between upper Big Cottonwood Canyon and the greater Park City area, this could reduce traffic flow and parking demand in Little Cottonwood Canyon. However, it could also enable evacuation of people from one canyon into the other in the event of a prolonged highway closure in either canyon. For these reasons, I suggest that the study area be expanded to enable UDOT to look at all options.</p> <p>3 - Adding a second park-and-ride facility at the mouth of Little Cottonwood could create more problems that it solves. The "Y" intersection is already a chokepoint during periods of high traffic congestion, and the ingress/egress options for a second parking facility at the "Y" could further complicate things. Due to space constraints, such a parking area would probably not accommodate enough cars to make it worthwhile unless a multi-story parking garage were built, which would detract from the aesthetics of the mouth of the canyon.</p> <p>4 - Finally, members of the Granite Community, which includes neighborhoods at the mouth of Little Cottonwood Canyon plus the entirety of the canyon itself outside of Alta and Snowbird, have a lot of local knowledge and experience with canyon traffic and parking issues. I recommend that the Granite Transportation Committee established by the Granite Community Council be given a seat at the table during the EIS process.</p> <p>Thanks for taking my views into consideration.</p> <p>Best regards,</p> <p>Bill Clayton District 6 Representative Granite Community Council</p>	Website
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	<p>I take issue with Section 2.3.1 The Purpose of the Project. The purpose of the project as stated in this section is reflected in one primary objective for S.R. 210: to substantially improve safety, reliability, and mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210. To what extent are the other "secondary" purposes described in this section subjugated by the primary purpose ?</p> <p>Nowhere in the Draft Purpose and Need or the Draft Alternatives Development and Screening Methodology and Preliminary Concept Report is mention made of the concept of carrying capacity, i.e., the maximum use capacity of Little Cottonwood Canyon from an environmental standpoint, beyond which the environment of the Canyon will be significantly and irreparably degraded, including the water quality of Little Cottonwood Creek. Instead, the documents project estimated use (in number of vehicle trips and visitors per year) for the year 2050. Even then, neither document assumes the visitation figures will be static beyond the year 2050. Unless we (all stakeholders and the general public) are able to arrive at a mutually agreed upon number (or set of numbers, such as number of visitors and vehicle trips per year) that would represent upper limits for annual use, and then enact the necessary use restrictions, we will never solve the problem of attempting to accommodate the ever increasing recreational demand within Little Cottonwood Canyon.</p> <p>Preliminary Evaluation of Alternatives: I was pleased to see a considerable list of alternatives that will be evaluated under the EIS, particularly the number of alternatives under Tolling, which sooner or later will have to implemented in an attempt, along with the initiation of bus service in the summer, to constrain the growth of or possibly reduce vehicular traffic in Little Cottonwood Canyon. I agree in principle with many of the alternatives listed, even some that are outside of the scope of the EIS. However, I have limited my comments to a select number below:</p> <p>Mobility/Capacity:</p> <p>I am not in favor of widening SR 210 between the mouth of the Canyon and Alta to increase road capacity, as this option will only fuel the growth of vehicular traffic in LLC. I would rather see the elimination of single occupancy vehicles during the ski season on weekends, or at least a reduction through tolling, bus transit, and possibly other measures.</p> <p>On-road Parking at the Resorts:</p> <p>The most effective means of eliminating on-road parking at Alta and Snowbird during the winter will require more skiers to take public transit in conjunction with tolling at the mouth of the canyon. As a further refinement to implementing tolling and enhancing public transit in LLC, require both Alta and Snowbird to notify UDOT when they estimate that their parking lots will reach capacity. This estimate would require resort parking personnel to keep in continual communication via radio with toll booth operators at the mouth of LLC. Toll booth operators at the mouth of the LLC would collect a toll from each vehicle going up the canyon, and at the same time would ask each vehicle its destination. Based on the responses, the toll booth operator(s) would tally how many vehicles are going to each resort, and periodically (for example, every 15 minutes) notify parking personnel at each resort the number of vehicles on SR 210 within the canyon that will require parking. Based on that information, and continuous communication between the toll booth at the mouth of the canyon and parking personnel at Alta and Snowbird, each resort eventually could predict with considerable accuracy the approximate time when each would reach parking capacity. The resorts would relay that prediction of when parking capacity would be attained to a UDOT dispatcher, who would provide that information to the toll booth operator(s) and also to the general public via the UDOT website, and perhaps websites for the Alta and Snowbird resorts, and also via as-yet-to-be built electronic signage along SR 210 north of the mouth and along SR209 west of the mouth of LLC. Since the vast majority of the general public has a smart phone, most skiers going up to the resorts would receive information regarding available resort parking via their smart phone, If public bus transit were available at a proposed transit hub near the mouth of the canyon, skiers who had not yet reached the toll booth at the canyon mouth could, upon learning that resort parking was full or would soon be full, park at a parking lot at that hub and" "subsequently take a bus to the resorts. Some vehicles headed up to one of the resorts might only learn at the toll booth that parking capacity had or would soon be reached at their destination resort. To minimize parking along SR 210 at both resorts, once resort parking capacity is reached, toll booth personnel would strongly urge vehicles to take public transit at a nearby transit hub. This approach would not fine motorists who park alongside SR 210 at the resorts during ski season, at least initially, but would hopefully at least reduce the number of vehicles that do so. Public education regarding the benefits of taking public bus transit would also be integral to this alternative, with the objective of mitigating or eliminating the problem or roadside parking at the resorts. It warrants consideration but will only be effective if tolling is implemented at a physical toll booth. This option could be summarized under ""Improving resort parking conditions communications.""</p> <p>I don't favor reversible lanes as they would not be feasible without the construction of a third lane all along SR 210 in LCC. I don't see how a reversible lane option would work for a largely two-lane road. Likewise, having SR 210 be one way during peak AM and PM periods ignores the potential needs of emergency responder vehicles. This idea is a non-starter.</p> <p>Tolling: Tolling needs to be seriously considered, and in my opinion, implemented, but in conjunction with bus service in the summer-fall, in order to reduce traffic congestion in LLC. Tolling should be straight forward, simple (based on the number of occupants), and with the option of purchasing a monthly pass for frequent users. I favor tolling all non-transit vehicles, but residents who live in LLC and those that work at the resorts and other businesses should be given special consideration with respect to tolling fees. Dynamic tolling based on the time of day, and perhaps weekday vs. weekend, should be seriously considered. Tolling revenue could pay for additional infrastructure required, e.g., a toll booth at the mouth of LLC, electronic signage, a new transit hub closer to the intersection of SR 209 and SR 210, etc.</p> <p>Other: One of the alternatives: Improve" "traffic conditions communications could be integrated with the ""Improving resort parking conditions communications"" that I have described above.</p> <p>I look forward to reviewing an analyses of the alternatives presented.</p>	Website
331	<p>It's very concerning and unacceptable the speed of Wasatch Blvd. It is a haven for road rage and speeding at speeds that are dangerous to life and destroying the quality of life for those who actually use Wasatch Bad for daily activities. Wasatch Blvd is not a commuter freeway, it is an access road for the city of Cottonwood Heights and the neighborhoods it runs through. Children use this road, bikers, walkers, runners, older people young people alike. As Wasatch Blvd run from 4500 S. & 3300 S. it has lights to help people access their roads and a speed limit of 40 MPH. For some reason as Wasatch Blvd runs south you have raised the speed limit to 50 right at the area people are trying to access the trails and canyons that are there. Non of the canyons have speed to 50 miles per hour. You then lower the speed as people are trying to access their neighborhoods then raise it again. It all needs to be 35 miles per hour. The stretch between 6200 s. & Bengal Blvd is ridiculous. If you go the 50 MPH you are forced off the road. car are cutting cars off and speeding well above 70 miles per hour. This is also a road used and promoted as a recreational road. I slowed down to get around some bikers on this stretch and was literally driven off the road which would have killed the bikers. Its an extremest dangerous situation you have created. You claim that using tools like adding a decorative median and narrowing the lanes naturally slows down cars. You need to try this on the area from 6200 S. to Big Cottonwood Canyon before you destroy the rest of our city. We feel this will improve the drive for all, the safety of all.</p> <p>We also think its very important to leave the charming winds in the road and the old growth trees. We think these will raise and keep the beauty and charm and prosperity of not only Cottonwood Heights but the canyons and all of the Salt Lake Valley Thanks for you time,</p>	Website
332	Please see the attached FOA comment on this Draft Purpose and Need. Please let me know if there are issues accessing this file. I appreciate your time and hard work	Email

333	I want more buses. I do not want more lanes or a train of any kind in Little Cottonwood Canyon.	Website
334	I want increased bus service up the canyon. I do not want extra lanes or a train of any kind.	Website
335	Do not take someone's home you sick sons of bitches just use more buses it's cheaper and does not take someone's house hope you can pull ur head out of ur ass and see that what u are doing is wrong. Just add more busses ???	Website
336	Use more buses up the canyon. Do not put extra lanes, or a train.	Website
337	Little Cottonwood Canyon belongs to all the people. It should not be destroyed by adding a third lane. Expanding roads for capacity, seems to never end. I-15 through Salt lake and Utah County for example. The problems with LCC Ski traffic, is only a few days a year, for only a few hours, during Avalanche mitigation. Snow sheds, need to be in place at the designated avalanche areas. This would eliminate much of the problems with cars, waiting for the Canyon to open. The two Ski Resorts have around 1500 plus employees. Most drive in personal adomobiles. The Resorts, need to bus them in, before a third lane is added. Tolling, would encourage carpooling, redusing traffic. This Canyon should be presserved. Not destroyed. Thank you. Little Cottonwood Canyon belongs to all the people. It should not be destroyed by adding a third lane. Expanding roads for capacity, seems to never end. I-15 through Salt lake and Utah County for example. The problems with LCC Ski traffic, is only a few days a year, for only a few hours, during Avalanche mitigation. Snow sheds, need to be in place at the designated avalanche areas. This would eliminate much of the problems with cars, waiting for the Canyon to open. The two Ski Resorts have around 1500 plus employees. Most drive in personal adomobiles. The Resorts, need to bus them in, before a third lane is added. Tolling, would encourage carpooling, redusing traffic. This Canyon should be presserved. Not destroyed. Thank you.	Website
338	There should be more buses that go up and down the canyon. We don't need to add more lanes or a train. Please keep our canyons they way that they are. We don't need to add more traffic up and down the canyon.	Website
339	There should be more buses that go up and down the canyon. We don't need to add more lanes or a train. Please keep our canyons they way that they are. We don't need to add more traffic up and down the canyon.	Website
340	I would not like to see extra lanes or a train. Why not add more buses?	Website
341	I vote for more buses and NO train or extra lanes up Little Cottonwood Canyon.	Website
342	I vote for no train or extra lanes up little cottonwood canyon. I vote for more buses up the canyon instead.	Website
343	Please consider that the option of having more buses would have the least impact on the environment as it would require very little to no change in the existing infrastructure and would increase the use of mass transit which would reduce emissions. Thank you.	Website
344	Something desperately needs to be done about the canyon traffic issue. I would love to see rail running up and down the canyon, but we need to stop doing what we're doing. I am against a toll to go up and down the canyon. I've skid and lived in slc my whole life. Currently, I cannot commit to the terribly long lines that exist, so I choose not to ski, which is terrible. We need a relatively quick, inexpensive way to escape the inversion and enjoy our mountains.	Website
345	Having lived in Little Cottonwood canyon all my life I have seen the changes that have taken place in the past 55 years. The canyon has changed from a quiet serene destination to an insanely busy freeway like road where every winter thousands of cars either rush up the canyon in an attempt to be the first on the fresh powder or sit in gridlock trying to get to one of the two ski resorts. The congestion, pollution, noise, and speed of the traffic detract from the beauty of the canyon and bring noise and air pollution into the one place where it is advertised that one can get away from both. Now it is being proposed that widening the road up the canyon to add more lanes and stuff more cars up the canyon will somehow improve something. I believe the only ones this really benefits are the ski resorts and it will without doubt destroy a large part of the canyon. Adding more busses and insisting that those going up the canyon to ski take public transportation might possibly help with the congestion. It is a better solution then destroying the beauty of the canyon by widening the road.	Website
346	Please use more buses, and don't alter the beautiful canyon with a train or more lanes!	Website
347	I do NOT want to see a train going into the canyon. The canyon is beautiful exactly how it is, and we should not wreck the wildlife and not to mention the people's homes that live there. We can always run busses up the canyon which does not disrupt anything and provides the same service. I do not want more lanes or the road widened up the canyon.	Website
348	I don't want a train passing through the mountains or canyon. I don't want to disrupt the wildlife or the beauty of the mountain. I want the mountain to remain as it is.	Website
349	Buses have helped keep traffic Fairly manageable. But more buses would be Very beneficial, would help keep single car drivers out of the canyon during peak traffic. Last winter alone for the Albion jr. High school bus we had 17 police escorts just to get the bus to pick up our children. This does not take into account the Granite Elementry and Waterford buses. Please send more UTA buses!!! They make a Big difference. Thank You	Website
350	I like many of the ideas. I like expanding parking at trailheads, parking structures at resorts. I like snow sheds and better avalanche mitigation. I like having more parking to use to support mass transit. I worry about having a train/monorail, as it would not support many of the other Canyon uses- access to skiing, hiking, climbing from areas not at regular trailheads would be impeded by tracks, and may be impassable . As someone who uses all of the Canyon, I worry about access to the non popular spots.	Website

351	<p>I support the following:</p> <ul style="list-style-type: none"> -If we add more lanes to SR 210, have those extra lanes be for bus only -Impose tolls for private vehicles with fees decreasing with more passengers -Tolls could support free fares for UTA -Provide free park & ride lots -Increase Park & Ride spots, many people would take the bus but can't find a spot to park to take the bus. -Alta direct bus. I don't ski Alta, but if I did, I would never want to take the bus as it takes so many stops to get there -Free UTA buses -No road parking -Charge for parking at the resort unless you have 3 or more passengers -Better bike lanes -Guard rails -Annual Tire/AWD/4WD inspection pass of sorts that won't allow cars up canyon in the winter unless they pass those requirements -Long term solution: light rail 	Website
352	Please keep the changes limited only to extra buses going up the canyon. Any more construction would wreak havoc on the ecosystem	Website
353	I believe that more bus service up the canyon would be beneficial. I would not want additional lanes or a train going up the canyon. This would disturb too much of the existing environment.	Website
354	I want more bus services, not a train or additional lanes.	Website
355	I believe the existing road should remain as it is. More busses or a shuttle service could be useful to mitigate traffic. I do not think any type of train or railway should be introduced to the canyon. I also disagree with widening the road to accommodate more traffic. I have enjoyed Little Cottonwood Canyon my entire life as a favorite area to ski, climb, bike and hike. If any major change is made to the area it may eliminate the charm and history of the area.	Website
356	Having lived at the mouth of little cottonwood canyon for over 50 years I feel that more buses to transport people up the canyon would preserve the pristine nature of the canyon.	Website
357	I want more buses for the canyon. I don't want more lanes and/or a train. Thank you	Website

First and foremost, I want to thank UDOT for its active role in engaging and connecting with community, and the presenting the project. This process has served to help UDOT not only to understand and define the issues, but to better understand and address the needs of local community members who will be directly impacted by this project. It is refreshing to see UDOT take a new and unique approach to this project in inviting community ideas and address their concerns into an ultimate solution. From the compilation of study data, balanced with community needs and concerns, a carefully devised plan for Wasatch Blvd will emerge.

Wasatch Blvd(SR210), has unique use by 3 user groups, listed by priority:

1. Local community neighborhoods, ingress/egress,
2. Tourism/Recreational/Ski traffic

And

3. Commuter traffic(which has increased due to higher density infill by adjoining communities).

Priority should be given to those living within proximity to the immediate area of Cottonwood Heights, who contend with Wasatch traffic daily: Neighborhood accessibility, Walkability, Ingress and Egress to neighborhoods adjoining SR210, Cyclist safety. These areas are a mix of medium density suburban and rural residential which adjoin open space along the foothills/benches. Wasatch Blvd. divides the neighborhoods all along its entire length, due to lack of pedestrian crossings, sidewalks, or safe passage (there are few cross points, none of which are terribly safe). In its current state it is an unfriendly and unsafe stretch of road for pedestrians or cyclists – huge room for improvements here. The driving experience along Wasatch/SR210 provides a unique scenic drive, it becomes more rural and interesting in nature as one moves southbound from Fort Union along Wasatch, and ultimately approaches the mouth of LCC (Little Cottonwood Canyon) – the true gateway to mountain recreation. The goal in Udot's project along this stretch should be to prioritize and embrace the quality of travel experience, be it in car, on bus, on bike, or afoot, thru sensibly and strategically planned design elements/features. Key design elements can bring a sense of place, as well as an inherent anticipatory feel, for travelers as they move towards their goal of entering LCC. As one moved northbound the scene changes from mountainous to rural, suburban and then commercial as one crosses "again Fort Union at BCC. There is a clear visual and sensory hierarchy at play here that can be enhanced to further elevate the travel experience. One means to enhance is to create more green-scape along the length of Wasatch, narrow the lanes, and design a road deliberately for slower speeds, so that folks can enjoy and embrace surroundings rather than race thru them. In doing so, a number of issues can be addressed: increased safety as result of reduced road speeds, decreased noise and pollution, and improved ingress/egress to/from adjoining neighborhoods. Currently, drivers living along Wasatch Blvd. take undue risks just to get in/out from neighborhoods; reducing speeds on Wasatch will give them safer opportunity to cross or get out into traffic lanes. I have spoke before about "neighborhoodizing" this section of Wasatch Blvd, to downgrade it from highway/road to a neighborhood street status, to connect the neighborhods they line its length, and find a solution that creates a scenic byway feel, that gives area travelers a unique and enhanced experience whether they are just heading out to the market, on their way to recreational activities in the canyons, riding their bike, walking, or commuting through.

Sensitivity to adjoining neighborhoods (in respect to safety, noise, and pollution, walkability and sense of neighborhood), and creating a unique traveling experience to/from the mountainous recreational areas, should take priority over commuter traffic.

In short, regarding commuter traffic - it is evident that the sections of Wasatch, south of the High-tee intersection, will not be widened to accommodate the daily commuter traffic that comes from these very areas, as those sections(in Granite, Sandy, and Draper) are outside of UDOT's jurisdiction, so it is perfunctory, and quite irrational, to widen only the stretch of roadway thru Cottonwood Heights, to merely shift the choke-point, and ultimately destroy the neighborhood character of this section of roadway, serves absolutely no justifiable purpose. Commuters will have to put up with traffic slowing as we all do on any given day anywhere across the valley... in other words, they can sux it up. The commuter traffic flow is not enough to justify or warrant rail lines, at this time, who's to say in 20 or 30 more years, but that would certainly be an interesting alternative, "only if," is integrated and planned to connect folks from across all points of the valley to recreational activities in the mountains as well. Final comment on commuters: communities south of Cottonwood Heights are not offering up their city-owned sections of Wasatch Blvd to transform it into a 4+ lane highway, so why should the community of Cottonwood Heights take on burden of widening a road imposed by outside usage? Those folks do not pay taxes in Chgts, their goal is simply to drive thru fast (first hand response during Granite township mtg, nov 2019).

Recreational and ski traffic will undoubtedly continue to increase as the population expands, so finding long-term viable options for moving people into recreational areas should be phased, initially with increased mass transit, and rideshare programs, and ultimately rail system. There is extensive debate over winter ski traffic versus summer traffic, and summer traffic volume can easily exceed winter traffic; winter type grid-lock does not occur in summer months simply because drivers are not contending with snow conditions. Closures with LCC for avi control and road snow-plowing account for most, if not all, traffic grid-lock that occurs on peak times (holiday and powder days) during winter. If crews are clearing canyons at 7am, and expect the road to be open by 8am, but things gets further delayed due to poor avi management, therein lies the problem. Maybe they need to start this process at 5 or 6am. Even though the LCC canyon is announced closed, traffic inevitably continues to push into the area, and ultimately backs up along Wasatch's length, and just sits still, with motorist idling - WHY? - Because there is no contingency traffic management plan for Wasatch Blvd road closures during winter. As result, this creates problems for local neighborhood ingress/egress, as well as impeded schools buses, and emergency vehicles needing to get thru these areas. Though this section of roadway is within Cottonwood Heights jurisdiction/city limits, its police force fails to come to the table with any sort of ski traffic management plan; this issue has been allowed to fester far too long. In neighboring communities immediately south of Cottonwood Heights, UPD and Sandy police both work to direct traffic off the roadways during these times. This matter has been brought to attention of Cottonwood Heights numerous times, and the city fails to take any action to clear the roadway. It's been further brought up to CWC (Central Wasatch Commission) by local residents to see if they (CWC) can seek to leverage the city to create a traffic management plan.

One final comment related to ski traffic matters. While the laws just changed, ever so slightly, the requirements on 4x4 and AWD vehicles imo fall short, and the law should be mandate to have Mtn snow tires, not just M+S. If you do 5 minutes of research you will conclude M+S tries are worthless in extreme conditions, such as those commonly occurring in LCC and BCC during winter months. Many slide-offs are 4x4, trucks and awd cars equipped with poor tires choices, M+S. Also, much of what we are seeing early this season is that vehicles are being allowed up the canyons when weather is favorable, "traction restrictions are lifted", only to find those same cars will and do have difficulty navigating down canyons when weather has turned later in the day. This scenario is a typical winter driving experience that sets up for driver failures. In summer higher volume of cars travel in/out of the canyons than during peak winter times –there are no slide off and no slowing red snakes. But, in winter the scenario is different and it's simply due to too many cars being allowed into the canyons while the traction restrictions were temporarily lifted. Stop lifting these restrictions. If cars are ill-equipped they should not be allowed up into the canyons, period. If safety is truly a goal this is a no-brainer requirement. UDOT and UPD both have first-hand weather data at their fingertips; knowingly allowing ill-equipped cars to travel into the canyons on days when storms are forecasted for later in the same day is negligent.

In future we hope that area residents can experience Wasatch blvd as a more user-friendly roadway, that connects community and neighborhoods, with safe/protected bike lanes, pedestrian access and crossings, and a heavily-planted linear trail/pathway that enhances the overall beauty of this unique area, as a gateway to LCC and BCC canyons.

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Website

359	<p>Comments on the Draft Purpose and Need Chapter</p> <p>Purpose and Need Comment 1 1.1.2 Background of SR 2010 Project</p> <p>Page 1-7, Paragraph 5: In order to accurately convey the general recommendation of the Mountain Accord it is necessary to revise the statement: "Although detailed alternatives were not developed under the Mountain Accord, the general recommendations included increasing transit service in winter and summer, formalizing parking to designated areas, making avalanche safety improvements, improving bicycle and pedestrian facilities, making operational traffic improvements, and considering tolling." An additional crucial statement from the Mountain Accord includes: "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." ... "2.6. To create transportation connections between the economic and population centers in the urban areas and the recreation destinations in the Central Wasatch Mountains that support the environmental, recreation, and economic goals of the Accord and serve residents, employees, and visitors. Such transportation connections should increase transit use, walking, and biking and decrease single-occupancy vehicle use. To focus transit improvements in locations that are compatible with the unique environmental character of the Central Wasatch Mountains." Both of these statements reflect the shared desire of the Accord signers to use transportation as a tool to maintain or improve ecosystem function and resiliency. As such, some language to that effect should be added in some form to the Background section of the Purpose and Need Chapter.</p> <p>Purpose and Need Comment 2 1.21.1 Purpose of the Project</p> <p>Page 1-9, Paragraph 4: The statement that minimizing potential long-term transportation system impacts to water quality is a "secondary objective" does not seem appropriate as the integrity of the watershed should be a primary component of the project alternatives screening process. It is crucial to bring the watershed function and resiliency to the forefront as a primary objective along with maintaining or improving overall ecosystem health and function.</p> <p>Comments on the Draft Alternatives Development and Screening Methodology and Preliminary Concept Report</p> <p>Draft Alternatives Development Comment 1 1.0 Introduction</p> <p>Page 4, Figure 2: Environmental Impacts are listed as part of Level 2 Screening. It would be a more logical approach to screen out alternatives that would have unreasonable impacts to the natural and human environments before investing time and resources into analyzing transportation alternatives and all the criteria and measures for associated with residential access and mobility that are listed as Level 1 screening criteria.</p> <p>Draft Alternatives Development Comment 2 2.3.3 Level 1 Screening Criteria</p> <p>Page 8, Table 1: Environmental and ecological criteria and measures should be part of Level 1 Screening and are currently absent until Level 2. Some objective criteria and measures regarding the avoidance of negative impacts to ecosystem and watershed function, healthy, and resiliency need to be considered before investing time and resources analyzing access and mobility for transportation alternatives that may otherwise not be considered due to unreasonable environmental impacts.</p> <p>Draft Alternatives Development Comment 3 2.3.3 Level 1 Screening Criteria</p> <p>Page 9, Table 2: Consistency and compatibility with local and regional plans should be a Level 1 consideration. Impacts to natural resources should be a Level 1 consideration. The measures for impacts to natural resources are unclear. What types of habitats are being considered as 'sensitive' and 'critical' and how will the relative comparison of acres be informative unless watershed-level measures are also being considered? In addition to a measure of acres impacted, other more meaningful measures like landscape-level connectivity of habitat and proximity of other threats/disturbance activities on the landscape to natural resources in addition to the cumulative overall watershed health and resiliency impacts must be measured under the "impact to natural resources criterion.</p>	Website
360	<p>I will simply reiterate a suggestion I have made multiple times at meetings and during previous comment periods. There have been too many outstanding and creative proposals to list here that avoid the widening of 210. Our ultimate goal is to control pollution and environmental damage in our canyon. A wider road encourages the very behavior we are trying to curtail--driving individual cars in the canyon! I suggest again that the least expensive proposal, a road toll, be instituted before anything else. No study can definitively predict human behavior, so people claiming that a toll would make no difference may be wrong. Let's find out. If a toll does not limit traffic, try the next least destructive suggestion. Scarring our gorgeous mountains in order to encourage more traffic before trying less expensive and destructive solutions is incredibly short-sighted.</p>	Website

361	<p>12/13/19 This my public comment on Draft Alternatives, Development and Screening Methodology and Preliminary Concept Report, Little Cottonwood Canyon, Environmental Impact Statement, Wasatch Boulevard to Alta, Lead agency: Utah Department of Transportation, October 30, 2019. I appreciate the efforts from all those involved in trying to propose a comprehensive solution to challenges in this area. Many of the proposed alternatives seem to offer a balanced approach. My primary objection is to any expansion of the intersection and parking at the intersection of S.R. 210 and S.R. 209, with especially strong objections to any increase in parking or development on the south side of SR210/SR209 intersection area. This will be the focus of my comment and counter-proposal. Summary areas of concern: • Private property and neighborhood impact • Safety • Sensitive Lands • Environmental • Financial</p> <p>Our home for decades is just a few hundred feet west and south from the intersection of North Little Cottonwood Rd (S.R. 210) and Little Cottonwood Rd (S.R. 209), a site for possible expansion road width and parking. The intersection of the S.R. 210 and S.R. 209 (hereafter, the "intersection") is currently terribly congested with automobile traffic at various times of day and season. The last thing we need at this location is a destination site parking expansion proposal for more cars, more traffic accidents, more noise pollution, more exhaust pollution, and multi-level parking structures detracting from the unique beauty of the location. On busy days, I routinely smell canyon car exhaust fumes and burning brake linings from outside my door, requiring air filtering for indoors. During the winter, it is periodically impossible to access the road even for emergencies, sometimes for hours at a time due to traffic congestion. This can be dangerous for numerous residents and for travelers needing urgent access. After a brief initial reduction in traffic congestion, expansion of parking and widening of roads in that area will soon thereafter proportionally increase all concerns for the long term.</p> <p>The canyon at its mouth acts as a megaphone for sound, with traffic noise bouncing off the canyon walls and into the neighborhood. We can even hear people talking in the existing parking lot from our homes. Spend a full day/night out here during different seasons and you will see. More cars and a multi-level parking structure eliminating sound-attenuating natural vegetation will make this far worse, especially any development on the south side of the intersection.</p> <p>Hwy 210 northwest the 210/209 intersection seems to have more widening possibilities; 209 is not viable for widening due to the creek, private property/homes, historic bridge, and other obstructions. A parking structure/expansion or additional development on the south side of the 210/209 intersection would likely demolish the current scenic/historic trail, popular with the neighborhood for vistas and community recreation. Will parking expansion be monitored 24/7? What about crime and safety for nearby residents and for users of the structure, particularly during off-hours? What happens at night, particularly on weekend nights between 10pm and 8am on the south or midnight and 7am on the north? The current parking entrance gate on the south of the intersection says it closes at 10pm, but it virtually never is closed, and residents can hear middle-of-the-night cars and partying up there, with concrete walls packed with graffiti still present for more than a year. Will security lights flood the structure and, consequently, the neighborhood skies? Will the multi-level echo-chamber parking structure turn the both the neighborhood and the world-class canyon view into a concrete jungle of downtown sounds, sights, and smells? What about other environmental impacts and other consequences to neighbors such as run-off, ground water, culinary well water contamination to next-door residents (our well, included), creek water, etc. In summary, I am opposed to expansion on the north side of the intersection, and very concerned and vehemently opposed to parking expansion on the south side of the intersection.</p> <p>However, I offer a counter-proposal, one that I believe has been suggested by others after careful thought and study. For the first part of the counter-proposal, I suggest eliminating further expansion of the Little Cottonwood Canyon Park & Ride on the north side of the intersection; and keep the south side of the intersection road, parking, open space, historic trail, all "as is." In its place, I propose that DOT purchases one to several properties currently for sale, comprising of several acres, ½ mile to 1 mile northwest from the 209/210 intersection down Hwy 210 on the north side. These locations together or individually could likely provide or surpass most or all of the parking needs of the 210/209 intersection without the issues impacting the very sensitive area of the 210/209 intersection. In fact, it will likely reduce the current impact at that intersection. In addition, these locations also provide trailhead and park possibilities as a multi-purpose approach to community needs.</p> <p>The second part of the counter-proposal, also eliminating expansion of the Little Cottonwood Canyon Park & Ride and other parking at the 210/209 intersection, is for DOT to purchase other land for the park & ride and multi-level or single level parking structure. This land is due west on Hwy 209 and located at the southeast intersection (or thereabouts) of 9400 S and Highland Drive (2000 E). This area appears perfect for the intended use. Abundant current parking, development, commercial, retail, and public space. Good for the local economy by bringing more people to restaurants and other adjacent retail establishments. There are large multi-lane roads accessing and connecting to freeways to the north and west. Then, bus transportation to the east as the road narrows to the Little Cottonwood Canyon resorts, and possible optional access to Big Cottonwood Canyon and resorts. A similar recommendation could apply to the land at the mouth of Big Cottonwood Canyon and Wasatch Blvd.</p> <p>The third part is a compromise recommendation that if parking expansion is to going to happen at the intersection of 209/210, then it should only be on the north side at the current park and ride, and absolutely not on the south side of the intersection. Even keeping the north side parking at current grade, it appears possible that an additional lower level on the north side would bring that lower level to grade of the S.R. 210 road, even allowing for some further east/west expansion if absolutely necessary on both levels. But this would be only a short term and partial solution without implementing recommendations included in the first part and second part counter-proposals, above.</p> <p>With this three-part counter proposal, all needs appear to be met, negative consequences are minimized, and additional benefits are provided.</p> <p>Thank you for considering these comments and ideas.</p>	Website
362	<p>To better help define purpose and need, a carrying capacity analysis should first be done to understand desired outcomes</p>	Website
363	<p>December 13, 2019</p> <p>Utah Department of Transportation Little Cottonwood Canyon Environmental Impact Statement Draft Alternatives-Development and Screening Methodology and Preliminary Concept Report Utah Department of Transportation, October 30,2019</p> <p>This letter is in response for comments regarding the Environmental Impact Statement, Draft Alternatives (October 30, 2019) for Little Cottonwood Canyon road. I am a resident of Salt Lake City, Utah for over 30 years. I have been an active hiker, nordic skier, snowshoer, and volunteer in the Central Wasatch Mountains for over 25 years. I recognize the increased number of recreation visitors to the Central Wasatch. I see the need to improve safety and mobility at corridors such as the Little Cottonwood Canyon (LCC) Road and Wasatch Boulevard. I hope that any transportation improvements will not adversely affect the watershed and ruin the natural character of this beautiful mountain area. I appreciate the Utah Department of Transportation (UDOT) efforts to address these issues.</p> <p>I believe that increased mass transit along the Little Cottonwood Canyon Corridor is the best means to improve mobility. I do not favor the construction of very ambitious transit means such as light rail, gondolas, monorails, or skytran. Construction of these systems would be very expensive, have potential to harm the environment and ruin the beautiful natural mountain character of the area. I support increased use of buses for improving transit. I recognize that it is not within the scope of UDOT to implement increased bus use. However improvement of trailhead staging areas should include bus stops features. Also increased bus transit will require the construction of large transit hubs in the Salt Lake Valley. I do not support increasing parking areas vehicles for the visitors to LCC. I also support closing or reducing on road parking areas to reduce private motor vehicle traffic and encourage bus transit. Increased bus transit will effectively and efficiently use the existing LCC transportation corridor and would not require large-scale construction in the environmentally sensitive LCC.</p> <p>The use of snowsheds, berms and stopping wall for avalanche mitigation should be carefully evaluated with concerns that these features adversely affect the environment and natural character.</p> <p>Thank you for your efforts to address this critical challenge and thank you for considering my comments.</p>	Website
364	<p>Please find the attached comments with respect to the Draft Purpose and Need and Screening Criteria Documents.</p>	Email

365	<p>UDOT, Please review the attached</p> <p>INITIAL STUDY FOR FEASIBILITY ANALYSIS OF TRAFFIC BENEFITS AND IMPACTS OF A SKI LIFT BETWEEN CANYONS AND SOLITUDE SKI AREAS</p> <p>http://local.sltrib.com/upload/2011/12/1323545544Traffic_Analysis_Interplan_.pdf</p> <p>This document is a good starting point for the UDOT EIS on alternatives to improve mobility on SR-210 as well as potentially postpone road improvements along I-80 through an alternative aerial transportation connection between the central Wasatch ski areas. What this report didn't say was how the aerial connection would provide for emergency egress from the cottonwood canyons which we now know to be very important as well.</p> <p>The report references the UDOT Long Range Transportation Plan which should have had this aerial connection included. .</p>	Website
366	<p>I love LCC and agree the traffic is a problem. I am glad UDOT is studying this and think that we need to understand the Purpose and Need of what is being built before anything is actually approved. This can only be done with a comprehensive capacity analysis for LCC. A capacity analysis would benefit all users of LCC, including the resorts. Failing to do this could have irreversible negative impacts on LCC in terms of watershed, recreation/environmental and economic impacts. It would be best to use existing infrastructure to help deal with traffic rather than adding rail, aerial, monorail, SkyTran, interconnect from Park City, but no decisions should be made until the Purpose and Need are more clearly defined.</p>	Website
367	<p>We apologize for missing the December 13 deadline for submission of comments, but we were out of town. We respectfully ask you to add the following comments to the public record, and to consider them carefully, as you proceed on this important project. Thank you.</p>	Email

November 21, 2019,

Kirk Nichols review of:

Little Cottonwood Canyon Environmental Impact Statement (LCC-EIS)

Draft Purpose and Need Statements

The purpose of my comments is to recognize the inadequacies of the Draft LCC-EIS now, while there is time to change the draft proposal, in this early stage, to meet the requirements of the National Environmental Policy Act (NEPA) and the Council of Environmental Quality (CEQ) regulations. Pausing and fixing now will save time later. Until the purpose and needs statement and study area are accurate, the future chapters of the LCC-EIS hold no meaning or credibility.

NEPA and Interdisciplinary team requirements.

The impression to the public is that UDOT as the lead agency has reduced the input of other members and disciplines of the interdisciplinary team rather than utilizing them to the fullest extent possible -- as required by NEPA. UDOT has removed themselves from the Central Wasatch Commission. The October 30, 2019 chapters of the Draft LCC-EIS read like engineering documents rather than an environmental assessment. The Purpose and Need Statements are about engineering – which UDOT does well. However, an Interdisciplinary team represents far more domains than just engineering. Many domains are absent, for this example -- Recreation Planning and Recreation Ecology are among the disciplines missing. With greater numbers of visitor on the federal land (the purpose of streamlining transportation) the carrying capacity of the land for elk and mule deer is reduced and is anyone at UDOT an expert on wildlife or recreation ecology? Without a strong interdisciplinary team, too many major and significant effects go unstudied. Considering the requirements of NEPA and the regulations of the Council of Environmental Quality (CEQ), UDOT's proposal is inadequate in such components as study area, connectedness, similar, and cumulative actions. Stronger input and funding for disciplines other than engineering are required by NEPA.

The excerpt from NEPA on the requirement of an interdisciplinary team and missed values when an assessment is too unilateral:

“Sec. 102 [42 USC § 4332]. The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall (B) identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by title II of this Act, which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations;”

(emphasis added)

Excerpt from the October 30, 2019 UDOT Draft

1.1.1

“The study area used for the Little Cottonwood Canyon Project extends along State Route (S.R.) 210 from its intersection with S.R. 190/Fort Union Boulevard in Cottonwood Heights, Utah, to its terminus in the town of Alta, Utah, and includes the Bypass Road (Figure 1.1-1). UDOT developed the study area to include an area that's influenced by the transportation operations in Little Cottonwood Canyon and to provide logical termini for the project. Separate impact analysis areas have been developed for each environmental resource evaluated in this EIS.”

The LCC EIS Study Area is inadequate to meet the “connected” requirements of NEPA. The proposed transportation alterations or actions, designed for delivering more people to the federal land, will have

major and significant impacts extending far beyond the S.R. 210 road right-of-way and the ski resort boundaries. The public will not accept that increased public spending on transportation and road improvement are only allowed to feed the volume of use at the commercial ski resorts. The public is demanding that all transportation improvements also include improved access to all sections of the canyon for example, trailheads, campgrounds, and picnic areas.

NEPA, in the CEQ Regulations printed below, and supported by case law, *Thomas v. Peterson*, requires that any action that itself would require an EIS and that is triggered by an action in an EIS, be studied together with the triggering action. Therefore, any significant increase in use, with direct and/or indirect effects onto the federal land throughout Little Cottonwood and Big Cottonwood Canyons, brought about by the proposed improvements in the narrow corridor of the road right-of-way, must be studied at the same time as the roadway improvements.

Excerpt from:

Thomas v. Peterson

“A. CEQ Regulations

1. Connected actions

The CEQ regulations require "connected actions" to be considered together in a single EIS. See 40 C.F.R. § 1508.25(a)(1) (1984). "Connected actions" are defined, in a somewhat redundant fashion, as actions that

"(i) Automatically trigger other actions which may require environmental impact statements.

(ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.

(iii) Are interdependent parts of a larger action and depend on the larger action for their justification."

The CEQ regulations (i) and (iii) must be addressed, and soon, during scoping and while preparing the draft EIS alternatives, not later during a Supplemental EIS. Save time, start it now. Do not blame NEPA and the federal regulations for a delay later; the regulations are clear now.

"(i) Automatically trigger other actions which may require environmental impact statements."

Each traffic pull-out or stop, where proposed improvements within the transportation corridor will spread the effects of increasing the numbers of visitors and are actions that require additional EIS studies. These studies must follow the impacts beyond the pavement and out onto the federal land, up the trails, out to the lakes, and ridges studying the significant impacts on soils, air and water quality, wildlife, and visitor experiences.

"(iii) Are interdependent parts of a larger action and depend on the larger action for their justification."

The undeniable larger action here is to improve transportation for the purpose of delivering people to recreate on the federal land. Big and Little Cottonwood Canyon traffic is connected, inseparable. When there is a blockage to one canyon, many visitors will immediately switch to the other canyon. People hike from one canyon to the other, requiring a vehicle shuttle between the two canyons. These two canyons are inseparable. These two canyons are geographically connected, the effects accumulate.

Therefore, both Big and Little Cottonwood Canyons must be studied as one larger, interconnected project studying the effects of increased visitation on the federal land throughout both canyons, rim-to-rim.

Excerpt from the October 30, 2019 Draft Purpose and Need chapter of the Little Cottonwood Canyon Environmental Impact Statement issued by UDOT:

“1.2 Summary of Purpose and Need

1.2.1 Purpose of the Project

UDOT intends to improve the commuter, recreation, and tourism experiences for all users of S.R. 210 through transportation improvements that improve safety, reliability, and mobility on S.R. 210. In developing alternatives for these improvements, UDOT will consider the character, natural resources, watershed, diverse uses, and scale of Little Cottonwood Canyon. UDOT's purpose is reflected in one primary objective for S.R. 210: to substantially improve safety, reliability, and mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210."

The October 30, 2019 "Purpose of the Project" reads as if the users of S.R. 210 never leave the transportation system. The purpose statement reads as if the visitors ride up the transportation system and then back down the system in one non-stop loop. This perception is reinforced by the study area. If a person were to be handed the study area map, and read the purpose statement as above, a reasonable person would conclude that all people do is ride up one side of the canyon and down the other, perhaps stopping at pull-outs along the way. The purpose of the proposal for transportation improvements is to put more people, more efficiently, onto the federal land, throughout the canyon, across all seasons.

The first paragraph of the Purpose and Need statement delineates for whom the proposal is designed: commuters, recreationists, and tourists. The sentence continues to say that transportation improvements are for the purpose of improving the experience of those users of S.R. 201. The actual purpose of the project is to move the people off the transportation system and to put more people, more efficiently onto the federal land. The first paragraph is vague on "improve the commuter, recreation, tourism experience". Specifics are needed here. "Improve" the experience might mean, provide entertainment and mood lighting while idling in traffic. This project and EIS proposal need clarity, the purpose of the proposal for an action is to increase the efficiency of delivering visitors to the federal land – year-round. Be honest.

There is no purpose statement for the Environmental Impact Statement. The purpose of an EIS is to study the harmful and beneficial effects of the increased visitation supported by the enhanced engineering in the transportation system. This project and purpose statement is for year-round visitation. As climate change is shortening the winter snow season when the resorts are open, the greater use of the canyons is happening during the summer and shoulder seasons. This increased use is not just significantly affecting the roadway, the trail heads, and the ski resorts, but the effects will be measurable throughout the canyons, up at the lakes, out on the trails, on the cliff faces, and up on the summit ridges. The October 30, 2019 purpose statement lacks clarity about studying the effects of all the commuters, recreationists, and tourists that a higher volume, more reliable transportation system will cause. The purpose of an EIS is to study all the major and significant, connected, cumulative, similar, direct, and indirect effects of a proposed action. The engineering may be on the road right-of-way; however, the purpose is getting the people off the roadway and onto the federal land – where NEPA requires that their effects must be studied. Right now, this project and EIS propose to only study the road corridor and not to study the effects of the purpose which is to put more people on the federal land.

"Hard-Look Doctrine is a principle of Administrative law that says a court should carefully review an administrative-agency decision to ensure that the agencies have genuinely engaged in reasoned decision making. A court is required to intervene if it "becomes aware, especially from a combination of danger signals, that the agency has not really taken a 'hard look' at the salient problems."

<https://definitions.uslegal.com/h/hard-look-doctrine/>

Latent Demand for Canyon Use Study Required by NEPA

One of the standards by which an EIS is reviewed is the standard of “Hard Look”. U-DOT has stated at a CWC Stakeholders’ meeting that U-DOT has no plan to study the latent demand of people who do not now visit the Cottonwood canyons because of congestion but who would immediately start using the canyons more if their time spent waiting while on the road was reduced. U-DOT said that would be too hard to study. It is taking exactly that “hard look” that is required in an EIS. U-DOT is using projections of growth out several decades (planning horizon) to predict the growth of use in the canyons. There is no provision in this EIS to capture the immediate increase in use if the road becomes less congested due to the proposed engineering action alternatives of the LCC-EIS.

Indicators and Standards and a hard look in NEPA

Indicators are carefully selected species, locations, and conditions that are measurably sensitive to change. The canary in the mine is the classic indicator for bad air in the mine. The standard is that if the sensitive bird can breathe enough good air, there must be enough air for the miner. The threshold is a sick or dead bird -- meaning get out of the mine to good air. Indicators of air and water quality, species abundance, and others have been developed by the Forest Service, however no standards or thresholds have been developed through adequate studies. No indicators and standards for visitor management have been developed. Without standards, it is not possible to ascertain whether significant effects are happening on the federal land. NEPA EISs and EAs must determine whether there are any significant effects to any major actions of federal projects.

Thank you for this and all opportunities to help fine-tune the actions in the central Wasatch Mountains,

Kirk Nichols
Big Cottonwood Community Council
CWC Stakeholder’s Council as President of Evergreen HOA
CWC Environmental Dashboard Steering Committee
Assistant Professor, Department of Health, Kinesiology, and Recreation
University of Utah



December 9, 2019

**Comments on the Draft Purpose and Need Chapter
Little Cottonwood Canyon EIS**

1 The purpose and need statement is deficient.

Protection of the environment needs to be elevated and included in the statement of the purpose and need for the project. As drafted, the purpose and need statement focus solely on substantially improving safety, reliability and mobility in Little Cottonwood Canyon. Protection of the environment is relegated to a secondary position – it is one of many factors that are considered as various proposals to improve safety, reliability and mobility are evaluated.

Making protection of the environment part of the purpose of the project is necessary because this is not a typical transportation improvement project. This is a one-way road into the National Forest. This pocket of National Forest is adjacent to a city of over a million people and that number is growing rapidly. Building a system to deliver these people into the National Forest must take into account, as a primary purpose of the project, the impact on the National Forest where these people are to be safely and reliably delivered.

This project can be contrasted with a typical transportation improvement project. Usually a project evaluates a road that connects City A to City B and those two points are part of a road network or grid system. There are likely ways out of City B and roads that connect with other population centers. Commerce can and will grow between City A and City B. In this case it is appropriate that the purpose of the transportation improvement be to improve the safety, reliability and mobility and the impact on the environment be considered secondarily as one lens to judge the various alternatives put forward to improve safety, reliability and mobility between City A and City B.

That usual case is in marked contrast to this case where a one –way road or other transportation system is being upgraded to facilitate the delivery of people into a National Forest. In a case such as this the impact of the transportation improvement on the National Forest is not just a lens for judging alternative but must become a central focus of the purpose and need statement of the project. The purpose of the project must be to improve the safety, reliability and mobility of people going to the national forest taking into account the impact putting these people in the National Forest will have on the National Forest.

At times during the discussion of improving transportation in Little Cottonwood Canyon some have used an analogy of two buckets connected by a hose. They argue that to get water from Bucket A to Bucket B you need a properly sized hose or else there will be unacceptable delays in getting the desired amount of water from Bucket A to Bucket B. In other words, to eliminate the bottlenecks in Canyon Traffic a larger road is needed, just as a large hose is needed to get water efficiently from Bucket A to Bucket B.

The problem with this analogy is that it presupposes two buckets for approximately equal size. That is not the situation with the Little Cottonwood Canyon. There one bucket – the population of Salt Lake Valley – is vastly greater than the area in Little Cottonwood Canyon where people are going. The analogy is more properly like a massive vessel on one end, perhaps the size of an oil barrel, and the destination in Little Cottonwood Canyon is more like the size of a thimble. If you are going to enlarge the size of the hose connecting the oil barrel to the thimble, you need to consider more than just the size of the hose and its immediate impact on the environment. You need to consider what happens when you use that enlarged hose to dump water into the thimble. How much can the thimble hold? When will it overflow? Is improving the rate of flow into the thimble a valid purpose? What is the impact of the larger hose on the thimble?

In the same way, the purpose and need statement of this project must consider the environmental impact on Little Cottonwood Canyon as a core element of the purpose of the project. The impact on the environment is not just a lens by which to judge various proposed alternatives but must be considered as part of the very purpose and need of the project. For these reasons the purpose and need of the project as drafted is deficient and must be expanded from merely improving safety, reliability and mobility in Little Cottonwood Canyon to considering as part of the purpose and need of the project the impact these improvements have on the Canyon.

The most significant impact of the proposed project will be those caused by the increased number of people that the highway improvements are intended to deliver into the Little Cottonwood Canyon ecosystem. This primary impact must be evaluated, and one way to insure the evaluation occurs is to include protection of the environment as part of the purpose and need of the proposed project.

Under the National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq., the EIS should identify and analyze the direct, indirect, and cumulative effects of a proposed action. 42 U.S.C. § 4331 (c)(i); 40 C.F.R. §1508.7, §1508.8. Direct effects of an action are those “which are caused by the action and occur in the same time and place.” 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.” Cumulative impacts are those environmental impacts “which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.”

If the purpose of the project is to increase the safety, reliability and mobility of traffic into Little Cottonwood Canyon it will increase the flow of people into the mountains. The presence of more people in the mountains is therefore not just a foreseeable impact, but an intended one. It is also the kind of impact that the laws and regulations defining indirect effects clearly contemplated: “Indirect effects may

include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” 40 C.F.R. §1508.7, §1508.8. Failure of UDOT to consider the impacts of successfully increasing the number of people accessing the Wasatch would represent such a fundamental deficiency of NEPA compliance.

Consequently the purpose and need statement for the project must take into account the impact of delivering more people into the National Forest. The description of the study area must not be limited to the specific roads that are named but must be expanded to include the National Forest lands where the project will deliver increased numbers of visitors to these lands.

2 Further problems with the Purpose and Need statement.

More pavement is neither desirable nor needed in Little Cottonwood Canyon. Something like 98% of the time there are no traffic problems in Little Cottonwood Canyon. The only times there are problems, the other 2% of the time, are on the busiest ski days or when snow causes road problems. Even then, the problem is limited to a few hours of the day.

On those busy days when traffic is backed up at the base of the Canyon and it may take an hour to get from the intersection of Bengal Blvd and Wasatch Blvd to the mouth on the Canyon, once a driver is in the Canyon the traffic flows. The problem is not lack of road capacity in the Canyon.

The traffic problem can be solved without more pavement in the Canyon. If buses had a way to get to the head of the line on some sort of new pavement on Wasatch Blvd and North Little Cottonwood Canyon Road then more people would use the bus and reduce congestion. This could be either a second lane restricted to bus traffic during these busiest times or by building a shoulder than only buses could use. This solution could be further enhanced with the construction of a large parking structure on some of the land currently used as a gravel pit.

Other options include attempting to reduce traffic through tolling or reduce traffic and drive more people into busses by charging for parking at the ski resort parking lots similar to the pay to park program instituted by Solitude.

In short, there are various options to solve the traffic problems in Little Cottonwood Canyon without adding a third lane. These solutions have less impact on the environment and should be implemented before a solution is attempted that involves adding more pavement in the Canyon.

The purpose and need statement needs to be rewritten. The purpose should not be limited to a stated goal of increasing safety, reliability and mobility in the Canyon. The purpose is to increase safety, reliability and mobility in the Canyon with the least environmental impact and damage. It is therefore incumbent on UDOT to revise the purpose and need statement and implement some of these possible solutions before undertaking an attempt to solve the problem with more pavement.

Thank you for considering these comments.



SANDY CITY ADMINISTRATION

KURT BRADBURN
MAYOR

MATTHEW HUISH
CHIEF ADMINISTRATIVE OFFICER

DATE: December 6, 2019

TO: Vince Isso, *HDR Senior Environmental Planner*

FROM: Sandy City Leadership
Kurt Bradburn, *Mayor*
Chris McCandless, *Sandy City Council Chair*
Matthew Huish, *Chief Administrative Officer*
Mike Gladbach, *Director, Public Works*
Tom Ward, *Director, Public Utilities*
Ryan Kump, *City Engineer*

RE: Response to “Little Cottonwood Canyon EIS Draft Purpose and Need”

Dear Mr. Isso,

Thank you for leading the Environmental Impact Study (EIS) efforts regarding Little Cottonwood Canyon (LCC) for Utah Department of Transportation (UDOT). In accordance with that significant work, please know how important Sandy City feels it is to ensure that State Route (SR) 209, between the mouth of LCC and Highland Drive also be included.

As you know, and the study stated, traffic congestion is heavy on SR-209, especially during the winter months. Sandy City leadership strongly feels that trying to analyze and resolve SR-210 traffic issues without including the impact and needs of SR-209 will render the SR-210 improvements less effective, potentially causing post-improvement outcomes to be less efficient and impactful than desired. We appreciate that although the “*Little Cottonwood Canyon EIS Draft Purpose and Need*” document mentions SR-209 issues in a number of places throughout, there is not a clear intent to expand on the concerns or agree to study them further which seems somewhat non-comprehensive, since LCC travel is directly related to SR-209 traffic. Accordingly, we urge and invite UDOT to continue to explore SR-209 needs as part of the complete picture, acknowledging the ever-present budget constraints, yet feeling that even a small portion of funding would be highly beneficial to study outcomes if applied to SR-209.

Below, please find other suggestions that Sandy City believes should be modified or addressed in the “*Little Cottonwood Canyon EIS Draft Purpose and Need*” document.

1. Since SR-210/Wasatch Blvd. runs through SLCO, Cottonwood Heights, SLC, and Alta, per definition, these jurisdictions should all be cooperating agencies.
2. As stated above, please include SR-209 (Sandy City) along with SR-210 when evaluating and drafting solutions regarding transportation into, and out of, LCC.
3. The document draws attention to WFRC's RTP, - pointing out SR-210 improvements needed during the next three WFRC phases. However, it fails to mention the improvements also needed on SR-209 in all three of the same phases where RTP #R-S-56 and transit route 994 run. It also states there will be increased travel demand on all main roads in the transportation system and should include SR-209 since it is clearly a main road into the canyon.
4. Statistics are given to account for only 54% of traffic volume in/out of the canyon via Wasatch Blvd and SR-210, but does not state how the other 46% of vehicles access LCC, nor what traffic percentage uses SR-209.
5. The document states that no formal bicycle lanes are on SR-209 which is inaccurate. SR-209 has bike lanes and a multi-use trail between 1300 East and Raintree Drive (2165 E). Sandy City's Trails Masterplan proposes both bike lanes and a multi-use trail continuing east all the way to the mouth of LCC. These bike facilities will be constructed as development occurs.
6. Vehicles waiting to enter LCC back up onto SR-209 to Highland, just as they back up on Wasatch to I-215, causing detrimental effects to residents, commuters, emergency access, and canyon reliability.
7. While the document states that canyon visitation is equally distributed between winter and summer, it also states that the capacity is often exceeded only during the winter months. Are these statements contradicting or could this be further defined?
8. Towards the end of the document, it states an assumption that canyon visitors will shift away from visits during weekends and holidays, and use the less busy mid-week days. However, it does not explain what will cause this to happen. Is there an improvement that will cause this shift?
9. Consider adding an expected timeline or milestone duration to the screening methodology document.

Thank you for considering Sandy City's concerns. If you have any questions, or wish to discuss this further, please feel welcome to contact Matthew Huish at 801-568-7102 or mhuish@sandy.utah.gov, or Mike Gladbach at 801-568-2968 or mgladbach@sandy.utah.gov.

MAYOR
HARRIS SONDAK

TOWN COUNCIL
CLIFF CURRY
ELISE MORGAN
MARGARET BOURKE
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December 10, 2019

John Thomas, Project Manager
Utah Department of Transportation

VIA EMAIL

RE: Little Cottonwood Canyon Environmental Impact Statement
Comments regarding Draft Purpose and Need, Alternative Screen Methodology Report

Dear Mr. Thomas,

The purpose of this letter is to provide comments from the Town of Alta (the Town) on the Utah Department of Transportation (UDOT) Little Cottonwood Canyon Environmental Impact Statement (EIS) Draft Purpose and Need and Alternatives Screening Methodology. The Town of Alta is an incorporated municipality in upper Little Cottonwood Canyon (LCC) that provides municipal services to 383 residents and, as the home of world-class skiing at Alta Ski Area and a scenic and accessible high-mountain watershed, hundreds of thousands of annual visitors.

The Town has been a leader in coordination among the public and private entities responsible for transportation and public safety in LCC for decades, and the Alta Marshals Office is a key agency in coordinating operations during roadway avalanche hazard mitigation missions. Promoting safe and efficient operations on S.R. 210 is of fundamental importance to the Town, because it is the only point of access for our residents and visitors to services in the Salt Lake Valley. The Town also takes seriously its obligation to be an effective steward of the invaluable natural resources within and beyond its boundary in the headwaters of Little Cottonwood Creek. We work to manage increasing recreation visitation, enforce land use regulation, and protect water quality.

The context that underlies all decisions by and activities in Alta is the need to balance resilient and reliable transportation within LCC, and our responsibility to manage the impacts that people have on our community and the canyon environment. We provide the following comments

regarding proposals for improvements to S.R. 210 and the multi-modal transportation system based upon it in light of this context.

General Comments

Disaster Resilience, Emergency Operations, and Evacuation

In early August of 2019, a series of heavy rain storms occurred in Little Cottonwood Canyon, resulting in large debris flows out of several of the same gullies crossing S.R. 210 which produce avalanches. These debris flows caused significant damage to the roadway and nearby utilities, which caused LCC access to be restricted for several days following the final storm on the evening of August 8th.

We are all fortunate that this event occurred on a midweek evening during the quieter summer season, when lodging and residences in LCC were generally vacant and traffic on S.R. 210 was sparse. However, if such an event were to occur during a busier time of the year, or if a truly catastrophic event were to occur during a peak day--for instance, a magnitude 7 earthquake on the nearby Wasatch Fault--there is a chance that more than ten thousand people, including local and regional residents and visitors to Utah, could be trapped in upper LCC, perhaps for an extended period of time. Hence, UDOT should consider broadly incorporating disaster resilience, emergency operations, and evacuation into its planning outlook as the EIS proceeds.

Visitor Growth Management

As you are aware, the Alta Town Council recently adopted Resolution 2019-R-14, A Resolution Supporting A Visitor Growth Management Study Which Evaluates And Plans For The Environmental Impacts From Increased Visitation Resulting From Transportation Improvements In Little Cottonwood Canyon. This resolution expresses Alta's support for focused efforts to address the effects of transportation system improvements.

Roadway Maintenance and Operations

The Town of Alta requests, in the LCC EIS and otherwise in its planning and budgeting process, that UDOT prioritize acquiring dedicated maintenance equipment for LCC. As Alta's law enforcement agency and a primary partner to UDOT in roadway and traffic operations in LCC, the Town of Alta and the Alta Marshals Office have almost 50 years of experience observing and managing congestion episodes and traffic accidents in LCC. A critical factor in maintaining an adequate level of service on the LCC road is the presence of maintenance equipment in the canyon when snowfall begins or intensifies during any given storm. The town suspects that keeping at least one snowplow, dedicated to LCC, in the canyon at all times during the winter season could reduce congestion events due to slide-offs and other snow related issues from developing—and that absent dedicated maintenance equipment, a higher-capacity road could be just as susceptible

to congestion related to slide-offs and overly timid (“white knuckle”) drivers as the current highway.

Specific Comments

Draft “Purpose for the Project”

The Town supports UDOT’s articulation of transportation-related purposes of the project-- specifically, in terms of the function of the transportation system that revolves around S.R. 210, improvements in “safety, reliability, and mobility” are appropriate goals. We would like to include a decrease in the number of vehicles in LCC, especially those that have single occupants.

The Town appreciates the recognition of the importance of the Little Cottonwood Canyon watershed to Salt Lake City’s water supply. However, we are concerned about the statement that, as a secondary objective in the EIS, the importance of the LCC watershed will not be used to determine whether an alternative was reasonable or practicable¹. This statement seems to imply UDOT believes watershed impacts from any proposal can be mitigated through design or best management practices. The Town is hopeful that UDOT’s environmental analysis will include a thorough evaluation of both short-term and long-term environmental impacts, and that alternatives generating substantial impacts to the LCC watershed will be ruled out.

Section 2.3.1 states the additional secondary objective of incorporating goals from the City of Cottonwood Heights’ *Wasatch Boulevard Master Plan*. The Town has conducted its own local planning efforts focused on the Alta Commercial Core, and the S.R. 210 corridor through Alta. From 2017 to 2019, the Town developed the Commercial Core Active Transportation Implementation Plan², which developed a range of concepts for street-design improvements that could improve conditions along the Alta segment of S.R. 210 for pedestrians and cyclists. The goals for the project are as follows:

- Accommodate bicycle and pedestrian use along SR 210 within the Town of Alta
- Socially activate the Commercial Core
- Manage vehicle speeds to increase safety for active modes and promote a comfortable atmosphere
- Provide street beautification and way-finding
- Preserve or optimize on-street parking
- Plan for seasonal issues (e.g. snow removal operations)

¹ Utah Department of Transportation. (2019) *Little Cottonwood Canyon Environmental Impact Statement*, Draft Purpose and Need Chapter, page 1-9. Retrieved from <https://littlecottonwoodeis.pennapowers.co/wp-content/uploads/2019/10/Little-Cottonwood-EIS-Chapter-1-Purpose-and-Need-4-Nov-19.pdf>.

² Town of Alta. (2019) *Alta Commercial Core Active Transportation Implementation Plan*. Retrieved from https://townofalta.com/wp-content/uploads/2019/08/Alta_Commercial-Core_04.29.19.reduced.pdf.

The Town requests that UDOT incorporate these goals into the purpose for the project, and screen alternatives based on whether those alternatives support implementing these goals on the Alta segment of the corridor.

Draft “Need for the Project”

The Town supports UDOT’s identification of key transportation system impacts in the statement of need for the project: decreased mobility related to ski season morning and afternoon peak travel times and commuter traffic; safety concerns and operational impacts related to avalanche hazard and the current avalanche control program; hazards related to the design of the current roadway; and issues related to road-side parking that occurs in Alta, at Snowbird, and along the highway near trailheads and other recreation access points.

Comments on Alternatives Screening Criteria

The Town requests that the alternatives screening criteria be updated to address our concerns regarding disaster resilience and emergency operations, as well as our concerns regarding short- and long-term impacts to water quality and watershed health in the LCC.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Sondak", written in a cursive style.

Harris Sondak, Mayor



December 13, 2019

Little Cottonwood Canyon EIS Project Team

Subject: Public Comments – Little Cottonwood Canyon EIS Draft Alternatives & Draft Purpose and Need

Dear Project Team Members:

Please accept this letter as official public comment from the City of Cottonwood Heights (“the city”) administration in regard to the following two draft documents of the Little Cottonwood Canyon Environmental Impact Statement (“EIS”):

- Draft Purpose and Need Chapter;
- Draft Alternatives and Screening Methodology and Preliminary Concept Report.

The EIS, and the improvements that will result from it, have a direct and immediate impact on the city. The entirety of the Wasatch Boulevard corridor, from Interstate 215 to the mouth of Little Cottonwood Canyon, is contained within city boundaries. Many city residents use the corridor every day for direct access to and from their homes and neighborhoods. While the EIS is a regional-level project, there is a direct local impact to the city and its residents. Thus far, the city and UDOT have engaged in a strong working partnership to beneficial results, which is greatly appreciated by the city’s staff, Mayor and City Council. As the EIS process continues, that strong partnership must continue to ensure that the EIS not only benefits the regional issues being studied, but that it also closely considers the character, scale, and diversity of uses found throughout the study area.

Since the previous public comments have been submitted, the city has continued to make progress in its planning efforts in the Wasatch Boulevard area. Most importantly, the city’s Wasatch Boulevard Master Plan was formally adopted by a unanimous vote of the City Council on July 2nd, 2019. It is requested that the reference to this plan in the draft documents be modified to reflect that the plan has been formally adopted (it is currently still referred to as a draft). The city is again appreciative that the goals contained in the Wasatch Boulevard Master Plan are referenced in these two draft documents. Many of the goals in the adopted plan are complimentary to what the EIS intends to achieve. UDOT’s willingness thus far to look at creative alternatives to identified challenges is commended, and the city urges that level of forward thinking to continue throughout the remainder of the EIS process. The city is especially appreciative of the Wasatch Boulevard design charrette and upcoming gravel pit mobility hub charrette and hopes that the results of these planning processes can be incorporated into formal alternatives and analysis at the appropriate time.

The city requests that UDOT considers the goals and objectives of the adopted Wasatch Boulevard Master plan as the city's formal recommendations throughout the corridor. It is evident from the draft documents that multiple alternatives will include additional roadway capacity, and that 'level of service' is a critical metric in the analysis of a road's effectiveness. The city's desire is that the analysis of any added capacity is done in a thoughtful way, and mitigation techniques are emphasized, even in the alternatives process, to ensure that the quality and character of the area surrounding the corridor is maintained. Further, the city feels that transit must play a critical role in the future of Wasatch Boulevard, and that data should account for a future increase in transit ridership, made possible by the current efforts to explore a regional mobility hub at the mouth of Big Cottonwood Canyon as well as various roadway programming efforts to incentivize transit over single-occupant vehicular travel. The following highlights from the Wasatch Boulevard Master Plan are a few examples of concepts that should be considered as alternatives are developed and analyzed:

- Explore added capacity to Wasatch Boulevard in a transit-prioritized manner, and in a way that is sensitive and adds value to the surrounding area;
- Allow for easier and safer vehicular neighborhood access onto the roadway;
- Consider traffic calming measures or speed limit reductions that would slow traffic, allow safer/easier neighborhood access, without negatively impacting roadway level of service;
- Create a network of shared-use pathways and pedestrian crossings along the corridor for active transportation and recreation (the current corridor does not contain pedestrian facilities or comfortable bicycle facilities. Further, the draft Purpose and Need chapter does not adequately address pedestrian facilities along Wasatch Boulevard);
- Strongly consider creative travel lane ideas instead of standard road widening (e.g. dedicated transit lanes, flex shoulders, etc.) to retain the character of the Wasatch Boulevard corridor while accommodating additional traffic during peak travel hours);
- Preserve/make consistent bicycle facilities;
- Consider additions to the draft documents that reference the impact to residents living along the corridor in addition to tourists, commuters, and recreation traffic;

It is encouraging that the Wasatch Boulevard Master Plan is referenced in the draft documents, and the city thanks UDOT representatives for its inclusion. We hope there is continued emphasis on looking at the corridor in a forward-thinking manner, developing creative and effective alternatives, and being mindful of the local impact of any alternative. The city looks forward to continuing its close work with the EIS project team throughout this study and related efforts in the area.

Sincerely,



Mike Johnson
Community & Economic Development Director
Cottonwood Heights

Date: December 11, 2019

To: Little Cottonwood Canyon EIS Planning Team

From: League of Women Voter of Salt Lake City

Re: LITTLE COTTONWOOD CANYON EIS
Comments on Draft Purpose and Need, and Screening Criteria

Dear Sir/Madam:

Thank you for the opportunity to present comment on the Draft Purpose and Need, and the Screening Criteria for the Little Cottonwood Canyon EIS.

After reviewing the documents, the League of Women Voters of Salt Lake is concerned that the importance of the natural environment and the critical resources of the *canyon*, on which we rely, are given inadequate attention in both the Purpose and Need and the Screening Criteria.

Regarding the Purpose and Need Statement:

The Purpose and Need Statement focuses solely on the transportation/traffic/mobility issues and does not address the underlying cause of all of these problems — over-use due of the natural environment, the important recreational resources available in the canyon and their close proximity to more than one million people. We believe strongly that the Purpose and Need statement should include language specifically directed at protection/conservation of the natural resource and environment in the canyon.

An additional bullet-point might include:

- Sensitivity of the natural resources and environmental quality in the canyon, most particularly water quality and quantity, wildlife habitat and migration patterns, sensitive soils and species, and the overall character and qualities of the canyon.

Regarding the Screen Criteria

Level 1 Screening Criteria most obviously leave out any reference to the environment issues or quality. Environmental issues are mentioned in the Level 2 Screening Criteria, but we believe that their importance to the broader community and users of the canyon should require a higher level of scrutiny that is appropriate in Level 1 Screening Criteria.

An additional Level 1 Screening Criteria could include:

No net loss of environmental and natural resource quality.

- Impacts related to the Clean Water Act and other local water quality standards and policy.
- Impact to natural resources: acres of sensitive habitat, acres of floodplain and wetlands, acres of critical wildlife habitat and migration routes, acres of disturbed/revegetated/restored landscape elements.

The League of Women Voters is a nonpartisan political organization that encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy. Several relevant

League Studies have concluded with consensus positions on issues related to the canyons. One of those issues is addressed in the *League of Women Voters of Utah Water Study* (September 2009) which addresses the full range of water issues and water sources in Utah. Another is our position on good planning in all of the canyons along the Wasatch Front.

Again, thank you for the opportunity to provide comment.

Respectfully,

Katherine Biele

President, League of Women Voters of Salt Lake



WASATCH FRONT REGIONAL COUNCIL

Bob Stevenson, Chair
Commissioner, Davis County

Jeff Silvestrini, Vice Chair
Mayor, Millcreek

Mark Allen
Mayor, Washington Terrace

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Senator Gregg Buxton
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Representative Mike Schultz
Utah House of Representatives

Carlton Christensen
Utah Transit Authority

Carlos Braceras
Utah Department of Transportation

Dawn Ramsey
Utah League of Cities & Towns

Lorene Kamalu
Utah Association of Counties

Robert Grow
Envision Utah

Evan Curtis
State Planning Coordinator

Andrew Gruber
Executive Director

December 12, 2019

Vince Izzo
Senior Environmental Planner
HDR
2825 E. Cottonwood Parkway, Suite 200
Salt Lake City, Utah 84121-7077

RE: UDOT Project Number S-R299(281) /UDOT PIN 16092
Little Cottonwood Canyon (SR 210) Environmental Impact Statement

Comments on the Draft Purpose and Need Chapter and Alternative Development and Screening Methodology and Preliminary Concept Report

Vince:

As a Participating Agency to the SR 210 Environmental Impact Statement, the Wasatch Front Regional Council (WFRC) thanks you for the opportunity to comment on the Draft Purpose and Need Chapter and Alternative Development and Screening Methodology and Preliminary Concept Report. Provided below are the collective comments from the Wasatch Front Regional Council Staff.

Draft Purpose and Need Chapter

Pedestrian and bicyclist data should be discussed in greater detail in Chapter 1 to improve safety, reliability, and mobility. Pages 1-44 are limited in terms of the amount of data that indicate the need for potential facilities to increase pedestrian and bicycling safety. Although the Draft Purpose and Need recognizes hiking, skiing, and other recreational uses which are very popular in Little Cottonwood Canyon and the approximately 2.1 million annual visitors to the Canyon, there is no additional data supporting the number of pedestrians and bicyclists under the Pedestrian and Cyclist section. Additional data could include UDOT's subscription to cyclist data from the Strava App. Strava Metro data should be used to provide a base number of cyclists using Little Cottonwood Canyon for recreational purposes between May-August for a yearly basis. A paragraph or two on additional general statistics of pedestrians/ cyclists is important in setting the stage for the Purpose and Need, and to emphasize that recreators ARE pedestrians traveling to, from, between trailheads and other sites. More supporting data for pedestrian and bicyclists strengthens the Purpose and Need for improving safety, reliability, and mobility in the EIS.

The Draft Purpose and Need should consider parking spaces and their uses, including the Utah Transit Authority's (UTA) Park-and-Ride lots both along Wasatch Boulevard and locations west. How do these UTA Park-and-Ride spaces get used in the summer with the existing minimal bus service available? How much are the UTA Park-and-Rides used during the winter months? It would be good to provide more of this basic data in the Purpose and Need.

2. Cont'd RE: UDOT Project Number S-R299(281) /UDOT PIN 16092
Little Cottonwood Canyon (SR 210) Environmental Impact Statement

Comments on the Draft Purpose and Need Chapter and Alternative Development and Screening Methodology and Preliminary Concept Report

Draft Alternatives Development and Screening Methodology and Preliminary Concept Report

There is some concern with the measure of meeting LOS D by 2050. Knowing that we are a growing region with limited space and air quality issues, this may not be a practical measure, especially by 2050. While the mobility measures seem to be focused on automobile traffic, it should be noted that in previous studies UDOT has evaluated people throughput, which should be considered here as well.

The screening criteria focus on user conflicts at trailheads and the pedestrian safety along roadway edges, with consideration to on-street parking, are great measures. It is also well founded that the goals from the draft Wasatch Boulevard Master Plan and impacts to watershed are being considered.

The Purpose and Need states a desire to improve safety, reliability, and mobility for all users of SR-210. This lends itself to including a screening criterion that measures the safety of biking and walking users throughout the roadway, not just at trailheads or areas with on-street parking. Enhanced reliability and mobility do not mean increased speeds and should not come at the expense of safety for people biking and walking. Please consider this in the reliability and safety section of the Level 1 Screening Criteria.

It should be considered that SR-210 has thousands of recorded on road bicycling trips per year based on Strava Metro data, and that by 2050, demand for recreational bike routes will increase with population.

Again, thank you for the opportunity to provide comments and participate in this important study. WFRC looks forward to our continued participation.


Ned E. Hacker
Director of Operations

The Wasatch Mountain Club (WMC) is a local organization focused on outdoor recreational activities and preservation of our environment. The WMC has over a thousand members and will be celebrating its centennial next year in 2020.

We are pleased to participate in the Little Cottonwood Canyon Environmental Impact Statement activities and happy to provide our comments to the Draft Purpose and Need Statement and the Draft Transportation Alternative Screening Criteria Report.

The WMC agrees with UDOT's intention of improving the "commuter, recreation, and tourism experience" for all users in the canyon. We are concerned however, that nothing be done in this process that could limit or degrade the recreation activities WMC members currently participate in.

We believe the long-term transportation solution for LCC must focus on mass transit to the maximum extent possible. The alternative screening process must prioritize this goal.

We also believe there are short and intermediate steps that will accommodate current needs and ensure easy implementation of that long-term solution.

We support proposals to improve parking at existing trailheads and other locations to enhance safety, allow additional recreational opportunities, and protect the environment. With the funding UDOT received through SB277, these projects are likely a once in a lifetime opportunity to improve current conditions and facilitate long term strategies.

Solutions may need to be implemented in stages. Mass transit requirements need to be implemented soon to alleviate traffic on weekends, holidays, and ski days. Otherwise, at least in the short to intermediate time frame, cars should be allowed to access trailheads and dispersed areas, during mid-week and off-peak times. This includes roadside parking necessary for many dispersed activities.

All users have seen growth of use in LCC and experienced crowds at busy times. Efforts to restrict access to areas within LCC make no sense until we actually know what the capacity is. There is no information on capacity of trails, off-trail backcountry use, or roadside and creek-side use.

We believe efforts to determine carrying capacity of the Wasatch mountains needs to be accelerated - especially of back county users and undeveloped areas users. This must be done to sustain this type of recreation, and transportation solutions must enable these uses.

Document specific comments:

"Draft Purpose and Need Chapter"

There is currently a need to expand and improve parking and facilities at trailheads to support users, and continued use of roadside parking for dispersed activities. Although the long-term goal should be for mass transit to these points, in the near-term we need more parking. These enhancements may be used for quite a while in fact, and need to be as useful as possible.

Throughout the document, but especially in section 1.2.2 "Need for the Project", roadside parking is called on-road parking. This is a misnomer. In most places where recreationists park, there is a shoulder to park off the road. Calling it on-road parking is inaccurate, purposely misleading and should be corrected throughout the document. The document only mentions the cons of roadside parking and

none of the pros. It is not necessarily a bad thing and it is legal. WMC members and the public utilize roadside parking for hiking, climbing, fishing, bird-watching and many other legitimate activities.

The WMC cares very much about the environmental consequences of various uses in LCC. We care about maintaining water quality. We care about the quality of the viewshed. We care about sustainability of wildlife habitat. We also care about the overall health of the ecosystem in LCC. But the authors need to be careful about making statements about roadside parking causing erosion, invasive weed spread, and other environmental degradation without any mention of data to back up those claims. For example, when I asked UDOT recently about map data depicting the informal “spider-web” trails mentioned in the document, they told me they have no such data. Various unsubstantiated claims are made throughout this chapter with no apparent way to back them up.

Section 1.4.2.3 “Transit Routes” describes the value of UTA bus routes for winter recreation. They acknowledge “there is no summer transit service with stops at trailheads in the canyon”. Unmentioned is the fact that there is no transit service to access parts of LCC not served by a trailhead, and there are many of those. Many of the route climbing and bouldering areas do not have formal trailheads. Some of the classic hikes including Tanners to the triple traverse, Coalpit to North Thunder, etc do not have formal trailheads. Figure 1.4-3 depicts “Little Cottonwood Canyon Recreation Destinations” but leaves out many. Figure 1.4-18 better illustrates LCC recreation destinations. This map depicts where people actually park to utilize their desired destination. Before roadside parking is eliminated, transit to these points must be created.

This section also identifies the fact that no current trailheads even have UTA stops. Development of stops at trailheads and frequently used areas must be a priority for all future transportation spending. There should be no parking area expansions or improvements without including construction of a bus stop and necessary support facilities.

The section titled “Roadway Safety” acknowledges the inadequacy of the current road design. In some locations the shoulders are less than one foot wide. This situation is further developed in the “Pedestrian and Bicycle Safety” section. This section describes the poor condition of shoulders and the potential danger of cyclists. This causes an extreme safety hazard for cyclists and must be remedied. Many WMC members are cyclists and their safety is of utmost concern. Everything that can be done to ensure both their uphill and downhill travel safety is necessary.

The section titled “Summer Parking” further decries roadside parking with no data to back up their claims. At least in the short-term, there must continue to be a way for users to park along roadside where necessary and recreate in these areas. Authors of this EIS must recognize current uses and needs of citizens and accommodate to the extent possible. Parking on the side of the road is currently legal and should remain so until satisfactory transit solutions are developed. Parking depicted in Figure 1.4-18 illustrates the current need for dispersed roadside parking. These dots represent legitimate legal users that must be accommodated with some sort of parking or mass transit options.

“Draft Alternatives-development and Screening Methodology Report”

This document describes the process for developing proposed alternatives to address transportation issues in LCC. The document refers to developing alternatives for trailhead parking. It does not define trailheads. We believe trailheads should include all traditional use trails; both developed trailheads and those used for common dispersed use areas.

Section 2.3.2 “Need for the Project” discusses the transportation needs in LCC. One of the needs identified is “Limited parking at trailheads”. This is only a small part of the problem. The current situation is limited parking at all recreation destinations in LCC. By limiting the study to a couple trailheads, UDOT misses the problem almost entirely.

The authors have left out another “need for the project”. The goal of overall traffic reduction should be identified as a need in this section. In the Screening Criteria, “Reduce or eliminate traffic conflicts” is mentioned but the overall need of reducing traffic in general is not.

Section 2.3.3 “Level 1 Screening Criteria” identifies the measures to “Improve reliability and safety by 2050”. Several of the measures have to do with trailhead traffic safety and the intention to “reduce or eliminate on-road parking”. The WMC agrees with that as a goal in the next 30 years. Presumably during that period improvements will be made to mass transit in LCC that will ensure dispersed recreation users can recreate in the places they currently do. Until that is accomplished, trailhead and roadside parking must not be eliminated.

Section 2.5 “Level 2 Screening” contains a list of Level 2 Screening Criteria. It has a list of Impacts to natural resources but leaves out one of the most important. The quality of the viewshed in LCC is one of the most important aspects to recreation experiences and it is not even mentioned. How can this not be a screening criteria? It is normally part of this kind of EIS study. “Impact to Viewshed” or “Visual Impact” must be listed as one of the Screening Criteria. Visual preservation of the landscape and scenic vistas in LCC must not be adversely altered. All transit alternatives must be measured for this criteria.

Throughout this, and previous efforts, there has been talk about various transit mode alternatives. Some would have very little visual impact beyond what already exists. Others would cause significant changes to the current views and have tremendous negative impact on the quality of the view and overall experience. The alternatives that have higher intrusive impact on the viewshed should be less likely to be the chosen alternative. Viewshed impact should be identified, measured and included as part of the screening and comparison of alternatives!

Section 6.1 “Travel Demand Model” must include dispersed recreation users in the required number and kind of transportation trips in LCC.

Section 6.2 “GIS Data” must include a layer of data showing current use of public lands; both type of use and number of users. There must also be a layer showing where roadside parking is currently used to meet dispersed recreation needs. These layers will be an important component of the Travel Demand Model to represent where transit stops will be required. All GIS data and models must be publicly available for inspection and use by stakeholders.

Section 7.0 “Alternatives to Be Considered” should include an alternative that expands shoulder width and quality to allow roadside parking to accommodate dispersed recreation users. This document talked about transportation deficiencies with parking on the shoulder as a problem. But the real deficiency is the fact that there are not better shoulders that can accommodate parking in areas that require it.

To summarize, the Wasatch Mountain Club is very supportive of this effort. We have two primary concerns with these draft documents. One is that mass transit solutions must get people to all places our members recreate, but until then roadside parking must continue. The other is that any alternative

must have minimal impact on the environment and the views in LCC, and impacts to the viewshed must be part of the screening criteria.

Submitted by Dennis Goreham,
WMC Conservation Director
December 13, 2019

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CENTRAL WASATCH COMMISSION

December 13th, 2019

RE: Little Cottonwood Canyon Environmental Impact Statement
Comments regarding Purpose and Need, Alternative Screen Methodology

Dear John Thomas and project team,

The Central Wasatch Commission would like to thank Utah Department of Transportation for the opportunity to comment on the October 30th release of the Little Cottonwood Canyon Environmental Impact Statement Purpose and Need and Screening Criteria chapters.

The Central Wasatch Commission (CWC) is comprised of eight local jurisdictions from the Wasatch Front and Back. The CWC members include the Town of Alta, Salt Lake County, Sandy, Cottonwood Heights, Salt Lake City, Millcreek, Summit County, and Park City. Additionally, the CWC has a thirty-four-member stakeholder council that advises on the work of the CWC. Members include representatives from the environmental, recreation, ski resorts, business, science, and academic fields.

Mountain Accord Background

The CWC's mission is to implement the Mountain Accord and to coordinate among jurisdictions and stakeholders to find solutions for the Central Wasatch Mountains. Mountain Accord was signed in 2015 to make decisions and implement solutions to protect the Central Wasatch and ensure its long-term vitality. This unprecedented collaboration of diverse groups created solutions for the future of the Central Wasatch. Mountain Accord's goal is to create and build a consensus that would include responsible stewardship of natural resources, preservation of quality recreation experiences, establish an environmentally sustainable transportation system, and contribute to a vibrant economy.

The Mountain Accord represents the culminating commitment of more than 20 jurisdictions and organizations who, through a voluntary, multi-year, public, consensus-based planning process agree to proceed with a suite of actions designed to ensure that future generations can enjoy all the activities we do today, while preserving our watershed and natural environment. The signers intend the Accord to influence future, local, regional and statewide decisions and to initiate efforts to enact meaningful solutions for the Central Wasatch in the face of growing pressures on this beloved mountain range. The process and outcome of the Mountain Accord and the mission of the Central Wasatch Commission aligns with UDOT's vision to partner and build the community of our dreams.

For Transportation solutions, the Accord reflected the work of hundreds of stakeholders over two years. Specific direction included:

“The [Mountain Accord] Blueprint proposes to connect residents and visitors to mountain destinations and connect communities and people to jobs via efficient and sustainable transit choices. The solutions would manage the impacts of a rapidly growing population in ways that will reduce reliance on automobiles and decrease impacts on the environment. The proposed transit network would not only provide a more sustainable way to travel, it would also provide a powerful tool for the region to shape growth, reduce sprawl, and promote transit-oriented development that supports economic growth, quality of life, and environmental protection.”

This memo incorporates comments from the CWC Board, member jurisdictions, and input from the CWC Stakeholders Council utilizing the Mountain Accord as the lens. The process to solicit comments included hosting a facilitated discussion with the Stakeholders Council and coordination with all the local governments in an around the Central Wasatch Mountains. During this time Stakeholders provided feedback and comments for the Purpose and Need and Screening Criteria. Finally, the CWC Board reviewed and approved these comments.

Purpose and Need

The following comments represent a comprehensive summary of the comments CWC has received from the CWC Board, member jurisdictions, and Stakeholders Council:

- Expand cooperating agencies
 - Request that Central Wasatch Commission be elevated to a Cooperating Agency throughout the EIS process. According to the Purpose and Need Chapter, “A cooperating agency is an agency, other than a lead agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. A state or local agency of similar qualifications may, by agreement with the lead agency, become a cooperating agency (40 Code of Federal Regulations Section 1508.5).” It is our Commission’s belief that the CWC does in fact have special expertise and jurisdictional responsibility for the Central Wasatch Mountains.
- Adding emphasis on improving air quality
 - Incorporate how any alternatives will help reduce automobile emissions
- Protecting watershed should be a top-level priority, as reflected in federal and state law and not a secondary criterion that is currently stated
 - Please enhance and elevate the importance of protecting this critical resource
 - Impacts related to Clean Water Act elevated to Level 1 Screening Criteria
 - Addition of Safe Drinking Water Act elevated to Level 1 Screening Criteria
 - Local regulations for protection of drinking water
 - Local jurisdiction land and water rights be included in the screening criteria

- Considering the requirements of NEPA and the regulations of the Council of Environmental Quality (CEQ), UDOT's approach to indirect and cumulative impacts, connectedness to other actions, and other issues important to the Central Wasatch Mountains may not be adequate. Input and funding for disciplines other than engineering are required by NEPA; we assume that UDOT is incorporating the many disciplines that are needed to address impacts on the Central Wasatch Mountains.
- Project area
 - Study area seems inadequate. The decisions of the LCC EIS will inevitably affect a broader geographic area than the roadway. That needs to be reflected in the P&N and screening criteria. For example, whatever mode is selected to achieve the objectives and purposes sought will tie to the rest of the transportation system. Those impacts and the effectiveness of each mode need to consider the broader, connected geography.
- Best practices on implementation of alternatives to minimize environmental impacts
- Decrease in the number of vehicles, especially those that have single occupants
- Include additional local plans (e.g., Alta Commercial Core, Mountain Accord, Salt Lake City Watershed Management plans, Salt Lake County Wasatch Canyons Master Plan)
- Purpose and Need chapter does not clearly address pedestrian facilities along Wasatch Boulevard
- Visitor Carrying Capacity. There is no requirement that UDOT conduct a carrying capacity study and CWC is not advocating that UDOT undertake such a study as part of the LCC EIS, A thorough understanding of the potential ROD on the affected environment is important and should be evaluated as part of the LCC EIS.

Screening Criteria

- Incorporate the principles of the Mountain Accord for the projects screening criteria
 - Equally evaluate all the options from Mountain Accord: aerial, trains, buses
- Consider the impacts on sound and noise
- Consider visual impacts
- How will alternatives create/deviate current runoff and create new hydrology system and what impacts will that have on the water quality
- Incorporate impacts of Climate Change
 - Impacts of climate variability on the resilience of infrastructure to natural disasters such as extreme weather events
- Cost and benefits analysis
- Operations and Maintenance
 - Roadway maintenance and operations- prioritize acquiring dedicated maintenance equipment for LCC
- Timing, Feasibility, Phasing
 - Consider implementation in the context of near-term projects and the results on traffic congestion mitigation
 - Timeline of alternatives
- No net adverse impacts to natural environment

- Substantially reduce vehicles
- Include study on latent demand
- Consider additions to the draft documents that reference the impact to residents living along the corridor in addition to tourists, commuters, and recreation traffic

In addition to the comments regarding the Purpose and Need and Screening Criteria, alternatives were mentioned during the process for UDOT to consider. Alternatives mentioned include:

- Focus on mass transit
 - Effectiveness, priority, optimize
- Mitigate parking
- Please include transit connections to Big Cottonwood Canyon
 - Currently, alternatives that will be considered are transit connections between Little Cottonwood Canyon and Wasatch Boulevard from the mouth of Big Cottonwood Canyon. The relationship to the transportation system in the Salt Lake Valley is not identified. For Park City, UDOT has only identified gondola connections; other modes aren't identified for evaluation or as possible alternatives.
- Expansion of Highland Drive
- Consider a variable, multimodal 3rd lane
- Ingress/egress from LCC for emergency
 - Consider incorporating disaster resilience, emergency operations, and evacuations
- Improper vehicles (snow tires, 2wd)
- Pulling parking away from the mouth of canyons
- Updated wayfinding & parking signage
- Tolling
 - Potential revenue and resources for the management of transportation impacts
- Improved and enhanced enforcement
- Improve transit capacity and prioritization along Wasatch Boulevard that adds value to the surrounding neighborhoods
- Consider traffic calming measures or speed limit reductions that would slow traffic, allow safer/easier neighborhood access, without negatively impacting roadway level of service
- Create a network of shared-use pathways and pedestrian crossings along the corridor for active transportation and recreation
- Strongly consider creative travel lane ideas instead of standard road widening (e.g. dedicated transit lanes, flex shoulders, etc.) to retain the character of the Wasatch Boulevard corridor while accommodating additional traffic during peak travel hours)
- Preserve/make consistent bicycle facilities

Other Impacts

Finally, The Blueprint of the Mountain Accord includes actions in accordance with the National Environmental Policy Act (NEPA). This includes preparing an environmental impact statement (EIS) or other environmental reports evaluating the impacts of the proposed action and alternatives:

- High capacity transit in the Little Cottonwood Canyon/Big Cottonwood/Park City corridor.
- Transit incentives and automobile disincentives including parking/pricing strategies.
- Year-round local bus service in Big Cottonwood Canyon.
- Fast transit service from the airport to the Park City area via I-80.
- Improved transit service on US 40 and I-80 between Quinn's Junction and Kimball Junction.
- Improved transit connections in Summit County.
- Shuttle service in Mill Creek Canyon.
- High capacity transit connections in the eastern Salt Lake Valley.
- Safety and access improvements for bicyclists and pedestrians.

The CWC requests that UDOT consider these long-term objectives in evaluating LCC solutions and their impacts. The CWC recognizes that UDOT is preparing an EIS on LCC and Wasatch Boulevard. But the decisions stemming from this EIS and ensuing investments will dictate the transportation system of the future for the Central Wasatch Mountains.

The CWC would like to thank UDOT for the opportunity to comment on the Purpose and Need and Screening Criteria chapters for the Little Cottonwood Canyon Environmental Impact Statement. It is the Commission's hope that the comments in this memo are helpful, considered, and incorporated moving forward.

The CWC is committed to supporting and engaging with UDOT throughout the EIS process. The CWC is available to assist UDOT through whatever forums best serve UDOT's needs.

Sincerely yours,

A handwritten signature in black ink that reads "Christopher Robinson" followed by a stylized mark that appears to be "Candless".

Chris McCandless
Central Wasatch Commission Chair, and Sandy City Council

Cc:
Jackie Biskupski, Salt Lake City
Jim Bradley, Salt Lake County
Christopher Robinson, Summit County

Mike Peterson, Cottonwood Heights

Andy Beerman, Park City

Jeff Silvestrini, Millcreek

Harris Sondak, Town of Alta

Jenny Wilson, Salt Lake County

Ralph Becker, Central Wasatch Commission Executive Director

Blake Perez, Central Wasatch Commission Deputy Director

Lindsey Nielsen, Central Wasatch Commission Communications Director

Metropolitan Water District of Salt Lake & Sandy

3430 East Danish Road, Cottonwood Heights, UT 84093
Phone: 801-942-1391 Fax: 801-942-3674
www.mwdsls.org



December 13, 2019

John Thomas
UDOT Region 2
2010 South 2760 West
Salt Lake City, UT 84104-4592
johnthomas@utah.gov

Subject: Comments for the Little Cottonwood Canyon EIS Draft Purpose and Need and Draft Alternatives and Screening Methodology

Dear Mr. Thomas,

This letter transmits comments from Metropolitan Water District of Salt Lake & Sandy (MWDSLS) in response to the Draft Purpose and Need and Draft Alternatives Development and Screening Methodology Report. MWDSLS supports and would like to reinforce comments submitted by Salt Lake City with the following comments:

Comments on the Draft Purpose and Need Statement

As a wholesale provider of drinking water, MWDSLS treats and delivers Little Cottonwood Creek water to Salt Lake City, Sandy City, and Jordan Valley Water Conservancy District. This water is then delivered within the respective service areas of these entities, with the potential to be conveyed to over one million people in the Salt Lake Valley. Source water protection of Little Cottonwood Creek is essential to the public health of nearly the entire Salt Lake Valley.

Another important aspect of Little Cottonwood Creek source water protection is the potential for adverse economic impacts resulting from source water quality degradation. Source water quality degradation can translate to significant increases in operations, maintenance, and capital treatment costs. These increased costs are ultimately passed on to the end user (residential, business, non-profit, government, etc.). Additionally, if Little Cottonwood Creek water quality degradation results in an untreatable water supply, Salt Lake City and Sandy City lose a vital piece of their drinking water supply portfolios.

Due to the importance of Little Cottonwood Creek as a drinking water source, protection of drinking water supply should be included in the Draft Purpose and Need Statement.

Comments on the Draft Alternatives Development and Screening Methodology

MWDSLS would like to see the following changes to the screening criteria outlined in the Draft Alternatives Development and Screening Methodology:

Metropolitan Water District of Salt Lake & Sandy

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- EIS Level 1 screening criteria should include protection of drinking water sources and impacts to both the federal Safe Drinking Water Act (SDWA) and state of Utah Safe Drinking Water Act.
- UDOT should consider whether alternatives could impact MWDSLS's treatment plant and intakes along the creek that convey water to the plant. This could be direct impacts to the integrity of water infrastructure or water quality impacts that result in the need to change water treatment processes or result in the temporary loss of the ability to use the Little Cottonwood Creek water for drinking water purposes. Roadway accidents, hazardous materials spills, or sedimentation resulting from construction activities have impacted MWDSLS's ability to treat the water in the past. Changes that could result in an increase of these types of incidents should be considered in Level 1 Screening Criteria.
- Level 1 screening criteria should be expanded to include other sections of the Clean Water Act (CWA), especially those that are protective of the beneficial use designation of Class 1C: Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water (DDW).

MWDSLS appreciates the opportunity to provide comment. Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Michael J. DeVries

Michael J. DeVries

MWDSLS General Manager

CC: Vince Izzo, HDR vincent.izzo@hdrinc.com



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
*Lieutenant
Governor*

Office of the Governor
PUBLIC LANDS POLICY COORDINATING OFFICE

KATHLEEN CLARKE
Director

December 13, 2019

Sent via electronic mail: johnthomas@utah.gov

John H. Thomas, PE
UDOT Project Manager
UDOT Region 2
2010 South 2760 West
Salt Lake City, Utah 84104

Subject: Little Cottonwood Canyon EIS -- Draft Purpose and Need and Draft Alternatives Development and Screening Methodology

Dear Mr. Thomas:

The Public Lands Policy Coordinating Office received the following comments from the Department of Environmental Quality, Division of Water Quality (DWQ) concerning the Draft Purpose and Need and Draft Alternatives Development and Screening Methodology for the Little Cottonwood Canyon EIS.

DWQ protects, maintains, and enhances the quality of Utah's surface waters and groundwater to protect beneficial uses and public health. The Division oversees the classification of the waters of the state (Clean Water Act §304 and Utah Code §19-5-110). Responsibilities include development of water quality standards, water quality monitoring and assessment, development of total maximum daily load plans (TMDLs) to restore impaired waters to their designated beneficial uses, issuance of discharge permits and 401 certifications for US Army Corps of Engineers (USACE) 404 permits, and the implementation of nonpoint source projects to improve water quality.

General Comments and Background Information

The Utah Water Quality Act requires the Water Quality Board to assign beneficial uses to the waters of the state. DWQ develops criteria to protect and restore those uses. Utah is required to assess its waters every two years to determine whether they are meeting water-quality standards. Waters not meeting the standards to protect for their beneficial uses are placed on the 303(d) List of Impaired Waterbodies. Once these waters are listed, the Clean

Water Act (CWA) requires the state to conduct in-depth water quality studies to determine the possible sources of the pollutant(s) causing the impairment and create a plan to restore the waters to their beneficial use(s).

Upper Little Cottonwood Creek has three designated beneficial uses:

- Class 1C: Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water from the Metropolitan Water Treatment Plant to its headwaters.
- Class 2B: Protected for infrequent primary contact recreation. Also protected for secondary contact recreation where there is a low likelihood of ingestion of water or a low degree of bodily contact with the water (e.g., wading, hunting, and fishing)
- Class 3A: Protected for cold water species of game fish and other cold water aquatic life, including the necessary aquatic organisms in their food chain, from the Metropolitan Water Treatment Plant to its headwaters.

Lower Cottonwood Creek has three designated beneficial uses:

- Class 2B: Protected for infrequent primary contact recreation from the confluence with the Jordan River to the Metropolitan Treatment Plant. Also protected for secondary contact recreation where there is a low likelihood of ingestion of water or a low degree of bodily contact with the water (e.g., wading, hunting, and fishing).
- Class 3A: Protected for cold water species of game fish and other cold water aquatic life, including the necessary aquatic organisms in their food chain, from the confluence with the Jordan River to the Metropolitan Treatment Plant.
- Class 4: Protected for agricultural uses, including irrigation of crops and stock watering, from the confluence with the Jordan River to the Metropolitan Treatment Plant.

Little Cottonwood Canyon is a protected watershed that supplies drinking water for the Salt Lake City area. According to the [1998 Salt Lake City Watershed Plan](#),

“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.”

The [Revised Forest Plan for the Wasatch-Cache National Forest](#) specifically addresses desired future conditions for watersheds in the Central Wasatch Management Unit:

“The underlying premise of resource management in this Management Area is the need to provide long-term, high quality culinary water to the large urban population of the Salt Lake Valley... Congress also directed the Forest Service to administer designated watersheds in cooperation with Salt Lake City for the purpose of storing, conserving, and protecting water from pollution. Providing quality recreation opportunities within the framework of watershed protection will be an increasing challenge as the Wasatch front population and national and international destination use of the area continues to grow. Continued coordination and cooperation among federal, state, and local government agencies, residents, businesses, and the recreating public will be imperative in order to meet these growing demands.

Given the importance of water coming from this area, watershed maintenance, protection, and enhancement will be a primary consideration in all management decisions. Watersheds and streams will continue to provide high quality water supplies to the Salt Lake Valley. Various uses and developments (ski resort design and development, campgrounds, picnic areas, trailheads and trails) will be designed to prevent or fully mitigate impacts, resulting in properly functioning conditions in these watersheds.” (USDA Forest Service, 2003)

In 2000, Little Cottonwood Creek was listed on Utah’s 303(d) List of Impaired Waterbodies for failing to protect cold-water aquatic life use (3A) due to elevated levels of zinc. A [Total Maximum Daily Load \(TMDL\)](#) for zinc was approved by the Utah Water Quality Board and the Environmental Protection Agency (EPA) in 2002. The TMDL cited historical mining activity (e.g., drain tunnels and adits) as the main source of zinc pollution. More recently, the [2016 Integrated Report](#) listed Upper Little Cottonwood Creek on the 303(d) list for failing to protect cold-water aquatic life use (3A) due to exceedances of copper, cadmium, and pH. Lower Little Cottonwood Creek was also listed in the 2016 Integrated Report for not protecting secondary contact recreation (2B) and agricultural (4) beneficial uses due to elevated levels of *E.coli* and total dissolved solids (TDS), respectively. The impairments on Lower Little Cottonwood Creek are a high priority for DWQ due to its high recreational use. An *E. coli* TMDL is planned for 2022 following intensive source monitoring.

The [2015 Salt Lake County Integrated Watershed Plan \(SLCIWP\)](#), described the progress made on strategic targets slated for analysis in the 2009 Watershed Plan, including reduction of pollutant loads to receiving waters and instream flows required to support watershed functions, specifically instream flows on Little Cottonwood Creek. According to the Municipal Stormwater Discharges section of the 2015 plan, the Utah Department of Transportation (UDOT), along with Salt Lake City and Salt Lake County, “samples and analyzes stormwater discharges to quantify the amount of pollutants conveyed to receiving waters. These pollutant estimates can provide the scientific and engineering basis to

implement management strategies and design and construct water quality improvements to reduce the discharge of pollutants to receiving waters” (SLCIWP, 4.1, pg. 114). This statement would indicate that UDOT has knowledge and experience with the environmental impacts of stormwater discharges and is well-equipped to identify potential stormwater issues and address the impacts through design strategies.

The Little Cottonwood Canyon watershed also provides important ecosystem services to residents and tourists. Protection of this valuable resource becomes even more critical as the population in the metropolitan Salt Lake area grows, which in turn will lead to increasing demands on clean drinking water, high-quality recreation experiences, and sustainable transportation solutions.

Draft Purpose and Need

Purpose

Although UDOT identified improving safety, reliability, and mobility on S.R. 210 as its primary objective for this project, these issues are also closely tied to long-term transportation impacts to water quality. In fact, watershed protection can and should be an integral part of the project rather than a secondary objective. Issues that arose as transportation concerns in the [Mountain Accord](#) and [Wasatch Front Regional Council \(WFRC\) 2019 to 2050 RTP](#) impact environmental resources in Little Cottonwood Canyon as well. Population growth, increased visitation, and dispersed recreation affect the demand for clean drinking water, the desire for unspoiled natural places, and opportunities for world-class recreational experiences.

Management practices to maintain the quality of these resources in the watershed will not have the same level of success if they are developed as an afterthought rather than as a fundamental aspect of transportation planning. The Federal Highway Administration (FHWA) [Planning and Environmental Linkages Program \(PEL\)](#) stresses the importance of considering environmental goals early in the transportation process. The PEL coordinated analysis process examines environmental resources, environmentally sensitive areas, and the possible environmental effects of transportation projects on these resources. Potential environmental effects from these projects may include direct, indirect, and cumulative effects that impact the natural and human environment. As such, mitigation and prevention measures to protect natural resources for transportation projects such as the Little Cottonwood Canyon Project should be considered at the beginning of the planning process and addressed on a programmatic level rather than on a piecemeal scale after key decisions have been made.

The Little Cottonwood Canyon watershed provides important ecosystem services and benefits to the area, services and benefits that will become more critical with Utah's projected population growth. According to the [Environmental Protection Agency \(EPA\)](#),

“The wide array of critical ecosystem services provided by healthy watersheds is frequently undervalued when making land-use decisions. Due to the complexity of natural systems and economic precedents, it is difficult to assign a dollar amount to a particular ecosystem service. However, there is a large body of research and evidence to support the fact that intact healthy ecosystems avoid costly restoration and ecosystem service replacement, and provide long-term economic opportunities...Protecting healthy watersheds can reduce capital costs for water treatment plants.”

The U.S Forest Service reiterates this [important link between healthy watersheds and water](#), stating that “(f)orest ecosystems play a critical role in delivering clean water to the public...[Investments](#) in the protection...of forested watersheds can help sustain these services and can often result in cost-effective alternatives to building new or improving existing infrastructure.”

The economic benefits of a healthy watershed and its contribution to the drinking water needs of a growing population must be taken into consideration at the front-end of a transportation project, not towards the end. As the EIS process is currently structured, environmental (secondary) objectives will be used to refine the project alternatives but “not...to determine whether an alternative was reasonable or practicable” (LCC EIS, Draft Purpose and Need, 1.2.1).

The proposed UDOT improvements to commuter, recreation, and tourism for S.R. 210 are not mutually exclusive to the goals of protecting the natural resources, watershed, and diverse recreational uses in Little Cottonwood Canyon. In fact, the project presents a unique opportunity for the systematic integration of a major transportation project with the protection of the canyon's natural environment and resources.

Need

According to the Draft EIS Need Statement, “transportation needs in the study are related primarily to traffic during peak periods, avalanche risk and avalanche control..., multiple on-road users in constrained areas, and anticipated future increases in visitation to Little Cottonwood Canyon as a result of population growth in Utah” (Draft Purpose and Need Statement, LCC EIS, 1.2.2).

DWQ has found there to be a significant overlap between these transportation issues and water-quality issues in the canyon. The Division has identified a number of water

quality issues that are inextricably linked with issues identified in the Draft EIS Need Statement. See below for details.

Vehicle Traffic in Little Cottonwood Canyon

Improved safety, mobility, and reliability for vehicle transportation in the canyon is the primary objective of the project. Traffic impacts to natural resources in the canyon should also be considered as part of the primary objective.

- Nonpoint Source Pollution from Fuel, Metals, and Salt-laden Runoff
 - Direct or indirect fuel spills on roadways can impact water quality. Contaminants from vehicle fuel can include xylene, glycoethylene, toluene, and methyl isobutyl ketone.
 - The current high volume of daily traffic in Little Cottonwood Canyon is considered a risk for nonpoint pollution from accidents that could spill large quantities of fuel, sewage, or other contaminants into the creek (Drinking Water Source Protection Plan (DWSPP) for Little Cottonwood Creek, 2003, pg. 22). Tanker trucks that service the ski resorts and Town of Alta are of particular concern. Increased visitation would likely increase this type of traffic in the canyon.
 - Salt-loading during the winter months from increased travel in the canyon impacts Little Cottonwood Creek. Road salting is a significant problem. Current data show that the monthly concentrations of total dissolved solids (TDS) (salts) in Little Cottonwood Creek spike significantly during the winter months from road salting.
 - In 2015, EPA signed an MOU with the automotive industry to [phase out copper from brake pads](#) to reduce the discharge of heavy metals and other pollutants in runoff from roadways. The measure is voluntary, but the MOU acknowledges that [copper is a primary pollutant of concern in highway runoff](#). Brake pads are a source of copper and cadmium in stormwater runoff, and the debris from worn pads can release these metals into the creek during storm events. The 2016 Integrated Report listed Upper Little Cottonwood Creek on the 303(d) list for failing to protect cold-water aquatic life use (3A) due to exceedances of copper and cadmium. As a point of reference, Little Cottonwood Canyon is a coniferous forest with low organic matter, and organic matter reduces metal expression in water. Given the low-organic matter ecosystem present in Little Cottonwood Canyon, increased traffic could increase metals pollution in Little Cottonwood Creek.
 - Pollutants on roadways can react with road materials to create additional sources of nonpoint source pollution.

- Air Pollution – Water Pollution Nexus
 - Airborne particulates from the incomplete combustion of petroleum products can be deposited into the water and snow.
 - Increased traffic and/or decreased mobility leads to greater particulate pollution in the canyon, which leads to increased deposition.

Stormwater Runoff

Stormwater runoff from changes to the road footprint and construction activities could have a significant impact on the water resources in Little Cottonwood Canyon.

- Larger Roadways and Additional Parking Lots
 - An increase in impervious surfaces in the canyon increases stormwater runoff and associated pollutants discharged into surface waters.
 - Current stormwater management practices may be affected by the non-contiguous nature of roadway improvements. If non-contiguous improvements are not aggregated under a comprehensive stormwater management system, stormwater issues from roadway improvements may not be identified or addressed.
 - Accommodations for increased traffic from larger roadways and additional parking lots will increase pollutant inputs into stormwater runoff.
 - Asphalt and roads in the upper part of the canyon could increase the speed of a contamination event (DWSPP for Little Cottonwood Creek, 2003, pg. 11).
- Road Construction
 - Reconstruction of roadway elements such as narrow shoulders, steep/sharp horizontal and curves, etc., could lead to increased soil erosion and sediment runoff into Little Cottonwood Creek during and after construction/realignment.
 - Changes to roadway elements could increase salt-loading into Little Cottonwood Creek depending on how these alterations change snowplow paths and the resulting road salt runoff.

Erosion and Sedimentation

While roadway and parking improvements are designed to reduce erosion from pavement damage and the creation of informal trailheads, increased traffic in the canyon may have the unintended consequence of increasing soil erosion and sedimentation.

- Future Travel Demand
 - Roadway expansion to accommodate predicted future travel demand could result in increased roadway usage and resulting erosion and sedimentation into nearby streams from vehicle impacts to the roads.
 - The “build it and they will come” approach may lead to greater canyon usage that increases erosion and sedimentation into nearby streams from developed and dispersed recreation in the canyon.
- Parking Lots
 - More parking spaces will encourage additional hiking, cross-country skiing, and snowshoeing in undeveloped areas which could lead to increased erosion and sedimentation from increased visitor levels/days.
 - The Revised Forest Plan for the Wasatch-Cache National Forest states that parking capacities in Little Cottonwood Canyon won’t exceed 2000 levels “unless modification is needed for watershed protection or to facilitate mass transit.” This statement points to a limitation on parking expansion, which may prove difficult should the carrying capacity of S.R. 210 increase. It is unclear how increased traffic absent concomitant parking capacity will solve the erosion problems noted in the Purpose and Need Section (1.4.3.2, page 1-39–1-40).

Sewage Infrastructure

A transportation infrastructure that supports higher visitor use will place unanticipated strains on the current sewage and septic infrastructure. The [2016 Integrated Report](#) identified Lower Little Cottonwood Creek as a high priority for TMDL development by 2022 for *E. coli*. This finding indicates that *E. coli* contamination is already an issue for Little Cottonwood Creek, and additional inputs could exacerbate current problems with pathogens in this drinking water source.

- Sewage System
 - If the current sewage infrastructure can’t meet predicted increases in visitation, there is the strong possibility of damage to the integrity of the sewerage structure and system failures that may impact water quality in the canyon.
 - Additional resort development /sewage infrastructure added to meet increased visitation would likely have unanticipated impacts on the watershed.
 - Additional development to meet the needs of increased visitation could increase the potential for spills from residential sewer holding tanks, either onsite or during transport.

- Septic and Trailhead Pit Toilets
 - Septic systems for private residences may contribute to fecal contamination in the creek. Additional usage of septic due to increased visitation/development increases the likelihood of added fecal contamination from leaking septic systems, insufficient drain field capacity, or locations that don't provide effective septic drainage.
 - An increase in bathroom facilities at trailheads could reduce the levels of fecal contamination due to trail/backcountry usage, but the number of pit toilets at trailheads may be insufficient to meet demand. Pit toilet siting may be challenging given the lack of appropriate locations that meet demand without creating potential contamination. Increased visitation could also reduce pit toilet life depending on volume, number of users, soil permeability, and groundwater level. Overflowing pit toilets could lead to an increase in fecal contamination near trails, streams, or tributaries as recreationists find other locations in the canyon in which to defecate.
- Dispersed recreation
 - Increased visitation supported by improved mobility and road carrying capacity on S.R. 210 will likely lead to further fecal contamination of Little Cottonwood Creek, particularly in backcountry areas.

Draft Alternatives Development and Screening Methodology

According to the Draft Alternatives and Development and Screening Methodology and Preliminary Concept Report (DADSM), UDOT considered concepts and alternatives to determine whether they were practicable and reasonable, met the project goals, were within the project area, and would be subject to analysis under NEPA (DADSM, 2.2, pg. 5). Suggested concepts or alternatives that meet these criteria will be evaluated in Level 1 screening.

DWQ is very concerned that this screening process, as proposed, evaluates water quality and natural resource impacts too late in the process to have any real bearing on the selection of alternatives. The process presumes that mitigation after the fact will address environmental impacts that may well be difficult if not impossible to mitigate when the project is underway or completed.

The purpose of the Level 1 Screening is to eliminate alternatives that do not meet the project's purpose and need (DADSM, 2.3, pg. 6). If water quality and natural resource protection is included in the project's purpose and need, then alternatives that could cause significant environmental harm would be screened out early. Currently, watershed protection is a secondary objective that will be considered near the end of the screening process. According to the draft document,

“UDOT...recognize(s) the importance of the Little Cottonwood Canyon watershed to Salt Lake City’s water supply and (the secondary objective will) mitigate short-term impacts and minimize potential long-term transportation system impacts to water quality...These secondary objectives (will be) used to refine project alternatives, **not used to eliminate alternatives in the screening process**” (emphasis added) (DADSM, 2.3. pg. 6).

Level 2 screening will be used to “identify alternatives that are practicable and reasonable” (DADSM, 2.5. pg. 9). In addition, the document states that Level 2 screening criteria will also be used to eliminate alternatives that “might meet the purpose and need for the project but would be unreasonable alternatives for other reasons – for example, an alternative would have unreasonable impacts to the natural and human environments” (*Ibid*, 1.0, pg. 3). It is unclear from this statement what would constitute unreasonable impacts.

According to the DADSM, UDOT will “collectively evaluate the alternatives that passed Level 1 screening against criteria that focus on the alternative’s impacts to the natural and built environment, estimated project costs, logistical considerations, and technological feasibility” (*Ibid*, pg. 6). Impacts related to the CWA and impacts to natural resources are among many criteria in the Level 2 screening criteria, but unfortunately, these criteria fail to mention important requirements under the CWA to protect water quality and watersheds, including nonpoint source pollution, stormwater pollution, and streams on the 303(d) List of Impaired Waters. In fact, the criteria direct their sole attention to U.S. Army Corps of Engineers (USACE) Section 404 permits and Clean Water Act 401(b) guidelines. While wetlands protection is an important component of the screening process, it is not the only relevant portion of the CWA that should be considered.

Alternatives to Be Considered in the Screening Process

A thorough examination of the alternatives proposed for consideration in the Level 1 screening process shows that some of the alternatives could have significant water quality impacts, as identified below (DADSM, 7.0, Table 3, pg. 17).

- Safety – Avalanche Mitigation
 - Road alignment and/or bridges
 - Berms
 - Stopping walls
- Safety — Parking
 - Expand trailhead parking with elimination of on-road parking within 0.25 mile of each trailhead

- Expand trailhead parking with elimination of off-road parking from S.R. 209/S.R. intersection to Snowbird Entry 1
- Mobility – Little Cottonwood Canyon
 - Gondola from Salt Lake Valley
 - Gondola from Park City
 - Train and/or light rail
 - SkyTran
 - Monorail
 - Additional road lanes
 - Reversible
 - Peak-hour shoulders

As was stated in earlier comments regarding the Purpose and Need of the project, consideration of impacts to water quality, watershed, and natural resource should occur at the beginning of the screening process, not towards the end. These alternatives present project scenarios that would be difficult to mitigate through design or best practices, and other alternatives could also pose unintended consequences that would/could not be addressed later in the screening process.

Conclusion

The Little Cottonwood Canyon Project provides decision-makers with a unique opportunity to examine and evaluate solutions for two critical issues — travel demand in Little Cottonwood Canyon and protection of the canyon’s watershed — in a future-oriented, integrated plan. The focus on transportation planning in the Wasatch Front Regional Transportation Plan 2019-2050 and the collaborative approach to preserving the central Wasatch Mountains in the Mountain Accord laid a firm foundation for the next steps decision-makers can take to find solutions to the increasing pressures that are and will be placed on Little Cottonwood Canyon from projected population growth, increased demand for safe drinking water due to population growth, and increased travel demands to this popular recreation spot.

Now is the time to assess optimal methods for meeting the economic and environmental needs of the public:

- Safety and reliability for transportation AND clean drinking water
- Mobility through sustainable transportation options
- Preservation of precious resources for a healthy watershed and world-class recreation opportunities

Inclusion of water quality and watershed protection in the Purpose section of the EIS will ensure that the proposed project and the alternatives selected will address these issues

John H. Thomas, PE
UDOT Project Manager
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Development and Screening Methodology
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in a comprehensive, inclusive manner. Best results will be achieved if transportation and environmental pressures on Little Cottonwood Canyon are evaluated simultaneously. Sustainable solutions that take into account the cumulative impacts of transportation on the natural environment will protect the watershed and the world-class recreational experiences in Little Cottonwood Canyon.

Thank you again for the opportunity to provide comments on the Little Cottonwood EIS. For additional information or clarification, please contact Sandy Wingert, Upper Provo and Jordan River Coordinator, Utah DWQ, at swingert@utah.gov or Jodi Gardberg, Manager, Watershed Protection Section, Utah DWQ, at jgardberg@utah.gov.

Utah DWQ and the Public Lands Policy Coordinating Office appreciate the opportunity for state agencies to provide comment.

Sincerely,

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

Kathleen Clarke
Director

To: John Thomas
Subject: RE: Granite Community Council Comments on the Purpose and Need Dec 2019

On Fri, Dec 13, 2019 at 11:50 AM <vaughncox@comcast.net> wrote:



Granite Transportation Committee

December 13, 2019

Mr. Carlos Braceras, Executive Director

Utah Department of Transportation

4501 South 2700 West

Salt Lake City, UT

Re: Little Cottonwood Canyon Environmental Impact Study

UDOT Draft Alternatives Development and Screening Methodology and Preliminary Concept Report

Dear Mr. Braceras,

Thank you for the opportunity to comment on the UDOT Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Little Cottonwood Canyon Environmental Impact Statement Wasatch Boulevard to Alta dated October 30, 2019. The Granite Transportation Committee (GTC) which is a

subcommittee of the Granite Community Council (GCC) has reviewed this document and wishes to provide the following comments and requests:

1. Section 1.0 Introduction and Figure 1 (geographic scope) – We believe that the geographic scope described in the Draft is not adequate. The report should specify that the geographic scope will likely be larger, and possibly considerably larger than what is specified in the introduction and what was specified in the May 15, 2019 Notice of Intent statement in the Federal Register (Vol. 84, No. 94 21894). Further, the UDOT letterhead on all EIS documents clearly specifies the geographic scope as being Wasatch Boulevard to Alta. **No change – See FAQ regarding scope of analysis**

If the scope is not officially expanded, certain alternatives now being considered (Table A-1) might be forced out of consideration by additional Level One screening. Cooperating or Participating agencies could use this geographic scope issue to dispute the inclusion of certain alternatives. Antagonistic groups could use the geographic scope issue to challenge the Record of Decision by UDOT.

GTC recommends that the geographic scope issue be addressed now and be expanded to include both Big and Little Cottonwood canyons as well as adjacent Summit and Wasatch Counties.

2. Section 2.3 Alternatives Screening Level 1: Purpose and Need – GTC believes that the purpose statement in subsection (2.3.1) should be broadened to clearly incorporate alternatives that might address mobility on SR-210 but might not physically occur on that highway or within the proposed study area (SR-210 corridor). Further, the purpose should reflect objectives from recent transportation studies conducted to increase general mobility to and between the Central Wasatch ski resorts. GTC believes UDOT should consider the following revised purpose statement: **The purpose does not limit improvements to SR 210 if the improvement will alleviate congestion on 210**

Substantially improve safety, reliability, and mobility on SR-210 from Fort Union Boulevard through the town of Alta for all users on SR-210 **and to facilitate safe, convenient, reliable and sustainable year-round access (and emergency egress) to and within the Cottonwood Canyons for diverse user groups, including recreationists (hiking, skiing, rock climbing, mountain biking, sightseeing, wildlife viewing, festivals, and music, etc.) and local residents. The current UDOT purpose is broad enough to capture the suggested changes. The proposed comment purpose would unreasonable limit alternatives to a narrow few.**

The above purpose statement is consistent with the direction provided by the Utah State Legislature via SCR-10 (2012), what was proposed by Salt Lake County in its November 2012 Mountain Transportation Study, as well as the Mountain Accord Transportation Study completed by Parsons Brinkerhoff (2017). Little Cottonwood road improvements would fit better into this broader purpose of facilitating transportation improvement to connect the Central Wasatch ski resorts.

3. Section 2.5 Level 2 Screening (Table 2) – Consistency and compatibility with local and regional plans – Screening for consistency and compatibility with local and regional plans are of major concern to GTC. The Regional Transportation Plan (RTP) that was prepared by the Wasatch Front Regional Council (MPO for Salt Lake County) and submitted to UDOT in May 2019. UDOT revised its NOI in May 2019 to incorporate the RTP and R-S-53 was included in the RTP (adding a third lane to SR-210).

Not only was the third lane project not proposed by the Granite Community Council (GCC) most of the members specifically oppose it. Further, it is our understanding that neither Summit or Wasatch Counties or Park City provided written input to UDOT to include a transportation link between the cottonwood canyon ski resorts in their county or city transportation plans provided to UDOT.

We are concerned that EIS cooperating and participating agencies could oppose certain alternatives to R-S-53 because they are inconsistent with these regional and rural transportation plans. For whatever reason, the Granite Community Council has specifically been left out as a cooperating or participating agency, thus preventing our input with these internal EIS deliberations with UDOT. While GCC is left out, it appears that other agencies (who might not have GCC best interests at heart) are included. UDOT should reconsider including GCC as a cooperating or participating agency to ensure that local voices are heard. **The noted criteria in the comment does not make an alternative unreasonable per footnote on table.**

4. Section 4.0 Agency and Public Involvement – The Granite Community Council (GCC) and the Granite Transportation Committee have special expertise in the realm of transportation needs for residents in much of Little Cottonwood Canyon. Up till now, The Granite Community Council has been left out of the transportation needs process other than to provide public input. Specifically, GCC was not asked to contribute to the Regional Transportation Plan that recommended the third lane that was developed by the Wasatch Front Regional Council. **Providing input on the third lane in the RTP is a separate process outside of the EIS.**

We believe that what was contained in that plan for Little Cottonwood Canyon was contrary to our needs. Further, members of the Granite Community Council are concerned that unless it is recognized as a cooperating agency in the UDOT EIS that some other entity will, once again, speak for our residents and potentially against our best interests. **UDOT has responded directly to this request in an email to GCC in 2019.**

Once again, thank you for the opportunity to contribute and comment on this important process.

Sincerely,

A handwritten signature in blue ink that reads "Vaughn Cox". The signature is written in a cursive style.

Vaughn Cox
Granite Transportation Committee Member
Granite Community Council Chair

SAVE OUR CANYONS

Tuesday, December 3, 2019

To whom it may concern:

Save Our Canyons welcomes this opportunity to provide comments on the Draft Statement of Purpose and Need for Little Cottonwood Canyon EIS, as well as on the Draft Alternatives Development and Screening Methodology and Preliminary Concept Report. As an almost 50-year-old organization dedicated to the preservation of the natural environment of the Wasatch Mountains, we have been an active participant on the programs this proposal suggests it is building upon, including, but not limited to Mountain Accord, and 2012 Mountain Transportation Study. 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 driven by careful planning designed to minimize environmental harm. The comments we provide here are designed to help in the development of such planning.

Because the present draft documents indicate that the direction UDOT is taking with the LCC project continues to raise the same concerns described in our comments on scoping, we incorporate those comments here by reference and attach a copy hereto.

About us

Save Our Canyons is a 501(c)3 organization dedicated to protecting the beauty and wildness of the Wasatch Mountains. The geography in which this EIS is taking place is not only the watershed for our members, but also a place that has innumerable values from public health to recreation. Reverence of the natural world and wildlife is a core value held by our community.

Our overarching concerns about this project is that it is not looking at issues in a year-round context, and that outcomes could fundamentally alter our canyon environments, our watersheds, impacting wildlife and plants that inhabit the area, disrupting natural processes which this community has invested in protecting for over a century. Numerous management plans cite the single greatest threat to the environmental quality is increased visitation.

We, on behalf of our members, are invested and interested in realizing long-term solutions that benefit the stated need of protecting our watersheds, hence our concern in short-term projects influencing by way of investment, the long-term outcomes. There are so many different concepts for transportation in this region, most suited toward aiding access for certain uses, few, if any, considering environmental and watershed impacts. We don't see how this process helps us get toward that end as proposed. We hope these comments might aid UDOT in realizing that end.

Last, financial resources are finite and should be used to support the to-be-determined long-term vision. If we don't know where we are going, we don't know how to get there; this appears to be a project for the sake of doing a project, not a project that leads us to an end. Our natural

environments and watersheds should be treated much differently than our urban environments, else we risk converting nature and natural systems into urbanized and engineered systems. Simply accommodating the variable that has been identified as the greatest threat to our watershed and ecosystem health, might jeopardize public health and place more costs on society.

Background

On March 9, 2018, the Federal Highway Administration on behalf of the Utah Department of Transportation (UDOT) published a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) “in and near Little Cottonwood Canyon”. Save Our Canyons and partners responded to this initial comment, within the comment deadline (see Save Our Canyons and partners 2018 comments, which are incorporated herein by reference). For a period of nearly one year, it was not entirely clear what the status of this project was, other than communications from UDOT that there was an intent to revise the NOI, and there by the scope of the project.

During this downtime, UDOT in coordination with the Central Wasatch Commission, met with stakeholders and developed a sister project to the LCC EIS called the Cottonwood Canyon Transportation Action Plan (CCTAP). Initial comment periods were published together, recognizing the necessity to comprehend connected actions across the region. At that point, UDOT seemed to acknowledge the importance of doing the LCC project in the context of planning for this resource.

On March 5, 2019, FHWA on behalf of UDOT, published notice in the Federal Register that, “UDOT intends to revise the scope of the analysis of the Little Cottonwood Canyon project, based on new information collected during the scoping process and development of a project need.” Then again, on May 15, 2019, UDOT revised the NOI, in anticipation of a draft 2019-2050 Regional Transportation Plan done by Wasatch Front Regional Council. We provided comment at this stage in the process as well, on both the CCTAP and the connected LCC EIS (see Save Our Canyons 2019 comments, which are incorporated herein by reference).

What is notable about the final revision of the NOI due to the anticipation of the WFRC 2050 RTP is that it ignores one of its more primary, and important actions as it pertains to SR-210. Phase 1 (2019-2030) recommends operational improvements on SR-210.¹ Our understanding in discussions with WFRC staff is that the operational improvements, which are of higher priority and may preclude the need for road-widening forecasted for Phase 3 (2040-2050). However, the NOI failed to note the prioritization of transit, only focusing on road widening, which the plan identified as a lesser priority, the more pressing priority being improving transit service, operationally. This process continually appears to diminish the planned roles of transit service, in deference to damaging development projects, increasing of impervious surfaces, within protected watersheds.

¹ Wasatch Choice Map. Transportation tab, Phase 1 on SR 210, Project ID: R-S-52. <https://wfr.org/wasatch-choice-map/#currentTabIndex=1&scale=144448&sideBarClosed=false&x=-12430228&y=4950925> (Dec. 5, 2019)

On October 4, 2019, UDOT sent an email² which stated:

“...UDOT initiated the Cottonwood Canyons Transportation Action Plan (TAP) in Spring 2019 to conduct additional planning and decision-making efforts by studying transit, tolling, congestion, pedestrian and bike facilities, and parking facilities. The intended outcome of the plan was to develop a prioritized list of actions and improvements to the Canyons, and to integrate short- and long-term solutions for both canyons. The TAP was initially very broad to address mobility and Big Cottonwood needs due to the refocusing of the Little Cottonwood Canyon EIS to address the immediate challenges of traffic congestion at key intersections, trailhead parking and canyon closures in Little Cottonwood Canyon.”

It then goes on to say, “The EIS has since been revised to include those mobility solutions, thus the current TAP study area and process overlaps the EIS...”. While UDOT states it has incorporated these items into the LCC EIS, its own *FAQ* document and *Draft Alternatives Development and Screening Methodology and Preliminary Concept Report* state they won’t be analyzing the things they say the EIS has been revised to consider. Further, both these documents (the *FAQ* and *Draft Alternatives...*) state that the EIS won’t be looking at “operational safety issues” and eliminate from consideration in Table A-1, many operational actions would aid in improving safety (one of the purposes of the EIS), prejudicing analysis toward building something in a watershed over better utilizations of policies, or better policy innovation to address the problems along the corridor.

This process has been a shell game at best. The foundation from which they have engaged the public has continually shifted. The scope they say has been revised has not been revised to reflect what they say it has been revised to do. UDOT would be well-served by planning and comprehensive analysis afforded by a programmatic EIS. Continual revisions to NOIs and cancellations of related projects, show we are searching for solutions before being able to articulate a problems.

Authority

UDOT’s authority to carry out this EIS process comes from a January 17, 2017 Memorandum of Understanding (MOU) between FWA and UDOT pursuant to 23 U.S.C. 327. A closer read of this section at 23 U.S.C. 327(a)(2)(B)(iv), yields several limitations. “... the Secretary may not assign— I) any responsibility imposed on the Secretary by section 134 or 135 or section 5303 or 5304 of title 49; or (II) responsibility for any conformity determination required under section 176 of the Clean Air Act (42 U.S.C 7506).”

Save Our Canyons is concerned that these limitations may prohibit UDOT from considering any options available for the Little Cottonwood Canyon EIS other than those that are eligible for funding under the Federal Aid Highway Program. Put another way, NEPA authority may not be

² UDOT Email, “Transportation Plan Update” <https://publ.campaign-view.com/ua/viewinbrowser?od=27218d28c96aa859ef1031efc627bb02a1185630859ca1fd0&rd=18598208e8571e79&sd=18598208e8571bfd&n=11699e4bffe1b31&mrd=18598208e8571bef&m=1> (October 4, 2019)

assigned to § 5303 or § 5304, which are the sections of federal law that deal with transit solutions. It appears this process is unnecessarily limited to Highway improvements, and that it may lack authority or ability to expend funds or implement projects for transit solutions. Transit solutions of course, are the overwhelming desire of local communities as identified in numerous plans.

Moreover, this project is also complicated by the fact that the area is contained within a non-attainment area. Road-widening projects are well known for contributing to more driving (you wouldn't widen a road if you weren't trying to accommodate more cars). More driving, hence more emissions only further challenges conformity with the non-attainment determinations, so we question UDOT's ability to undertake a project that is in direct conflict with cleaning up our putrid air.³ As I write this the 10-minute US EPA pm2.5 AQI at the Cottonwood Heights sensor (situated on SR 210) is 159.

Due to the complexity of the problems, the many jurisdictions (and conflicts with their existing plans) and the aforementioned issues, we question the appropriateness/legality of looking solely at a road corridor in context of the drafted purpose and need. A programmatic EIS with joint lead agency's being the US Forest Service and Salt Lake City, both of whom have federal jurisdiction over the areas on which UDOT's highways rest, would yield the best results for the affected environments. Should Little Cottonwood Canyon be the State's priority, tiered implementation to focus on Little Cottonwood would be available under a programmatic EIS.

Existing plans

As we hope you are aware, there are several plans that discuss the Wasatch Canyons, and the desired future conditions for the study area. In our Nov. 13, 2019 meeting with the project team, a question came up about how UDOT is going to coordinate with local governments and support plans and initiatives they are working toward. The response from John Thomas was two-fold. First, he mentioned how some jurisdictions were coordinating agencies on the EIS. Second, he stated that UDOT and team would review plans to screen for consistency and coordination. This appears to be consistent with the requirements of 40 CFR § 1506.2, particularly subpart (d).

Although there is a clear consensus, reflected in conclusions of multiple planning processes occurring over decades, that the transportation problems in the Central Wasatch canyons are similar and interrelated, and that they therefore need to be addressed with comprehensive and integrated planning, UDOT is pursuing transportation improvements in LCC as a one-off project, with no analysis of how transportation decisions in LCC will integrate with the comprehensive, multi-canyon transportation system that earlier planning documents have concluded are needed. Integration with such a comprehensive transportation system should be a clearly stated purpose of the project.

³ Federal Register. <https://www.federalregister.gov/d/E9-25711>

Please consider some of the following provisions from local plans for consistency. It would be horribly inefficient to do something that conflicts with the trajectory of local jurisdictions have been working toward.

Some of the statements from these plans include the following (excerpts from attached document):

“THE HIGHWAY TRANSPORTATION GOAL OF THE PLAN IS TO REDUCE PRIVATE VEHICULAR TRAFFIC IN THE COTTONWOOD CANYONS DURING PEAK PERIODS. TO ACHIEVE THIS GOAL, MEASURES SHOULD BE IMPLEMENTED TO DISCOURAGE PRIVATE AUTOMOBILE USE AND TO ENCOURAGE USE OF MASS TRANSIT IN THE SHORT TERM.”

“The highway transportation goal of the plan is to reduce private vehicular traffic in the Cottonwood Canyons during peak periods. The County should implement measures to achieve this goal, and discourage private automobile use and encourage mass transit.”

“In the meantime, there are two additional recommendations. First, continue to promote the use of alternatives to the private vehicle. Increased bus service and transit amenities should be encouraged. The added amenities at Snowbird’s Creekside Lodge are excellent examples of how the resorts can support transit use. Second, continue to support the “human element” of canyon operations.”

“Strategy: Create a year-round transit system as an alternative to driving and parking in the Cottonwood Canyons.”

“Study feasibility of extending UTA Trax to a transit hub at the mouth of Big Cottonwood Canyon or Little Cottonwood Canyon to serve shuttles and buses to Millcreek, Big and Little Cottonwood Canyons.”

“Increase transit use and decrease impacts associated with automobile use in the canyons.”

“Support management objective to reduce future fragmentation of intact habitats. Provide connectivity in fragmented habitats and between habitats to promote genetic diversity in wildlife populations.”

“Salt Lake County desires to maintain healthy native wildlife populations through the protection and enhancement of habitat, natural landscapes, and ecosystems in the county.”

We strongly encourage you to look at these documents and adhere to the adopted plan priorities and trajectory. These documents are very consistent over time.

General Concerns with UDOT's EIS process

As set forth more thoroughly in our scoping comments, we have two overarching concerns about UDOT's approach to the LLC project. First, although there is a clear consensus, reflected in conclusions of multiple planning processes occurring over decades, that the transportation problems in the Central Wasatch canyons are similar and interrelated, and that they therefore need to be addressed with comprehensive and integrated planning, UDOT is pursuing transportation improvements in LCC as a one-off project, with no analysis of how transportation decisions in LCC will integrate with the comprehensive, multi-canyon transportation system that earlier planning documents have concluded are needed. Integration with such a comprehensive transportation system should be a clearly stated purpose of the project.

Second, addressing the transportation-related needs of canyon visitors is not limited to ensuring time-efficient transportation up the canyons to however many people want it; transportation planning must also consider how transportation improvements themselves affect what the canyons offer that makes people want to visit them in the first place. This is not the first time transportation improvements have been considered in LCC, and, though not subject to precise quantification, there is a level of visitorship, and the direct, indirect, and cumulative impact it brings, that would substantially diminish what attracts people to the canyon. It makes no sense to blindly pursue successive transportation improvements until we find we have reached that point. SOC therefore believes it is essential, before moving forward with any transportation improvements, to develop a characterization of the experience visitors want from canyon and nearby mountains in order to ensure that self-defeating "improvements" that actually degrade this experience can be avoided.

Purpose and Need

SOC is concerned that the narrowness of UDOT's purpose and need statement may lead to the selection of a predetermined alternative. SOC is disappointed that the purpose and need document demonstrates that UDOT appears determined to define the challenge of improving transportation in LCC in a way that leads to, at best, minor variations of fundamentally a single action that just happens to be narrowly within what UDOT does—road construction and improvement. This conclusion arrived at after regular involvement in this EIS process leads us to remind the agency that NEPA requires more than a narrow alternative analysis.

It is boilerplate NEPA law that an agency must "rigorously explore and objectively evaluate all reasonable alternatives," [i]nclud[ing] reasonable alternatives not within [its] jurisdiction," 40 C.F.R. §1502(a), (c) (emphasis added), and it may not game and subvert the alternatives identification process by "defin[ing] the objectives of its action in terms so unreasonably narrow that only one alternative . . . would accomplish the goals of the agency's action, and the EIS would become a foreordained formality." *Citizens against Burlington, Inc. v. Busey*, 938 F.2d 190, 196 (D.C. Cir. 1990); see also *Citizens' Comm. To Save Our Canyons v. U.S. Forest Serv.*, 297 F.3d 1012, 1030 (10th Cir. 2002) ("Courts will not allow an agency to define the objectives so narrowly as to preclude a reasonable consideration of alternatives.")

The problem with LCC transportation identified in earlier planning efforts, and that is obvious to any regular visitor to the canyon—the need, in NEPA terms—is that people experience long delays getting up and down the canyon in peak travel times. Yet, the P&N document makes it clear that UDOT characterizes the problem differently—as vehicle congestion, as well as avalanche-related delays. Of course, it is true that vehicle congestion serves to lengthen travel times, but this congestion is a product of critical contributing factors—the present utilization of the public of the present mix of transportation modes. Yet, in defining the objectives of the project—the purpose, in NEPA terms—it becomes clear that UDOT sole measure of success is the reduction of vehicle congestion itself. It thereby ignores the critical factors contributing to this congestion and that should therefore serve as the basis for the development of alternative actions considered in the EIS. By defining the need only in terms of traffic congestion and the project’s purpose only as improving the flow of vehicles, UDOT ensures development of essentially a single solution—increasing the vehicle-carrying capacity of the asphalt infrastructure.

The conclusion that UDOT begins this project with the predetermination that the ultimate outcome will principally be highway construction is clear from several portions of the record thus far. First, the assignment of FHWA’s NEPA obligations to UDOT itself is legally predicated on LCC transportation improvements constituting a “highway project.” 23 USC §327(a)(2)(A). The very fact that UDOT is the lead agency in the present NEPA process appears to foreclose analysis of reasonable alternatives that look primarily toward different utilization of the current highway infrastructure and/or a substantially different mix of transportation modes.

Second, in a striking example of predetermining the outcome of the NEPA process, UDOT adopts the conclusion of a state planning process that LCC Highway capacity would be increased by widening it and adding a third lane. UDOT explained that the Wasatch Front Regional Council published its conclusion that this project should be built during the LCC scoping period. In a blatant example of a state priority predetermining the outcome of a federal decision-making process, UDOT appears to have concluded that this expansion of LCC Highway would be presumed in the LCC NEPA process.

Third, that UDOT has preselected a result is also clear from the metrics identified for measuring the success of the response to the purpose and need’s goal of improving “mobility.” These are UDOT’s standards for “Level of Service” (LOS), which are exclusively a function of vehicle congestion. See Draft Purpose and Need Chapter pp. 1-25 to 1-32. With these the exclusive measures, solutions involving different utilization of the highway and different vehicle mixes are never considered, leaving the EIS inevitably to conclude that the only way to improved “mobility” is through increasing the vehicle-carrying capacity of the highway, with little or no consideration of how this highway may be used differently and more efficiently. In other words, UDOT is beelining straight to a result narrowly within its jurisdiction and institutional comfort zone — laying down asphalt.

General Comments

The purpose and need chapter fails to consider many of the following issues of importance to the area where the project is being proposed.

One of the essential purposes and functions of the Central Wasatch Mountains, inclusive of Big and Little Cottonwood Canyons where alternatives are being evaluated, is supplying water to the communities in Salt Lake and Summit counties. Similarly, numerous plans of jurisdiction state that visitation is the greatest threat to our water quality, yet we see no attempt to understand the implications of inducing use and the connected impacts this will have on water quality.

Increased visitation to Wasatch is challenging the realization other agencies goals, objectives, and legal obligations (ie. SLC Watershed, Safe Drinking Water Act, USFS Plan). Does UDOT care that its actions might cause harm and massive expenses to protect water quality, like needing to build a new water treatment plant?

Increasing impervious surfaces are known to degrade water quality. Projects like expanding roadways and/or expanding parking lots, not only increase point sources pollutants to our waterways, but also contribute to non-point sources pollutants via visitation increases. Further, imperviousness creates hydrologic sheeting issues and alters the fluvial function and hydrography, threatening water quality (ie. turbidity, stream temperature, etc.) and aquatic habitat, among several other environmental qualities of importance to public health and public values. As climate change compounds some of these impacts, how do the alternatives further stress some of these variables, and make the goal providing of high quality water to people that much more difficult or costly?

Climate change is altering both recreational uses and runoff dates, quality/quantity issues, stressing the both the natural and human environments. How do the alternatives impact visitation trends, hence roadway usage and connected impacts on the environment? Is

UDOT cites the need to comply with the Clean Water Act, but neglects to look at legal obligations that bind cooperating agencies, like the Safe Drinking Water Act (SDWA). Looking at the SDWA is required as part of the authority granted by FHWA and as one of the most important values of the Wasatch, not to mention the purpose for which it was established as a National Forest, water quality must be part of the purpose and need of the project.

Salt Lake County is a non-attainment area and this project should not lead to an increase in air pollutants exacerbating noncompliance with the Clean Air Act. Please demonstrate how alternatives will decrease unhealthy emissions, and do not complicate conformance with the Utah SIP.

Screening Criteria

The screening criteria, both level 1 and level 2, fall short and need to be improved. Here are several ways the criteria can be improved:

In addition to metrics for the Clean Water Act, we recommend adding screening criteria for compliance with the Safe Drinking Water Act. Modeled turbidity, stream temperature, oxygen due to alterations in the hydrograph and both point and non-point source pollutants should be measured and forecasted for varying alternatives.

Air quality metrics – How do the varying alternatives affect compliance with the SIP for the following measures: Ozone, PM2.5, PM10, etc... It is well known that expanding roadway capacity just encourages more driving.

Shared Stewardship – trying to reduce WUI scores, do these actions conflict with the goals as articulated in the USDA-UTAH Shared Stewardship agreement? Further, the Shared Stewardship Priority Map cites “Headwaters Little Cottonwood Canyon” as a top priority and according to Utah DEQ - Division of Drinking Water has a score of 100 out of 100 as it pertains to the importance of this particular watershed. Over 90% of the project is within this HUC12 boundary. Point is, even the state has conflicting priorities for these areas. Is this project complicating the priorities not only with agencies outside of the state, but even amongst the State's own divisions.

Alternatives

The following concepts or alternatives some of which are missing others were unduly ruled out of scope should be incorporated or come back into the analysis.

It seems that looking at alternatives that better deliver people without vehicles to the entrances of the canyons, the start point of SR-210 and the “elbow” of SR-210 that turns into Little Cottonwood Canyon Rd, is not being adequately analyzed as an alternative. Exploring the use of mass transit (light rail, buses, BRT, etc) from the University area along Foothill Blvd then onto Wasatch Blvd to the gravel pit area that is being considered for a multi-use transit center could aid SR-210 through a huge reduction in vehicular traffic. An east side (north-south) transit service would bisect east-west arterials such as 3300 S., 3900 S, and 4500 S., for example, some of which already have economic nodes. Both these routes, Foothill and Wasatch Blvds could also benefit from transit service in non-ski seasons and numerous popular trailheads that are accessed off these routes could benefit from this service.

In its alternatives analysis, UDOT eliminates consideration of speed limit considerations, citing it is an operational issue, not required in EIS analysis. Not understanding the impacts of how variables interact in this sensitive environment is a symptomatic flaw of analysis in this project. UDOT says it won't analyze the impact of visitation on the watershed, only the roadway. Further it states that it won't analyze speed limits, however, speed limits affect throughput and they also impact safety. These are two key issues covered by the purpose and need and deserve more thorough analysis.

Free or discounted transit service is listed as outside the scope of the EIS (Table A-1. Pg. A-3. Preliminary Evaluation of Alternatives/Concepts during EIS Scoping Periods). We disagree — tolling needs to be part of the EIS. The ratio of toll cost relative to transit cost will affect travel behavior and therefore impact on the human and natural environments. If toll revenues, for

example, were uses to offset/increase transit service, that too would affect travel behavior. If costs of transit/tolling and use of the revenues not factored in the screening criteria, realities will skew toward increasing roadway capacity.

Conclusion

The canyons of the Wasatch Range play an important role in our communities, economy and quality of life. This area is incredibly complex, as numerous plans and studies have acknowledged. It is because of that, that we believe everything should be analyzed at the right scope and scale, in a holistic manner where these tensions and issues that exist in these canyons, can not only help decision makers, but the community whom they serve. We believe that incorporation of our comments will aid the agency by:

1. Arriving at an outcome that will result in a net benefit for this complex ecosystem.
2. Helping our community understand this complexity of the environment and the tradeoffs for various options, and
3. how it supports other agency and community goals.

The Wasatch is confronted with a variety of challenges. This project may set the tone for generations and will affect what options might be afforded to connected environments and regions, it seems this was the intent of the source of funding from the legislature in 2016. Complex issues and environments need complex analysis and solutions. We still struggle to understand how this process as you have defined gets us to a point where we are actually resolving issues that confront us and looking at the big picture of what is confronting the region and what end we are striving toward. It is clear that the resignation of UDOT from the Central Wasatch Commission and cancellation of the Cottonwood Canyons Transportation Action Plan that UDOT doesn't believe Mountain Accord held the answers. With an ill-defined problems statement (purpose and need), that doesn't acknowledge the complexity of the environment in which the project takes place, one can only expect the outcomes will similarly miss the mark.

This is not to say that we do not want options to be analyzed. We do. We would have hoped for a process that looked at all the option for the entire region, not just as it pertains to Little Cottonwood Canyon.

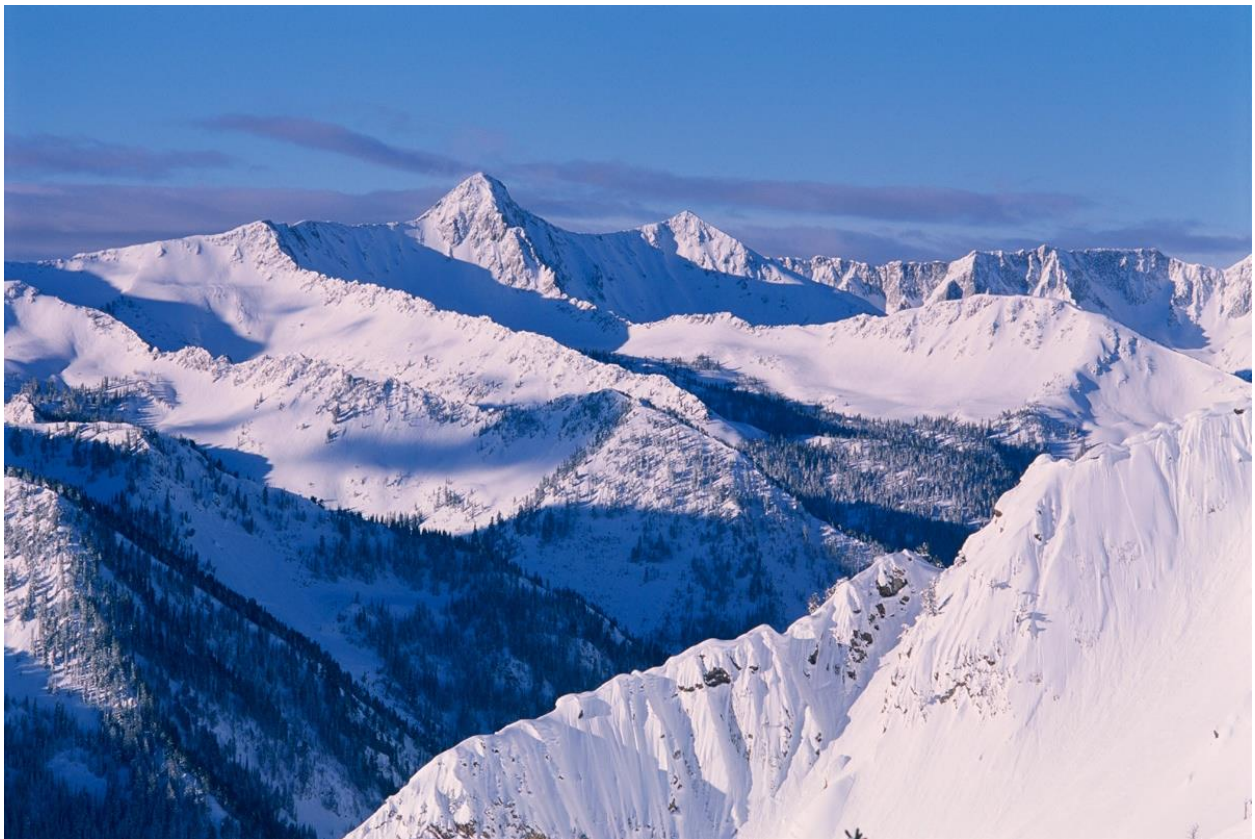
Thank you,



Carl Fisher
Executive Director
Save Our Canyons

SAVE OUR CANYONS

Compiled by Save Our Canyons for consideration and reference to inform the Draft Statement of Purpose and Need for Little Cottonwood Canyon Environmental Impact Study (EIS). Wasatch Mountain transportation recommendations from 30 years of study and planning.



Wasatch Canyons Master Plan (1989)

- “THE HIGHWAY TRANSPORTATION GOAL OF THE PLAN IS TO REDUCE PRIVATE VEHICULAR TRAFFIC IN THE COTTONWOOD CANYONS DURING PEAK PERIODS. TO ACHIEVE THIS GOAL, MEASURES SHOULD BE IMPLEMENTED TO DISCOURAGE PRIVATE AUTOMOBILE USE AND TO ENCOURAGE USE OF MASS TRANSIT IN THE SHORT TERM. FOR THE LONGER TERM, A MOUNTAIN TRANSPORTATION SYSTEM SHOULD BE DESIGNED AND PURSUED.
- SUCCESS OF THESE MEASURES DEPENDS UPON PUBLIC/PRIVATE SECTOR COOPERATION, INTERGOVERNMENTAL COORDINATION, AND PUBLIC ACCEPTANCE.
- Affected jurisdictions should also pursue measures to enhance mass transit use. Park-and-ride/kiss-and-ride facilities to serve canyon mass transit are clearly needed immediately. This may mean a number of small lots or a centralized, efficient location. The location and sizes of the lot(s) should be based on transit efficiencies and Community acceptance. Salt Lake County should aggressively pursue a solution to this need. Establishment of multiple bus stops within the canyons and a shuttle service geared to dispersed recreation would help alleviate congestion from that use.
- In addition to governmental actions, each ski resort should develop, annually update and monitor a plan for the reduction of private automobiles specifically at that resort. Some resort options for mass transit incentives could have coincidental canyonwide benefits.
- Approval of any additional skiers at one time (SAOT) at a resort would require a resort evaluation and mitigation plan for V projected traffic effects on the existing or future transportation system resulting from the ski use expansion.
- Mass transit systems within the canyons may need to be further publicly subsidized to reduce prices as a further user incentive. In addition, the implementation of these measures will require additional special mass transit busses which are equipped to safely service the canyons.

Sandy City Watershed Management Plan (2002)

3. Join Salt Lake City in developing a Memorandum of Understanding (MOU) with the Utah Department of Transportation (UDOT) to manage and maintain canyon road surfaces with special attention to water quality (surface runoff, salt, and deicing, snow removal, etc.)

Page 2-27

pg. 2-27, I, 3.

Salt Lake Countywide Watershed - Water Quality Stewardship Plan

“Encourage UDOT to manage road surface with special attention paid to water quality.” Table 1.3, pg. 1-9 Little Cottonwood Canyon

“The highway transportation goal of the plan is to reduce private vehicular traffic in the Cottonwood Canyons during peak periods. The County should implement measures to achieve this goal, and discourage private automobile use and encourage mass transit.”

“Establishing park and ride facilities to serve Big and Little Cottonwood Canyons should occur immediately.” T 1.4, pg. 1-12

Revised Forest Plan - Wasatch Cache National Forest - Central Wasatch Area (2003)

- “Providing quality recreation opportunities within the framework of watershed protection will be an increasing challenge as the Wasatch front population and national and international destination use of the area continues to grow. Continued coordination and cooperation among federal, state, and local government agencies, residents, businesses, and the recreating public will be imperative in order to meet these growing demands.” – pgs 4-153 – 4-154
- “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.” – page 4-160
- “The ski resorts in Big and Little Cottonwood Canyons will continue to serve as hubs of year-round outdoor recreation use on both private and public lands within the permit areas. Recreation opportunities offered on public lands within the resort boundaries will be complementary to and compatible with those that are allowed and/or emphasized on surrounding public lands outside the boundaries. Opportunities that build on the unique values of public land are featured over those that are focused on the constructed environment.” pg 4-160
- “New resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues.” -- pg 4-161

Little Cottonwood Canyon Avalanche Study (2006)

<http://arc.lib.montana.edu/snow-science/objects/issw-2006-907-909.pdf>

VI. ALTERNATIVES

There are two very fundamental ways to lower the AHI: change the road and how avalanches affect it, or change traffic characteristics. The graphic below illustrates the strategies evaluated in this study, and how they relate to these two fundamental methods.



There are two ways to change the road: “active” and “passive” measures. Active measures influence how snow is managed by technology and/or people. Active measures analyzed in this study include Gaz-ex exploders; increasing the current artillery program; and using infrasound to improve slide detection. Passive measures are structural changes to the road. They are permanent and as such can have impacts to the built and natural environment in the canyon. Examples of passive measures analyzed in this study include realigning the road to avoid slide paths; construct snow sheds so that snow goes over the road; and build berms to deflect or absorb as much of the slide as possible.

The other fundamental way to influence the AHI is by changing traffic. As traffic increases, speeds decrease, and the AHI rises. Reducing the number of cars on the road allows the remaining cars to go faster, which decreases the avalanche risk. This can be accomplished through increased transit service; better use of park-and-rides; improved travel information for drivers; and making sure traffic exits the resorts at day’s end in an efficient manner.

VII. RECOMMENDATIONS

Short term recommendations include:

- Additional artillery at Tanner's Flat
- Infrasound detectors
- Improve berms
- Install Gaz-ex at the Hilton slide area
- Implementing an ITS project for park-and-ride management, and for improvements to canyon communication systems
- Explore driveway metering

The intent of this study was to explore, analyze and present long term options. Because the long term solution has so many

possible combinations, relative high costs, and likely high levels of regulatory hurdles, there are no specific long term recommendations. Those should be decided through a more formal process, likely triggered by a NEPA process. Stakeholders in the canyon should pursue funding for a larger NEPA study that will analyze the costs (both in dollars and impacts) and benefits of large infrastructure changes, be that transit, snow sheds, toll road, tunnel, or road realignment.

In the meantime, there are two additional recommendations. First, continue to promote the use of alternatives to the private vehicle. Increased bus service and transit amenities should be encouraged. The added amenities at Snowbird's Creekside Lodge are excellent examples of how the resorts can support transit use.

Second, continue to support the "human element" of canyon operations. SR-210's great safety record is due to the high level of dedication, training, and collaboration of UDOT, S.L. County Sheriff, USFS, and resort snow safety personnel. This public/private partnership has functioned well, albeit with some bumps along the way, for many years. Regardless of future technology, infrastructure, or changes in the way the canyon risks are managed, this human element must be continued.

Cottonwood Canyons Scenic Byways Study (2008)

https://travel.utah.gov/wp-content/uploads/CMP_121608_portable.pdf

Goal: Improve travel conditions on the Byways

Strategy: Use transportation demand management (TDM) strategies to reduce congestion along the Byways, while still providing access to recreation amenities.

Reducing auto trips while still maintaining access to recreation areas along each of the Byways is a central component to the Corridor Management Plan. A suite of strategies should be implemented to improve the options for travel, and manage the overall demand for autos along the Byways. Strategies include providing information to drivers on areas where carpooling can occur, as well as a ‘casual carpooler’ program available online. Transit service should be expanded, as discussed below, and transit amenities should make travel by bus comfortable and convenient. Outlying parking can be used to promote additional carpooling or transit use at the mouth of each canyon, and school districts should be approached for their interest in shared use parking on weekends. Resorts and businesses should encourage employees to carpool and take transit. The Byways Committee should discuss with resorts the possibility of implementing parking pricing strategies to discourage single occupant driving.

Strategy: Create a year-round transit system as an alternative to driving and parking in the Cottonwood Canyons.

Demand exists now for summer transit service in the Cottonwood Canyons. As the resort areas continue to develop and diversify, parking resources will become more and more limited while demand on the transportation networks will simultaneously increase.

A year-round transit system in both Canyons can provide access both to resort area visitors and recreationists utilizing public lands. An increase in transit service should be accompanied by improvements to transit facilities: better user comfort and aesthetics at transit stops, bus priority infrastructure, increased safety and security, and park-and-ride facilities. Express buses to Cottonwood Canyons destinations from select locations in the Salt Lake Valley should be considered.

Strategy: Create a Parking Management Plan.

A comprehensive year-round Parking Management Plan will address parking issues at both developed and informal activity sites in the Cottonwood Canyons. The goal of the parking management plan should be to improve access to parking while enhancing user safety and protecting natural resources. The parking management plan should address USFS’s stated intent of no net parking increases on National Forest System lands, and how additional parking demand generated by canyon activities can be met elsewhere. Components of the parking management plan should include enforcement of existing parking restrictions (particularly along SR-210 and the Alta Bypass Road); official evaluation of currently informal parking areas at trailheads; parking pricing strategies at the resorts; capacity study and possible expansion of park-and-ride lots; and utilization of technology to provide drivers with accurate real-time information about parking resources. Parking Management Plan efforts should be coordinated with the year-round transit system plans to ensure cohesive and sensible connections between parking and transit.

Strategy: Promote and monitor cyclist and pedestrian safety.

The Cottonwood Canyons Scenic Byways should offer safe recreation opportunities for bicyclists and pedestrians in addition to drivers. The Byways are already popular destinations for cyclists, and additional actions can be taken to increase cyclist accommodations. Debris should be cleared from the roadway more frequently, as it poses a hazard to cyclists traveling downhill at high speeds. Interpretive materials for Byway users could provide “share the road” information, such as the local law requiring a three-foot clearance between cyclists and passing cars. Bicycle paths (as opposed to bicycle lanes) should be considered in the Cottonwood Canyons where feasible, to provide cycling opportunities for novice cyclists and others that are uncomfortable riding directly in traffic. Pedestrian safety at high-activity areas should be improved through enhanced crossings and signage for drivers.

Goal: Disseminate important information through a variety of outlets to improve the traveler experience

Strategy: Create a Scenic Byways Visitor/Transit Center.

A visitor/transit center should be established for the Cottonwood Canyons Scenic Byways. The center’s location should be easily accessible to visitors and have adequate space to act as a major transit hub and parking facility. The visitor/transit center should act as a welcoming place and could offer roadway information and regulations, historic background of the Byways, and interpretive guides. The visitor/transit center should provide enhanced transit amenities; ideally, visitors to the Cottonwood Canyons would stop at the visitor center prior to reaching the Byways and opt to utilize transit services instead of driving. The visitor/transit center can also provide information for visitors on wild-life viewing and watershed protection.

Wasatch Canyons Tomorrow (2010)

Transportation Goal Statement: Transportation projects should reduce congestion, improve air quality, and facilitate access and public safety, while maintaining our high-quality recreational experience and protecting the natural environment.

Transportation Recommendations:

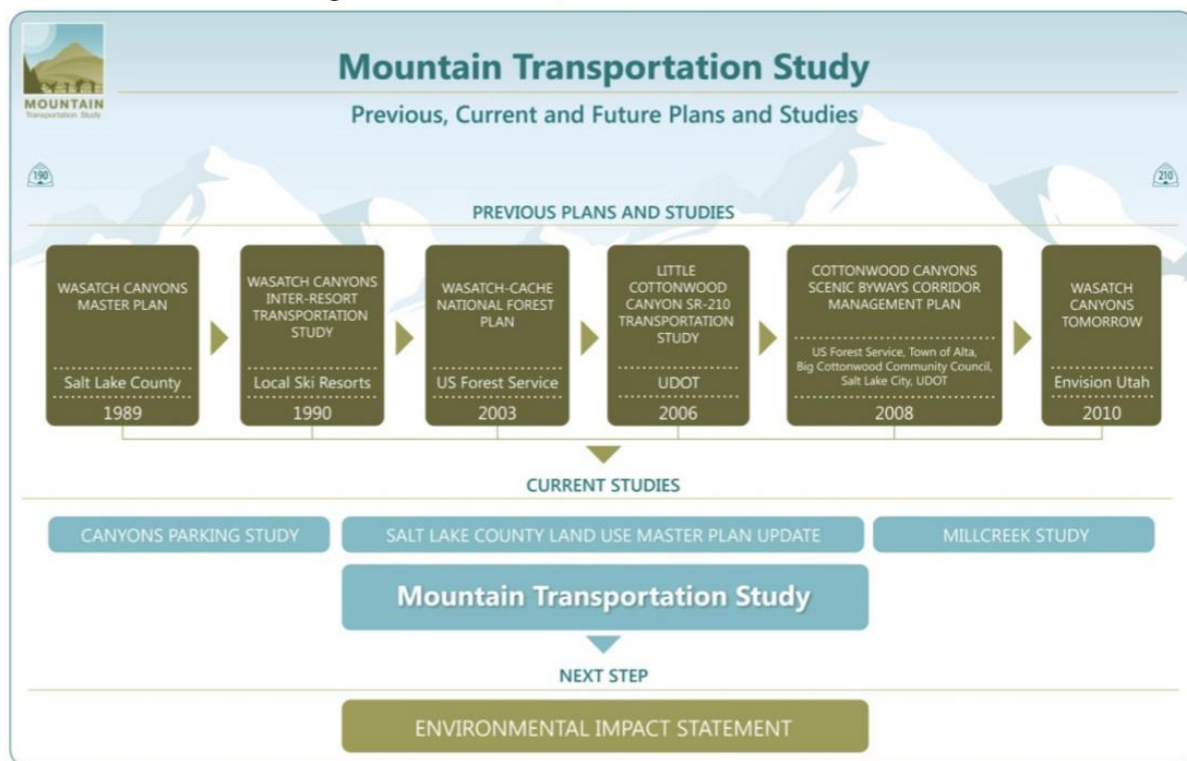
1. Expand winter only to year-round transit service in Big and Little Cottonwood Canyons.
2. Continue to look for and promote ways to improve road-cycling safety for both transportation and recreation.
3. Prepare and implement updated road corridor avalanche control plans for Big and Little Cottonwood Canyons.
4. Study feasibility of extending UTA Trax to a transit Hub at the mouth of Big Cottonwood Canyon or Little Cottonwood Canyon to serve shuttles and buses to Millcreek, Big and Little Cottonwood Canyons.
5. Develop Express Bus transit service between Downtown Salt Lake City and Summit County/Park City
6. Conduct a feasibility study of extending a mountain rail line up Little Cottonwood Canyon to Snowbird and Alta.
7. Study the feasibility of alternative transportation for Millcreek Canyon
8. Implement recommendations from the Big and Little Cottonwood Corridor Management Plan (*above mentioned Scenic ByWays Plan*).

Mountain Transportation Study (2012)

The Mountain Transportation Study was intended to bring together a diverse stakeholder group; develop consent on key topics, a deeper understanding of transportation to and within the Cottonwood Canyons, and a range of transportation solutions; and provide recommendations for next steps (see Figure ES-1). This study provides the following recommendations:

- Consider potential short-term transportation projects.
- Utilize a tiered Environmental Impact Statement (EIS) process for the next effort.
- Consider the Federal Transit Administration (FTA) as the lead agency with UTA, USFS, the Federal Highway Administration (FHWA), and potentially other agencies such as the U.S. Environmental Protection Agency (EPA) as joint leads.
- Evaluate regional trips during scoping and purpose and need development.
- As part of the Tier 1 EIS, include additional analyses of land use, watershed, multiple uses, and economic opportunities.

Figure ES-1: Previous, Current and Future Studies



FINDINGS

Data supports the numerous stakeholder comments concerning traffic congestion on peak days during the winter ski season. A model was developed to estimate vehicle trips based largely on skier visits. As skier visits increase, whether due to natural growth or increased share of statewide skier visits, projected traffic is expected to worsen (see Figure ES-4). While modeling was conducted associated with resort skier days, it is also important to recognize that increased vehicle trips might be associated with other year-round recreation uses. For example, there is considerable weekend traffic during the autumn colors.

A key outcome of the technical and stakeholder processes was a framework for a future purpose and need, stated below.

The purpose of the Mountain Transportation project is to:

- Facilitate safe, convenient, attractive, and reliable year-round access to and within the Cottonwood Canyons.
- Increase transit use and decrease impacts associated with automobile use in the canyons.
- Increase the attractiveness of the region and support the tourism and recreation economies by improving connections between the canyons and the population base, the hospitality infrastructure, and the regional transit network in the Salt Lake Valley.
- Plan for future population growth and add to the quality of life of Salt Lake Valley residents.

Solutions will be ecologically, socially, and economically sustainable, i.e., they will meet present needs without compromising the ability of future generations to meet their needs. Specifically, solutions will:

- Support watershed protection and management objectives, and prevent degradation of watershed health and water quality, especially municipal source water areas.
- Support a diversity of recreation uses and maintain high-quality recreation experiences.
- Minimize noise, viewshed, air quality, and wildlife habitat impacts.
- Integrate land use and recreation objectives of the U.S. Forest Service, Salt Lake County, and Salt Lake City, recognizing that land use, transportation, and recreation are interdependent.
- Consider the diversity of recreation uses in the canyons, including cyclists and pedestrians.

Transportation modes—including auto, bus, bus rapid transit (BRT), rail, and aerial transportation—were evaluated based on multiple characteristics: capacity, costs, and speeds. Table ES-1 shows an example of these characteristics for the segment from the mouth of Little Cottonwood Canyon to Alta.

Each mode has benefits and challenges; the ultimate solution will be the subject of future analyses. This study provides a framework for alternative concepts that can be developed in more detail during a future NEPA process—when the purpose and need and logical termini are better understood.

Proposed Action

The Federal Transit Administration, Utah Transit Authority, U.S. Forest Service, and [list other lead agencies] intend to prepare a Tier 1 Environmental Impact Statement for the Mountain Transportation project. The Mountain Transportation project will facilitate safe, convenient, attractive, and reliable year-round transit access to and within the Cottonwood Canyons. The project may include fixed-guideway improvements (such as bus rapid transit, rail, or aerial gondola) to connect the regional UTA transit system in the Salt Lake Valley to the recreation activities in the Cottonwood Canyons, and potentially to the recreation activities in the Park City and Summit County areas. The project will be ecologically, socially, and economically sustainable, i.e., it will meet present needs without compromising the ability of future generations to meet their needs and it will improve, or at a minimum, not degrade the Cottonwood Canyons' natural environment and municipal watersheds.

Mountain Accord Transportation Study Recommendations (2016)

Proposed Scenario for Further Evaluation and Public Discussion

The scenario proposes to manage growth by shifting from more impactful modes (autos) to less impactful modes (transit, walking, biking) and by directing higher levels of use to key recreation nodes that have the facilities to handle higher concentrations of people.

Roadside parking would be formalized in limited areas and restricted in other areas, making room for bike lanes (at least in the uphill direction) and reducing safety and environmental impacts associated with roadside parking.

Recreation nodes would include bus stops and pullouts, restrooms, ADA facilities, cross-walks, and connections to nearby trails.

Comparison of Current Conditions and Proposed Scenario

	Current Conditions	Proposed Scenario
Number of Cars on Peak Days	11,000	8,000
Average Occupancy Rate	1.8 people per car	2.2 people per car
Winter Transit Use	4-5%	20%
Summer Transit	Virtually no summer transit	New service, schedule TBD
Parking Spaces in the Valley	2,900	5,400 to 5,900
Parking Spaces in the Canyons	9,600 formal and informal spaces (<i>There are at least 6,000 formal spaces at ski resorts and most of the remaining parking spaces are informal.</i>)	Parking to be formalized, restricted, and enforced. Number of formal spaces to be determined through NEPA process, but assumed to be much less than 9,600.
Cycling Facilities	Shoulders of varied width	Bike lane in uphill direction

PURPOSE AND PROBLEM STATEMENT

The purpose statement describes what purpose the transportation infrastructure serves and the reason improvements are needed in the Cottonwood canyons. The main purpose of the transportation system in the Cottonwood canyons today is to serve recreation activities (commercial and dispersed) for locals as well as tourists. Residents of the canyons (estimated at fewer than 500) and employees of the ski resorts and other canyon businesses also use the roads. The ski resorts estimate about 2,000 employees travel into the canyons on a peak winter day (out of a total of 20,900 people traveling into Big and Little Cottonwood canyons).

Transportation and canyon stewardship improvements are needed because the growth in recreation use is exceeding the capacity of the current auto-based infrastructure and impacting natural resources.

The proposed purpose for improvements in the Cottonwood canyons is to accommodate and manage growth in recreation uses while minimizing impacts to natural resources and maintaining positive recreation experiences. Safety is also always a critical factor. There are opportunities to improve safety associated with avalanche mitigation, incident/emergency response, and pedestrians/cyclists, among others.

The proposed purpose is based on public feedback, the problems described below and further documented in WSP/PB reports, the Accord, and Mountain Accord System Group reports (Existing Conditions, Idealized Systems). The purpose statement will undergo agency and public review if a NEPA process is initiated.

(https://drive.google.com/drive/folders/1Cn80Wzst8eoa0o_BqoTBHOPfPm8M6MIe)

Land Use

13.3.2 Management Objective

Land uses on public lands should prioritize resource protection and environmental stewardship over resource development. Salt Lake County supports restrictive land use designations, including Wilderness areas, roadless areas, and wild and scenic rivers.

30.1 Wildlife

- 3 **Context**
- 4 Salt Lake County enjoys a diverse and abundant wildlife population, which contributes to a productive
- 5 natural environment. Wildlife also yield important social and economic resources including recreation
- 6 opportunities such as photography, wildlife observation, and hunting.
- Utah's Wildlife Action Plan considers
- 18 key habitats and provides management strategies to improve the habitat's condition (see pages 73–123).
- 19 Also, the plan considers threats and provides actions to reduce the threats (see pages 124–216).[1]
- **30.2 Desired Future State**
- 14 Salt Lake County desires to maintain healthy native wildlife populations through the protection and
- 15 enhancement of habitat, natural landscapes, and ecosystems in the county.
- 17 **30.3 Management Objectives and Associated Policies**
- 18 **and Guidelines**

20 30.3.1 Management Objective

- 21 Support land management actions that keep native species off the Endangered Species List. Provide for
- 22 sustained diversity of species at the genetic, population, community, and ecosystem levels. Maintain
- 23 communities within their historic range of variation that sustains habitats for viable populations of
- 24 species.

26 Policies and Guidelines

- Support public education programs that promote water conservation, wildfire prevention, and wildlife habitat.
- Support management objective to reduce future fragmentation of intact habitats. Provide connectivity in fragmented habitats and between habitats to promote genetic diversity in wildlife populations.

35 **30.3.2 Management Objective**

36 Support maintenance and improvement of existing aquatic habitats, including riparian and wetland habitat.

39 **Policies and Guidelines:**

- Support efforts and activities supporting watershed health and aquatic habitat as outlined in Salt Lake Counties 2015 Integrated Watershed Plan.[4]

30.3.4 Management Objective

- 15 Coordinate with DNR and the Utah Department of Transportation to reduce wildlife vehicle collisions on Salt Lake County roadways.

18 **Policies and Guidelines**

- Support mitigation projects which aim to mitigate wildlife vehicle collisions.
- Work with the UDWR and the Utah Department of Transportation to minimize adverse wildlife/public interaction

(https://drive.google.com/drive/folders/1Cn80Wzst8eoa0o_BqoTBHOPfPm8M6Mle)

- Transportation
 - Work with the UDWR and the Utah Department of Transportation to minimize adverse wildlife/public interactions;

- Access
 - TL2: Sustainable Development Patterns - Plan for compact growth, reduced sprawling development, and increased opportunities for people to access services and places of work

 - TL4: Pedestrian and Bicycle Infrastructure Improvements - Develop infrastructure for alternatives to on-road travel

- Roadways
 - TL1: Regional Transit Expansion - Explore and expand regional transit options especially from Summit County to/from Salt Lake City and Heber City

 - TL5: Alternately Powered Vehicles - Continue to promote alternately powered vehicles, as well as develop infrastructure to support using these vehicles

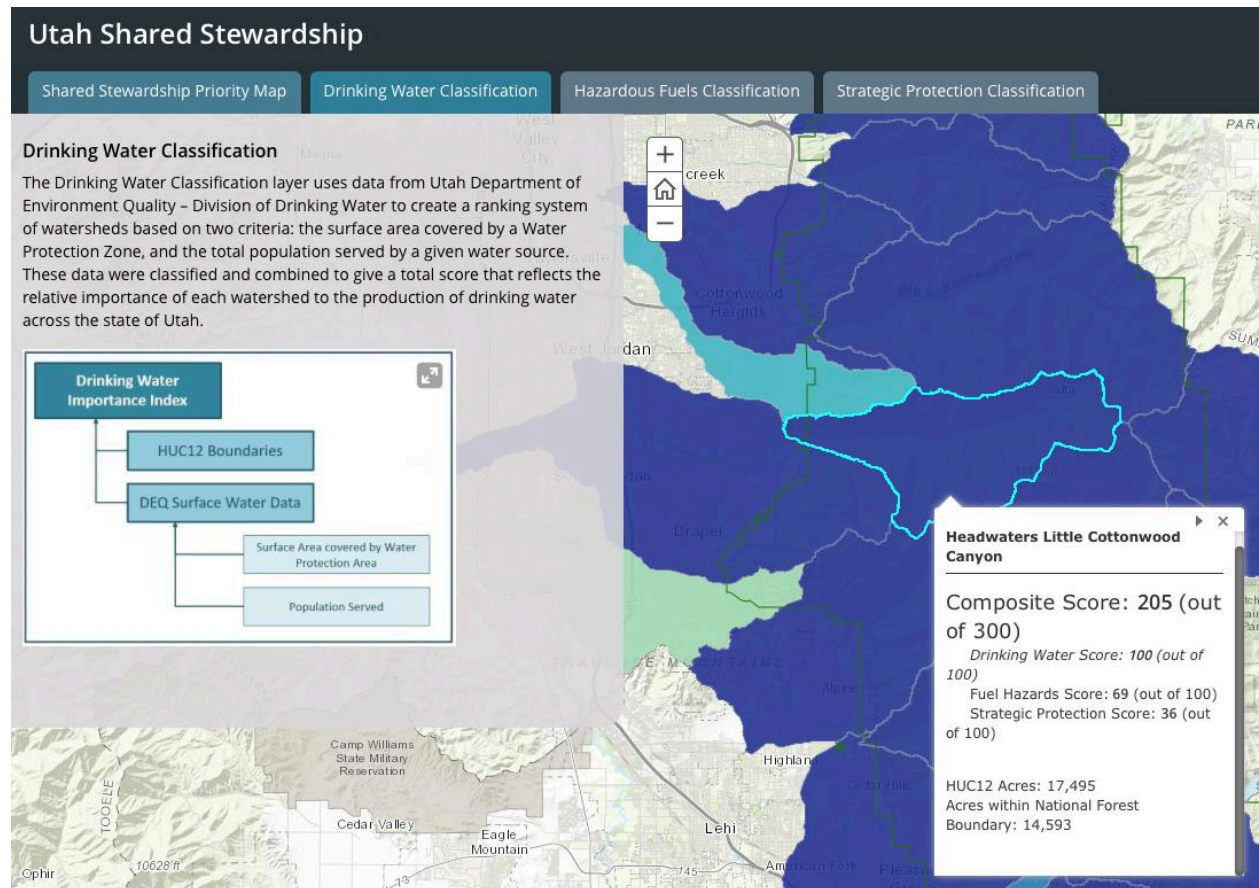
Under the agreement, the State of Utah and Forest Service will focus on landscape-scale forest restoration activities that protect at-risk communities and watersheds. Shared Stewardship responds to the urgent and growing challenges faced by managers and owners of forests in Utah and across the nation, among them catastrophic wildfires, invasive species, drought, and epidemics of forest insects and disease. Of particular concern are longer fire seasons and the increasing size and severity of wildfires, along with the expanding risk to communities, water sources, wildlife habitat, air quality, and the safety of firefighters.

Agreement: <https://www.usda.gov/media/press-releases/2019/05/22/usda-forest-service-and-state-utah-sign-shared-stewardship>

<https://www.fs.fed.us/managing-land/shared-stewardship>

Interactive Map:

<https://utahdnr.maps.arcgis.com/apps/MapSeries/index.html?appid=c28e4ada7c9443a3b3545b9a436f2435>



Wasatch Front Regional Council - Wasatch Choice 2050 (2019)

<https://wfrc.org/wasatch-choice-map/#sideBarClosed=false>

Wasatch Choice Map #wherematters

Vision **Transportation** Land Use Economic Development Recreation

A key strategy of the Wasatch Choice 2050 Vision is to provide transportation choices.

Major transportation projects, like freeways, rail & bus transit, interchange upgrades, widenings, and even regional trails or bikeways get their start through inclusion in the **Regional Transportation Plan (RTP)**. RTPs are updated every four years and look typically plan 25 or more years into the future.

This map shows projects in the most recent **2019-50 RTPs** that were adopted by the respective boards of elected officials for the **Wasatch Front Regional Council (WFRC)** and **Mountainland Association of Governments (MAG)** metropolitan areas.

Prior to adoption, the projects were prioritized after considering technical analysis of impacts and benefits and extensive stakeholder and public input.

Click on any project on the map to see detailed information including estimated costs and phasing.

Project Information	
Project ID	R-S-52
Project	Little Cottonwood Canyon Road
From	Wasatch Boulevard
To	End of Canyon
Project Type	Operational
2019 Lanes	2 / 3
2050 Lanes	2 / 3
2050 Functional Classification	UDOT minor arterial
2050 Right-of-Way (feet)	50.00
Needs Phase	1
Financially Constrained	1

SAVE OUR CANYONS

Friday, May 3, 2019

To whom it may concern:

Thank you for the opportunity to comment on the Cottonwood Canyons Transportation Action Plan and the Little Cottonwood Canyon EIS. As you are aware, our organization has been working for sometime on issues in the Wasatch Mountains, inclusive of active participation on the programs this proposal suggests it is building upon, including, but not limited to Mountain Accord, and 2012 Mountain Transportation Study. We are pleased to provide you some comments to not only inform the analysis you will undertake, but also share with you our concerns about process structure, order of operations, and comprehension of what the issue that is attempting to be solved.

Background

Save Our Canyons views actions in the Cottonwood Canyons as connected. Numerous governments and stakeholders have analyzed and acknowledged this relationship for generations. As such we found it difficult to separate our comments on these two actions, Cottonwood Canyons Transportation Action Plan and the Little Cottonwood Canyon EIS. Not only are these two actions connected but the concurrent NEPA analysis (and looming decisions) in which you are requesting comments, will not only prejudice the other, but will also fundamentally alter our canyon environments, our watersheds, and wildlife and plants that inhabit the area.

The planning horizon for the two projects are different but related. It is our understanding that the Little Cottonwood Canyon EIS is looking at short-term solutions and the Cottonwood Canyons Transportation Action Plan is looking at a longer-term vision for transportation. It is our expectation that the short-term projects do not prejudice the longer term plan. For example, if the long-term vision is looking at a fixed guideway, evaluated through Mountain Accord, either replacing or abandoning the road, why would we make short-term investments in road widening projects for something we might not use? We use this merely mentioned to illustrate the nexus between these projects, and this should not be construed as an outcome we support. We are invested and interested in realizing long-term solutions that benefit the stated need of protecting our watersheds, hence our concern in the short-term projects influencing by way of investment, the long term needs. Financial resources are finite and should be used to support the to be determined long-term view.

Vision

What do we want the Wasatch to look like in 10 years? In 100 years? How do these projects help us meet that end?

At its highest level, our vision for the Wasatch is one where the natural environment, wildlife habitat, and our watersheds are protected, certainly not degraded. Whatever happens in this area should happen for the benefit of:

- the creatures that inhabit or have inhabited (extirpated species we wish to see return) the area;
- the public who is reliant upon and deserving of high quality drinking water and;
- the millions of visitors who seek recreational values from adventure to respite

The 2008 Scenic Byways Cottonwood Canyons Corridor Management Plan¹ articulates the following vision:

- Protection of the watershed and natural resources of each canyon
- Sustaining and enhancing the scenery of natural areas
- Increased public education about the outstanding qualities of each canyon
- Safe and enjoyable Byway travel for all users, including drivers, cyclists, and pedestrians
- Preservation and enhancement of the cultural resources of each canyon
- Economic sustainability of the communities along the Byways
- Efficient and convenient transit and alternative transportation connecting Byway destinations, as well as the Byways to the Salt Lake Valley
- High quality well-maintained recreation facilities

Some of the projects that have been brought up by the project team certainly fit this vision, while others detract. It is worth mentioning that nearly every study commissioned over the past three decades all call for improved and year-round mass transit. This could easily, and with relatively minimal impact utilizing existing infrastructure, be accomplished with buses. This might be the most effective use of the monies allocated for the LCC EIS.

Visitation

Many resource management plans that pertain to this geography of the Cottonwood Canyons identify visitation as the single greatest threat to the environment. Therefore it is important to understand whether our actions increase visitation or reduce visitation. Any attempt at increasing visitation should first understand the impacts of increasing visitation and their affect on the broader environment, not just the narrow scope of the roadway.

In recent years, we've also experienced how susceptible to behavioral changes the canyons are. Recent changes in winter closures in Little Cottonwood have implications on Big Cottonwood. When Little Cottonwood is closed, it people change their behaviors and go up Big Cottonwood (or even Millcreek). This example shows the inter-relationship in use between canyon access corridors hence it is difficult, if not irresponsible to do projects without understanding how it impacts the other.

With these considerations, what purpose do these projects serve? Is it to increase the number of vehicles that can travel up the canyons? Is it to increase the number of visitors who come into these canyons? Is it to get visitors onto different modes with the goal of reducing the number of vehicles? Do you plan to put additional visitors at resorts or at trailheads? Will those visitor aid in the realization of land management goals and priorities for protecting watersheds? What risks from increased visitation are anticipated?

Will a fee be implemented to encourage carpooling and mass transit use, specifically buses. Will revenue from parking or transit are implemented will those funds support trailhead and toilet upkeep (limited but efficient canyon "sanitary facilities")? Where in the canyon do we want to

¹ Cottonwood Canyons Scenic Byways: Corridor Management Plan (2008), pg. 31
https://travel.utah.gov/wp-content/uploads/CMP_121608_portable.pdf

encourage more use/less use? Will transit options support access from various points around the valley to limit congestion at canyon mouths? Is there a known level of visitation where we begin to degrade the canyon health and user experience?

Fire

Exacerbated by a changing climate, the western United States and the State of Utah are experiencing intensification of wildfires. As with increased visitation and impacts on the land, there is a correlation between increasing roads and visitation and increased wildfire risk. For example, in reviewing Utah's fire ignition data, it was found that between 2000 and 2015, Utah has seen over 190% more fires within 300 ft of a road. Nationally, it is found that humans cause over 90% of wildfires, and in our review of Utah's ignition data suggests that national average is relevant in our state.

How will increasing capacity help meet the goal of reducing wildfire risk? Will these projects expand or intensify the current status of the WUI?

Noise impacts

As use increases, so does noise. Will these projects increase the number of modified mufflers, currently not allowed but also not enforced, in the area? As mentioned in "background" why are we focusing on short term investments in road widening when there is desire to change the system? This would result in more construction, over a longer period of time.

Focus on private vehicle access will continue to induce noise whereas bus transit mode change reduces vehicles, has little to no infrastructure/construction noise.

Watershed

SR-210 is the primary access point to public lands in Little Cottonwood Canyon. What happens on the roadway, happens on the forest, and therefore in our watershed. The Forest plan states that the "underlying premise of resource management in this Management Area is the need to provide long-term, high quality culinary water to the large urban population of the Salt Lake Valley. Salt Lake City owns all or the largest percentage of water rights in each of the Wasatch Canyons except Red Butte, and has congressionally delegated authority to protect the water supply. Congress also directed the Forest Service to administer designated watersheds in cooperation with Salt Lake City for the purpose of storing, conserving and protecting water from pollution."²

It goes on to acknowledge the how difficult it will be to balance the recreation demand while protecting the watershed.

"Providing quality recreation opportunities within the framework of watershed protection will be an increasing challenge as the Wasatch front population and national and international destination use of the area continues to grow."

Further, the plan notes that access, parking and the road way are a significant challenge and that cars should not be accommodated and that mass transit is the best way to help ensure for protective goals are met.

"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

² Wasatch Cache National Forest - Revised Forest Plan (2003) - USDA Forest Service

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.”

Both of these projects take place inside a protected watershed. Our access into these areas is a privilege, not a right, as such we must carefully steward these areas to ensure for our continued and future enjoyment. Many watersheds across the west, in particular, are closed to public access. It should go without saying that it is because of projects like these very projects, that it is much easier to protect the watershed and ecological values absent the human element. We find it imperative that a full analysis of the impacts on the watershed from any increase in capacity they may to facilitate. Given the importance of these watersheds, a narrowed analysis that only looks that at the impacts to the roadway, and not the capacity the roadway helps deliver, would be a significant short-coming of any analysis and a disservice to the community and the environment.

Wildlife

Recent studies in the region have documented the relationship between increased recreational activity and the impacts on wildlife. A recent study says that “Human-wildlife interactions can alter wildlife behavior, which can lead to increased stress levels, missed foraging opportunities, reduced reproductive success, avoidance of certain habitats, and increased mortality.”³ Interestingly, this study was done in the Diamond Fork area of the Wasatch Mountains, not too far away from the Cottonwood Canyons, the subject of these two actions. This local study documented that increased interactions between wildlife, both during the day and in the twilight hours, reduced wildlife activity.

Just because we see wildlife doesn't mean we aren't having an impact on their behaviors. Using science and data points we can help to shift our behaviors and impact to help protect the irreplaceable values that exist in the area. Watershed and wildlife data should help direct and guide our use and enjoyment of the area.

Another project being overseen by Wild Utah Project to study the movements and interactions of wildlife is being looked at in the Cottonwood Canyons. It might be helpful to partner with them to better understand the regional importance of these canyons to wildlife populations and how they move throughout the region. This information can only benefit the stewardship and management of the natural values that exist on the property and how they can be enhanced. This project is nearly ready for public consumption and we hope that the data can be used in effort to better understand the impacts of these projects.

Comments Specific to the Little Cottonwood Canyon EIS

In 2006, UDOT in conjunction with Alta Ski Lifts, Snowbird, the Town of Alta and UTA undertook a study looking at risks and identifying a blueprint for the future of the canyon. Specifically, the study sought to quantify the Avalanche Hazard Index for Little Cottonwood Canyon, and also provide short and long-term options for improving safety along the highway.

One key finding of the analysis was the relationship between traffic and the AHI. While, yes, Little Cottonwood enjoys a high AHI, it is in part because of traffic.

³ The influence of periodic increases of human activity on crepuscular and nocturnal mammals: Testing the weekend effect (2016). Nix, Howell, Hall McMillan. <https://www.sciencedirect.com/science/article/pii/S0376635717301948>

“The other fundamental way to influence the AHI is by changing traffic. As traffic increases, speeds decrease, and the AHI rises. Reducing the number of cars on the road allows the remaining cars to go faster, which decreases the avalanche risk. **This can be accomplished through increased transit service; better use of park-and-rides; improved travel information for drivers; and making sure traffic exits the resorts at day’s end in an efficient manner.**”⁴

The Wasatch Front Regional Council’s 2050 plan also recommends “express bus/special service” in Little Cottonwood Canyon. It is requested that 15 minute peak and 30 minute off-peak headways be provided. This, in conjunction with increased parking near the gravel pit, again, seems to be the least impactful, lowest risk, most broadly supported project that could instigate the needed behavioral changes required to address canyon congestion issues.

To that end, in 2017/18, UTA adjusted services in the Salt Lake area to help get 15 minute headways during peak times. This resulted in a boost in ridership which was declining. The lesson learned here, is that if transit is dependable, people will utilize it. The other significant efforts to both improve ridership and transit is to make it available year-round, and priced so as to incentivize transit use. Most people see barriers to using transit and one of those barriers is cost, another is time. If we can address the time and either lower the cost of transit, or raise the cost of driving with 2 or fewer people in a vehicle, we believe we can make significant steps toward resolving congestion in the canyons without disturbing additional land. A project like this seems well within the scope of the legislation that made funds available and within the budget of the funds allocated.

It seems these already identified, implementable and widely supported proposals, should be the primary focus of the LCC EIS. Studies, plans and collaborative efforts that have consumed decades of analysis and millions of dollars, with many points of light saying the same thing.

It is worth noting that since 2006, Salt Lake County has been doing analysis on attitudes toward our watersheds. The most recent survey, done in 2015, states that 52% of people want less urban development than already exists in their watersheds, and 41% want it to stay the same, while only 7% want more urban development.⁵ As we know, land use is often driven by transportation and it is clear that people place high value on the natural environment, wishing it to remain as natural or even in a better natural condition than already exists. UDOT needs to heed this sentiment from the constituents they serve and take greater care than they ever have before when looking what so called solutions they wish to implement in Little Cottonwood Canyon.

SOC’s most overarching criticism of the proposed project is that it prematurely dedicates resources to one component of an as-yet undefined larger project. It is widely recognized that transportation problems seen in the Wasatch require the preparation of a comprehensive transportation plan, and one is in the initial stages of development. Because the non-LLC elements of such a plan have not been developed, it cannot presently be known whether and how the proposed LLC project will fit into and be compatible with this comprehensive plan. It is a virtual certainty that, if developed as an element of a comprehensive plan for the Wasatch, the LLC project would not look the same as it will if it proceeds as an ad hoc project. To that extent,

⁴ Little Cottonwood Canyons Transportation Study (2006). Jon Nepstad, Ritchie Taylor, Chris Stethem, Andrea Clayton. <http://arc.lib.montana.edu/snow-science/objects/issw-2006-907-909.pdf>

⁵ Salt Lake County Watershed Public Opinion Survey (2015) pg. 16. Opinion Works. https://slco.org/uploadedFiles/depot/publicWorks/fwatershed/2009_Water_Quality_Stewardship_Plan/2015publicsurvey_ful.pdf

the project represents a waste of monetary resources, and impact of natural resources (which might be deemed as invaluable given their importance).

In terms of the environmental analyses, without the completion of a comprehensive plan, it is impossible for the EIS for the present project to include meaningful cumulative impacts analyses that reflect impacts of the LLC project together with the other project, as clearly required by NEPA. SOC believes that UDOT must, as is usual in such circumstances, prepare a programmatic EIS for the entire set of interrelated Wasatch transportation projects, then prepare separate, tiered EISs for the individual component projects. See 40 C.F.R. §1505.20.

Perhaps the most significant impacts of the proposed project will be those caused by the increased number of people that the highway improvements are intended to deliver into the Wasatch. Currently, it is SOC's understanding that UDOT views such impacts as beyond the scope of NEPA requirements. This could hardly represent a greater misreading of its obligations.

Under the National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq., the LLC EIS must identify and analyze the direct, indirect, and cumulative affects of a proposed action. 42 U.S.C. § 4331 (c)(i); 40 C.F.R. §1508.7, §1508.8. Direct effects of an action are those "which are caused by the action and occur in the same time and place." Indirect affects are those "which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable."

Cumulative impacts are those environmental impacts "which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions."

Obviously, the purpose of the LLC project is to reduce the existing traffic bottlenecks and allow an increased flow of people into the mountains. The presence of more people in the mountains is therefore not just a foreseeable impact, but an intended one. It is also a kind of impact that the CEQ regulation defining indirect effects clearly contemplated: "Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. §1508.7, §1508.8. Failure of UDOT to consider the impacts of successfully increasing the number of people accessing the Wasatch would represent such a fundamental deficiency of NEPA compliance that SOC would feel completely confident in challenging the EIS on that basis.

In performing an analysis of the impacts of significantly increased visitation of the Wasatch, there are many types of direct, indirect, and cumulative impacts the EIS must consider. These include (recognizing that some may be subsumed under others in analysis):

- Ecosystem impacts
- Impacts on plant life and animal wildlife, including endangered, threatened, and sensitive species
- Watershed impacts
- Impacts from future construction and development inevitably resulting from increase demand for housing, lodging, services, etc.
- Impacts on visitor experience at and outside of ski resorts
- Impacts on backcountry use, including user conflicts from and among other backcountry users, including those making such use under present and foreseeable Forest Service use authorizations, such as helicopter skiing

- Impacts of increased backcountry visitation together with present and future Forest Service use authorizations, including helicopter skiing, on plant and animal life, including endangered, threatened, and sensitive species
- Impacts on visitor safety
- Impacts attributable to enlarged parking areas, including at trailheads
- Impacts of improved canyon access together with new road construction on National Forest lands, which may result from the expected amendment of the Forest Service's Roadless Rule.

In terms of the direct impacts of the proposed projects, there are several types of impacts that the improvements and/or their construction may cause that the EIS must consider, including:

- Impacts on riparian areas
- Ecosystem impacts
- Impacts on plant life and animal wildlife, including endangered, threatened, and sensitive species
- Watershed impacts
- Impacts on visitor safety

There also is a potential for a variety of indirect and cumulative impacts attributable to the improvements and/or their construction that the EIS must identify and analyze, apart from those associated with increased visitation. These may include:

- Impacts from the LLC project in conjunction with the construction and use of other transportation projects, including elements of a broader transportation plan for the Wasatch canyons and mountains.
- Indirect impacts stemming from the direct impacts; for example impacts on wildlife population health, number, and behavior indirectly attributable to more direct effects of the improvements and/or their construction on migration, access and passage to/from habitat areas
- Impacts of the proposed improvements together with new road construction on National Forest lands, which may result from the expected amendment of the Forest Service's Roadless Rule.

Comments Specific to the Cottonwood Canyons Transportation Action Plan

We think the CC TAP process is an important project. This is the project that should have been done five or so years ago with Mountain Accord. We would be much better served by the LCC EIS had this analysis already taken place. To that point, our primary comment about the CC TAP is why isn't this the top priority? Doing this concurrent to the LCC EIS rather than initiating the project without understanding how it supports or detracts from the vision that will be identified once the CC TAP concludes.

It is widely recognized that transportation problems seen in the Wasatch require the preparation of a comprehensive transportation plan, and it is our understanding that that is the intention of the CC TAP. It is our hope as well that this project will help to not waste monetary resources, and impact of natural resources (which might be deemed as invaluable given their importance).

SOC believes that UDOT will, as is usual in such circumstances, prepare a programmatic EIS for the entire set of interrelated Wasatch transportation projects, then prepare separate, tiered EISs for the individual component projects. See 40 C.F.R. §1505.20.

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- Ecosystem impacts
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- Impacts on visitor safety

There also is a potential for a variety of indirect and cumulative impacts attributable to the improvements and/or their construction that the EIS must identify and analyze, apart from those associated with increased visitation. These may include:

- Impacts from the CC TAP project in conjunction with the construction and use of other transportation projects, including elements of a broader transportation plan for the Wasatch canyons and mountains.
- Indirect impacts stemming from the direct impacts; for example impacts on wildlife population health, number, and behavior indirectly attributable to more direct effects of the improvements and/or their construction on migration, access and passage to/from habitat areas
- Impacts of the proposed improvements together with new road construction on National Forest lands, which may result from the expected amendment of the Forest Service's Roadless Rule.

A concept worthy of analysis

While we appreciate the desire of governments to want to build more infrastructure, however, it seems to us in our review of the conditions that the challenge in Little Cottonwood Canyon (LCC EIS) and of the Central Wasatch (CC TAP), has to do with efficient use of existing infrastructure. A number of studies that have been done in the canyons cite low vehicular occupancy for a reason for roadway failures. Roadway failures are often times due to winter conditions which really should be an expectation for travelers. Efforts to enforce restrictions have certainly increased in the past several years. Simply providing more opportunities for travelers to increase occupancy (incentivizing carpooling) or more opportunities throughout the region for people to get on a variety of express buses (particularly to individual resorts) need to be explored. It is a worthy goal to contemplate the idea of a car-less canyon, with few exceptions.

Save Our Canyons believes the best method to improve transportation, while preserving the wilderness character and natural habitat of these canyons, is to implement a reliable, affordable, and efficient shuttle system using vans and buses. This shuttle system would be operational year round, but would have higher capacity during peak use periods. For the shuttle system to be successful, additional park and ride lots need to be developed. These lots would be developed throughout the Salt Lake Valley. Existing and future transit hubs would also be used as boarding stations for the shuttle system. The shuttle system would be designed to provide service for all canyon visitors: resort skiers, dispersed users, hikers, resort employees, summer season visitors, and others. Current congestion problems in the Cottonwood Canyons are largely associated with ski resort operations, most notably on weekends and holidays. The shuttle system would provide express shuttle service to each ski resort from park and ride lots/transit hubs. Winter express shuttles for dispersed use would also be part of the system. These shuttles would provide transit to users from park and rides/transit hubs to winter trailheads. Similarly, in summer, shuttles would provide hikers express service from park and rides/transit hubs to trailheads. The proposed shuttle system is NOT a traditional multi-stop bus service. The proposed shuttle system is one that conveniently transports individuals from park and ride lots and transit hubs to mountain locations with "express" service. The shuttles would have a limited number of stops, and in many instances would provide nonstop transit service (most notably to ski resorts).

A key feature of the shuttle system would be short transfer times at park and rides lots/transit hubs and at mountain locations for return service back to the park and ride lots/transit hubs. We should look for under-utilized existing parking lots that could support buses/shuttle pool lots. Parking at church lots during the week or schools on the weekends, seem to be a logical place. Schools and churches are often within walking distance of homes. Shuttles will need to be able to meet peak demand. The success of this system is dependent on convenience and short wait times for users. Low fares need to be a part of the system to encourage use. A shuttle system using vans and buses has the benefit of being highly flexible. The shuttle system could easily (and cheaply) be modified as demands change in the future.

There needs to be an evaluation as to whether this shuttle system is publicly or privately operated (or a combination of both). There should also be an evaluation of the feasibility of a system of vans for “home to mountain” service that would augment the shuttle service described above. Such a home to mountain system would resemble an airport limousine service, with scheduled pick up and return times.

The vehicles used in the shuttle system would be vehicles appropriate for mountain travel, including travel through inclement weather. Ideally, these vehicles would utilize clean fuel systems (e.g. natural gas or electric) to minimize impacts to air quality.

Coupled with the shuttle system, there should be consideration to implement “congestion pricing” for private vehicles in the Cottonwood Canyons. Congestion pricing is a market based approach to reducing congestion. Congestion pricing is utilized in power marketing, where users pay a higher price for power during “on-peak” hours. There are also many examples of congestion pricing in transportation. The adjustable rates for use of the HOV lanes on I-15 is an example of congestion pricing. Congestion pricing is being used in the European cities of London, Stockholm and Milan to reduce traffic. In these cities, private vehicles must pay a fee to enter the “high-use” area of city center during peak congestion periods. These systems have been successful in reducing traffic. Congestion pricing in the Cottonwood Canyons could be implemented during peak traffic periods to reduce the number of private vehicles during peak use periods. Private vehicles would be required to pay a “congestion fee” to drive up the Cottonwood Canyons during said peak periods. Initially, this congestion fee may only be collected on weekends and holidays during the winter season (consistent with current traffic patterns). The congestion fee could be collected using the EZ pass system or possibly by an online system where a user purchases the fee on a computer or smart phone. Consideration should be given for waiving the fee for vehicles with high occupancy (3 or more passengers). The revenue collected from the congestion fee could be used to offset costs of the shuttle system. The congestion fee should be considered for Big and Little Cottonwood Canyon, but not for Mill Creek Canyon where a fee system is already in place.

The success of the shuttle system depends upon a “shift” in attitudes and behaviors of residents in northern Utah. A public outreach program would need to be put in place prior to the implementation of the shuttle system. Current public outreach programs on water conservation and air quality have helped raise public awareness about these important resource/environmental issues in Utah. The outreach program for the shuttle system would be designed to raise awareness about transportation issues in the canyons, the importance of people changing their behavior, as well as providing specific information on how the system works.

Bike lanes for safe cycling in the Cottonwood Canyons and Mill Creek Canyon need to be added. The addition of bike lanes may require some modification of existing roadways.

The existing two-lane road configuration, coupled with a reliable shuttle system provides a good solution to current and forecasted travel demands in the Cottonwood Canyons and Mill Creek

Canyon. A reliable bus/shuttle system would reduce the number of vehicles in the canyons and reduce congestion. The bus/shuttle system would also help alleviate the problem of limited parking in the canyons.

Conclusion

We appreciate the opportunity to provide comments on these issues of great importance to our region. We remain very concerned about the implications of projects in the short term, dictating the long-term solutions. As such it seems the long-term plan (CC TAP) should inform the short-term solutions (LCC EIS), but the inter-relationship between behaviors and the natural environment don't appear to be fully understood or appreciated. As members of the Central Wasatch Commission (a partner in these projects) have suggested, we have one shot at getting this right. We couldn't agree more. We hope that these comments help clarify some of our concerns and perhaps persuade the decision makers that guide this process to take a hard look at many issues of substance, but also process design to ensure we are careful with the natural environment and finite resources.

The continual re-scoping of the LCC EIS, seems to make the point for the need of the CC TAP to become the primary focus and effort, prior to any proposal to make changes to the roadway.

We look forward to continued discussions and engagement, hopefully building broader consensus around these issues.

On behalf of the Save Our Canyons community,

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

Carl Fisher
Executive Director
Save Our Canyons



December 13, 2019

Little Cottonwood EIS Project Team,
c/o HDR
2825 E. Cottonwood Parkway,
#200 Cottonwood Heights, Utah 84121

John Thomas
UDOT Region 2
2010 South 2760 West
Salt Lake City, UT 84104-4592
johnthomas@utah.gov

**Subject: Comments for the Little Cottonwood Canyon EIS
Draft Purpose and Need and Draft Alternatives and Screening
Methodology**

Dear Mr. Thomas:

This letter transmits comments from Salt Lake City Department of Public Utilities (Salt Lake City, or the City) in response to the Utah Department of Transportation's (UDOT) Little Cottonwood Canyon Environmental Impact Statement (Project or EIS) comment period for two documents: 1. Draft Purpose and Need Chapter; and 2. Draft Alternatives and Screening Methodology and Preliminary Concept Report (both dated October 30, 2019). Salt Lake City appreciates the opportunity to serve as a Cooperating Agency and to provide comments for this EIS. Little Cottonwood Canyon provides a significant portion of Salt Lake City's water supply. The City has statutory and regulatory jurisdiction for Little Cottonwood Canyon related to its water rights and watershed management, significant water infrastructure, and special expertise within the EIS study area.

In addition to the comments below, the City provided comments as a response to the Scoping period in June 2019 that are included as an attachment to this letter. Please consider the City's concerns included in those comments in the record for the EIS. Many of these concerns are not addressed in the two documents mentioned above.

BACKGROUND AND CONTEXT

Salt Lake City provides drinking water to more than 360,000 residents. For over one hundred years, the mountainous expanse of Little Cottonwood Canyon and the neighboring Big Cottonwood, Parleys, and City Creek Canyons serve as the City's municipal watersheds and are critical sources of water for the City and residents it serves. Because of the need to manage these watersheds to provide clean and reliable water, the City and the state of Utah petitioned the federal government to create the Wasatch Forest Reserve, which was established in the early 1900s. Now called the Uinta-Wasatch-Cache National Forest, the main management goal for

Little Cottonwood Canyon the other municipal watersheds to this day remains the protection of culinary water supply (see the current Wasatch-Cache Forest Plan, 2003). Federal legislation from 1914 and 1934 directs the United States Forest Service (USFS) to manage the federal lands within these watersheds in a manner consistent with the protection of the City's culinary water supply.

Water resources are collected from several watersheds within the Wasatch Mountains, including Little Cottonwood Canyon. This water is then treated to meet federal and state drinking water standards and conveyed to the public. Salt Lake City's water service area includes all of Salt Lake City and portions of the cities of Cottonwood Heights, Holladay, Midvale, Millcreek, Murray, and South Salt Lake. Sandy City also operates its own distribution system to serve its residents and receives a substantial part of its culinary water supply directly from Little Cottonwood Canyon.

Salt Lake City's water resources emanating from Little Cottonwood Creek are treated at the Little Cottonwood Treatment Plant operated by the Metropolitan Water District of Salt Lake and Sandy (MWDSLS). Water from Little Cottonwood Creek is directly diverted into two intakes that convey water into MWDSLS' treatment plant. The first water intake is located at the Murray Penstock near the Wasatch Resort Community. MWDSLS delivers treated water from Little Cottonwood Creek to Sandy's and Salt Lake City's drinking water distribution systems, ultimately providing water to more than 450,000 residents.

Salt Lake City also collects, treats, and distributes water from other Wasatch streams, including Parleys Creek, City Creek, and Big Cottonwood Creeks. Together with Little Cottonwood Creek, these surface water sources comprise 50-60% of Salt Lake City's water deliveries each year.

As a Cooperating agency in the EIS, the City's intent is to inform UDOT and the Project managers about its jurisdiction, legal authority, and expertise related to its water resources. This includes regulatory mandates, land and water ownership, and more than a century of water management and watershed protection. The City is prepared to provide UDOT with expertise to incorporate water resources into the Purpose and Need and overall evaluation. Given our jurisdiction, legal authority, and expertise, we hope that UDOT will incorporate our previous input provided in June 2019, as well as our comments below.

COMMENTS TO THE DRAFT PURPOSE AND NEED STATEMENT

Please include the protection of drinking water supply in the Project's Purpose and Need statement. The consistency of this statement aligns with over a century of public land management strategy in Little Cottonwood Canyon, the Wasatch-Cache National Forest Revised Master Plan, the Salt Lake City Watershed Management Plan, the Salt Lake County Wasatch Canyons Master Plans (both from 1989 and the present draft) as well as the intent of the MS4 permit that guides UDOT's water quality stewardship in Little Cottonwood Canyon. The City's requests have come in previous comments and in working closely with UDOT project staff. As a Cooperating Agency in this project, the City feels the consideration of water quality lays the groundwork for successful analysis and implementation in solving transportation issues that Little Cottonwood Canyons faces.

COMMENTS TO THE DRAFT ALTERNATIVES DEVELOPMENT AND SCREENING METHODOLOGY AND PRELIMINARY CONCEPT REPORT

1.0 Suggested Changes to Level 2 Screening Criteria

a. Consideration/Addition of the Safe Drinking Water Act as a criterion, should be elevated to Level 1 Screening Criteria.

Pursuant to the authority granted to UDOT through 23 U.S.C. 327 via the Memorandum of Understanding (MOU) dated January 17, 2017, with the Federal Highway Administration, the Safe Drinking Water Act must be included as part of this EIS screening criteria. The EIS Level 1 screening criteria should include protection of drinking water sources and impacts to both the federal Safe Drinking Water Act (SDWA) and the state of Utah Safe Drinking Water Act. Per Utah Administrative Code (UAC) Rules R309--105-7 and R309-605, Public Water Systems like Salt Lake City's are responsible for protecting their sources of drinking water from contamination. As previously stated, Little Cottonwood is a critical part of the surface water supply for both Salt Lake City and Sandy City. They take water from MWDSLS Little Cottonwood Treatment Plant, which has intakes directly from Little Cottonwood Creek. Past roadway accidents, hazardous materials spills, and sedimentation from construction activities have directly impacted these intakes resulting in the temporary loss of the ability to use the Little Cottonwood Creek water for drinking water purposes.

b. Impacts related to the Clean Water Act should be elevated to Level 1 Screening Criteria.

In the current draft, the Level 2 Screening Criteria includes impacts on the federal Clean Water Act (CWA). In Table 2, the Measure indicates acres and types of wetlands. Section 5.2 references Section 404(b)(1) Guidelines for specification for disposal sites of dredge and fill material. The City supports including the protection of wetlands and the CWA Section 404(b)(1) in the Screening Criteria. However, the City requests the CWA is elevated to the Level 1 Screening Criteria and is expanded to include other sections of the CWA, including Section 303.

Additionally, the City requests the Level 1 Screening Criteria include impacts related to the Utah Water Quality Act. The Screening Criteria needs to contain compliance with UAC R317-2 Standards of Water Quality of the State. This includes, but is not limited to, protection of Category 1 Waters. The Screening Criteria should state the alternatives will be protective of the beneficial uses assigned to the Little Cottonwood Creek as outlined in UAC R317. This includes the beneficial use designation of Class 1C: Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water (DDW); Class 2B: Protected for infrequent primary contact recreation; and Class 3A: Protected for cold water species of game fish and other cold water aquatic life, including the necessary aquatic organisms in their food chain.

c. Local regulations for the protection of drinking water should be in Level 1 Screening Criteria.

The City requests local water quality related regulations to be included in screening criteria. These include Salt Lake City's watershed ordinance contained in Chapter 17.04 of Salt Lake City's code, and the Salt Lake County Health Department Regulation #14.

d. Salt Lake City's land and water rights should be included in the Level 1 Screening Criteria.

Salt Lake City holds a significant portion of the water rights associated with Little Cottonwood Creek. Actions proposed by this EIS must not impact the City's ability to use these water rights. Thus, the impact of project alternatives on the City's ability to put its water rights to beneficial use should be included in screening criteria. Salt Lake City also owns land for conservation purposes that may be impacted by alternatives considered. Protection of the City's land is needed to assure that it is not being impacted by unauthorized use. Salt Lake City is prepared to work with UDOT to identify land and water rights that might be impacted by different alternatives.

e. Water infrastructure should be included in the Level 1 Screening Criteria.

UDOT should consider whether alternatives could impact water infrastructure, especially the treatment plant and the intakes along the creek. This should include direct impacts to the integrity of the water infrastructure, as well as indirect impacts. An example of an indirect impact on water infrastructure is the short and long term degradation of water quality that could occur due to the construction and operation of the transportation alternative, as well as the increased or changed use patterns in the watershed. These short and long term water quality impacts could result in damage to water infrastructure or the need to change water treatment processes. Should infrastructure be impacted due to transportation alternatives, significant public costs would be incurred.

f. Operations and maintenance impacts should be included in the screening criteria.

Salt Lake City is concerned that transportation alternatives could impact our watershed operations and management by increasing the scale of public access. Salt Lake City funds a watershed operations division in order to protect water resources from pollution and degradation. Salt Lake City's watershed management includes watershed restoration activities, restroom, and trailhead maintenance, and public education. The City often assists and partners with the USFS in watershed management. Increased access and use, and changes in the patterns of recreational use and land use have a significant impact on the City's management capacity and costs. Transportation changes will result in changes in public access. As such, watershed management implications should be a screening criterion for transportation alternatives. As a note, transportation alternatives could also provide benefits to some of the watershed management challenges, and it would be helpful to evaluate them from that perspective.

While the project focus area is predominantly the Highway 210 corridor, the changes in transportation will affect public access to recreational sites. This will affect the Little Cottonwood Canyon watershed outside of the highway corridor. This project should consider the direct, cumulative, and indirect costs and benefits related to specific operational, maintenance, and management costs of canyon usage associated with each transportation alternative. This should include both within and outside of the project area in Little Cottonwood Canyon as part of the Level 2 Screening Criteria.

Given that the road corridor and mobility allow the movement of people, project screening criterion must also include the indirect and direct costs and impacts as it

proposes alteration of the mobility regimes. This is important due to the strong connection between the roadway and all the recreational amenities that the public heavily uses and impacts year-round.

g. Tolling should be reconsidered to provide resources for the management of transportation impacts.

The City requests a reconsideration of the determination of the Table A-1 (Draft Alternatives Development and Screening Methodology and Preliminary Concept Report, Appendix A, page A-4) that “tolling revenue should go back into the canyon” as something that is outside the scope of the EIS. Regardless of mechanisms, the EIS should include an analysis of the feasibility of funding mechanisms associated with each proposed alternative in screening criteria. Given that tolling is a key concept that has been extensively discussed regarding sustaining operations in Little Cottonwood Canyon, it seems that the disconnection of tolling from the EIS minimizes a functional analysis of any sort of funding mechanisms in the canyon.

Present management budgets remain critically insufficient for existing use and demand on services in Little Cottonwood Canyon. For example, given its limited budget, the Salt Lake Ranger District of the Uinta-Wasatch-Cache National Forest (UWCNF) calls upon its governmental, nonprofit, and other partners to assist with basic maintenance responsibilities in Little Cottonwood Canyon and elsewhere on the Ranger District. In addition, there are capital expenses that need to be considered. The City’s contributions to UWCNF operations include (but are not limited to) pumping vault toilets at trailheads, purchasing and installing new vault toilets at trailheads and funding summer maintenance and outreach crews on an annual basis. Not all of these activities are in the project area specific to the roadway. However, they are indicative of the situation in which the agencies become responsible for the management of Little Cottonwood Canyon under the existing levels of mobility and access provided by the road corridor. Additional mobility and access could put additional pressure on these agencies.

Additionally, the Salt Lake Ranger District (SLRD) unit of the UWCNF lacks an active weeds management crew to perform weed mitigation. Instead, the City takes the lead on many aspects of weed mitigation for SLRD. The nonprofit organization Cottonwood Canyons Foundation takes on this role in Little Cottonwood Canyon, working closely with Salt Lake County and the City. Noxious weeds have a significant impact on the elevation of wildfire risk. Post wildfire impacts on water quality include changed water chemistry, increased sedimentation, and loss of use of the water source.

2.0 Suggested Changes to Level 1 Screening Criteria

Incorporate the impact of Climate Change to winter use peak demand.

Based on the City’s understanding of the intent stated both by the Draft Purpose and Need and staff presentations, this EIS intends to primarily focus on addressing peak winter roadway congestion with a planning horizon to 2050, incorporating population growth of the Valley’s population, and correlating increase of use of Little Cottonwood Canyon. Screening criteria should incorporate climate models, which demonstrate a possible rise in the rain and snow elevation and a corresponding rise in minimum

snowpack elevations during the project's timeline. With the forecasted upward elevational creep of the rain and snow line, this project must also be scalable and translatable to a summer use format. Existing winter peak strain on travel corridor mobility may experience a downward trend if the market demand diminishes due to less peak demand days.

3.0 Comments on Tools Used

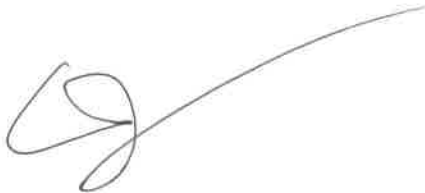
Section 6.2- GIS Data- Modelling impacts.

It is important to note that the present quality of water demonstrates that the past century of source water quality protection efforts by the City and its partners, including UDOT, are effective. Any models used to determine impacts to water quality must be recognized as limited and used in an informative rather than determinative manner.

Thank you for your consideration of Salt Lake City's input during this comment process. We hope to enhance this process through our participation.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,



Laura Briefer
Director

CC: Brandon Weston, Utah Department of Transportation
Vince Izzo, HDR
Jacki Biskupski, Salt Lake City Mayor
Erin Mendenhall, Salt Lake City Mayor-Elect
Cindy Gust-Jensen, Salt Lake City Council Director
Marian Rice, Salt Lake City Water Quality & Treatment Administrator
Patrick Nelson, Salt Lake City Watershed Program Manager
Rusty Vetter, Salt Lake City Deputy City Attorney
Mike Devries, Metropolitan Water District of Salt Lake and Sandy General Manager
Tom Ward, Sandy City Director of Public Utilities
Ralph Becker, Central Wasatch Commission Executive Director

ATTACHMENTS: Salt Lake City Department of Public Utilities Comments on Notice of Intent to Revise Scope of the Little Cottonwood Canyon EIS (June 14, 2019)



June 14, 2019

John Thomas
UDOT Region 2
2010 South 2760 West
Salt Lake City, UT 84104-4592
johnthomas@utah.gov

Subject: Comments to the Little Cottonwood Canyon EIS Draft Coordination Plan

Dear Mr. Thomas:

This letter transmits comments from Salt Lake City Department of Public Utilities (Salt Lake City) in response to the Little Cottonwood Canyon EIS Draft Coordination Plan, dated May 31, 2019. Salt Lake City appreciates the opportunity to serve as a Cooperating Agency in the Little Cottonwood Canyon EIS process.

1. **Section 3.2, Public Involvement Development and Screening of Alternatives:** Salt Lake City recommends the third sentence read "UDOT will consider comments submitted by the public, cooperating agencies, and participating agencies as it develops proposed methodologies for alternatives screening and impact analysis."
2. **Table 5:** Projects identified in the ROD will likely need to obtain permits from the Utah Department of Natural Resources, Salt Lake County Health Department, Salt Lake County Planning and Development Services, and Salt Lake City. Salt Lake City recommends including the following approvals to Table 5:
 - a. Salt Lake City's Watershed Ordinance § 17.040 and Salt Lake City Surplus Water Permits: Needed where water resources are desired for proposed projects or are otherwise impacted.
 - b. Salt Lake County Health Regulation #13: Needed if sanitary facilities are proposed.
 - c. Salt Lake County Health Regulation #14: Regulates the use and occupancy of watersheds within Salt Lake County.
 - d. Salt Lake County Foothills and Canyons and Overlay Zone (Salt Lake County Ordinance Chapter 19.72) and Mountain Resort Zone (Salt Lake County Ordinance 19.13): Land use approvals would be needed for projects in the unincorporated areas of Big and Little Cottonwood Canyons.
 - e. Utah Department of Natural Resources: Administers stream alteration permits.

Thank you for your consideration of Salt Lake City's comments on this Coordination Plan. We appreciate the opportunity to serve as a Cooperating Agency, and hope to enhance this process through our participation.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to be 'LB', with a long horizontal stroke extending to the right.

Laura Briefer
Director

cc: Brandon Weston, UDOT
Vince Izzo, HDR
Marian Rice, Salt Lake City
Patrick Nelson, Salt Lake City
Carly Castle, Salt Lake City

From: UTA
To:
Cc:
Subject:
Date:

Here are comments from UTA. Please let me know if you have any questions.

P & N

Section 1.3 Regional Transportation Planning (p1-11)

- Recommend removing this section, moving information into Section 1.4.2

Table 1.3-1 (pg 1-12)

- The Funding phase for “Little Cottonwood Corridor- Special Service Bus should be “unfunded”, not “3”.
- To assure we are talking about the RTP the Limits of the Little Cottonwood Canyon Park and Ride should be “SR 209 and Wasatch Blvd” instead of blank because everyone will think it’s at the mouth.

Figure 1.4-8 and 1.4-9 (p1-30)

- Road capacity line should be added the figures.

Summer vs. winter traffic

- Need a better description of the anticipated travel pattern for summer vs. winter recreation, projected to 2050. This is particularly important if we are to improve mobility for winter recreation and not for summer recreation (Example: no transit in summer). Based on Figure 1.4-9 and growth rate of 1.2%, the July 4th traffic would be around 1000 vehicle per hour (congestion condition).

Expected future demand

- It would be good to extrapolate data to estimate people/hr for 2050, since that will be the demand that we would need to design for to address mobility.

Length of document

- Considering the recent focus to make NEPA documents more concise, specifically 150-300 pages for major infrastructure projects, has UDOT provided guidance on the expected length of this EIS? P&N + Methodology = 50+33 = 83 pages.

Methodology

Table 1 (p8)

- Improve mobility in 2050 - Meet peak-hour average total person demand on busy ski days in Little Cottonwood Canyon. --- What is this number? Please define and quantify in P&N Chapter.

Thanks,



NEPA Project Administrator
Utah Transit Authority

669 W. 200 S.
Salt Lake City, UT 84101
www.rideuta.com

From: Izzo, Vincent [mailto:Vincent.Izzo@hdrinc.com]

Sent: Monday, November 4, 2019 8:33 AM

To: Lance Kovel <lancekovel@fs.fed.us>; Hu, Autumn (NEPA Project Administrator) <AHu@rideuta.com>; Jason.a.gipson@usace.army.mil; strobel.philip@epa.gov; Larry_Crist@fws.gov; Defreese, Amy <Amy_defreese@fws.gov>; Laura Briefer <Laura.briefer@slcgov.com>; Shirlee Silversmith <ssilversmith@utah.gov>; James Toledo <jtoledo@utah.gov>; Vicki Varela <vvarela@utah.gov>; Jay Kinghorn <jkinghorn@utah.gov>; Sindy Smith <sindysmith@utah.gov>; Joel Karmazyn <jkarmazyn@utah.gov>; Sandy Wingert <swingert@utah.gov>; Brian Cottam <briancottam@utah.gov>; Gerry Gray <ggray@utah.gov>; Becker Ralph <ralph@cw.utah.gov>; Ned Hacker <nhacker@wfr.org>; Madeline Francisco-Galang <MFrancisco-Galang@slco.org>; kmoncur@slco.org; MShipp@cottonwoodheights.utah.gov; Danny Astill <dastill@murray.utah.gov>; cwells@murray.utah.gov; Ryan Kump <RKump@sandy.utah.gov>; Harris Sondak <hsondak@townofalta.com>; Eric Sorensen <sorensen@mwds.org>; DeLoretto, Mary (Acting Chief Svc Dev Ofc) <MDeLORETTO@rideuta.com>; Nelson, Patrick <Patrick.Nelson@slcgov.com>; Michael Johnson <MJohnson@ch.utah.gov>; gbaptist@slco.org; Nicole.D.Fresard@usace.army.mil; RThompson@slco.org; Hubner.Matt@epa.gov

Cc: Izzo, Vincent <Vincent.Izzo@hdrinc.com>; John Thomas <johnthomas@utah.gov>

Subject: Little Cottonwood Canyon EIS, Utah - Request for Review and Comment on Purpose and Need and Alternative Screening Methodology

The Utah Department of Transportation (UDOT) is preparing an Environmental Impact Statement (EIS) for transportation improvements on State Route (S.R.) 210 in Salt Lake County, Utah. Referred to as the Little Cottonwood Canyon EIS, it is examining proposed improvements on S.R. 210 from its intersection with S.R. 190/Fort Union Boulevard to its

terminus in the town of Alta. Transportation improvements are needed to improve the safety, mobility, and reliability of S.R. 210 for residents, visitors, and commuters. Your agency has agreed to be a cooperating or participating agency in the preparation of the EIS. One of the important steps in the EIS process is the development of the project purpose and need and of the alternatives. Attached for your review and comment is the draft Purpose and Need chapter and Alternative Screening Methodology Report. Please provide your comments to these documents to Vince Izzo at vincent.izzo@hdrinc.com by December 13, 2019. For those that could not attend the October 30, 2019 agency meeting I have attached the presentation given at that meeting and the purpose and need summary.

If you have any questions about these documents or your involvement in this process, please contact me.

Vince Izzo

Senior Environmental Planner

HDR

2825 E. Cottonwood Parkway, Suite 200
Salt Lake City, UT 84121-7077

M 406.396.6223

vincent.izzo@hdrinc.com

hdrinc.com/follow-us

UDOT LCC EIS - Draft Purpose and Need Chapter					
USDA Forest Service Comments					
12/13/19					
Document	Section	Page	Paragraph	Sentence	Comment
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.1.1	1-5	3	1	Minor clarification in reference to the statement, "The study area also includes the S.R. 210 Bypass Road in the town of Alta"; only a portion of the S.R. 210 Bypass Road is within the Town of Alta Municipal Boundary. Recommend rewording statement if intent is to include entire S.R. 210 Bypass Road in the study area.
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.2.1	1-9	1	1	Recommend explicitly defining the scope of the term "safety" since the need for safety mitigation in the Canyon may be interpreted to include elements which may or may not be within the transportation corridor and/or project scope, such as wildland fire/fuels mitigation, canyon emergency egress, and other safety concerns inherent to the Canyon.
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.2.1	1-9	Reliability/Mobility definition call-out	2	The term "highway facility" seems to infer that the transportation system is comprised of only roadways, thereby potentially predetermining feasible alternatives and limiting the potential scope of 'mobility'. Consider clarifying or rewording in order to encompass the range of transportation corridors that may be considered under the scope of 'mobility' (e.g. aerial tramways, rail, trails/paths, etc.).
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.2.1	1-9	6	2	The USDA Forest Service should be included in addition to the other agencies identified with jurisdiction/interests in the management of the LCC watershed, since Congress has explicitly directed the Forest Service to administer designated watersheds on National Forest System lands in cooperation with Salt Lake City for the purpose of storing, conserving and protecting water from pollution.
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.4.3.2	1-33	4	1	In relation to the potential effect on the purpose and need of avalanche mitigation measures in the Canyon, recommend discussion of the dangers and intent to phase-out artillery use for avalanche control, and the current challenges of installing RAC systems in the canyon due to restrictions within designated wilderness areas.
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.4.3.2	1-39/1-40	4/1	3-2	<p>If reference to the statements:</p> <p>"The ability to expand parking on land managed by the USDA Forest Service, which includes many of the resort parking areas, is limited per the Revised Forest Plan Wasatch-Cache National Forest (USDA Forest Service 2003). The plan states that, in the Tri-Canyon Area (Big Cottonwood, Little Cottonwood, and Mill Creek Canyons), the parking capacities of canyon parking areas (ski area lots, summer-use homes, and developed and dispersed recreation sites) will not exceed the levels in 2000 unless modification is needed for watershed protection or to facilitate mass transit.",</p> <p>when used in the context of this document, appear to incorrectly infer that the parking limitation in the Plan is a standard or policy, when in fact it is a "Desired Future Condition" associated with the objective of watershed health in the next 50-100 years.</p> <p>For clarity and accuracy, recommend rewording these statements similar to:</p> <p>"The ability to expand parking on land managed by the USDA Forest Service, which includes many of the resort parking areas, is guided by the Revised Forest Plan Wasatch-Cache National Forest (USDA Forest Service 2003). For the purpose of watershed protection, the Plan indicates that a desired future condition in the Tri-Canyon Area (Big Cottonwood, Little Cottonwood, and Mill Creek Canyons), is to maintain the parking capacities of canyon parking areas (ski area lots, summer-use homes, and developed and dispersed recreation sites) so that parking capacity does not exceed year-2000 levels unless modification is needed for watershed protection or to facilitate mass transit."</p>
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.4.3.2	1-42	2	4	In reference to the sentence, "This creation of new paths reduces the quality of the natural environment, including water quality", recommend clarifying that roadside parking, in addition to spider-trails, impacts forest resources; highlighting contributions to overall 'watershed degradation' as opposed to only water quality.
UDOT LCC EIS - Draft Purpose and Need Chapter - Oct 30, 2019	1.4.3.2	1-44	3	2	In reference to the sentence, "Informal trailheads contribute to erosion, mineral soil loss, the spread of invasive weeds, and loss of native vegetation and can be unsafe for users"; the use of informal parking areas and creation of spider-trails, which may bypass trailhead facilities, also contribute to watershed degradation due to the fact that toilets are not available or are bypassed by visitors. Recommend discussion of this issue since it is a key component of watershed protection and formalizing parking at trailheads.

UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019

USDA Forest Service Comments

12/13/19

Document	Section	Page	Paragraph	Sentence	Comment
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	1.0 & 2.5	3/10	Bullet #5/3	NA	The Level 2 screening description appears inconsistent between Section 1.0, Page 3, Bullet #5 and Section 2.5, Page 10, Third paragraph. (Compare Impacts and Costs to Benefits subsection). Specifically, the example provided in Bullet #5 on Page 3 does not appear to address how benefits will be compared and/or weighed against impacts and costs.
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	2.1	5	2	3	In reference to the sentence, "UDOT will also consider safety improvements related to avalanche mitigation and trailhead parking in Little Cottonwood Canyon that affect safety, reliability, and mobility for all users of S.R. 210.", recommend noting that the standards and guidelines in the 2003 Wasatch-Cache Revised Forest Plan will be considered in the development of alternatives, as applicable. Inherent to this statement are watershed protection standards and guidelines.
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	2.3.2	7	Last two bullets	NA	Recommend noting that the impacts mentioned in the last two bullet items contribute to overall watershed and water quality degradation in order to further justify the project need associated with the stated consequences of, "Creation of informal trailheads that contribute to erosion, mineral soil loss, the spread of invasive weeds, and loss of native vegetation in the canyon Damage to the pavement along the roadway edge, which causes increased soil erosion and runoff into nearby streams"
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	2.3.3	8	Table 1	Measure - 4th bullet	Minor clarification - in the measure, "Reduce or eliminate traffic conflicts between motorized and nonmotorized transportation modes at existing trailhead locations", recommend replacing "existing" with "key", or similar, since the preliminary concepts may contain current unofficial or user-created trailheads, not currently recognized as part of the National Forest trail system.
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	2.5	9	Table 2	NA	In the event that additional NFS lands would be required for the implementation of specific transportation alternatives, it is assumed that such lands would be considered for appropriation by FHWA under 23 U.S.C. Section 317. Actions proposed on NFS lands that are not appropriated by FHWA may require a Forest Service NEPA decision (see comment on Section 5.5). Is screening for consistency with Title 23 required, or is it otherwise a currently planned screening measure?
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	5.2	13	General	NA	Recommend noting and/or discussing that Salt Lake Valley Health Department, Health Regulation #13 - Wastewater Disposal Regulation, and #14 - Watershed Regulation are enforceable on NFS lands within the watersheds under the co-jurisdiction of Salt Lake City Department of Public Utilities. In some cases, these regulations may be more restrictive than Clean Water Act Section 404 and/or Executive Order 11990.
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	5.5	15	General	NA	It appears that Section 5.5 - Appropriation of Lands Owned by the United States for Highway Purposes infers that any proposed actions on NFS lands will only be on such lands that will be appropriated by FHWA. Is it anticipated that actions may be proposed on NFS lands that will otherwise not be appropriated by FHWA? If so, recommend discussion that such actions on NFS lands may be subject to a joint or separate Forest Service NEPA decision under the requirements of the Forest Service NEPA Regulations at 36 C.F.R. Section 220.
UDOT LCC EIS - Draft Alternatives Development and Screening Methodology and Preliminary Concept Report - Oct 30, 2019	7	17	Table 3	Aerial Transit Alternative	Recommend adding clarification within document addressing if aerial transportation corridors across NFS lands are covered under the provisions of 23 U.S.C. Section 317, or other authorities, permitting the appropriation of such lands for highway or transportation purposes. If such authorities are not applicable, a discussion of the Forest Service NEPA decision requirements (see comment on Section 5.5), and discussion of Forest Service Special Use Permit or easement requirements may be warranted to assess the authorization of such alternatives on NFS lands.

To view online: <https://bit.ly/2RIHWgl>

Unite for CH ~ Wasatch Blvd

November 27, 2019

Public Comment with regards to the Purpose and Need UDOT Document (Little Cottonwood EIS)

On November 4th, 2019 UDOT released a Purpose and Need document in relation to their Little Cottonwood Canyon EIS. Because this project will determine the function, design, safety, and operation of Wasatch Blvd within city limits, U4CHW has gone through the effort to review and present to this document to UDOT as our collective public comment, as well as to disseminate this information among residents of CH with aim to help the public understand, formulate and submit a better informed comment to UDOT.

UDOT is accepting public comment through December 13, 2019. We hope our effort helps empower citizens to share their concerns in a constructive manner, as well as assist UDOT in how best determine the improvements of this project for the benefit of all. You can view UDOT's documents and enter your comments at their website:

Summary of our overall impression and relevant content

Overall Impression:

Unite for CH~Wasatch finds with deep regret, and to the great consternation of local residents, that new standards of planning and design are NOT being adopted and utilized by UDOT as presented by their official documents. THEREFORE WE ASK ALL RESIDENTS AND CONCERNED CITIZENS TO UTILIZE YOUR OPPORTUNITY FOR PUBLIC COMMENT TO DEMAND OF UDOT A HIGHER LEVEL OF EXCELLENCE.

Summary:

UDOT recognizes 3 different segments of S.R. 201 with distinct elements and character. UDOT was charged by the state legislature in 2017 to make transportation improvements at tourist and recreation destinations within the state with significant economic development impact. UDOT determined to focus mostly in Little Cottonwood Canyon "because of its high recreational use and economic benefit from tourism to the State." UDOT consequently determined that for transportation improvements to be effective, they would have to reconfigure more than just the canyon road itself, therefore expanded the project's scope from the intersection of Ft. Union Blvd. and Wasatch Blvd. to the City of Alta. While UDOT welcomes "public input and input from the City of Cottonwood Heights, they make it clear that these are secondary recommendations.

We have identified major blind spots within this project, The purpose and need document continues to make scant mention of current air quality conditions, fails to mention any detrimental impact to human and wildlife from roadway noise, and avoids any mention of negative impacts to human and wildlife as a result of current operating speeds along this corridor.

UDOT seems to justify widening plans for Wasatch blvd (from 2 to 5 lanes) by adopting the Wasatch Front Regional Council's (WFRC) Regional Transportation Plan (RTP), but fails to take into context the broader goals that guide the WFRC Vision 2050 document. It should be requested, by both the public and the WFRC, for UDOT to adopt a balanced approach to improvements in order to further the goals of the WFRC: "Healthy and Livable Communities, Access to Economic and Educational Opportunities, Manageable and Reliable Traffic Conditions, Quality Transportation Choices, Safe User Friendly Streets, Clean Air, Housing Choices and Affordable Living Expenses, Fiscally Responsible Communities and Infrastructure, Sustainable Environment, Ample Parks Open Spaces and Recreational Environment." ~ Wasatch Choice 2050, Goals and Strategies.

UDOT has publicly acknowledged adopting "a new way" for this project, a more progressive approach to mobility as well as unprecedented collaboration with other entities. Yet, the Purpose and Need document

does not reflect such resolve and retains old patterns that contradict voiced opinions by project director, Mr. John Thomas.

First and foremost, this document acknowledges the use of a rigid and antiquated road classification system which categorizes Wasatch Blvd as a Principal Arterial. This classification equates freeway conditions, i.e.; I-215 and by doing so it limits the range of solutions that can be employed for the benefit of mobility of ALL users of Wasatch Blvd.

"The two main shortcomings of the Functional Classification System in an urban environment are that it does not consider other modes of transportation and does not consider roadway functions outside of access and mobility." ~ Urban Roadway"

"Classification - Before the Design Begins, GERRY FORBES

Predictably, UDOT continues to utilize automobile LOS as the one and only measurable form of mobility within the corridor; so far as to provide current count of cars, future estimated travel demand, and even establishes a minimum requirement of Level Of Service (LOS) of D as a long term goal.

There is very little mention of current bicycling conditions and no mention at all of a target level of service once improvements are completed. There is a brief description of how poor mass transit currently performs, but fails to measure any current LOS of this particular form of transportation; further, any attempt at determining a specific long term LOS goal for it is sorely missing. Much more troubling is the absolute absence of pedestrian conditions, present or future, along Wasatch blvd.

The public should also feel disappointed to learn that UDOT treats safety as a historical element through the use of VMT (Vehicle Miles Traveled) rather than utilize the more progressive sustainable safety guidelines consistent with Vision Zero and systematic safety guidelines. In essence, the difference lays in the understanding that the risk for accidents with serious injury has no relation to past events, but each new interaction among users of Wasatch Blvd presents an independent, measurable, and therefore preventable level of risk. ALTA Planning + Design summarize this new approach best:

"The foundation for reducing speeding-related crashes is setting and designing to a target speed that is appropriate for the context. Our job as transportation professionals is not to defend past practices (i.e. how a street was previously designed or how to set speed limits), it is our job to evolve our practices to reflect the new societal needs/cultures, new environments, changes in land uses, or changes in a community or corridor. It is our duty to re-evaluate all the factors, which often times warrants new approaches to address the complex needs of today. Designing "self-enforcing" streets that force people driving to slow down and pay attention to their surroundings is critical to reducing speeding-related crashes." ~ Alta Planning + Design

A more detailed look at UDOT's Prupose and Need document

1.1.1 Description of the Study Area

UDOT states in this chapter the boundaries of the study from Ft. Union"

"blvd to the town of Alta as an area that is influenced by the transportation operations of Little Cottonwood Canyon. Further, it distinguishes 3 distinct segments of S.R. 210 for clarity each for its own character, function, and separate environmental conditions (Land Use, community, destinations). Wasatch Blvd; between Ft. Union to the Split to La Caile (High-T intersection) is the first segment enumerated in this document, and the one we will concentrate in.

1.1.2 Environmental Impact Statement

As a chapter that describes the area, UDOT talks about the wilderness preservation aspects in the canyons, the watershed value to the communities in the valley, and the proximity to an ever growing valley and the value to the state's economy due to recreation activities in the canyon, parking needs, and the directive from the state legislature to fund transportation improvements that have a significant economic development impact associated with recreation and tourism, that are impacted by traffic congestion. What this chapter fails to mention is the poor air quality the valley experiences due mainly by

excessive car dependence b local communities, the existing noise levels the current operation of the road generates within the residential as well as the and wilderness areas S.R. 210 traverses and the safety concerns to people and wildlife by speeding traffic in this corridor.

1.2.1 Purpose of the Project

UDOT states its primary objective as: “to substantially improve safety, reliability, and mobility on S.R. 210 from Fort Union Boulevard through the town of Alta for all users on S.R. 210.

We find the lack of definition of “all users” in their objective somewhat perplexing. In the side-box next to their objective definition, UDOT defines Mobility as the “ability and level of ease to travel along a highway facility.” But not ALL users of S.R. 210 move along Wasatch; many of them traverse, cross, enter, and/or exit at different intervals of the roadway. Therefore, while the elements UDOT is considering from the CHWMP (Cottonwood Heights Wasatch Master Plan) will be used to refine, but not eliminate alternatives from consideration. U4CHW feels that mobility, as defined by UDOT, is inaccurate and excludes about 50% of all users (Local traffic that originates or terminates within the residential streets connected to Wasatch Blvd) in conflict with the stated goal of “improving conditions for ALL users of S.R. 210.

At the end of this chapter, UDOT again proposes to review and minimize, rectify, or reduce potential impacts to the human and natural environment, but fails to enumerate a large number of impacts; such as air quality impacts, noise levels, animal fatalities, etc. for which no baseline is provided, no study has been conducted, and therefore we cannot make an educated assumption as to what the future conditions might result from the improvements that might be performed.

1.2.2 Need for the Project

A list of 5 needs is presented to the reader at this point, along a definition of peak periods. Peak periods UDOT explains, are” the periods of the day with the greatest amounts of traffic... Peak periods are looked at by transportation analysts when examining the need for a project.” In plain speak UDOT is saying that at some points of the day, or by seasonality, there are too many cars to fit in the road. Careful consideration about peak times should be evaluated due to the fact that over-emphasizing LOS is often used to justify overbuilt roads that are inhospitable to pedestrian or any other road user not moving along passenger cars, thus further inducing more car miles driven, more traffic, and more need for greater expansion of the road. U4CHW seeks to terminate this vicious cycle and use this opportunity to make qualitative rather than quantitative improvements. Further cause of concern is the second Blue box within this chapter, where UDOT explains Travel Demand as “expected number of transportation trips in an area. Travel demand can be met by various modes of travel, such as automobile, bus, light rail, carpooling, and cycling.” Why is this concerning? Because UDOT fails to recognize pedestrian travel as a viable form of mobility along or across Wasatch blvd and as such there is no mention of such travel studies, pedestrian need statements, or current conditions within Wasatch blvd are acknowledged anywhere within this document.

Wasatch Blvd deficiencies listed within this chapter are:

a) Decreased mobility in winter morning (am) and afternoon (PM) Peak travel periods related to visit to ski areas. U4CHW statement: This is a SEASONAL demand that requires seasonal supply solutions, rather than permanent expansion of the roadway. From different opening and closing” “hours at ski resorts, mass transportation, tolling, and alternative routes (gondola from Park City to Alta/Snowbird) are some examples that can ease the capacity of the road with little or no permanent width expansion of Wasatch Blvd.

b) Decreased mobility on Wasatch Blvd resulting from weekday commuter traffic. A more traditional LOS study, which again focuses on particular time periods of the day and fails to enumerate the number of hours the road stands empty. There are many reasons mobility is impaired through Wasatch blvd. and the most obvious one is that cars arrive with too much speed at points in the road where cars are traversing Wasatch (intersections), or the road is merging into fewer lanes. When cars arrive at high speed to places

where cars have to yield to crossing or merging traffic, excessive braking results and a chain event of such braking causes traffic backups. A proposed solution by U4CHW is metering traffic at the Ft. Union intersection along with limiting speed through traffic calming to allow cars to merge with ease. Metering is a solution UDOT employs at I-15, and traffic calming has many benefits, from safety, improved air quality, noise reduction, less road kill collisions, and improved mobility to all users of Wasatch Blvd. Meanwhile, simply expanding the number of lanes will have the usual consequence of speeding traffic, creating more braking events at intersections, produce more noise, increase air pollution from braking and accelerating episodes, as well as reducing safety to all users of Wasatch Blvd.

c) Roadway elements that do not meet current design standards; for example, shoulders that are narrow, and horizontal and vertical curves that are steep and/or sharp. While we agree that current design is unsafe, U4CHW is concerned at the examples provided by UDOT at this point. All elements that they present as non-compliant are traffic calming elements that are listed per NACTO and other traffic guidelines. Narrow shoulders and curves that limit visibility are some of the many elements that should be employed within the urban segment of Wasatch Blvd to reduce speeding above a safe threshold. Only if the author is attempting to retain 50 mph speeds would these elements would need to be removed. Retaining 50 mph speed limits is against the stated will of U4CHW & the CHWMP and does "nothing to improve mobility within this stretch of road.

d) Limited parking at trailheads and ski areas that leads to on-road parking. This item is outside Wasatch Blvd and as such we are not presenting a comment.

1.3.1 Regional Transportation Planning

WFRC provides a table for planned and funded improvements RTP (Road Transit Plan) as developed in their choice 2050 plan. It lists Ft. Union from 3000 e. to Wasatch Blvd as being expanded from 3 to 5 lanes to 5 to 7 lanes and Wasatch Blvd to be expanded from 2 or 3 lanes to 5 lanes. Both these projects are planned and are to be funded as soon as possible.

1.4.1 Planning for Future Conditions

After showing us a table from the WFRC's RTP, UDOT proceeds to encapsulate their intent and align improvements to Wasatch blvd with goals and objectives from this multi-entity planning group. It even goes so far as to state that "UDOT coordinated with WFRC and obtained WFRC's 2050 travel demand model for use in developing this EIS." Interestingly, table 1.1.1 shows the Wasatch Front Regional Council as a participating agency, not a coordinating agency. So we are left in doubt to the level of coordination these two planning bodies are truly operating for the benefit of the regional community. What is clear is that taking a table of future needs from the WFRC's RTP without presenting the goals established by the WFRC is a misrepresentation of the intent of the 2019-2050 goals of this entity. A closer look would yield the following website statement from the WFRC where you can read the following statement: "WFRC established these goals to inform how future transportation investments will be evaluated, selected, and prioritized, and how those projects will be coordinated with local community priorities regarding the use of land and the pursuit of economic development opportunities." Goals by which these improvements should be weighed include among others:

- a) Livable and healthy communities
- b) Quality transportation choices
- c) Safe, user friendly streets
- d) Clean air
- e) Fiscally responsible communities and infrastructure
- f) Sustainable environment, including water, agricultural, and other natural resources.

Again, improvements to Wasatch blvd should be construed as an opportunity"

"to further the attainment of the goals mentioned above and not just simply increase road capacity due to future travel demand and population growth along SL County and Utah County as show in table 1.4-1.

Why? Because travel demand can be a self-fulfillment proposition due to induced demand, a factor that

facilitates urban sprawl – and is against the goals of U4CHW as stated in our petition - as well as against WFRC goals..

1.4.2 Importance of S.R. 210 in the Local and Regional Transportation Systems

Perhaps the biggest disappointment to local residents can be found within this chapter, UDOT designates Wasatch blvd as a PRINCIPAL ARTERIAL “intended to serve major activity centers and typically have the highest traffic volume and longest trip demands” This statement puts in doubt all language used by Mr. John Thomas with regards to a new approach by UDOT and being a process that is open to balance the needs of 3 distinct users of Wasatch Blvd. The designation of PRINCIPAL ARTERIAL as described by the Traditional Functional Classification is an interstate freeway; basically giving little or no concessions to the many local demands of this roadway. If Mr. Thomas is sincere in his neighborhood conversations with residents, then it is important to remind UDOT that street designations can fail to consider local context and such designations often fail to deliver the necessary type or roadway development for the diversity and special needs of roadways within an urban setting – and serve only to prioritize rapid automobile traffic rather than seek mobility solutions for ALL users of Wasatch Blvd.

UDOT goes on to highlight the economic impact by the travel demand of recreation seekers. Stating a demand of yearly vehicle trips into LCC of 1.2 million vehicle trips per year, or 3288 average daily trips (365 / 1.2 million); equivalent to 2.1 million people per year, or 5,753 people per average day (365 / 2.1 million). Since UDOT states in a previous chapter that they use WFRC estimates to predict travel demand, we will assume that UDOT uses similar travel demand numbers used by the city of CH in their CHWMP (Cottonwood Heights Wasatch Master Plan). Calculating the numbers provided on Figure 2.23, page 54 of the CHWMP, the estimate of the number of trips that begin and end within the boundaries of EIS Wasatch Blvd (Ft. Union and the split to La Caile)"

"segment provides 10,060 daily vehicle trips that ingress or egress Wasatch blvd or 3.67 million vehicle trip per years (10,060 x 365 = 3,671,900). While travel patterns might differ from recreational to local users, we will use the same ratio UDOT uses to estimate recreational number of visitors of 1.75 passengers per car; at that rate, we get number of 17,605 local residents or 6.43 million local residents that depend on access to move across rather than along Wasatch blvd at any given day/year; hardly a trivial number. I can hardly imagine that elected officials at the state legislature have given carte blanche to UDOT to eradicate and diminish the quality of life of local residents (Voters) when, as stated by UDOT, these improvements should accommodate for the safety, health, and general welfare of ALL USERS of S.R. 210.

Not to be pessimistic, not everything is gloom, section 1.4.2.3 Transit routes –states that use of mass transit options is nearly non-existent (7%), and especially by non-local visitors, who our chamber of commerce, state, and tourism marketing organizations should be planning to guide towards mass transit options rather than letting them arrive at recreation destinations by private or rental cars. Clearly there is large potential to relief roadway capacity by increasing use of mass transit by non-local visitors first and foremost, and by the non-regular local visitors. Summer transit service should also be considered.

The last group of users studied is bicycle and pedestrians at section 1.4.2.4. Actually, pedestrians within the Wasatch Blvd segment is totally overlooked, not a single word is referenced to this user, and that does not bode well for improvements that will have any measurable impact in promoting safe and convenient walking strategies as a valid form of mobility by people that live in this area. As we mentioned before, 6.43 million people cross the road, some of them just from east to west rather than commute north or south. Increasing the use of Active transportation among this group of users could prove dramatic relief for road capacity within the most constrained segments of Wasatch Blvd. The study does mention bike lanes at Wasatch blvd and how they categorized as low-comfort bicycle facilities. Low comfort is an understatement. The FHWA Bikeway Selection guide is clear that a bike lane or shoulder lane is not an adequate facility on urban streets where cars are"

"travelling at speeds above 30 mph and/or at rates above 7k Average Daily Trips (ADT) - Wasatch experiences well above double this amount of traffic. Physical separation and in areas not in the clear zone are the only acceptable safe alternative as per guidelines. (Source: FHWA Bikeway Selection Guide, Figure 9: Preferred Bikeway Type for Urban, Urban Core, Suburban and Rural Town Contexts)

Travel up the canyon by bicycle, once left only to confident, athletic type of riders, might also be a thing of the past due to the availability of e-bikes, and as such all considerations for safety as determined by FHWA guidelines should be considered throughout the entire length of the study area.

1.4.3 Current and Future Transportation System Needs

Mobility: At this point UDOT comes right back to LOS as their single minded goal on how to measure mobility. Failure to determine the amount of single passenger cars, transit, bicycle LOS, pedestrian LOS, etc. shows an inability to view a problem of capacity in its entirety and reverts onto how best fit more cars through a paved road with no interruption. Peak time is explained further and the goal of a LEVEL D during the morning and evening commute is determined to be a transportation nirvana. Couple of issues here: accommodating Level D for 2050 forecasted travel demand would require significant expansion of roadway capacity that would provide Level B or better in 2030, even through 2040. Such large expansion of LOS for car travel is likely to induce more people to drive rather than seek other viable options such as car pool, mass transit, active transportation, etc. Also, it should be obvious to UDOT if Alternative mobility options are truly to be desired, then improvements that accommodate LOS level D in 2050 will make it much harder in the 2020's to shift corridor users to mass transit options.

Safety: speaking of hanging on to old ways. UDOT presents safety statistics through a summary of crash rates from periods of 2010 – 2018 and compares them to state wide averages to determine the safety of a roadway. This is a futile exercise because past experience is not only a poor predictor of future outcomes, it has no connection to it. The Law of Probability has two types of events that can be studied: DEPENDENT or INDEPENDENT. When a driver approaches an intersection, his or her"

"probability of being involved in an accident is not dependent on past outcomes. Just like flipping a coin, no matter what the outcome of the last flip, a new flip of the coin retains a 50/50 percent for that outcome.

So, if this form of evaluating safety is meaningless, then what is a valid measure of safety? U4CHW promotes the concept of Sustainable Safety, where the use of data can be used to implement rules that minimize, if not eliminate, the probability of serious crashes; defined by UDOT as "a crash resulting in at least one severe injury or a fatality." Sustainable Safety principles requires the use of Target Speeds for roadways enforced through design that have specific functions; for example, streets where cyclists or pedestrians share the same road the target speed should not exceed 20mph, because at speeds above 20 mph the probability of severe injury (as explained by the law of probability) increases exponentially due to the nature of the crash of a 4,000 pound vehicle against a 180 pound individual travelling at speeds above a "SAFE" threshold. Another example that is applicable at Wasatch blvd is the target design speed of 30 mph where cars meet at 90 degree angles, regardless if they are signalized or not. The reasoning for this principle is the ability of cars to absorb a side impact from another vehicle and provide safety to passengers is greatly diminished once the speed exceeds 30 mph and therefore higher speeds are an unacceptable level of risk to users that will cross Wasatch blvd at 90degrees.

The last paragraph of this chapter is very troubling, it revisits UDOT's understanding of substandard design elements that as previously stated in this document clearly show a willingness of UDOT to retain high-speed travel along Wasatch Blvd rather than utilize traffic calming elements to slow speeds to levels that provide "SUSTAINABLE SAFETY" to all USERS of Wasatch Blvd. Shoulder width of 8 ft, clear zones of 20 to 22 feet, increased sight distance, and longer deceleration lanes for center lanes – all indicative of high speed environments at the cost of safety to ALL users.

The rest of the document does not address local issues of Wasatch Blvd, and as such it was not reviewed by U4CHW.

Thank you.



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Friends of Alta

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Alta, UT 84092

Kyle Maynard,, Executive Director
(801) 742-9719

Dear Carlos Braceras & the UDOT EIS Team,

Friends of Alta believes that we, FOA and UDOT, must continue to communicate openly about this LCC EIS. We know that this has been an emotional, and at time contentious, process, but that illustrates how much these mountains mean to the residents of Alta, Salt Lake County, the Wasatch Front, the State, and indeed the nation. Little Cottonwood Canyon is a special and unique place. On behalf of these mountains and the sensitive ecosystems that comprise them, Friends of Alta wishes to submit its public comment on the *Draft Purpose and Need and Screening Methodology document*.

Sincerely,

Kyle Maynard

Executive Director

Friends of Alta

DRAFT PURPOSE AND NEED

In **Section 1.1.1 Description of Study Area**, it states “Separate impact analysis areas have been developed for each environmental resource evaluated in this EIS.” FOA requests you provide a summary or further information on these analysis areas, who prepared them and what resource they represent? Based upon the maps and information publicly provided to this point, the study area is limited to the roadway, plus ski area parking areas. This limited study area does not reflect the reality of the true scope of what UDOT is examining – i.e. *how to move more visitors onto federal land in Little Cottonwood Canyon year-round*. The study area at a minimum should be all federal land between the ridgelines in Little Cottonwood Canyon but would be more appropriate if Big Cottonwood was included as well.¹ John Thomas, in a meeting with the public, stated that Big Cottonwood would be studied to the extent that travel in Little Cottonwood Canyon impacts travel in Big Cottonwood Canyon. This gives further credence that the environs of both Big and Little Cottonwood Canyon will be impacted by the transportation changes to S.R. 210 and the spread of more visitors.

Section 1.2.1.1 Environmental Impact Statement - A facet of this documents that is missing is what is the purpose of the EIS itself. The purpose, set out by the drafters of NEPA was:

To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation . . .” 42 U.S.C. 4321 §2.²

This document reads much like an engineering proposal and does not convey the intended message of *progress with restraint* in regard to our fragile environment. This section of the EIS would be a good place, up front, to inform the public on the purpose of the Environmental Impact Statement which is “*to study all the major and significant connected, cumulative, similar, direct, and indirect effects on for every proposed action.*” The code and regulations require the consideration of all impacts on the environment, as well as changes or effects caused by the project that would on their own require an EIS be lumped together in the same EIS. C.F.R §1508.25(a)(1)(1984). The purpose of EIS is to ensure that human and the environment coexist harmoniously. Discussing the purpose of the EIS and the environmental factors potentially at

¹ A larger study area accurately reflects the continuing spread of recreation activities in the mountains in both the summer and winter.

² “The Congress, recognizing the profound impact of man’s activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans. 42 USC §4331.

risk in these projects propels this study in the right direction. “Simply by focusing the agency’s attention on the environmental consequences of a proposed project, NEPA ensures that important effects will not be overlooked or underestimated only to be discovered after resources have been committed or the die otherwise cast.” *Kleppe v. Sierra Club*, 427 US 390. With that said, Friends of Alta proposed the following be added to this section:

“The purpose behind this Environmental Impact Statement is to examine the direct, indirect, and cumulative impacts of various proposed transportation projects along State Road 210 in Little Cottonwood Canyon. Areas of concern, generally and to be expanded upon further in this document, include but are not limited to watershed health, aquatic life, flora and fauna health, and air quality.”

FOA hopes UDOT and its consultants are not susceptible to losing site of the forest for the trees, and thus potentially creating a false sense of mission for the public and their public funds. Reiterating the fundamental purposes of the EIS process serve as a powerful reminder of what the current goal is – to establish the environmental impacts of various transportation proposals.

Under **Section 1.2.1 Purpose of the Project** – The draft EIS outlines three primary purposes: *improved safety, reliability, and mobility*. Secondary objectives include adhering to the goals of the City of Cottonwood Heights and protection of the watershed.³ These secondary objectives “were not used to determine whether an alternative was reasonable or practicable.” FOA would suggest making protection of the watershed and environment a primary objective or a qualifier of primary objectives. The purpose behind this suggestion is at the outset of the EIS to eliminate possible solutions that while efficient and safe, may have such an adverse impact on our vital and increasingly threatened watershed to the extent that they do not merit further consideration. Placing watershed protection as a primary objective – giving it weight in the reasonableness and practicableness of an alternative would not only satisfy many of the environmental non-profits groups and Salt Lake City, it would also save UDOT time and money in the impacts portion of the EIS by eliminating those alternatives that on their face would have a direct, indirect, or cumulative impact on the Little Cottonwood Canyon watershed. Alternatively, the impacts to the watershed could be emphasized more in the Screening Criteria, discussed further below. Friends of Alta proposes the new language be:

“UDOT intends to improve the commuter, recreation, and tourism experiences for all users of S.R. 210 through transportation improvements that improve the movement of visitors safely, reliably, and efficiently onto federal land without doing irreparable damage to the watershed”

This is an honest assessment of the Federal land ownership (the ski areas do not own the vast majority of land used for ski area operations) and the increasing visitation both during winter and the remaining three (3) seasons. With this set as the scope of the purpose, we can understand the

³ The goals referenced for the City of Cottonwood Heights are those contained in its Wasatch Boulevard Master Plan, “such as a connected network of paths and trails for transportation and recreation and a balance of livability, roadway capacity, and sustainable canyon access.” *Draft Purpose and Need Section 1.2.1 paragraph 3.*

breadth of these projects and understand that their impacts – both positive and negative – reach far beyond the roadway, the ski resorts and the ski season.

In **Section 1.2.2 Need for the Project**, we suggest that there be some acknowledgement to Mountain Accord’s intended outcome - *the intent to improve reliability, safety, and mobility while not sacrificing the thing...the reason that people are coming up the canyon*. This would improve the direction of this project and give credence to the past studies that have laid the foundation for this EIS. There have been decades of attempts to find a solution accompanied by numerous studies on how to fix the traffic woes. This simply gives some acknowledgement to peoples’ concerns and a nod to the intent and vision that residents and visitors of LCC wish to see where currently there is only a very broad, academic review of the past.

Furthermore, adding this phrase qualifies the need for parking stated further down in the section. The parking in LCC is limited by the 2003 Forest Service Management Plan, *as stated on page 1-39 to 40*. The introduction of impermeable surfaces changes how runoff enters the creek and can cause pollution and flooding. Qualifying parking accommodations up front with the desired environmental condition prevents the introduction of cheap and harmful solutions and has the added benefit of calming the environmental groups.

An additional concern to the “Needs” portion of the document is the need to accommodate peak traffic days in the winter with a project that will have a year-round impact.⁴ This is an area of concern that may be addressed in management strategies introduced in the “alternatives” portion of the EIS. However, it would be worth clarifying for concerned parties that UDOT will not solely focus on fixing 10 to 20 days winter traffic per year but will consider the seasonal difference in the canyon and how increased travel will affect the watershed in other parts of the year. It is crucial not to approach S.R. 210 like a portion of State Street. This road is more akin to Arches Scenic Drive than to a typical road and should be treated as such. While it may seem easy to compartmentalize where UDOT builds a road or transit solution and the Forest Service deals with the natural resource itself, it is simply impossible to separate the two. You must consider the role that the Central Wasatch Mountains play and why there is even a demand, year-round, for visitation. Giving the above short statement would go a long way to addressing that issue.

Section 1.4.3 Current and Future Transportation System Needs – considers the current and future demand that burdens the access to Little Cottonwood Canyon. We are all familiar with the “Red Snake” that has long spurred these conversations about improving transportation. Friends of Alta’s primary worry with UDOT’s travel model is its lack of consideration of Latent Demand – that is to say, the amount of increase in road use (or transit use) once the congestion issues are solved and people no longer feel the need avoid the road. The idea being that for

⁴ It is understood UDOT is using a travel model accounting for the 50th worst traffic day – not peak travel scenarios. The purpose of our concern is that winter and summer traffic are very different – with heaviest traffic in the winter – and impacts are different as a result. Accommodating more winter travel will correlate to summer impacts that must be considered in this EIS process.

many in the valley, the congestion and traffic delays currently serve as a deterrent from driving up the canyon. With a projected immediate increase in visitorship when congestion is solved what will the impact be? UDOT has previously stated that it will not consider this concept because it is too difficult to measure. NEPA, however, has long settled in both code and case law that such a difficulty does not provide an excuse to not study the question. Without considering latent demand, the amount of visitor increases in the Canyon currently predicted by UDOT's model will fail by a factor of that latent demand (i.e. the baseline will be higher than currently modeled). We feel that exercising the time and money on this issue will pay dividends later in informing the public on travel in the Canyon, as to time and congestion.

In **Section 1.4.2.2. Recreation and Tourism Access**, will UDOT be providing the quantitative data on the revenue impact on ski areas caused by traffic? NEPA is a science-based process to protect the environment. Using rationales and claims that are not support by scientifically collected data would be outside the scope of the EIS process.

DRAFT ALTERNATIVES DEVELOPMENT & SCREENING METHODOLOGY AND PRELIMINARY CONCEPT REPORT

The following questions and comments pertain to the Draft Alternative Development and Screening Methodology and Preliminary Concept Report.

In **Section 2.2 Preliminary Evaluation of Concepts and Alternatives Received during the Scoping Process** - UDOT should include: “*does not substantially increase the visitorship of the canyon*” or “*does not substantially alter the character and nature of the canyon.*” Neither of the concepts are contrary to the draft's stated purpose: “to substantially improve safety, reliability, and mobility” or the secondary objectives – to consider the Wasatch Master Plan and the impacts to the watershed.⁵ The aim is not to move as many people as possible – simply to improve traffic flow. It was proposed in a meeting with UDOT representative John Thomas on November 13th, that including this in the preliminary evaluation by doing a shallow scientific consideration of these concepts that on its face appear to have a great impact would solve two issues. First, it would save UDOT time and money on a detailed scientific analysis for those alternatives that substantially increase visitorship or change the character and nature of the canyon that would not be prudent options to consider further. As it stands now, those alternatives would not be eliminated unless they create too much cost, impact, or do not adhere to the purpose and need. Second, this would satisfy or address a significant concern of the environmental community – that the LCC Transportation Project will have a detrimental effect on the watershed, or forever change the mountains that we all know and love. Additionally, as stated above, the impact on the watershed is considered a secondary objective that will not cause the elimination of alternatives. The watershed should be one of the primary considerations in every alternative and

⁵ It is a given that over the next two decades visitor numbers will increase. Our intent in this comment is to emphasize that this project's goal is not to facilitate that increase but merely to plan for the change develop means to manage that increase.

those that would have a significant impact or cost to taxpayers (through mitigation and increased need to treat water) should be eliminated.

In **Section 2.5 Level 2 Screening**, the process will “*determine whether any of the alternatives would have substantially greater impacts or costs without having substantially greater benefits.*” The word “*substantially*” is a very subjective term. What the citizens of Salt Lake Valley and Alta may deem as substantial and what UDOT may deem as substantial are very different. The concern here is that if there is a risk or impact on the environs of the canyon, a theoretical equal relationship between benefit and impact would make that project viable – a 1:1 ratio, if you will. We think this is not a representative approach to the examination of impacts. State Road 210 is very different from State Street or Wasatch Blvd both in its surroundings and the very reason why it is so highly used. What UDOT should do is define or parse out what “*substantially*” means. The intent of many who frequent the canyons and the best choice for the future of Little Cottonwood Canyon – especially to remain an economic contributor to the state – is to value the environment and watershed impacts greater than the potential benefits of a transportation project.

Level 2 Screening should also include a more in-depth list of anticipated impacts. The scope of the Level 2 Screening is too broad and the EIS process as it proceeds will benefit from at least an anticipatory list of impacts. UDOT should then disclose to the public who they intend on hiring to the interdisciplinary team to satisfy NEPA code section 42 U.S.C. §4332:

*The Congress authorizes and directs [emphasis added] that, to the **fullest extent possible**: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act, and (2) all agencies of the Federal Government shall*

(A) Utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on man’s environment.

*(B) Identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by title II of this Act, which will insure that **presently unquantified environmental amenities and values may be given appropriate consideration** in decision making along with economic and technical considerations.”*

In this draft Purpose and Need, as stated above, there is no emphasis on the study of environmental impacts, but rather an outline of potential transit options and how to examine how great each will be. The EIS process requires an investigation of cumulative impacts, and case law dictates that “[i]t is not appropriate to defer consideration of cumulative impacts to a future date when meaningful consideration can be given now.” *Kern v. U.S. Bureau of Land Mgmt.*, 284 F.3d 1062 (9th Cir. 2002). Going off of the point made in paragraph 6 above, considering the environment qualities that will potentially be impacted, in at least a high level manner, will save UDOT time and money down the road, further define the scope of impacts studies, and assure the public that UDOT is attempting to take care of the mountains we all love. The consideration of cumulative impacts is ripe for this study and deserving detail in this draft

Purpose and Need/Screening Criteria Document. Friends of Alta proposes the following be added to the Screening Criteria:

Vegetation	Threatened, endangered, and Sensitive (TES) species, vegetation loss, species mix alteration, invasive species – at trail heads, on trails, at lakes, and other destinations
Wildlife	Threatened, endangered, and Sensitive (TES) species, birthing mortality and winter mortality due to escaping the presence of humans, disproportionate population increases due to human food trash, spread of pathogens
Soils and Geology	Multiple trailing, trail entrenching, compaction, soil loss, water channeling onto trails, increased sedimentation into creeks.
Water Quality	Invasive aquatic species, pathogen count, sedimentation. Temperature, dissolved oxygen, increases in Total Maximum Daily Loads.
Air Quality	Carbon monoxide, ozone, particulates
Crowding and Congestion	Acceptable/not acceptable number of encounters by zone, day of week, holidays, time of day, by destination site
Conflicts	Physical conflicts (accidents), different user types, mechanized, not mechanized
Human Waste	Presence and location as it correlates to congestion in specific areas
Changes in Acoustic Environment	Unlawfully modified mufflers, large group voice noise
Damage to cultural Environment	Vandalism, theft
Criminal Activity	Burglary, home invasion, assault, arson
Visitor Use Management	Studies are needed on how to more sustainably distribute visitors among sites, harden trails, and access areas, place limits where and when needed
Capacity Study (as it pertains to the number of species and of each species in a given areas – e.g. capacity of moose in Albion Basin)	Usually done in zones of low, medium, and high impact locations

Increased costs to private property owners	In both canyons
Increased Business	Potential for increased built human environment in both canyons, which will contribute to increases in traffic
Increase in Visitation	Increases in visitation based on latent demand and over time (<i>see above comment about latent demand</i>)
Increase in Built Environment	Increases in impermeable surfaces that will contribute to changes in runoff, pollution and degradation in water quality

In conclusion, the LCC EIS is at a proverbial “fork in the road.” One route leads to successful planning, engineering, and community cooperation in improving transportation in Little Cottonwood Canyon. The other route leads to descension, severe environmental degradation, and potential expensive and time-consuming litigation. Having UDOT actively and continually engaging with the community to create the solution we all want will be the best possible solution for the Central Wasatch. Friends of Alta is prepared for and hoping for a cooperative process.



Utah Department of Transportation (UDOT)
5829-5993 2100 S
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Comments submitted electronically at:

<https://www.udot.utah.gov/littlecottonwoodeis/#submit-comments>

December 12, 2019

RE: Comments on the Draft Purpose and Need & Alternative Screen Criteria in preparation for the Little Cottonwood Canyon EIS

Wild Utah Project is a 501(c)(3) non-profit conservation organization based in Salt Lake City, Utah. Our mission is to provide science-based strategies for wildlife and land conservation. For 23 years, we have applied the principles of conservation science to land and wildlife management. We bring together community science volunteers, wildlife and habitat studies, technical support, and computer mapping analysis using Geographic Information Systems (GIS) to conservation partners in our region. Wild Utah Project works with state and federal agencies to fill critical wildlife and habitat data gaps necessary to make more informed management decisions about our public resources.

We appreciate the opportunity to provide comment to UDOT. Our comments focus on actions that impact ecosystems, watersheds, wildlife resources, and associated habitats.

Comments on the Draft Purpose and Need Chapter

Purpose and Need Comment 1

1.1.2 Background of SR 2010 Project

Page 1-7, Paragraph 5: In order to accurately convey the general recommendation of the Mountain Accord it is necessary to revise the statement: "Although detailed alternatives were not developed under the Mountain Accord, the general recommendations included increasing transit service in winter and summer, formalizing parking to designated areas, making avalanche safety improvements, improving bicycle and pedestrian facilities, making operational traffic improvements, and considering tolling." An additional crucial statement from the Mountain Accord includes: "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." ... "2.6. To create transportation connections between the economic and population centers in the urban areas and the recreation destinations in the Central Wasatch Mountains that support the environmental, recreation, and economic goals of the Accord and serve residents, employees, and visitors. Such transportation connections should increase transit use, walking, and biking and decrease single-occupancy vehicle use. To focus transit improvements in locations that are compatible with the unique environmental character of the Central Wasatch Mountains." Both of these statements reflect the shared desire of the Accord signers to use transportation as a tool to maintain

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or improve ecosystem function and resiliency. As such, some language to that effect should be added in some form to the Background section of the Purpose and Need Chapter.

Purpose and Need Comment 2

1.21.1 Purpose of the Project

Page 1-9, Paragraph 4: The statement that minimizing potential long-term transportation system impacts to water quality is a “secondary objective” does not seem appropriate as the integrity of the watershed should be a primary component of the project alternatives screening process. It is crucial to bring the watershed function and resiliency to the forefront as a primary objective along with maintaining or improving overall ecosystem health and function.

Comments on the Draft Alternatives Development and Screening Methodology and Preliminary Concept Report

Draft Alternatives Development Comment 1

1.0 Introduction

Page 4, Figure 2: Environmental Impacts are listed as part of Level 2 Screening. It would be a more logical approach to screen out alternatives that would have unreasonable impacts to the natural and human environments before investing time and resources into analyzing transportation alternatives and all the criteria and measures for associated with residential access and mobility that are listed as Level 1 screening criteria.

Draft Alternatives Development Comment 2

2.3.3 Level 1 Screening Criteria

Page 8, Table 1: Environmental and ecological criteria and measures should be part of Level 1 Screening and are currently absent until Level 2. Some objective criteria and measures regarding the avoidance of negative impacts to ecosystem and watershed function, healthy, and resiliency need to be considered before investing time and resources analyzing access and mobility for transportation alternatives that may otherwise not be considered due to unreasonable environmental impacts.

Draft Alternatives Development Comment 3

2.3.3 Level 1 Screening Criteria

Page 9, Table 2: Consistency and compatibility with local and regional plans should be a Level 1 consideration. Impacts to natural resources should be a Level 1 consideration. The measures for impacts to natural resources are unclear. What types of habitats are being considered as ‘sensitive’ and ‘critical’ and how will the relative comparison of acres be informative unless watershed-level measures are also being considered? In addition to a measure of acres impacted, other more meaningful measures like landscape-level connectivity of habitat and proximity of other threats/disturbance activities on the landscape to natural resources in addition to the cumulative overall watershed health and resiliency impacts must be measured under the “impact to natural resources criterion.

Sincerely,



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Thank you very much for this opportunity to comment on the draft Purpose and Needs and Alternatives Development and Screening Methodology for the Little Cottonwood Canyon (LCC) Environmental Impact Statement (EIS). We particularly appreciate the opportunity to comment on these specific chapters in advance of the entire Draft EIS (DEIS), because the statement of purpose and need and the alternatives framework comprise the heart of this and any environmental impact statement. Early adjustment to the approach to these two chapters can prevent significant problems in the overall EIS analysis. We also encourage UDOT to solicit public comments at discrete future stages of the EIS analysis, in addition to the required comment opportunity on the full DEIS and prior to adoption of a Record of Decision, so you can iteratively incorporate new ideas before selecting a proposed alternative and releasing a draft EIS report. In particular, given the critical role of the travel demand model in the analysis, it is appropriate to allow public comment on that aspect of the analysis while there is still time to make appropriate revisions to the model.

We submit these comments in our individual capacities. We are residents of Salt Lake City, and we travel to and use all of the canyons along the Wasatch Front very frequently to hike, run, ski, snowshoe, and otherwise enjoy the Wasatch Mountains. Although we share the interest of many Salt Lake City residents in efficient and effective transportation to and from the Wasatch Canyons, transportation solutions also need to consider important environmental values. These include the ecological integrity of Little Cottonwood Canyon and the other Wasatch Canyons, water quality and aquatic ecosystem health in Little Cottonwood Creek and the other Wasatch Canyon watershed (particularly given the critical role of the Wasatch watersheds to Salt Lake City's public water supply), and the transportation-related air quality and environmental justice impacts of canyon recreation throughout the Wasatch Front. One of us also has a history of heart health issues which are exacerbated by chronic and acute episodic air pollution, making transportation-related air quality impacts of particular concern to us.

Overview

The two draft chapters currently subject to public comment are too narrow in geographic scope and too narrow in stated objectives to facilitate consideration of an appropriate range of solutions to the transportation challenges facing LCC as well as the adjacent canyons. As a result, alternatives are unnecessarily and unfortunately constrained, and the full scope of environmental impacts cannot be evaluated adequately and comprehensively. The DEIS should consider the transportation needs and problems in LCC, Big Cottonwood Canyon (BCC), Mill Creek Canyon (MCC), and potentially Parley's Canyon. This will open up a much wider and more appropriate set of transportation options that could better protect the ecological integrity of the Wasatch Canyons and help to improve air quality along the Wasatch Front, particularly during critical winter inversion periods and summer ozone pollution episodes, which are so inimical to the health and welfare of Wasatch Front residents. Sadly, promoting more automobile travel by those Wasatch area residents who can afford to ski and otherwise recreate in the canyons, and to escape the adverse health impacts of winter inversions and intense summer pollution, exacerbates already severe air quality for those who remain in the valley below.

Purpose and Need

The statement of purpose and need suffers from two limitations in scope that compromise the ability of the EIS to consider and evaluate a full range of alternatives to the transportation problems facing the Wasatch Canyons. First, the scope of the study area is inappropriately small, in ways that narrow the range of reasonable alternatives to consider. Second, and relatedly, the stated project objective is inappropriately narrow. The goal should be to move people in and out of the canyons as efficiently as possible, and in ways that minimize environmental impacts, not to minimize road congestion *per se*. The purpose and need statement also reflects a flawed assumption that all motor vehicle travel demand in LCC must be met through public investments regardless of the natural carrying capacity of the canyon for recreation and other visitation and the environmental impacts of that increased visitation.

The study area is inappropriately constrained

The study area is limited to LCC itself (a single main road with one short bypass road) and the most immediate feeder road into LCC (S.R. 210 to Fort Union Boulevard). This extremely small study area artificially constrains potential alternatives to the LCC transportation problems. It limits options to infrastructure and other improvements *within* the very narrowly defined study area, such as expanding the road itself in LCC, widening the feeder roads in the immediate vicinity, and expanding trailhead parking capacity. The transportation challenge in LCC, however, involves all of the feeder areas funneling traffic into LCC from throughout the Wasatch Front (and beyond). Ignoring the sources of LCC travel demand inappropriately limits the range of viable options to consider.

Limiting the study area to LCC and its most immediate feeder road also ignores that fact that similar transportation issues face other Wasatch canyons, including BCC, MCC, and Parley's Canyon. Those canyons are likely to be subject to similar analyses in the future. It is short-sighted, therefore, to consider each canyon's transportation problems in isolation, and in the case of the inevitable later analyses, only after decisions have been made for the earlier canyons in line. That approach almost guarantees that chosen solutions will entail road and parking lot expansion or other improvements within each individual canyon and the immediate feeder roads to those canyons. It is likely to exclude broader solutions that might more effectively and more cost-effectively address transportation solutions along the entire canyon transportation corridor, in ways that promote rather than degrade regional air quality.

One viable option that is foreclosed by a fragmented canyon-by-canyon analysis is a major transit plan traversing the entire set of canyons. For example, a more broadly scoped analysis could consider a bus rapid transit (BRT) line running from Foothill Drive near the University of Utah all the way to and into LCC, with the option to route individual buses into each canyon along the way as demand dictates over time. Given the inherent flexibility of BRT technology, routes and frequency could even be varied as demand varies at different days and times. Limiting the study area to LCC and its immediate vicinity either forecloses or biases the evaluation of this type of alternative in two ways.

First, the cost-effectiveness of this kind of transit investment may be low relative to road expansion if considered only in light of ridership within the LCC corridor. If ridership along the entire canyon transportation corridor is included in the analysis—for example, winter ski ridership to Solitude and Brighton as well as to Snowbird and Alta—the fiscal analysis could shift dramatically. Stated differently, transit improvements into each individual canyon may not be cost-effective, while an integrated transit system serving all of the canyons might.

Second, limiting the geographic scope of the analysis is likely to bias the new travel demand model (TDM) UDOT proposes to commission as part of the EIS process. Individual transit decisions are based predominantly on convenience, including frequency of service, wait time, and the timing and convenience of transfers. How visitors arrive in the LCC corridor will affect the transportation choices they make once they reach the LCC area. In particular, drivers and passengers in personal vehicles are less likely to park and transfer to a bus, particularly with cumbersome ski and other gear, when they are only a few miles from their final destination and given that parking is limited in the LCC vicinity. Those riders are more likely to take transit that originates much closer to their homes or other points of origin, particularly if expanded transit parking is dispersed throughout the corridor to support a more robust transit system.

Importantly, assumptions about rider behavior will be used in developing the TDM and will affect the model predictions significantly. These behavioral assumptions are likely to result in lower projected transit ridership for the “LCC alone” scenario than would be the case for a more robust and convenient transit system covering a wider corridor. Therefore, limiting the study area to the immediate LCC corridor will inappropriately skew the analysis in favor of road and parking investments over transit investments. This kind of analytical bias is prohibited in NEPA analysis.

We recognize that people reach the LCC corridor from several directions, not only from the East Bench. Thus, the idea of a canyon-wide transit system along the East Bench is only one of several potential (and not mutually exclusive) options to increase the percentage of visitors who arrive in the LCC corridor already riding transit rather than by private vehicle. This, however, underscores that the study area definition is too narrow to facilitate a broader range of viable transit-oriented options to travel demand in LCC and the other canyons. The analysis should collect data and analyze the number of visitors who reach LCC and the other canyons from different feeder directions across different time periods (and projected increases in those visitors over time). Different transit-oriented solutions might be appropriate from different feeder directions. This would allow a more robust analysis of combined transit improvements that could significantly reduce the percentage of canyon visitors who arrive in the canyon corridor *already on transit*, rather than assuming that the only viable transit solution is to transfer automobile riders onto transit once they reach the very constrained canyon corridors. Designing a system that incentivizes travelers to take transit from their point of origin (as opposed to the base of LCC) will also reduce regional traffic and improve Wasatch Front air quality much more than a solution focused on LCC alone.

The draft justifies the extremely narrow geographic study area by asserting that it is based on “logical termini.” This explanation is entirely inadequate and itself illogical. Although any number of artificial “terminus” points can be identified in any transportation corridor, for NEPA purposes the selected termini must be “logical”, that is, logically connected to the travel demand being considered. Essentially no travelers to LCC actually originate from the intersection of Fort Union Boulevard and Little Cottonwood Canyon Road. Ski and other recreational visitors originate from all over the valley and limiting the analysis as proposed ignores that critical reality. As explained above, that artificially constrains or forecloses the range of alternatives to be considered, or more importantly, the manner in which alternatives are evaluated in the TDM and other analysis.

The “logical termini” rationale has been used to ensure that EISs for proposed new *highway projects* are not divided into inappropriately small segments rather than analyzed as an integrated, logical project. It ensures that an EIS for new road construction does not justify one road segment to an illogical terminus (in between two cities in the middle of nowhere), thus foreclosing route or other options for the remainder of the project linking two logical destinations (the two cities). That rationale simply does not apply to a multi-modal transportation analysis in which it is not, or at least should not, be assumed at the outset that road expansion is the presumptive solution to the problem. As explained above, the geographic study area for this EIS should be based on the sources of travel demand contributing to the existing and future congestion in LCC and adjacent canyons.

The stated project objective is inappropriately narrow

The draft purpose and need for the project is to “substantially improve safety, reliability, and mobility *on S.R. 210*” (emphasis added). This focus on S.R. 210 itself biases the analysis by suggesting that the only primary objective of the EIS is road safety and mobility. This is flawed for several reasons.

First, NEPA requires a statement of purpose and need that does not bias the identification and evaluation of alternatives. A more neutrally stated and objective framing of the transportation issue for LCC and the other canyons would be to “ensure that visitors have an adequate range of options to safely and reliably travel to and from recreational and other destinations” within the study area. This would clarify that the purpose of the project is not presumptively to “improve” the road, but to improve transportation options and effectiveness. Although buses would also travel on the roadway surface, other transit options might not. Eliminating the stated focus on the road itself would reduce any implication that widening roads or other road improvements are the presumptive solution to the problem. The focus would shift, as is appropriate, to safe and reliable travel and mobility options rather than roads *per se*. We also note in this regard that widening feeder roads into LCC will necessarily funnel more cars into the canyon, making a decision to widen the road within LCC a foregone conclusion.

Likewise, by adding trailhead parking in the statement of project purpose and need, the draft inappropriately assumes that facilitating more automobiles to canyon trailheads is

presumptively the best way to meet this demand. Expanding trailhead parking does not foreclose entirely the option of providing transit services to trailheads. However, given that the current transit focus in LCC is to accommodate skiers, and given that the DEIS chapters appear to continue that exclusive winter focus, expansion of trailhead parking is likely to defer or eliminate the possibility of adding bus service for summer hiking and other activities. This is in addition to the separate but related issue of whether the trails themselves, and the associated ecosystems, can withstand even higher hiker use than already occurs without significant degradation.

Second, the draft inappropriately relegates one core environmental objective—protection of the LCC watershed—to the status of a secondary objective. It also fails entirely to articulate air quality as an objective of the EIS. Given the invaluable status of LCC and other Wasatch watersheds to our water supply and given that air quality is often at its worst along the Wasatch Front during periods of peak travel demand into LCC and other canyons, these are important omissions. Based on these issues, we would modify the proposed statement of purpose and need we suggested above as follows: “to ensure that visitors have an adequate range of options to safely and reliably travel to and from recreational and other destinations in ways that protect and enhance the water quality and aquatic ecosystem integrity, and that minimizes transportation-related air quality impacts of travel to and from the canyons.”

LCC and other Wasatch Canyons Cannot Sustain Unlimited Vehicle Demand

The draft appears to assume that whatever travel demand materializes for LCC (and other canyons) necessarily must be met, and that it must be met through public investments. Relatedly, the document appears to assume that whatever demand for increased *automobile* use materialized must be met, which similarly presupposes road and parking improvements to meet that demand. Neither assumption should be made in an objective analysis.

All ecosystems have an inherent carrying capacity before resource values begin to degrade. That is true for the environmental resources of the canyons, and it is likewise true for the canyon transportation systems. The public, through its government, does not automatically need to accommodate as many vehicles and as many people in the canyons as demand would suggest. As individuals, we often make personal choices about where we recreate in order to minimize impacts to the Wasatch Canyons during peak periods. We would prefer to protect the aesthetic and ecological values of the canyons rather than assuming that we have an inalienable right to be there whenever we please, especially if we make the choice to travel by individual automobile.

Even if the EIS assumes that the public, through UDOT, does have the responsibility to facilitate as many *people* as desire to visit LCC and the other canyons, that does not necessarily mean it has to accommodate everyone desiring to enter the canyon in private vehicles, particularly single occupancy vehicles. There are a number of ways to increase canyon visitor access without enabling increased canyon private vehicle use. These include constrained rather than expanded parking, parking fees sufficient to induce more visitors to arrive by transit or in

carpools, a road toll similar to that currently in effect in Mill Creek Canyon (or a canyon-wide toll system), and similar travel demand management options rather than presumptively increasing capacity. Those who may argue they should not have to pay to travel to recreate in the canyons should consider the equity of the very real and serious health and other environmental costs they are imposing on others along the Wasatch Front, including those who cannot afford to ski.

In evaluating the propriety of public investments to facilitate higher canyon travel demand, we also need to consider the fact that the peak travel demand is generated by privately owned, for-profit ski resorts that are already operating on public land and contributing to the degradation of public resources and values. Although we appreciate that the ski industry provides a substantial number of jobs and other economic benefits to the State of Utah, that does not mean that the subsidies they receive from the use of public lands must be enhanced further through unlimited public investments in transportation. To the large extent that the travel demand problem in LCC and BCC are generated due to ski industry demand, they should be required to contribute to solutions that reduce rather than increase traffic. This could include mandatory parking fees imposed by all canyon ski resorts, including parking fees that decrease based on the number of passengers in each vehicle. They could also include ski resort investment in increased van service and buses from the airport and other major points of origin, including transit services tied to annual ski pass purchases. The ski resorts are a major source of travel demand in the canyons and should be responsible to contribute to solutions.

Alternative Development and Screening Methodology

Many of our comments on the alternative development and screening methodology for the LCC EIS overlap with or were suggested by our comments on the statement of project purpose and need. This is not surprising because the manner in which the EIS purpose and need is framed can have a substantial impact on the range of alternatives to be considered, and the manner in which they are evaluated and compared. Therefore, we will not repeat those aspects of our comments except to reiterate that the EIS should consider, on a level playing field with road and parking improvements, alternatives such as expanded transit from throughout the main feeder areas along the Wasatch Front, tolls and parking fees, and constrained parking and road capacity as an incentive to reduce single passenger vehicles or to ride transit.

In terms of analytical methodology and potential EIS bias, however, the alternative development and screening methodology suggest several additional issues:

First, as intimated above, the manner in which the TDM is developed, and the assumptions and other inputs to that model, will have a substantial impact on the analysis and resulting decisions. Given this critical role of the TDM, it is essential that the full DEIS describe the TDM in detail, along with all of its key assumptions and other inputs. This will both serve NEPA's public disclosure and information purpose, and allow members of the public to understand and comment fully on the EIS methodology.

Second, UDOT's continued focus on level of service (LOS) on roadways as the predominant measure of transportation efficacy (as it has done for many other projects) is inherently biased. Much as individual vehicle passengers dislike any inconvenience whatsoever, if a goal is to incentivize more people to travel by transit or to carpool or travel during off-peak periods, some level of congestion is *desirable*, and actually would promote wiser and more efficient investment of limited public transportation funds.

Likewise, most of the stated screening criteria *appear* to be biased in favor of roadway improvements, but we acknowledge that this depends on how those criteria are interpreted and used. These include substantially reduced peak-hour travel times on S.R. 210, the ability to meet peak-hour average travel demand on busy ski days, substantially reduced traffic backups, as well as the LOS criterion discussed above. Each of these criteria can be met through alternatives such as enhanced transit and pricing-based or other travel demand management strategies. It would be less biased, however, to eliminate all reference to road performance so that the criteria are not misinterpreted as being entirely focused on, or skewed towards, road improvements. At a minimum, this interpretation of the stated screening criteria should be stated explicitly in the DEIS.

Finally, little information is provided about the methodology to evaluate air quality impacts of proposed alternatives, and the stated methodology for evaluating water quality and other environmental impacts is insufficient. The Level 2 screening criteria identify the raw acreage of wetlands and other resources that might be affected by project alternatives, rather than actual wetlands functions and values or other environmental impacts. The LCC riparian corridor is very narrow, particularly in places where the creek is confined between narrow canyon walls. This is one of the main reasons it may be vulnerable to road widening or other construction impacts. A seemingly small impact assessed solely in terms of acres of habitat lost or destroyed could belie an extremely significant impact to the aquatic ecosystem, including water quality, riparian vegetation, aquatic and aquatic-dependent wildlife, or other resources. The criteria used to assess environmental impacts must be qualitative as well as quantitative to properly measure and compare the impacts of the alternatives considered.

Conclusion

Those who recreate in the Wasatch Canyons throughout the year (winter and summer) often do so to escape the adverse impacts of exercising in the valley during inversions, but ironically contribute to that very pollution for those who remain in the valley. A canyon-wide transportation approach to this problem would help create a win-win solution to this irony. It would promote wiser public investments, more cost-effective and long-term solutions, and more equitable distribution of program costs and benefits – both for those who enjoy improved transportation solutions into the canyons, and for those who remain in the valley and enjoy improved air quality and other benefits of wiser transportation choices. We urge UDOT to expand the study area, as well as the focus and methodology of the analysis, to promote those win-win solutions.

Again, we appreciate this opportunity to comment on these two critical chapters of the LCC DEIS, and look forward to future opportunities to comment during this process.

Sincerely,

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.