From: Pamela Carpenter
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Subject: Concerns Regarding Data, Process, and Representations Supporting the Emigration Canyon Study Phase
Date: Wednesday, January 28, 2026 12:44:37 PM

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Dear Members of the Municipal Services District Council,

I am writing to formally express concerns regarding the statistical, scientific, and procedural justifications presented in support of advancing the Emigration Canyon study phase associated with the Emigration Road corridor.

Use of Safety Statistics

The safety statistics cited in the presentation do not, as presented, demonstrate elevated bicycle safety risk. The figures rely on aggregate counts and percentages without the analytical components necessary to assess risk or causality.

Specifically, the summary statistics are insufficient to support conclusions regarding bicyclist safety without additional analytical context and disaggregated data, including:

- **Absence of exposure metrics** (e.g., crashes normalized by bicyclist volume, cyclist miles traveled, or vehicle miles traveled)
- **Undefined "active transportation" classification**, making it unclear whether the data refer to bicyclists, pedestrians, micromobility users, or mixed-mode incidents
- **Unspecified temporal scope**, preventing assessment of trends, seasonality, or the effects of recent operational or geometric changes
- **Lack of mode-specific severity analysis**, with no disaggregation by injury type or crash mechanism
- **Absence of peer facility comparison** to similar canyon roadways, functional classifications, grades, or speed environments
- **No causal or contributing-factor analysis**, such as speed, geometry, weather, wildlife, lighting, enforcement, or impairment

Percentages derived from small sample sizes are inherently volatile and may overstate relative risk. Aggregate summaries also mask spatial, temporal, and operational patterns necessary for targeted safety interventions.

Without access to raw data and an appropriate analytical framework, these statistics cannot support claims that Emigration Canyon is unsafe for bicyclists. At most, they indicate corridor usage, not elevated risk.

Grant Justification and Community Input

Other elements cited in the grant justification raise similar concerns. No documentation has been provided regarding litigation risk or anticipated litigation expenses; despite public discussion of potential right-of-way impacts and the

financial exposure such actions could create for MSD.

Additionally, the "resident input" referenced appears to reflect limited engagement consistent with a small focus group rather than a representative survey of affected residents. Characterizing this level of engagement as broad community support is not methodologically sound.

Study Phase Representations

I understand the argument that data gaps may justify a study phase. However, repeated assurances that the community can "stop after the study phase" if outcomes are unfavorable are difficult to reconcile with statements made during public meetings indicating that the funding opportunity cannot be declined.

Once public funds are accepted and expended, institutional momentum and sunk-cost considerations make discontinuation far more challenging in practice. This disconnect understandably contributes to resident concern and hesitancy.

In addition, the council should understand that stating there will be plenty of opportunities after this study phase to contribute is also not relevant when stating we cannot pass up this 6-million-dollar financial opportunity; hence, it is more than a fear that this project will go on no matter what the resident feedback. It is a certainty by your own words.

Civic Process and Representation

The tone and conduct of the most recent Emigration Canyon town council meeting further compounded these concerns. Residents who attended to engage substantively expressed frustration with being perceived as obstructive rather than participatory. Civic engagement should be treated as an essential component of governance, particularly when policies involve long-term impacts to property, land use, and community character. Civic engagement is not dependent on the time you have to serve your community or your employment status either. It is inspiring to see residents engaged with their elected representatives. They just do not feel very heard or represented currently.

It is also relevant that none of the council members advocating for this project reside on the affected roadway. While residents of certain canyon subdivisions—where council members reside—have organized to represent their interests, similar efforts by residents living directly along the road appear to be received differently. This raises equity concerns regarding whose voices carry weight in decision-making.

Residents along Emigration Canyon Road represent the lower end of the canyon's property value and income spectrum and will bear the most direct impacts of any roadway changes. At the same time, the primary beneficiaries of the proposed project are non-resident, discretionary users of the corridor, many of whom have greater financial and organizational capacity to engage in sustained advocacy. This imbalance warrants careful consideration. This inequitable distribution of project impacts should be addressed.

Request for a Defensible Evaluation Framework

Before approving a study phase, I respectfully request that MSD require a clear evaluation framework, including:

- Defined study period and geographic limits
- Clear mode definitions within "active transportation"
- Exposure measures (bike counts or modeled proxies)
- Crash rates normalized by exposure
- Crash-type analysis (bike-vehicle, overtaking, driveway conflicts, single-bicycle incidents)
- Speed distribution analysis (before/after, not just posted speed)
- A recognized before/after method (e.g., Empirical Bayes)

Absent such a framework, I urge consideration of whether grant funding could be redirected toward trail improvements or non-roadway investments that enhance safety and access without introducing right-of-way or property impacts.

Emigration Canyon is a historic homestead canyon, not a federally managed recreation corridor; not a resort canyon. While cyclists have multiple route options throughout the valley, residents have one home and one yard.

I appreciate your consideration of these concerns and respectfully ask that the Council recommit to a transparent, data-driven, and representative process.

Sincerely,
Pamela Carpenter
5623 Emigration Canyon Road

Here is what the research further says:

- **Bike lane added while narrowing lanes/shoulders" can improve safety (counterintuitive but supported**
  - https://www.fhwa.dot.gov/publications/research/safety/21012/21012.pdf

- R**esearch literature reviews report drivers tend to go faster when shoulders are present or wider.**
  - That speed effect matters because **injury severity rises rapidly** with speed, and canyon roads already have limited forgiveness, mitigating your safety justification for this project.
  - https://www.sciencedirect.com/science/article/abs/pii/S0967070X18301720