

Alta Ski Area is encouraged and pleased with UDOT's recent announcement that it is moving forward with Phase 1 transportation improvements in Little Cottonwood Canyon. Given transportation's impact on the ski and work experience, Alta Ski Area is very interested in working with UDOT to refine and implement transportation improvements that enhance current conditions and provide greater flexibility.

The purpose of this letter is to share observations, concerns, and suggestions regarding the proposed Phase 1 transportation improvements, which we believe will increase the likelihood of their success. Our observations, concerns, and suggestions are based on decades of experience with transportation issues, avalanche mitigation, and visitor and employee behavior in Little Cottonwood Canyon.

Observations

- 1. Winter storms and a slick road more significantly impact traffic mobility than the number of vehicles in the canyon.** Travel times down the canyon average 20-30 minutes on peak days when S.R. 210 is dry, whereas travel times can approach 1 hour or more when it's snowing, and the road surface is slick even on non-peak days. UDOT has limited resources to remove snow from the road surface in the canyon, and those resources take time to deploy and get into the canyon. Those resources are further limited when it is snowing in the valley, and they are needed elsewhere.
- 2. Traffic congestion on the roads and neighborhoods near the mouth of Little Cottonwood Canyon exponentially increases every 5 minutes after 8 am when the road is closed for avalanche mitigation and snow removal.** There is significantly less traffic congestion and delays once avalanche mitigation is complete, and the road is opened by 7:30 am, as was regularly accomplished a decade ago.
- 3. Traffic Mobility is significantly impacted in the Town of Alta on peak days, when the Mainline between Alta and Snowbird is closed, and all traffic leaving Alta must use the Bypass Road. Gridlock** can occur and may last 30 minutes to an hour when the road surface is dry, and 2-3 hours when it is slick. It is very frustrating to Alta visitors and employees to experience gridlock, and when they finally pass Snowbird, they discover its parking lots are emptied before vehicles leaving Alta can move.

4. **Alta's parking reservation system limits the number of vehicles coming to Alta, has increased carpooling, and encourages the use of public transit.** Since its implementation, carpooling to Alta has increased from 22% (1.8 to 2.2 people per vehicle), the number of vehicles coming to Alta has decreased, and public transit use has increased. Parking reservations are only needed on peak days (weekends and holiday periods – 60 days per season), and all reservations released for those days are booked. Parking inventory for reservations is released at 3:00 pm on Sunday afternoon for the following weekend. The released inventory on Sunday afternoons is now booked within 15 minutes of release!
5. **Bus transit service is an effective option for employees and some skiers when it is simple, comfortable, convenient to use, and takes them to where they want to go.** Our experience shows that comfort, convenience, and ride time are more important to skiers who use the bus than service frequency is for resort-destination service. Since UTA began serving only one stop in Alta, we have observed significant declines in employee and skier ridership among those who previously used the other bus stops. They now drive vehicles. Feedback from savvy skiers who use public transport is that it works if you have a seat for the trip. It is not a pleasant experience, especially if you must stand for a 30-minute-plus ride to Alta. We have also noted that buses cannot travel the speed limit up the canyon and impede traffic flow.
6. **Significant impediment to downhill traffic mobility and inequitable merging occur when the roadside between Entry 1 and Entry 4 at Snowbird is parked.** Vehicles parked on the roadside are currently allowed to make illegal U-turns to merge into downhill traffic. These illegal U-turns are usually three-point turns, which bring traffic to a stop and allow more roadside vehicles to merge below their point of merge. Zipper merging of traffic from Snowbird into the traffic from Alta is inequitable and also impedes the mobility of traffic on S.R. 210. The merge median below Entry 1 improves the flow of traffic exiting Entry 1, but impedes the flow of traffic and frustrates drivers on S.R. 210 as it allows vehicles exiting Entry 1 to pass up to 50 vehicles on S.R. 210 before they merge into the S.R. 210 traffic.

Concerns

1. The factor that most significantly impedes traffic flow and creates congestion is a slick road surface. When the road surface is slick, its capacity to move traffic is significantly reduced, impeding the flow of traffic and creating traffic congestion. It does not appear that **there are improvements proposed in phase 1 to address the most significant transportation flow impediment.**
2. Closure of the mainline between Alta and Snowbird during peak periods and/or when the road surface becomes slippery always impedes the flow of traffic exiting Alta and often creates gridlock. **There are no improvements proposed in phase 1 to eliminate the gridlock that occurs on peak days when the mainline is closed.**
3. **One Transit Hub and Location.** A transit hub located in the center of the Town of Alta may simplify the service for the transit provider; however, it is not convenient or a viable option for many visitors and employees. Employees of some of the lodges and the ski area will need another form of transit (shuttle?) from the transit hub to their place of employment. Skiers needing childcare, ski school lessons, rentals, or access to their seasonal lockers at base areas will need transport to the base areas. A transit hub in the center of the Town of Alta will disrupt and require changes to Alta Ski Area's Transfer Tow, the primary means of transport over snow between the Albion and Wildcat base areas to service the proposed transportation hub. It will also require some means of transport from the Transfer Tow level to the transit hub elevation, a rise of approximately 75 feet. In addition, this transit hub is located in a known avalanche path, which entails associated issues, risks, and additional costs. *Bus service that does not take riders to where they want to go will discourage ridership.*
4. **We do not believe increased bus service will reduce the number of vehicles visiting the Alta Ski Area.** Current parking reservation demand during peak periods (which are reservation periods) indicates that every car that is removed by increased transit service will be replaced by another vehicle. We currently sell out of parking reservations during peak periods (60 days per year). It should also be noted that the parking used by skiers visiting Alta Ski Area is located on USFS lands under a Special Use Permit that allows and limits parking to levels specified in the Forest Service Master plan. **Alta Ski Area has no desire to reduce the parking capacity it has been using for several decades.**

5. **Tolling will not effectively improve traffic mobility.** It will not limit the number of vehicles allowed to visit Alta. It is income-based, not capacity-based. We believe limiting access by capacity, not wealth (tolling), is more equitable and appropriate. Alta currently manages the number of vehicles visiting the ski area through a reservation system and fills its available parking on weekends and holidays (60 days per season). We believe that individuals who drive and switch to public transportation because of tolls will be replaced by others willing to pay the tolls. Tolling introduces legal conflict, operational redundancy, and equity risks without reducing vehicle volume or improving traffic mobility. Tolling penalizes employees, pass holders, less affluent skiers, and skiers who comply with parking limits and regulations. Whereas Alta's parking reservation system preserves the legal rights of the ski area, limits the number of vehicles parking at Alta, prevents "cruising for parking", eliminates speculative driving, and is significantly more effective at increasing carpooling and the use of public transit, while managing the number of vehicles coming to Alta.

6. **Public Transit, specifically bus service, does not work for the vast majority of skiers.** Private vehicles better match the realities of skiing: gear, comfort, privacy, family needs, and reliability. The amount of gear (boots, bags, food, skis, poles, helmets, layers) skiers bring with them to go skiing makes public transit more difficult. Private vehicles offer guaranteed seating (no standing), privacy, greater comfort, shorter travel times, and flexibility that bus service cannot match. It should also be noted that more than 55% of skiers visiting Alta come from outside Utah, and up to 50% of vehicles in our parking lots are rentals. These skiers stay in the valley at a variety of locations, as well as, in Summit County. Time and convenience are precious to these skiers, and they rent and drive vehicles for that reason. They and affluent Utah residents are willing to spend money for access and convenience and are not interested in the time and logistics required to use public transit.

7. Buses servicing the canyon have approximately 45 seats. The proposed 10 minute bus service will provide seats for 270 people per hour or 1,080 people in 4 hours at 100% occupancy. **Expecting ridership to be higher than this is expecting riders to be willing to stand for a 30-plus minute ride in a canyon.**

Suggestions (Refinements)

1. **Enhance Snow Removal Capabilities.** Create snowplow storage, with salt and sand storage, and living quarters for plow drivers that are occupied during storm cycles in the Town of Alta. This will enable UDOT to address hazardous driving conditions on S.R. 210 more rapidly and efficiently by having resources in the canyon when the S.R. 210 begins to get slick, rather than those resources needing to be dispatched from locations outside of the canyon and traveling to and up the canyon. The slick road has the most significant impact on traffic mobility and congestion.
2. **Keep the mainline open.** Make every effort to keep the mainline between Alta and Snowbird open between 3 pm and 7 pm daily. Use more frequent avalanche mitigation and technology to reduce avalanche risk above the mainline to minimize mainline closures, which will improve traffic mobility and reduce gridlock in the Town of Alta.
3. **Enhanced Bus Service.** Design and implement an enhanced bus service that is convenient and a viable option for as many riders as possible, rather than one that works best for the service provider.
 - a. Build a transportation hub at the mouth of Little Cottonwood Canyon. Only having the hub at the mouth of Big Cottonwood reduces the viability of bus transportation for many potential riders.
 - b. Provide direct service from the transportation hub at the mouth of Little Cottonwood Canyon to Alta, bypassing Snowbird. This will reduce stops and travel time increasing the viability of the service for more riders.
 - c. Service all the bus stops in the Town of Alta, as was done in the past, instead of building a transportation hub in the center of the Town of Alta. This will increase viability of bus transportation for employees, passholders with lockers at base areas, and the skiers visiting the ski area. It is more convenient and will take them where they want to go. The disruption, inconvenience, and additional services required for the proposed transportation hub in the Town of Alta are very significant and make it a less viable option for riders. A 15-minute service covering all previous bus stops in the Town of Alta, with direct service to Alta from a transportation hub at the mouth of the canyon, can be accomplished with 6 buses.

- 4. Seasonal implementation of the traction law.** The traction law and sticker program have reduced the number of vehicles in the canyon without proper traction devices. However, implementation of the traction law based on a weather forecast or when the road becomes slick still allows vehicles without proper traction devices to be caught in the canyon when traction devices are needed. Implementing the traction law from November 1 – April 30 would further reduce the number of vehicles in the canyon without proper traction devices when the road is slick and thereby increase mobility during hazardous driving conditions.
- 5. No Tolling – Use Reservations and/or fixed parking limits.** Reservation systems, coupled with a fixed parking capacity, have proven effective in increasing public transit use in an equitable manner, reducing the number of vehicles coming to Alta, and managing where vehicles park. Tolling does not limit or manage the number of vehicles entering the canyon or where they will park. It may also place UDOT in the position of providing a competitive advantage to ski areas located outside of the Cottonwood Canyons, and is contrary to the rights given to the ski areas under their Special Use Permit with the USFS. Rather than using tolling to try to motivate skiers to use bus service, focus on building a bus service that works for as many riders as possible, not needing tolling to encourage ridership.
- 6. Provide Equitable Merging between Alta and Snowbird Traffic and eliminate illegal U-turns into oncoming traffic on S.R. 210.** Installing a median barrier between Entries 1 and 4, with breaks for Entries 2 and 3, would prevent illegal U-turns. Metering traffic exiting Snowbird’s parking areas at Entries 1-4 to provide more equitable merging than a zipper merge will improve the mobility of the traffic on S.R. 210 exiting Snowbird.

Thank you for taking the time to review our observations and concerns, and for considering the refinements we believe are essential to enhancing the mobility and safety of traffic on S.R. 210, and the success of the proposed Phase I improvements. We appreciate the working relationship we have with UDOT and look forward to working together for many years to come in Little Cottonwood Canyon.

