**Central Wasatch Commission**

**Outline for Comments to**

**Utah Department of Transportation**

**Little Cottonwood Canyon Draft Environmental Impact Statement**

**DRAFT OUTLINE 8/16(updated with Laura Briefer comments 8/23)**

**Opening Paragraph:**

* + This comment document regarding the draft environmental impact statement for Little Cottonwood Canyon comes from the Central Wasatch Commission.
	+ The CWC is comprised of the 10 local jurisdictions in and adjacent to the central Wasatch Mountains
	+ Part of the CWC mission is to implement the [Mountain Accord](http://cwc.utah.gov). The consensus agreement in 2015 contained actions to achieve agreed upon values, objectives, and specific actions to better protect the Central Wasatch Mountains and address longstanding unresolved issues.
	+ Regarding mountain transportation in the Central Wasatch the Mountain Accord stated a goal:
		- “A sustainable, safe, efficient, multi-modal transportation system that provides year-round choices to residents, visitors and employees; connects to the overall regional network; serves a diversity of commercial and dispersed recreation uses; is integrated within the fabric of community values and lifestyle choices; supports land-use objectives; and is compatible with the unique environmental characteristics of the Central Wasatch.”
	+ Over the past two years, the CWC has been committed to developing a regional mountain transportation recommendation to address the growing year-round transportation demand in the Central Wasatch.
	+ Little Cottonwood Canyon is a critical piece of a regional mountain transportation system.
	+ Earlier this year, the CWC released it’s [Pillars of Transportation](https://cwc.utah.gov/transportation/) document for UDOT to consider as a final alternative is chosen.
	+ This comment document uses the Pillars document as a lens in which to consider both alternatives and the Draft EIS.

Through the lens of PIllars:

**Visitor Use Capacity**

Key points from Pillars:

* + Transportation improvement have the potential to significantly increase the quantity of visitors
	+ Negative environmental, public safety and water resource consequences from direct, indirect, and cumulative impacts of more visitors resulting from the transportation improvements.
	+ Over-use could negatively impact the visitor experience for both tourists and locals who seek to enjoy a wide range of recreation and nature from unmanaged crowds
	+ Corresponding visitor use strategy needs to be identified and implemented to complement any existing management plans.
	+ The P&N and UDOT objectives seek a reduction in traffic to the resorts at peak times of 30%.

CWC Comment:

* The CWC is working with the National Forest Service and Utah State University in a Visitor Use Study.
* Final research should be done by the end of 2022.
* The CWC requests that any alternative is flexible enough to meet the findings from the study.
* If a greater reduction in traffic were achieved through optimizing alternative transportation solutions, what would the impacts be?
* The DEIS does not include in its analysis the negative environmental, watershed, and water resource impacts of increased use of Little Cottonwood Canyon which would be a result of the increased transportation capacity built into both the gondola and enhanced bus alternatives. Increased visitation to the canyon’s natural resources is a connected action to the two alternatives presented. This limitation in the analysis results in a lack of understanding of the direct, indirect, and cumulative consequences of the proposed actions in the DEIS, which, in our opinion, does not meet the intent of NEPA. CWC requests that this analysis be conducted, and the Record of Decision be postponed until this analysis is complete.

**Watershed Protection:**

Key points from Pillars:

* Protection of the fragile environmental conditions and particularly a watershed that serves more than 450,000 people in the Salt Lake Valley is a top priority in the Central Wasatch Mountains. Any transportation solution for LCC should minimize and mitigate negative environmental impacts.

CWC comment:

* + The CWC very much appreciates the information developed regarding impact to riparian, streams, and the watershed. However, as stated above, the information presented is missing the connection between the alternatives’ role in increased transportation capacity and the direct, indirect, and cumulative impacts to the watershed and public water resources of the canyon.
	+ The CWC continues to implore the EIS team to further reduce the impacts to these critical resources.
	+ The alternatives both have impacts on the watershed. Are either improving the watershed?
	+ The alternatives all have direct, indirect, and cumulative impacts on the watershed. [Assimilate comments from SLCo, SLC and Sandy on specific impacts and how the DEIS addresses those impacts.]

**Traffic Demand Management, Parking and Bus (or other Transit) Strategies:**

Key Points from Pillars:

* The Commissioners favor the implementation of a set of traffic management strategies that address both traffic impacts on the roads accessing Big and Little Cottonwood Canyons, as well as the roads within these Canyons
* Canyon traffic management options include variable tolling, limited access for single occupancy vehicles, carpool programs, and the reduction of on road parking.
* Appropriate roadway improvements along Wasatch Boulevard and 9400 South.
* The TDM and other strategies to reduce traffic are tied to methods to integrate transportation solutions into the broader regional transportation system for the Salt Lake Valley and beyond. (See next section)

CWC comment:

* The DEIS targets the desired action from the CWC.
* Tolling is included for both LCC and BCC.
* Curious to know more about the impacts of tolling in BCC?
* Will there be additional Transportation Demand Management, like eliminating on-road parking, TDM strategies for BCC?
* Will there need to be improved transit in BCC because of the tolling?
* Are there any anticipated roadway improvements for 9400 South? What are the impacts on the Sandy area beyond Highland Drive with increased parking and access to LCC through the alternatives?

**Integration into the Broader Regional Transportation Network**

Key points from Pillars:

* A broader, more holistic approach should be used when implementing solutions for traffic issues related to LCC. This approach extends beyond the mouths of Big and Little Cottonwood Canyons.

CWC comment:

* Alternatives do not consider larger regional transit options
* What transit options are available to LCC visitors to connect to the canyon transit alternatives
* How different alternatives may be impacted by or mitigated through better transit options leading to the mouths of LCC and BCC need to be better evaluated

**Year-Round Transit Service**

Key points from Pillars:

* Year-round transit service is a central element for transportation to destinations in the Canyons as reflected in Mountain Accord and the work by the CWC on a successful MTS
* Including dispersed recreational opportunities, and other dispersed recreational opportunities in the surrounding areas

CWC comment:

* As noted above, the CWC prefers a transit solution that operates year-round. It would be preferred if the UDOT team would include analysis of year-round operations for all alternatives. Please consider how the alternatives can potentially meet year-round demand, cost on operations and maintenance, and environmental impacts.
* We are also concerned that both of the alternatives presented in the DEIS will ultimately be used for year-round service for developed and dispersed recreation once they are constructed. This is likely a connected action. The DEIS did not analyze the environmental impacts of year-round use. CWC requests that these be analyzed as part of the NEPA process.

**Long-Term Protection of Critical Areas Through Federal Legislation**

Key points from Pillars:

* The ultimate transportation solution should be conditioned upon the passage of federal legislation (the Central Wasatch National Conservation and Recreation Area Act) The MA and the CWC have concluded that passage of lands and resource protection through additional land designations and solving transportation issues are integrally related; they both need to happen to address the needs for users of the Central Wasatch Mountains.

CWC comment:

* The UDOT DEIS recognizes several amendments to the current forest plan to accommodate both of the final alternatives. The proposed CWNCRA calls for an updated forest plan and potential changes from UDOT can be accommodated in the bill.
* The Federal legislation can help facilitate transportation solutions; provisions in the existing draft would enable acceptable transportation solutions to be implemented.

**Member jurisdictions comments:**

Add pertinent comments from member jurisdictions that align with Pillars.

 Possible additional issues heard from some Commissioners and Stakeholders:

* Olympics
* Climate change

**CWC Stakeholders Council:**

In addition to having an eleven member board, the Central Wasatch Commission also has a 35 member Stakeholders Council that serves as an advisory body to the CWC board. The Stakeholders Council represents a wide variety of interests in the Central Wasatch Mountains. The group has continued to take an interest in transportation solutions and provide feedback to the CWC Board.

 At a recent Stakeholders Council meeting, the members brainstormed ways to improve each of the alternatives. They are as follows:

 Include SHC process and outcomes

**Closing paragraph:**

The Central Wasatch Commission appreciates the enormous work and information on the LCC EIS to date.

 The CWC continues to urge UDOT to expand the scope of this EIS to include all three canyons along the Central Wasatch Mountains and how the LCC EIS transportation solutions will be integrated into the regional transportation system. These canyons are all connected and each of them have an impact on the other. The CWC urges UDOT to consider year-round transit options, be aggressive in getting more cars off the road.

The CWC wants to reiterate our agency’s vision for a mountain transportation system that was written and agreed upon in the Mountain Accord:

“A sustainable, safe, efficient, multi-modal transportation system that provides year-round choices to residents, visitors and employees; connects to the overall regional network; serves a diversity of commercial and dispersed recreation uses; is integrated within the fabric of community values and lifestyle choices; supports land-use objectives; and is compatible with the unique environmental characteristics of the Central Wasatch.”

 The feedback provided in this document is critical to developing a preferred transportation alternative that meets the needs of the region and solves transportation problems in LCC.