



CENTRAL WASATCH COMMISSION

October 17th, 2022

Mr. Josh Van Jura, Project Manager
Little Cottonwood Canyon EIS

Subject: The Central Wasatch Commission Comments for the Final EIS and Phased Alternative

Dear Mr. Van Jura and the Little Cottonwood Canyon EIS Project Team

Please accept the following document as comments from the Central Wasatch Commission regarding the Final Environmental Impact Statement and the Utah Department of Transportation's preferred phased alternative. The CWC thanks UDOT for the opportunity to provide valuable feedback for the LCCEIS process.

The CWC is an interlocal agency comprised of the local jurisdictions in an adjacent to the Central Wasatch Mountains. The CWC is charged with implementing the Mountain Accord which addresses transportation, environmental, economic, and recreation challenges. In 2021, the Central Wasatch Commission released the "Pillars for Transportation Solutions in the Central Wasatch Mountains" document, which frames transportation solutions for the Central Wasatch Mountains. The "Pillars," or values, consider visitor use capacity, watershed protection, traffic demand management and parking strategies, a year-round transit service, and integration into the broader regional transportation network, as well as the overall and long-term goal of protection of critical areas in the Central Wasatch Mountains through federal legislation, the Central Wasatch National Conservation and Recreation Area Act (CWN CRA). Since the beginning of the LCCEIS process, the CWC has actively engaged in assessing the foundational documents and reports of the EIS process and successful solutions for transportation in the Central Wasatch Mountains. Throughout that process, each Commissioner has invested heavily in studying and reviewing objectives and options regarding the complex decisions surrounding solutions to the transportation and preservation challenges facing Little Cottonwood Canyon and the Central Wasatch Mountains.

The Commissioners are unified in the opinion that "doing nothing" regarding the challenges facing the Central Wasatch Canyons is not a viable solution. The CWC has come to an agreement on a set of "pillars" that should be considered and implemented in connection with the eventual transportation solution in the Record of Decision. These broad principles are consistent with the original intent of the Mountain Accord, and we believe should be applied to whatever transportation mode is recommended in UDOT's Record of Decision. After reviewing the FEIS, the CWC has evaluated the preferred alternative through the pillar values.

Visitor Use and Capacity

The proposed phasing alternative being considered for the Record of Decision will have the potential to significantly increase the quantity of visitors accessing LCC, and the type of impacts that

increased visitation will have. The phased alternatives pose a risk of “over-use” of LCC, which could result in negative environmental, public safety and water resource consequences. Additionally, over-use could negatively impact the visitor experience for both tourists and locals who seek to enjoy recreation and nature from unmanaged crowds.

These concerns have been raised repeatedly by the public, various groups, and elected officials during the EIS process, but the limited scope of the EIS’s stated “purpose and need” has not allowed UDOT the opportunity to fully consider these issues. To appropriately address the risks, we believe a corresponding visitor use strategy needs to be identified and implemented to complement any existing management plans.

- The CWC Visitor Use Study will be completed later this year and recommend to UDOT to delay ROD until ample time has been given to UDOT to incorporate it into the EIS
- The Visitor Use study will help develop the phased approach alternative timeline, implementation, metrics of success
- FEIS notes the high likelihood of significant increased visitation
- Trailhead stops may require additional NEPA analysis and should be begin immediately

Watershed Protection

Protection of the fragile environmental conditions of the Central Wasatch Mountains is the highest priority for the communities that rely on these Mountains for watershed and water supply. Any transportation solution for LCC should minimize and mitigate negative environmental impacts, including irreversible damage to the watersheds that provide precious drinking water to more than 450,000 people in the Valley and in LCC itself.

Salt Lake City and its Department of Public Utilities are a member of the CWC and the primary watershed manager. The CWC supports the comments and recommendations from SLCDPU. Those topics, themes, and concerns are as follows:

- Inadequate modeling with the gondola with the footprint of the towers and the volume of water discharge
- Failed to properly analyze water impacts
- Removes land protections for footprint of towers, adds risk, and unintended consequences
- Concerns regarding diesel generator backups at the towers near the water source
- The proposed 2,500 stall garage may have significant impact immediately above the intake. Concerns regarding the construction of the facility as well as on-going protections and potential accidents that could impair the creek right before entering intake.

Transportation Demand Management, Parking, and Transit Strategies

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. In addition, consideration of expanded transit service and parking management outside of the Canyons is critical, regardless of the transportation mode selected for LCC.

Management strategies outside of the Canyons include providing parking in dispersed locations and improved transit service. The Commissioners also favor appropriate roadway improvements along Wasatch Boulevard that align with Cottonwood Heights Wasatch Blvd. Master Plan. Canyon traffic management options include variable tolling, limited access for single occupancy vehicles, carpool programs, and the reduction of on-road parking. These Canyon strategies should be utilized immediately as a “first phase” of the proposed phased alternatives, i.e., even before a long-term LCC transportation mode is designed and constructed. None of the proposed transportation alternatives in the EIS will be fully effective without corresponding traffic demand management, expanded regional parking, and transit strategies.

- Initial phased approach aligns with the values and preferences from above.
 - How will the bus approach integrate with UTA's service system?
 - How much more service will be added to the current system?
 - How will this proposed service overcome today's challenges?
- Tolling
 - Understand the need for tolling just the upper portion of the canyon on peak winter days
 - Better define pricing structure
 - How will both a tolling and parking fee impact visitation?
 - Would tolling have any impact on peak PM demand?
- Eliminating parking adjacent to ski areas
 - Will this be a phased approach as well?
 - If parking is eliminated where is that people demand going?
 - Will there be bus service that meets the demand?
- Recognizing more parking is need outside of the canyons
 - How will the flow and management of the parking structure be implemented to ensure minimal congestion on Wasatch Blvd.
 - Concerns about not fully developing gravel pit, 9400 s & highland, and connections to trax stations

Integration into the larger regional transit system

Understanding that the EIS is limited from a geographic perspective to a narrow focus on LCC and its immediate surrounding area, a broader, more comprehensive approach should be used when implementing solutions for traffic issues related to LCC. To that end, consideration should be given to the integration of any LCC-oriented system with transportation issues attendant to Big Cottonwood Canyon and the broader valley-wide transportation network. To justify the cost from a public benefit perspective, a large-scale infrastructure investment that serves a singular purpose (i.e., alleviating traffic congestion issues affecting LCC) should be accompanied by broader service and infrastructure investment in other areas of the valley.

- The FEIS fails to address how this will integrate into to broader regional transit system
- Recommend having all improved bus service start at a TRAX station
- There are now several key points in the FEIS that call for action in Big Cottonwood Canyon. This is a recognition that work needs to be done in BCC.
- CWC taking on BCCMAP work in advisement of UDOT to help move forward BCC mobility solutions
- Recognize the concerns of Cottonwood Heights Blvd.

- Design speed and formal speed limit remain critical factors in ensuring that safety and a high quality of life are improved and maintained for all residents along the Wasatch Boulevard corridor.
- Concerns about the 2,500-stall parking structure creating an increased direct negative impact to the city and effectively fracturing the Cottonwood Heights' community around the Wasatch Boulevard corridor.
- Additional parking stalls will lead to lower levels of vehicular service on peak ski traffic days, thereby prompting an increase in capacity on Wasatch Boulevard. The increased parking capacity then becomes a self-imposed justification to add vehicular capacity to the corridor, to which Cottonwood Heights is opposed.
- Cottonwood Heights is concerned with the removal of existing mature vegetation along the corridor for the purpose of installing sound walls or adding vehicular roadway capacity. The city recommends that UDOT avoid disturbing healthy, mature vegetation to the greatest extent possible. If removal is found to be unavoidable, the city recommends that UDOT utilize a certified arborist to analyze any tree that may require removal. Instead of removal, the city recommends that UDOT relocate any healthy mature trees to a nearby location along the corridor
- Recognize key points from Sandy and Alta

Year-round transit service

The Commissioners consider year-round transit service to destinations in the Canyons a priority, including dispersed recreational opportunities, and other dispersed recreational opportunities in the surrounding areas (such as areas along the foothills). The existing LCC EIS only considers winter, peak transit service.

- The FEIS fails to recognize the need and demand for year-round transit service
- If considerable amount of resources are going into buses over the next few years, the service provider should be able to use those resources during the summer as well. The buses purchased to increase service during the winter season should also be used throughout the year.
- Recognize that gondola B does evaluate summer usage, but the forecasted usage is extremely limited
- Why was not a similar evaluation done for year-round bus service
- How can the proposed trail head parking improvements accommodate future multi-modal trips (running, bikes, transit, etc.)

Long-term protection of critical areas through federal legislation

Transportation improvements for LCC should be coupled with improved land and natural resource protection. The ultimate transportation solution should be conditioned upon the passage of federal legislation (the Central Wasatch National Conservation and Recreation Area Act). This coupling of federal legislation to transportation is necessary given the delicate balance that was central to the Mountain Accord agreement, based on four principal tenets: transportation, economy, recreation, and environment.

- Recently, the CWC released its Environmental Dashboard which monitors five main elements of the Central Wasatch. This tool, meant to be used by the public, for subject area experts, educators, press, and policymakers, will be helpful in setting both metrics of success and monitoring conditions during phased implementation.
- The time may be ripe to move the proposed CWNCRRA forward as transportation solutions are being finalized.
- Language in the bill is flexible enough to accommodate UDOT's phased approach
- Would any change in land-use, management plans, land designations during bus phasing have an impact on future high-capacity transit options?

In addition to the evaluation of the FEIS through the Pillars lens, the CWC has the following recommendations:

- A complete and thorough action plan that gives the public a timeline of implementation
- A collaborative effort to define what success looks like, mutually agreeing on successful metrics and evaluation measures throughout the phased implementation
- A detailed plan of how the Cottonwood Canyons Transportation Investment Fund will be used to implement the phased approach alternative
- Please provide more accurate costs
- Tolling issues regarding single occupancy vehicles (residents, delivery trucks, emergency vehicles, utilities vehicles) still being charged. The
- Is there a preference for the service provider (UTA, UDOT, outside party)? Is there support from public service provider?
- Please further describe how the gondola alternative is "scalable." How/where will cabins be stored?
- The decision to move forward with the gondola an option should not be a funding-based decision but a metrics, data, and level of service decision. Consider using the 30% reduction of vehicles immediately and perhaps use that as the near-term metric.

Of CWC members, Salt Lake City passed a resolution supporting a phased bus approach but eliminating gondola alternative. Cottonwood Heights and Sandy comments include support for a phased bus alternative but eliminating the gondola alternative as well as concern for impacts to the watershed.

The CWC thanks UDOT for the opportunity to review and comment on the FEIS materials, report, and the proposed phased alternative. Without a doubt, the UDOT LCCEIS team has put in a tremendous amount of thought and effort to try and address mobility issues in Little Cottonwood Canyon. There are several key values from the CWC's Pillars document that are not addressed in the FEIS. Additionally, several CWC member jurisdictions have concerns regarding watershed protection and roadway design. It is our hope that these recommendations, and those of the CWC member jurisdictions, are considered, studied, and incorporated into the Record of Decision. The CWC remains a committed partner, willing to collaborate with UDOT and stakeholders to find the best solutions for the Central Wasatch.

Sincerely,

Chris Robinson, CWC Chair
Summit County Council

Erin Mendenhall, CWC Co-chair
Salt Lake City, Mayor

Jeff Silvestrini, CWC Treasurer
Millcreek City, Mayor

Dan Knopp, Commissioner
Town of Brighton, Mayor

Monica Zoltanski, Commissioner
Sandy City, Mayor

Mike Weichers, Commissioner
Cottonwood Heights, Mayor

Nan Worrel, Commissioner
Park City, Mayor

Roger Bourke, Commissioner
Town of Alta, Mayor

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