

October 17, 2022

Little Cottonwood Canyon EIS
c/o HDR
2825 E Cottonwood Parkway, Suite 200
Cottonwood Heights, UT 84121

Re: Final Little Cottonwood Canyon Environmental Impact Statement: S.R. 210 from Wasatch Blvd through the Town of Alta

Dear UDOT Project Team:

The following letter provides comments from the Salt Lake County Mayor's Office to the Utah Department of Transportation (UDOT) on the Little Cottonwood Canyon Environmental Impact Statement (EIS) S.R. 210 | Wasatch Blvd to Alta. Salt Lake County remains grateful for the opportunity to act as a Participating Agency in connection with this critically important endeavor.

Please note that the issues outlined below represent my position as the Chief Executive official of Salt Lake County, following years of engagement on this issue, as well the position of a majority of the Salt Lake County Council, the members of which have added their signatures to this comment letter. In addition, the Salt Lake County Council and I adopted a Joint Resolution in support of various issues addressed in this comment letter (see **Attachment A**). This letter, together with the Joint Resolution, demonstrates that Salt Lake County, as a governmental body, has significant concerns with the recommendations made by UDOT in its Final Environmental Impact Statement issued on August 31, 2022 (Final EIS).

Summary

Overarching concerns with UDOT's Preferred Alternative Recommendation: Gondola B (Base Station at La Caille) ("Gondola B"), with a phased approach implementation.

We appreciate UDOT recognizing the value of a "phased implementation approach" in addressing the traffic problems in and around Little Cottonwood Canyon (LCC), and we agree that Enhanced Bus Service (with no canyon road widening) should be an aspect of that strategy. We disagree, however, with the conclusion that the phased approach is merely an *initial phase* before implementing the Gondola B option. Rather, we believe that UDOT should not recommend Gondola B as the preferred alternative in the Record of Decision (ROD). We recommend an expanded version of the phased approach (which we otherwise refer to as the "Common-Sense Solutions" approach) as the final preferred alternative.

The Common-Sense Solutions approach entails many of the phased approach elements included in the Final EIS (such as enhanced busing, tolling infrastructure, trailhead parking, limitations on roadside parking, etc.). However, the Common-Sense Solutions approach expands upon the phased approach; it also includes additional traffic congestion mitigation techniques, such as parking management strategies, multi-passenger occupancy incentives, traction device requirements and enhanced enforcement. When implemented, the Common-Sense Solutions approach will adequately address the "*safety, reliability and mobility*" concerns identified in the EIS process, while preserving existing recreational opportunities and the magnificent visual experience of LCC, all at a significantly lower initial capital cost.

Although many aspects of the Common-Sense Solutions approach are not new, these solutions have never been implemented in a *comprehensive and coordinated* manner — and have never been backed with adequate funding. Perhaps some aspects of the approach have been tried in a piecemeal fashion, but what we are calling for now is an investment in a *strategically, integrated system*. This approach will require broad, continued collaboration between various stakeholders, including UDOT, Salt Lake County, the U.S. Forest Service, Utah Transit Authority (UTA), private landowners, local municipalities, and police agencies (such as the Unified Police Department, the Utah Highway Patrol and Sandy and Cottonwood Heights law enforcement agencies). This coordinated effort can (and should) start immediately following the issuance of the ROD (and appropriation of funding). There will be no need to wait. The approach will also have the added advantage of occurring simultaneously with the ongoing canyon “visitor capacity” assessment.

A Common-Sense Solutions approach allows us to move forward with solutions *and* gives us the flexibility to see what works, allowing for a change in course if circumstances warrant. For example, bus inventory can be “scaled up” as demand increases; conversely, plans to expand the fleet based on projections can be downsized if the projections turn out to be inaccurate. In addition, various aspects of the Common-Sense Solutions can be implemented simultaneously or “stacked” within a relatively short time frame. Think of it as the pursuit of a combination of strategies (such as enhanced busing, tolling, micro-transit options, expanded parking reservations, etc.) that allows for levers to be pulled (or adjusted) as impacts are measured, ultimately this will result in a more informed and potentially less expensive solution. The Gondola B option fails to provide that opportunity for long-term flexibility¹. Once the “shovels are in the dirt” for the gondola, any realistic opportunity to “shift gears” and adopt another major system will have passed.

The Common-Sense Solutions approach is a highly judicious response in that it recognizes that there are hundreds of unknown variables at issue with a project of this complicated scope and long-term nature. Taking an appropriate amount of time to invest in *pragmatic and adaptable* solutions that offer the ability to pivot is the *smarter*, more fiscally prudent approach for a 50+year highly complex infrastructure project. Put simply, our community should not commit to a large-scale, permanent, visually degrading, costly capital project like Gondola B before we understand the actual effects of these more practical, flexible, and less costly solutions.

Framework for Common-Sense Solutions Approach

The Common-Sense Solutions approach provides an opportunity to measure the effectiveness of a variety of initial techniques over a three-five-year period based on performance metrics. If sufficient gains have not been made during that time, then a decision can be made as to the next steps, including consideration of whether a new EIS or supplemental EIS process is appropriate.

¹ We note that some commentors have objected to the use of the word flexible in reference to the adaptability of the Common-Sense Solutions approach. To be clear, our use of the term flexible is intended to mean flexibility over the *life of the system*, not necessarily from a day-to-day operational perspective.

Phased Approach/Common-Sense Solutions Investments & Techniques

- ✓ Investment in the Enhanced Bus Alternative as described in the Final EIS, with electric bus technology.
- ✓ Construction of mobility hubs at the Gravel Pit and 9400 South/Highland Drive locations².
- ✓ In addition to tolling infrastructure, other travel demand management strategies, including vehicle occupancy restrictions during peak travel times, resort parking reservations, and enhanced smartphone app technologies to assist travelers in mode choices and parking availability³.
- ✓ Multi-passenger vehicle incentives such as micro-transit, carpooling, and rideshare programs.
- ✓ Increased enforcement of UDOT's Traction Law, together with expanded hours of traction device inspection operations.
- ✓ Increased canyon roadside parking fees. Supplemented with increased parking violation enforcement, November–April on peak days/at peak hours: Friday, Saturday, Sunday, and Holidays from 5–10 am; 3–6 pm; 9–10 pm (to prevent overnight parking).⁴
- ✓ Other elements already contemplated by the Final EIS, such as trailhead parking, on-street parking enforcement measures, and noise walls.

Estimated Costs of the Common-Sense Solutions/Potential Funding Opportunities

- Estimated Costs
 - See ***Attachment B*** for Preliminary Cost Estimates of the Common-Sense Solutions Approach.

² The Final EIS eliminated the Gravel Pit and 9400 S/Highland Drive mobility hubs when it increased the gondola base station parking garage to 2,500 spaces. We recommend adding those mobility hubs back into the preferred alternative, as well as considering (over time) adding a set of micro-hubs scattered throughout the valley. This system of mobility hubs could seamlessly integrate different modes of transportation to maximize connectivity and access for transit riders. The hubs would be amenity rich and focused on “place making.” For example, they might include storage lockers, bicycle parking and repair facilities, wi-fi service, retail, and restaurants/cafes to create a robust array of options to incentivize transit ridership.

³ We acknowledge that some of these strategies already exist (e.g., UDOT's smart app), but the *totality* of the strategies have never before been *collectively* tested, and, with additional funding, they could be vastly improved upon. Even a small portion of the half a billion dollars contemplated by the Final EIS could dramatically enhance some of these tools that are already being utilized, like UDOT's app.

⁴ Salt Lake County is currently in the preliminary stage of considering an amendment to a canyon roadside parking ordinance (in unincorporated areas) that includes the possibility of increasing street parking violation fees with enhanced violation enforcement on peak days, during peak hours.

- Potential Funding Opportunities
 - We have explored potential funding sources for the Common-Sense Solutions approach and have identified numerous potential opportunities through the “Bipartisan Infrastructure Law” as well as funding at the national, state, and local level. For example, the cost of electric buses and charging infrastructure could be eligible for the “Buses and Bus Facilities” program or the “Low or No Emissions Grant” program,” and the cost of the enhanced smartphone app technology could be eligible for the “Strengthening Mobility and Revolutionizing Transportation (SMART)” program or the “Advanced Transportation Technology and Innovation (ATTAIN)” program.
 - In addition to these formula and competitive funding opportunities from federal programs, there is also the potential for legislative action at the state level through the Transportation Investment Fund (TIF), the Transit Transportation Investment Fund (TTIF), or separate appropriation identified for a specific funding need.
 - Local funding opportunities could also potentially come from the County option sales and use tax for highways and public transit revenue or the County’s ongoing investment in local law enforcement efforts. There is also potential revenue available through competitive grants that Wasatch Front Regional Council administers such as the Surface Transportation Program (STP), Congestion Mitigation Air Quality (CMAQ) Program and the new Carbon Reduction Program (CRP).
 - These are merely a handful of examples of various potential funding opportunities for the Common-Sense Solutions approach.

Demonstrable Success

The potential success of the Common-Sense Solutions approach isn’t theoretical. Some benefits of the approach are already underway. For example:

- Alta Ski Area’s parking reservation system during the 2021-2022 ski season reduced traffic congestion in LCC without a corresponding decrease in skiers. According to Alta’s General Manager, the Alta parking reservation system experience was “amazing” in that it: “(1) spread out the traffic flow during the morning hours, (2) reduced the number of vehicles coming to Alta on weekends and holidays, (3) reduced the early morning queuing at the canyon mouth on road closure days, (4) increased carpooling, (5) improved the parking experience at Alta, and (6) improved the skier experience.”⁵
- Wasatch Backcountry Alliance conducted a highly successful micro-transit van program during the 2021-2022 season that shuttled dozens of skiers to and from Alta. That program has the potential to scale up even further, especially with additional coordination and funding.

Some commentators suggest that these strategies have already been tried and proven ineffective. We beg to differ. First, many of the strategies have not yet been tested, such as tolling, mobility hubs,

⁵ Email from Mike Maughan, Alta General Manager, dated October 4, 2022. Note: It is also our understanding that Sundance Resort operates a successful parking fee program.

vehicle occupancy restrictions during peak travel times, carpooling/ride share programs, and enhanced enforcement/expansion of traction device requirements. Second, although some measures have been explored (such as busing up the canyon), our community has never invested the amount of funding that is now being considered into a new fleet of “better buses,” i.e., buses that are sustainable, more comfortable, reliable, quieter and get riders to destinations more quickly. As noted above, some measures have been tried and have demonstrated success even though they are still in an exploratory phase. The Alta Resort parking experiment demonstrated tremendous success, and an adequately funded and coordinated micro transit program could prove to be extraordinarily impactful. The key to the Common-Sense Solutions is the idea that we move forward now with a *collection of pragmatic strategies*, measure what works and adjust accordingly. We are confident that the *cumulative* effect of these strategies will solve the underlying issue without the need to commit to an immovable, irreversible massive infrastructure project.

Fundamental Issues with the Final EIS

Before addressing some of our specific concerns with the Gondola B alternative, we would like to share our thoughts on a broader issue, namely that the EIS process suffered from a fundamental flaw given the limited nature of the stated “*Purpose and Need*.” Although we sincerely appreciate the tremendous efforts made by UDOT’s team throughout the LCC EIS process and we continue to hold each member of the team in high regard, we have concluded that the EIS process was hampered from an early stage in that the stated project purpose — defined as roadway “*safety, reliability, and mobility*” — was overly narrow. We share the opinion of Salt Lake City Public Utilities (SLCPU) and others that important topics, such as watershed impacts, general environmental concerns and a larger geographical scope of the project area, should have been included in the Purpose and Need.⁶ The fact that UDOT so heavily highlighted the road “reliability” factor in its “Final EIS Alternatives Summary” underscores how UDOT prioritized issues related to road efficiency at the expense of other more compelling environmental and social justice concerns.

This limited scope was inappropriate given the unique nature of the road, and surrounding land, at issue. The project in the LCC EIS isn’t a routine transportation project. The road that travels through LCC (S.R. 210) is no ordinary road. It runs through a unique physical environment, adjacent to a critical watershed, and it provides access to cherished recreational resources. We believe that the fundamental essence — or “spirit” — of the NEPA process that requires consideration of environmental impacts was overshadowed by the desire to obtain a “free flow of traffic.” The result was a failure to appropriately consider the inherent values that LCC represents to our community.

Even if one concedes that the project purpose was adequately scoped, we question whether UDOT effectively considered certain “indirect” and “cumulative” impacts of the Gondola B (as called for in the NEPA process). Examples of such impacts include the topic of “visitor capacity” and issues related to a question of “community fairness.” On this latter issue, we remain deeply troubled with the idea that public funds (in the amount contemplated) would be used to address a traffic congestion issue for a highly narrow population when the congestion at issue only occurs roughly 15-20 days per year, and (even per conservative estimates) will only reach a maximum of 50 days per year of congestion impact (50 years in the future). There are *many* transportation corridors throughout Salt Lake County that suffer from traffic congestion, 365 days a year. We believe a legitimate question exists as to why a

⁶ It is our understanding that Salt Lake City Public Utilities, a Cooperating Agency, raised these concerns during the project purpose scoping process, as have hundreds of public comments.

desire to make it more convenient for visitors to get to two private ski resorts in a single canyon takes precedence over the needs of other residents of Salt Lake County to get to and from work and other destinations.⁷

Specific Concerns with Gondola B Alternative

Issue: Advancements in Electric Bus Technology

We believe that UDOT should have more thoroughly assessed the viability of electric bus use in LCC during the EIS process. We acknowledge that UDOT ultimately concluded that the Enhanced Bus alternative was more environmentally beneficial than the Gondola B alternative regarding overall emission reductions and air quality (when considered from a statewide perspective). We continue to assert, however, that the omission of a robust consideration of electric buses in the EIS process was a mistake.

UDOT made the following statements regarding electric buses: *“Because electric bus technology is still evolving, electric buses were eliminated from consideration...”*⁸ and *“[t]he reason electric buses were not included in the analysis was not to make one alternative look better but rather to give UDOT the option to use diesel buses if necessary. If UDOT evaluated electric buses only, then there would be no option to use diesel buses.”*⁹ That logic explains why diesel buses were *included* in the analysis at the outset of the EIS process, but it does not adequately explain why electric buses were *eliminated from consideration*, or at least *not fully considered*, particularly when it became clear over time that electric buses were almost assuredly viable for LCC.

Admittedly, when UDOT began the EIS process, electric bus technology was just beginning to be introduced into selected markets, including Park City. At that time, although electric bus models were technically “market ready,” they presented various mechanical and maintenance challenges, as most new technologies do. UDOT noted such when it stated that *“...electric bus batteries currently have both limited range and performance issues on steep grades.”*¹⁰ Over time, however, the situation dramatically changed.

In 2022, newer generation buses are being introduced into fleets across the Intermountain West. These buses are more efficient, have longer battery life, and are more structurally sound to handle the rigors of full-time bus fleet usage. In addition, a Proterra electric bus has been specifically tested in LCC and has proven it can handle multiple laps in cold weather conditions on one battery charge.¹¹ Based on those factors, we believe the current generation of electric buses can handle LCC in all weather conditions, subject to some limited issues that are not insurmountable. It should also be noted that an electric bus option will have a lifetime cost that is either competitive (or even possibly less expensive)

⁷ We also question what other ski resorts in Utah think about the idea of a high cost, publicly funded transportation system that only benefits their competitors’ resorts.

⁸ Chapter 2.2.2.2 Page 44 of Final EIS (Preliminary Alternatives Evaluation-Transit Alternatives)

⁹ Chapter 32.2.9DD Pages 32-126 of the Final EIS (Basis for Identifying the Preferred Alternatives)

¹⁰ Chapter 2.2.2.2 Page 44 of Final EIS (Preliminary Alternatives Evaluation-Transit Alternatives)

¹¹ In a test conducted in 2020, Proterra found that their ZX5 MAX electric bus in cold weather conditions (21 F) was able to complete 8 laps up and down the canyon on one full battery charge. [UDOT LCC \(Proterra\) High Fidelity Simulation Results](#)

than its diesel counterpart¹². Lastly, we do not see any issues with the process of heating electric buses. Diesel heaters for electric buses are a low-cost option that would have de minimis emission impacts and would likely only be used in the harshest of weather conditions.¹³

Salt Lake County has carefully evaluated the viability of electric bus technology and has concluded that it is ready for use (or, at a minimum, close to ready for use) in LCC in all weather conditions. We acknowledge that UDOT still has reservations, which is why we call upon UDOT to create a set of testing metrics and performance parameters that electric buses should meet. UDOT could then invite private electric bus companies to participate in a series of tests to determine whether electric buses are, in fact, viable in LCC. This can all be done during this upcoming winter season, prior to the issuance of the ROD. Once it is confirmed that electric buses are viable, UDOT can engage in an updated cost comparison. As noted above, life cycle costs for the bus option could be lower with an electric bus model¹⁴.

We note that NEPA law calls for a supplemental EIS in the event of “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action.”¹⁵ We question whether the advancement in electric bus technology during the four-year time frame from when the EIS process started to today, and the failure of UDOT to more fully explore that new technology, warrants the need for a supplemental EIS.

The future use of electric buses (or other sustainable technology) throughout all of Salt Lake County has the potential to make a dramatic impact on air quality for Salt Lake County residents now and for future generations. A NEPA EIS process is called for under federal law when a “*proposed major federal action is determined to significantly affect the quality of the human environment.*”¹⁶ NEPA requires that the lead agency consider a reasonable range of alternatives that can accomplish the purpose and need of the proposed action.¹⁷ In our opinion, UDOT’s failure to more thoroughly study electric bus technology during the EIS process was a significant omission in this regard.

Issue: Environmental Justice and Equitable Access

We also have concerns with UDOT’s environmental justice analysis in the Final EIS, particularly how it relates to the question of social equity and access. One of the guiding principles for including an environmental justice component into a NEPA study is to “*recognize interrelated cultural, social,*

¹² Electric buses currently have a larger upfront capital investment. On a levelized lifetime cost, however, electric buses are cost competitive, if not the less expensive option on account of maintenance and fuel costs. Electric buses have fewer moving parts than traditional diesel buses, leading to less maintenance needs. For example, maintenance costs for electric buses are estimated to be \$0.55 per mile compared with \$1.53 for a diesel fleet. In addition, the fuel efficiency of electric fleets is estimated to be 16.5 miles per gallon equivalent compared with 3.8 miles per gallon for a diesel fleet, and the fuel per mile cost of electric buses is estimated to be \$0.28 compared with \$0.59 for diesel. See: [Electric Buses in America \(Lessons from Clean Cities Pioneering Clean Transportation\)](#)

¹³ Emissions from diesel heaters are relatively minimal. 4 liters of diesel can heat an electric bus for 100 km and will emit 105 kg of carbon. <https://www.nrel.gov/docs/fy21osti/76932.pdf> (Page 40).

<https://www.epa.gov/energy/greenhouse-gases-equivalencies-calculator-calculations-and-references>

¹⁴ In addition, we question some of the conclusions UDOT made in its assessments regarding vehicle emissions. We acknowledge that UDOT calculated a total emission savings of 640 tons of CO₂ from the use of electric buses versus diesel buses. Our measurements, however, suggest those predicted savings to be much higher. We encourage UDOT to work with CO₂ emission calculation experts to reexamine their estimates.

¹⁵ [United States Environmental Protection Agency website](#)

¹⁶ See [link](#).

¹⁷ [United States Environmental Protection Agency website](#)

*occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed action.*¹⁸ UDOT defined the EIS’s “environmental justice impact analysis area” as “the area within 0.25 mile of S.R. 210 from Fort Union Boulevard to the town of Alta and includes the proposed mobility hubs at the gravel pit and the park-and-ride lot at 9400 South and Highland Drive.”¹⁹ UDOT explained that it selected this geographical scope because its “traffic evaluation” indicated that the area “... would likely experience most of the project-related impacts from construction and changes in traffic patterns and access.”²⁰ As with the scope of the “Purpose and Need,” we find this definition too narrow.

With respect to a more routine transportation project, perhaps limiting the “impact analysis area” to the immediate vicinity of the applicable corridor makes sense. But, as noted above, S.R. 210 is not your average garden variety road. It travels through an extraordinary landscape that offers beloved recreational opportunities for all Salt Lake County residents, not merely the residents who live within a quarter of a mile of the corridor. In fact, the geographic area that is within proximity to the project area tends to be more affluent than other areas within Salt Lake County. The residents that live in this area have an important voice in the EIS assessment. They are, however, not the only populations affected by the Final EIS decision.

We believe everyone should have access to public lands, regardless of income or zip code. The preferred alternative recommended by UDOT could create a situation where low-income (and even middle-income) families could be precluded from recreating in LCC above the area where the tolling starts unless they are willing to pay for the (currently undisclosed) cost of the gondola ride and base parking garage fees²¹. According to statements by UDOT representatives, the toll is currently predicted to cost between \$25–\$30 per vehicle. The Final EIS acknowledges this by observing that one solution for cost-conscious populations is to “wait to recreate after peak hours.”²² We don’t think access to Utah’s “Greatest Snow on Earth” should be limited to only individuals and families that have the financial means to enjoy a morning of winter recreation. Public lands should have equitable access for all, not just the affluent among us. The fact that the preferred solution will be a publicly funded project only underscores this point. The Gondola B alternative does not serve the broad, diverse public who will fund it. Rather, it prioritizes ski resorts, wealthy residents, and tourists.

Issue: Impact on Watershed in Little Cottonwood Canyon

Throughout the EIS process, SLCPU expressed significant concerns regarding risks to the watershed posed by the construction of the Gondola B alternative. We recognize that staff members of SLCPU are among the foremost experts on water quality issues related to the Central Wasatch. We continue to defer to their expert opinion regarding the need to protect the health of the watershed that serves over 450,000 residents of the Salt Lake Valley.

¹⁸ See Community Guide to Environmental Justice and NEPA Methods Project of the Federal Interagency Working Group on Environmental Justice & NEPA Committee (page 4).

¹⁹ Chapter 5, Environmental Justice of the EIS. Introduction page 5-1

²⁰ Chapter 5, Environmental Justice, Section 5.1 Introduction page 5-1

²¹ We note that UTA, WFRC, UDOT, and MAG are currently conducting a Regional Zero-Fare Study to evaluate the potential for a systemwide fare-free alternatives on UTA’s public transit services. After completing the study, if UTA were to implement fare-free public transit options, there would be no out-of-pocket expense for riders taking buses to the desired resort.

²² Chapter 5 Environmental Justice, Section 5.4.3.2.2 Impacts from Tolling on Lower-canyon Users, page 5-12

According to SLCPU, the construction of the Gondola B towers includes excavation, grading, blasting, and other construction activities, all of which pose a risk of pollutants entering nearby waterways used for public drinking water. In addition, the operation of the Little Cottonwood Canyon Treatment Plant could be compromised on account of pollutants entering the plant from these same construction activities.

SLCPU has also raised a concern regarding the general risks posed by the increase of unmanaged crowds on account of a high-capacity system traveling within a second (or “additive”) transportation corridor. Our understanding is that SLCPU considers the risk of overuse as one of the most significant threats to the long-term protection of the canyon’s watershed, and we believe UDOT should have more fully examined this concern as an “indirect” impact of the Gondola B alternative.

Issue: Increased traffic congestion on North Little Cottonwood Road and Wasatch Blvd as motorists enter the 2,500-parking stall garage that is part of Gondola B

We have concerns that the La Caille base station will result in a significant level of traffic continuing to travel on Wasatch Boulevard and S.R. 210 in densely populated residential portions of Cottonwood Heights, Sandy, and the Unincorporated Salt Lake County areas at the base of the canyon. By putting all parking for the Gondola B alternative at the base station, as well as increasing the number of parking stalls from 1,500 to 2,500, there is a significant risk that traffic volume will exceed roadway capacity and congestion will result on North Little Cottonwood Road and Wasatch Blvd during peak travel hours.²³

Issue: Visual Impact of Gondola B Alternative

The single most problematic aspect of the Gondola B alternative is its devastating and irreversible impact on LCC’s world-renowned views. We have spoken at length about this concern in our comment letter to the prior draft LCC EIS, but we would be remiss to not highlight it again. We will state simply that the majesty of LCC should not be permanently marred by 22 gondola towers (with an additional 4 angle/base stations) scattered along the 8-mile stretch of the treasured, scenic by-way of Little Cottonwood Canyon Road. At least one of those towers will measure at 262 feet²⁴. Even UDOT acknowledged the enormity of this visual impact. We believe UDO should give this consideration greater weight in its final preferred alternative recommendation.²⁵

Comments on Sub-Alternatives

Please see **Attachment C** for our comments on the Sub-Alternatives.

²³ We also question how UDOT intends to acquire the land needed for the new access road. Will that require an eminent domain proceeding?

²⁴ As a point of reference, a 262 foot structure is the equivalent of a roughly 19 story in height commercial building (assuming an average measurement of [14 feet per floor](#)). As another point of reference, the Statue of Liberty stands at a total of 305 feet (with the statue at 151 feet and the pedestal base at 154 feet).

²⁵ We also note that the Federal Aviation Administration may require flashing lights on some of the towers, particularly any tower reaching a height of over 200 feet.

Conclusion

The LCC EIS study first began over four years ago. A tremendous amount of time and energy has been committed to this effort. We remain deeply grateful to UDOT's staff and all stakeholders, partners, and members of the public who have worked tirelessly to engage in the process and provide valuable input.

As lengthy of a time as four years may seem, however, let's not forget that it took millennia for mother nature and glaciers to carve the unique and breathtaking landscape of LCC. Given this historical fact, we believe it makes sense to spend a bit more time exploring the efficacy of less invasive and more practical solutions before we permanently rip up our cherished canyon. We'd rather see common-sense solutions change driving habits than change LCC's natural landscape. Additional time will also allow us to test, measure, and, ultimately, make more informed decisions based on fewer hypotheticals.

Above all, the social equity issues triggered by the Gondola B alternative cannot be easily dismissed. We do not believe that a legitimate justification can be made for spending \$550 million of hard-earned taxpayer dollars (pre-inflation, no less) on a transportation option that primarily benefits visitors to two private resorts when we have other more critical community issues to address. Just think of what that level of investment could accomplish for issues such as east-west traffic congestion, the health of the Great Salt Lake, or county-wide affordable housing. The Gondola B alternative is not a benefit for all. It is a benefit for the few.

But there is a better option — implementing the Common-Sense Solutions approach. This option offers real solutions while maintaining the visual beauty of the canyon and protecting our air quality and watershed. We strongly encourage UDOT to reassess its findings in the Final EIS and adopt this smarter, more fiscally prudent, and environmentally sound option.

[SIGNATURES ON THE FOLLOWING PAGE]

Thank you for providing us with the opportunity to share our thoughts regarding the Final EIS.

Sincerely,



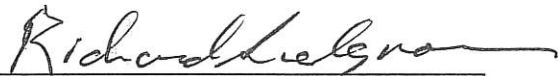
Jennifer Wilson
Salt Lake County Mayor



Laurie Stringham
Salt Lake County Council Chair



Jim Bradley
Salt Lake County Council At-Large C



Richard Snelgrove
Salt Lake County Council At-Large B



Arlyn Bradshaw
Salt Lake County Council District 1



Ann Granato
Salt Lake County Council District 4

Attachment A

[Joint Resolution]

RESOLUTION NO. 6022

DATE: October 4, 2022

A JOINT RESOLUTION OF THE SALT LAKE COUNTY COUNCIL AND THE SALT LAKE COUNTY MAYOR SUPPORTING A COMMON-SENSE SOLUTIONS APPROACH TO THE UTAH DEPARTMENT OF TRANSPORTATION'S LITTLE COTTONWOOD CANYON ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, Little Cottonwood Canyon ("LCC") is a treasured natural resource; and

WHEREAS, the Utah Department of Transportation ("UDOT") has been conducting an Environmental Impact Statement related to transportation improvement alternatives for State Route (S.R.) 210 in and near LCC for over 4 years (the "LCC EIS"); and

WHEREAS, Salt Lake County (the "County") has served as a participating agency for the LCC EIS, and members of County leadership and staff have actively engaged in the LCC EIS process since its inception; and

WHEREAS, UDOT recently issued a Final LCC EIS (the "Final EIS"), in which it identified Gondola Alternative B (the "Gondola Alternative"), with proposed phasing, as the preferred alternative to improve transportation in LCC; and

WHEREAS, UDOT is conducting a 45-day comment period for the Final EIS prior to its issuance of a separate Record of Decision (the "ROD"); and

WHEREAS, the Gondola Alternative: i) will cost taxpayers at least \$550 million in initial construction costs, together with ongoing operational expenses; ii) will make stops at only 2 private ski resorts; iii) will remove only 30% of vehicular traffic from the canyon road; iv) will entail the construction of 22 high-rise hotel sized gondola towers along the canyon road; and v) has limited flexibility to pivot in the event of changing circumstances; and

WHEREAS, the Final EIS failed to adequately and effectively consider alternate transportation modes, such as electric (or other sustainable) buses and different options for tunneling technology; and

WHEREAS, an alternate common-sense solutions approach (the "Common-Sense

Solutions Approach”) exists that has the potential to adequately address the transportation needs highlighted in the LCC EIS, but through more practical and less invasive transportation strategies, such as parking management technologies and policies, multi-passenger vehicle incentives, traction device requirements and regionally placed mobility hubs; and

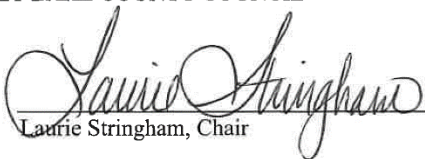
WHEREAS, the Salt Lake County Council and the Salt Lake County Mayor wish to articulate their joint position on the proposed alternative identified in the Final EIS.

NOW THEREFORE, be it resolved that the Salt Lake County Council and the Salt Lake County Mayor recommend that the Gondola Alternative be eliminated from consideration in the final ROD, and, instead, UDOT adopt the Common-Sense Solutions Approach, which is a more fiscally conservative and environmentally sound option; and

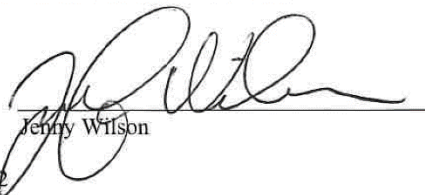
BE IT FURTHER RESOLVED that the Salt Lake County Council, acting as the legislative body for Salt Lake County, and the Salt Lake County Mayor, acting as the executive body for Salt Lake County, intend to continue to support the Common-Sense Solutions Approach as the recommended solution for the transportation issues related to S.R. 210 in and near LCC.

APPROVED and ADOPTED this 4th day of October 2022.

SALT LAKE COUNTY COUNCIL

By: 
Laurie Stringham, Chair

SALT LAKE COUNTY MAYOR

By: 
Jerry Wilson

ATTEST:

Sherrie Swensen
Sherrie Swensen
Salt Lake County Clerk

REVIEWED AS TO FORM

[Signature] 28 Sept 2021
District Attorney Date

Council Member Alvord voting	"Nay"
Council Member Bradley voting	"Aye"
Council Member Bradshaw voting	"Aye"
Council Member DeBry voting	"Nay"
Council Member Granato voting	"Aye"
Council Member Snelgrove voting	"Aye"
Council Member Stringham voting	"Aye"
Council Member Theodore voting	"Nay"
Council Member Winder Newton voting	"Nay"

Attachment B

Estimated Common-Sense Solutions Costs

Note: Costs are high-level planning estimates that will need to be refined during operational and engineering reviews.

Estimated Common-Sense Solutions Costs

CAPITAL/START UP	TOTAL COSTS	DESCRIPTION		
Mobility Hubs (2 at \$49M each)	\$99,000,000	Design & Construction	<i>As with the Gondola B Alternative (starting at LaCaille), operational cost savings for e-buses is predicted to mitigate the higher up-front costs than diesel buses, thereby resulting in lower lifetime costs.</i>	
Wasatch Blvd Roadway Widening	\$62,000,000	Design & Construction		
Electric Buses and Charging Infrastructure	\$150,000,000	Purchase		
Tolling Infrastructure	\$5,000,000	Infrastructure		
Trailhead Parking	\$5,800,000	Design & Construction		
Noise Wall	\$824,000	Design & Construction		
Parking Management Strategies – including resort parking reservation systems and smartphone app technology to let travelers know of parking availability/travel times	\$500,000	Technology		
Multi-Passenger Vehicle Occupancy Initiatives, e.g. rideshare, carpooling, etc.	\$1,000,000	Infrastructure		<i>Items shaded in gray are additional items added for Common-Sense Solutions, i.e., not included in Final EIS calculations.</i>
Expanded Traction Device/Tire Chain Requirements with Expanded Law Enforcement and support staff November-April on peak days/hours	\$500,000	Technology & Compensation		
Increase canyon roadside parking fees, along with increased enforcement Nov.-April on peak days/hours: Friday, Saturday, Sunday, and holidays from 5-10 a.m., 3-6 p.m., 9-10 p.m.	\$250,000	Technology & Compensation		
TOTAL	\$324,856,000			

Attachment C

Sub-Alternatives Assessment

1. **Five-lane Alternative (Wasatch Blvd alternative)** — We support the City of Cottonwood Heights' pursuit of its Wasatch Blvd Master Plan (July 2019).
2. **Snow Sheds with Realigned Road Alternative (avalanche mitigation alternative)** — We would prefer that UDOT eliminate the Snow Sheds sub-alternative from the final ROD. We are particularly concerned about the sheds' size, visual impacts, and environmental impacts.
3. **Trailhead improvements with No Roadside Parking within ¼ Mile Alternative (trailhead parking alternative)** — We support the trailhead parking alternatives set forth in the Final EIS. We particularly appreciate the following goals: 1) enhanced roadway safety; 2) mitigation of traffic conflicts between motorized and non-motorized transportation modes at the trailheads; 3) reduction (or in some cases elimination) of roadside parking to improve safety and operational characteristics of S.R. 210. In general, formalized parking helps to reduce vehicle-pedestrian conflicts, congestion, and crowding, and we support those efforts. Salt Lake County further recommends additional parking at trailheads to be studied to better understand the capacity of the trail system. This is due, in part, to a potential for the increased demand on lower trailheads because of the upper canyon toll. Further consideration needs to be given to bus service at the various trailhead parking lots to provide for disbursed recreational opportunities in LCC. This will in part help address some of the equitable access concerns.
4. **No Winter Parking Alternative** — We also support the improved safety measure of eliminating winter roadside parking adjacent to the ski resorts. The change will improve mobility and reduce friction between parked vehicles and vehicles in the travel lanes. The plan also allows for improved winter snow removal operations since snowplows would not have to navigate around parked cars. It should be noted that parking on the side of the roadway poses a risk of degradation of sensitive resources and watershed, so this measure will also have a positive environmental impact.
5. **Mobility Hubs Alternative** (at the Gravel Pit and 9400 South and Highland Drive) — We object to the elimination of the two mobility hubs in the Final EIS. Salt Lake County recommends that the mobility hubs be constructed as described in the draft EIS (1,000 parking stalls at 9400 South/Highland Drive and 1,500 parking stalls at the gravel pit) with additional mobility hubs strategically placed in Salt Lake valley that seamlessly integrate into the ski bus service.