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December 10, 2019

John Thomas, Project Manager
Utah Department of Transportation

VIA EMAIL

RE: Little Cottonwood Canyon Environmental Impact Statement
Comments regarding Draft Purpose and Need, Alternative Screen Methodology Report

Dear Mr. Thomas,

The purpose of this letter is to provide comments from the Town of Alta (the Town) on the Utah Department of Transportation (UDOT) Little Cottonwood Canyon Environmental Impact Statement (EIS) Draft Purpose and Need and Alternatives Screening Methodology. The Town of Alta is an incorporated municipality in upper Little Cottonwood Canyon (LCC) that provides municipal services to 383 residents and, as the home of world-class skiing at Alta Ski Area and a scenic and accessible high-mountain watershed, hundreds of thousands of annual visitors.

The Town has been a leader in coordination among the public and private entities responsible for transportation and public safety in LCC for decades, and the Alta Marshals Office is a key agency in coordinating operations during roadway avalanche hazard mitigation missions. Promoting safe and efficient operations on S.R. 210 is of fundamental importance to the Town, because it is the only point of access for our residents and visitors to services in the Salt Lake Valley. The Town also takes seriously its obligation to be an effective steward of the invaluable natural resources within and beyond its boundary in the headwaters of Little Cottonwood Creek. We work to manage increasing recreation visitation, enforce land use regulation, and protect water quality.

The context that underlies all decisions by and activities in Alta is the need to balance resilient and reliable transportation within LCC, and our responsibility to manage the impacts that people have on our community and the canyon environment. We provide the following comments

regarding proposals for improvements to S.R. 210 and the multi-modal transportation system based upon it in light of this context.

General Comments

Disaster Resilience, Emergency Operations, and Evacuation

In early August of 2019, a series of heavy rain storms occurred in Little Cottonwood Canyon, resulting in large debris flows out of several of the same gullies crossing S.R. 210 which produce avalanches. These debris flows caused significant damage to the roadway and nearby utilities, which caused LCC access to be restricted for several days following the final storm on the evening of August 8th.

We are all fortunate that this event occurred on a midweek evening during the quieter summer season, when lodging and residences in LCC were generally vacant and traffic on S.R. 210 was sparse. However, if such an event were to occur during a busier time of the year, or if a truly catastrophic event were to occur during a peak day--for instance, a magnitude 7 earthquake on the nearby Wasatch Fault--there is a chance that more than ten thousand people, including local and regional residents and visitors to Utah, could be trapped in upper LCC, perhaps for an extended period of time. Hence, UDOT should consider broadly incorporating disaster resilience, emergency operations, and evacuation into its planning outlook as the EIS proceeds.

Visitor Growth Management

As you are aware, the Alta Town Council recently adopted Resolution 2019-R-14, A Resolution Supporting A Visitor Growth Management Study Which Evaluates And Plans For The Environmental Impacts From Increased Visitation Resulting From Transportation Improvements In Little Cottonwood Canyon. This resolution expresses Alta's support for focused efforts to address the effects of transportation system improvements.

Roadway Maintenance and Operations

The Town of Alta requests, in the LCC EIS and otherwise in its planning and budgeting process, that UDOT prioritize acquiring dedicated maintenance equipment for LCC. As Alta's law enforcement agency and a primary partner to UDOT in roadway and traffic operations in LCC, the Town of Alta and the Alta Marshals Office have almost 50 years of experience observing and managing congestion episodes and traffic accidents in LCC. A critical factor in maintaining an adequate level of service on the LCC road is the presence of maintenance equipment in the canyon when snowfall begins or intensifies during any given storm. The town suspects that keeping at least one snowplow, dedicated to LCC, in the canyon at all times during the winter season could reduce congestion events due to slide-offs and other snow related issues from developing—and that absent dedicated maintenance equipment, a higher-capacity road could be just as susceptible

to congestion related to slide-offs and overly timid (“white knuckle”) drivers as the current highway.

Specific Comments

Draft “Purpose for the Project”

The Town supports UDOT’s articulation of transportation-related purposes of the project-- specifically, in terms of the function of the transportation system that revolves around S.R. 210, improvements in “safety, reliability, and mobility” are appropriate goals. We would like to include a decrease in the number of vehicles in LCC, especially those that have single occupants.

The Town appreciates the recognition of the importance of the Little Cottonwood Canyon watershed to Salt Lake City’s water supply. However, we are concerned about the statement that, as a secondary objective in the EIS, the importance of the LCC watershed will not be used to determine whether an alternative was reasonable or practicable¹. This statement seems to imply UDOT believes watershed impacts from any proposal can be mitigated through design or best management practices. The Town is hopeful that UDOT’s environmental analysis will include a thorough evaluation of both short-term and long-term environmental impacts, and that alternatives generating substantial impacts to the LCC watershed will be ruled out.

Section 2.3.1 states the additional secondary objective of incorporating goals from the City of Cottonwood Heights’ *Wasatch Boulevard Master Plan*. The Town has conducted its own local planning efforts focused on the Alta Commercial Core, and the S.R. 210 corridor through Alta. From 2017 to 2019, the Town developed the Commercial Core Active Transportation Implementation Plan², which developed a range of concepts for street-design improvements that could improve conditions along the Alta segment of S.R. 210 for pedestrians and cyclists. The goals for the project are as follows:

- Accommodate bicycle and pedestrian use along SR 210 within the Town of Alta
- Socially activate the Commercial Core
- Manage vehicle speeds to increase safety for active modes and promote a comfortable atmosphere
- Provide street beautification and way-finding
- Preserve or optimize on-street parking
- Plan for seasonal issues (e.g. snow removal operations)

¹ Utah Department of Transportation. (2019) *Little Cottonwood Canyon Environmental Impact Statement*, Draft Purpose and Need Chapter, page 1-9. Retrieved from <https://littlecottonwoodeis.pennapowers.co/wp-content/uploads/2019/10/Little-Cottonwood-EIS-Chapter-1-Purpose-and-Need-4-Nov-19.pdf>.

² Town of Alta. (2019) *Alta Commercial Core Active Transportation Implementation Plan*. Retrieved from <https://townofalta.com/wp-content/uploads/2019/08/Alta-Commercial-Core-04.29.19.reduced.pdf>.

The Town requests that UDOT incorporate these goals into the purpose for the project, and screen alternatives based on whether those alternatives support implementing these goals on the Alta segment of the corridor.

Draft “Need for the Project”

The Town supports UDOT’s identification of key transportation system impacts in the statement of need for the project: decreased mobility related to ski season morning and afternoon peak travel times and commuter traffic; safety concerns and operational impacts related to avalanche hazard and the current avalanche control program; hazards related to the design of the current roadway; and issues related to road-side parking that occurs in Alta, at Snowbird, and along the highway near trailheads and other recreation access points.

Comments on Alternatives Screening Criteria

The Town requests that the alternatives screening criteria be updated to address our concerns regarding disaster resilience and emergency operations, as well as our concerns regarding short- and long-term impacts to water quality and watershed health in the LCC.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Sondak", written in a cursive style.

Harris Sondak, Mayor