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Josh Van Jura, Project Manager
Utah Department of Transportation

VIA EMAIL

RE: Comments Regarding the Draft Little Cottonwood Canyon Environmental Impact Statement

Dear Mr. Van Jura,

Thank you for the opportunity to provide comments on the Draft Little Cottonwood Canyon Environmental Impact Statement (the DEIS) prepared by the Utah Department of Transportation (UDOT).

In addition to the specific considerations contained in a separate letter with comments from the Town of Alta, I have some more general concerns with both current proposals. While the other letter focused on concerns with the design and operations of the DEIS proposals, this letter focuses on concerns with transportation and visitation policy. These concerns include the magnitude of the investment each proposal would require, the relatively small decreases in congestion that the proposals envision, underlying assumptions about climate change and the future need for the infrastructure these proposals would build, and the risk of delivering too many people into Little Cottonwood Canyon that either proposal entails.

Both proposals are too expensive. On the assumptions that both proposals' costs are about \$600 million, and that 30% of 6000 skiers are accommodated on average during each of 120 days per season for 25 years, the per skier-day cost of each proposal is greater than \$111. Furthermore, the great majority of the costs are paid upfront while the return is realized only over many years so the real cost will be higher in terms of present dollars. This amount is too high for the expected return to the public in terms of sales tax and other revenues, even including any possible marginal multiplier effect of spending at the ski areas. With climate change certain to shorten our ski seasons in the Wasatch Mountains in the near future, the per skier-day cost of these proposals will be even greater. Finally, in the face of widespread inequality, poorly funded schools, and the need

to protect human life and private property through seismic retrofits and climate impact mitigations, I just don't think that skiers' convenience is a top priority for this magnitude of expenditure.

Reducing traffic by 30% of 2050's expected level during the ski season is too modest a purpose. Removing many more cars throughout the year should be the target of this effort, on the assumptions that the population of Salt Lake Valley will continue to grow quickly and that there continues to be increasing demand in both summer and winter for travel in Little Cottonwood Canyon. Of course, such a reduction will be even more expensive but if money is going to be spent on improvements to transportation, it must be for year-round infrastructure that removes most of the cars from the Canyon.

The assumption of year-round growth in demand rests largely on what happens regarding climate change. The DEIS gives too short shrift to this issue. A more complete and updated assessment of both the effects of climate change on the proposals and their effects on climate change should have been conducted as part of UDOT's EIS. Only a few pages of analysis of climate change inform the DEIS, and the effects of climate change are too easily dismissed as irrelevant. The underlying research studies on which this dismissal is based are decades old, and as has recently been noted by the Intergovernmental Panel on Climate Change, climate change predictions are increasingly dire and newer models are better at predicting the actual rate of change. The 2020 annual report for Vail Resorts takes a more sober view than UDOT, for example, and says, "The effect of climate change, including any impact of global warming, could have a material adverse effect on our results of operations as a result of increased weather variability and/or warmer overall temperatures, which would likely adversely affect skier visits and our revenue and profits." Conversely, there is no discussion on skiing's contributions to climate change. How a proposed bus system is fueled and how electricity is generated for a gondola are critical factors for assessing the environmental impacts of the alternatives. More generally, as BlackRock's CEO Larry Fink explains, all business must transform to net zero; sustainability is a standard for BlackRock's investment of more than \$7 trillion. How do UDOT's proposals achieve zero emissions? If BlackRock wouldn't invest in a plan without knowing the answer to that question, I do not think that the people of Utah should either.

Finally, UDOT should have included careful analysis about the number of additional people their proposals would deliver to Little Cottonwood Canyon. In particular, it was clear to all parties during planning for the 2002 Winter Olympics that no events should be held in Little Cottonwood Canyon. I cannot support any proposal that increases the likelihood that events would be held in the Canyon if the Olympics return to Utah unless definite and fully reliable prohibitions against holding events there are included in the proposal. Despite current sentiment against holding events in the Canyon, given climate change it is likely that lower elevation resorts soon may not remain viable venues for competitive winter sports and pressure to hold events in Little Cottonwood Canyon may be intense. Furthermore, it is simply not plausible that all increased visitation from the UDOT proposals will remain within the commercial ski areas. Visitor use outside the ski areas and outside the ski season is exploding, with many vehicles parked for miles along the road in all seasons creating traffic hazards. Visitation now clearly exceeds the capacity of the already

inadequate toilet facilities within the canyon. Without understanding how visitor use is to be managed both inside and outside the ski areas, the selection of either proposal is premature.

I suggest, instead of adopting either proposal, that UDOT begin immediately with incremental changes to travel in Little Cottonwood Canyon and monitor results carefully to inform further incremental improvements. These changes could include:

- Immediate implementation of a traction device requirement
- Tolling
- Construction of a dedicated lane for egress from Alta past Snowbird
- Increased bus and van service
- Improved trail-head facilities.

In conjunction with already planned parking changes in Little Cottonwood Canyon – fees, permits, and reservations for parking – I believe it is very worthwhile experimenting with easily implemented and relatively inexpensive innovations.

Do not hesitate to reach out to me or to Town of Alta staff if you would like to discuss our comments. We appreciate the engagement your team has provided us throughout the EIS process.

Sincerely,



Harris Sondak
Mayor