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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). The Town of Alta (the Town) provides municipal services, including police and public safety, to our residents and to hundreds of thousands of annual visitors to Alta. State Route (SR) 210 is Alta's sole transportation corridor and route of access from the Salt Lake Valley. The Town has participated diligently in every transportation planning initiative focused on Little Cottonwood Canyon (the Canyon) over the past several decades and the Town is grateful for UDOT's efforts to identify projects to improve safety, reliability, and mobility on SR 210.

This letter was developed by Town of Alta staff members, and it includes general comments, comments regarding inclusion of Town of Alta facilities and community elements in the DEIS, and comments specific to the gondola and bus alternatives.

General Comments

The Alta Town Council adopted Resolution 2019-R-14 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. While the proposed bus and gondola systems would deliver passengers primarily to ski areas, are accompanied in the DEIS by various transportation demand management measures, and would either not operate or be less desirable compared to travel by private vehicle outside of ski season, they nevertheless represent very significant increases to the transportation system capacity in the Canyon. If summer visitation increases to the point where SR 210 becomes congested, and if gondola fares are subsidized in the summer season, the gondola could become more popular than the DEIS predicts

it will be upon construction and would thus increase summer visitation beyond what the DEIS predicts. If peak period shoulder lanes are opened to private vehicles or if summer transit services are offered in the future, the preferred bus alternative could also lead to increased summer visitation. Without ski area operations taking place during the summer, these increased visitors may tend to seek destinations outside of the ski areas. And without the buffering effect of winter snow cover, these visitors could create environmental impacts not analyzed in the DEIS. For these and other reasons, the Town urges UDOT and USFS to consider impacts to natural resources, visitor experience, and local communities from increasing the transportation system capacity in the Canyon.

The alternatives are focused narrowly on transporting ski area visitors, during ski season because ski season ski area visitation, and the concentration of that visitation during peak travel periods related to ski area opening and closing times, is presumed to be the primary factor leading to traffic congestion in the Canyon. However, the Town is concerned that this narrow focus will disadvantage other Canyon users and may impair future adaptation of the transportation system as trends in seasonal visitation shift. UDOT can mitigate these problems by doing the following:

- partner with local entities to ensure that a bus or gondola station are integrated with local infrastructure and mobility networks
- prioritize multi-modal access and functionality at trailheads throughout the Canyon as designs for trailhead improvements are developed
- rigorously evaluate the capability of each alternative to facilitate egress from and access to the Canyon in the event of an emergency, such as extreme avalanche hazard, wildfire, landslide, or earthquake, and ensure that all user groups, including dispersed recreation visitors, residents, and other persons present in the canyon for purposes other than skiing at Alta Ski Area or Snowbird, are considered in this evaluation

Construction of a bus or gondola-based transit station in Alta could fundamentally change the shape and function of local transportation infrastructure, alter Alta's world-class alpine landscape, create environmental impacts in the headwaters of Little Cottonwood Creek, and generate significant new demand for municipal services, including water, sewer, fire protection, police and public safety, and other services. For all of these and other reasons, UDOT must coordinate directly with the Town of Alta in the event plans for an Alta transit station are developed further.

The Town of Alta has long advocated for UDOT to assign road maintenance resources including snowplows and other assets that are essential to maintaining roadway function during snowstorms to a permanent location in upper Little Cottonwood Canyon. The presence of snowplows within the canyon at the onset of a period of high precipitation intensity can be a deciding factor in whether the road surface remains drivable for vehicles in the canyon. The Town recommends UDOT partner with local agencies and private companies in upper Little Cottonwood Canyon to invest in and install local roadway maintenance assets. This will be especially important in the event that UDOT decides to widen SR 210 to add peak period shoulder lanes for busses, as the bus lanes may be susceptible to faster road surface deterioration during snowstorms without the benefit of constant vehicle traffic. The Town also recommends that a full-time traction law be implemented in Little Cottonwood that requires snow tires and four-wheel drive during the winter weather seasons.

After UDOT installed a high intensity activated crosswalk (HAWK) signal on SR 190 near Cardiff Fork in Big Cottonwood Canyon in summer 2020, SR 190 experienced major down-canyon delays related to afternoon ski area egress that may have been exacerbated by the operation of the signal. If UDOT improves the Lisa Falls Trailhead and installs a HAWK or similar traffic signal, it should consider ways to mitigate the impact of such a traffic signal on the afternoon, down-canyon traffic flow on SR 210, which on many days is already badly congested.

Comments Regarding Acknowledgements of Town of Alta Facilities and Municipal Services in the DEIS

Various sections of the DEIS fail to account for community facilities in Alta and services provided by the Town of Alta. Chapter 20, 20.4.2.2 States that the proposed bus system would stop only at the ski areas and so would not induce visitation in the Town of Alta. Alta Ski Area is within the Town of Alta, and the Town provides municipal services to Alta Ski Area and all visitors to Alta, including Alta Ski Area's visitors. Anyone arriving in Alta by any mode of transportation would increase demand for Town of Alta drinking water and sewer infrastructure; Town of Alta law enforcement service, firefighting and EMS services paid for by property taxpayers in Alta, and other services provided locally in Alta.

Section 4.3.6 Utilities describes utility providers in the study corridor. The Town of Alta is the culinary water and sewer provider in Alta, but that is not acknowledged in Table 4.3-3. Salt Lake County Service Area #3 operates the Town of Alta water system under a contract, and a licensed sewer operator operates the Town sewer system under a contract. All costs to operate and maintain these systems are borne by user fees. UDOT must consult the Town of Alta regarding water and sewer infrastructure in Alta instead of Salt Lake County Service Area #3.

The final tower in the proposed gondola alignment and the Alta station are very close to, if not encroaching upon, two key components of Town of Alta infrastructure. The Town of Alta Park is located on 0.4 acres of National Forest System lands and operated under a USFS special use permit. The Town Park has been in place since 1977 and residents and other community members frequently gather there in summer months to play volleyball and enjoy each other's company. Gondola tower 20 would be situated adjacent to the northwest corner to the park. The tower would dominate views to the north of the park and could create noise impacts from cabins moving over sheave trains and entering the nearby station. UDOT should formally acknowledge the Town of Alta Park in DEIS Table 4.3-1 and must analyze whether the impacts of nearby gondola elements would constitute impacts to a recreation resource under Section 4(f) of the Department of Transportation Act.

Both tower 20 and the footprint of the proposed Alta station appear to encroach on a segment of the Town of Alta sewer line between the Alta Lodge and the Rustler Lodge. Relocating this sewer alignment to the south of its present location could be environmentally challenging and expensive, as wetlands associated with Little Cottonwood Creek are located just to the south of the current sewer alignment.

Table 4.3-2 and Figure 4.3-6 describe various types of community facilities along SR 210, and a few key community facilities in Alta are not represented on these exhibits. The Alta Medical Clinic, located inside the Goldminer's Daughter Lodge next to the Alta School, is a small,

independent urgent care-type facility that provides a variety of medical services to Alta locals and visitors. Our Lady of the Snows is a Catholic chapel located at 10189 East, SR 210, where in-person mass is conducted during ski season. It is also the most heavily used indoor community gathering space in Alta. UDOT should acknowledge these facilities throughout DEIS Chapter 4 “Community and Property Impacts” and consider impacts to these facilities from the preferred alternatives.

Comments on Gondola Alternative

The proposed gondola system could provide a reliable alternative to SR 210 during inclement weather, avalanche hazard, and other conditions or events that compromise the viability of SR 210. But this alternative raises several concerns.

According to various plan-view renderings contained in the DEIS, the Alta gondola station is situated to the southwest of the “Rustler Mine Dump” parking area, in the runout of several large avalanche paths, including Flagstaff Shoulder, Main Flagstaff, and Binx’s Folly. The Town recently completed an architectural feasibility study of a new community center facility on a parcel just upslope from the location of the proposed gondola station, on the north side of SR-210. Town of Alta Code requires building permit applications include certification that a proposed structure is designed to protect human life from a 100-year avalanche. As part of that study, therefore, consultants to the Town evaluated the potential impact pressure, velocity, flow height, and areal extent of a 100-year avalanche event along the avalanche paths and runout area that affect the community center site. This analysis concluded that both the community center site, and the location of the proposed gondola station, are subject to avalanche debris with substantial impact pressure, velocity, flow height, and aerial extent from 100-year avalanche events. For these reasons, UDOT must seriously consider the technical feasibility of, and likely construction costs associated with, building a gondola station in the proposed location, as well as whether it is technically feasible to locate the final span of gondola cables at elevations that may be subject to flowing avalanche debris from paths that affect the site.

Evacuation of the gondola would be an extremely complex procedure given the length of the alignment, the number of cabins, and the hazards present within Little Cottonwood Canyon. Evacuation during periods of high avalanche hazard would be especially challenging because passengers would disembark from cabins into stations, and then potentially be required to remain within those stations until avalanche hazard has been mitigated. In designing each of the three stations planned in the Canyon, including the Alta Station, the Snowbird Station, and the Tanners Flat Angle Station, UDOT should contemplate the capacity of the stations to function as emergency shelters for large numbers of people that can withstand the impacts of avalanches that affect the location of each station.

Chapter 17, Visual Resources, describes the selection of 25 *Key Observation Points* (KOPs) by UDOT “that would have views of the project elements and that represent the most critical viewpoints.” The only KOP selected in Alta is near the Catherine Pass Trailhead in upper Albion Basin. There are numerous additional locations in Alta that would represent a common point of observation for the DEIS action alternatives that are even more popular with motorists, recreation visitors, and Alta residents than the Catherine Pass Trailhead. For instance, either of the two major Alta Ski Area parking lots are much more popular recreation access points, and they are adjacent

to a much higher volume transportation corridor than the Catherine Pass Trailhead, which is only accessible by vehicle from roughly July 1st to November 1st each year via the Albion Basin Summer Road (ABSR). Another example is the eastern terminus of SR 210, where the ABSR begins and provides winter access to Grizzly Gulch, Twin Lakes Pass, and Catherine Pass, among other destinations. This is widely considered one of the most popular winter-season access points for non-ski area recreation in the Cottonwood Canyons, and it is also extremely popular in the summer season as part of the route to access upper Albion Basin.

Additionally, the final four towers and associated cable spans of the gondola alignment will prominently affect the view down Little Cottonwood Canyon from nearly any viewpoint along the floor of the upper canyon. Tower 17 will be placed on Peruvian Ridge in a location where it appears that it will disrupt the horizon line. These and other elements of the gondola will be visible from most residential areas and overnight lodging properties in Alta. Numerous Alta residents and community members have expressed concerns with these potential impacts.

UDOT acknowledges noise impacts from the preferred alternatives in DEIS Chapter 11. UDOT's analysis of noise impacts from the gondola seems to find that noise created by gondola towers and stations would be within the noise impacts already created by SR 210. For some Alta residential areas, commercial properties, and common public gathering spaces, the gondola will be closer than SR 210, which could cause gondola-related noise to exceed noise emanating from SR 210. Additionally, SR 210 only creates noise impacts when vehicles are travelling on the roadway. The gondola will be operating continuously throughout its daily operational period, so any periods of silence that take place when no vehicles are travelling on SR 210 would be disrupted by constant gondola noise. This would be especially impactful to residential areas along the Alta-Snowbird Bypass Road and commercial properties including the Rustler Lodge, the Alta Lodge, and the Goldminers Daughter Lodge.

Bus Comments

Whereas the gondola alternatives include simple plans for upcanyon stations at Snowbird and in Alta, neither of the bus-based alternatives include any indication of where a high-capacity bus station in Alta would be situated. The location of such a facility could be a critical aspect of the functionality and popularity of a bus system, and local traffic and vehicular circulation would need to be coordinated with the arrival and departure of busses every five minutes. Like a future gondola station, a bus station would need to be designed with avalanche hazard in mind. UDOT will need to coordinate with the Town of Alta to provide water and sewer service to the facility, and to understand the implications of the facility for local law enforcement and shelter-in-place capabilities.

The speed limit on SR 210 through Alta is 25 miles per hour, but due to the very wide nature of the paved corridor through Alta, it is already common for vehicles to exceed the speed limit. It seems likely that peak period shoulder lanes along most of SR 210, which would not bear any vehicular traffic in the summer, would create greater visual clearance on the roadway and induce even faster vehicle speeds. UDOT must consider design elements to mitigate increased vehicle speeds if it

chooses to widen SR 210 in the lower and mid canyon segments of the roadway. If design elements to mitigate increased vehicle speeds are not installed, and if speed limit enforcement is not widely effective, any improvement in safety for cyclists, pedestrians, and others could be undermined by the hazards associated with faster vehicle speeds.

Widening SR 210 to add peak period shoulder lanes for the proposed enhanced bus service will dramatically alter the experience of driving on the Little Cottonwood Canyon Scenic Byway. Much of the roadway through the canyon is a narrow, winding, 2 lane road. Widening the road will entail massive new cut and fill slopes along the length of the roadway particularly in the lower canyon, where presently the roadway corridor is narrowest. UDOT should consider all possible measures of the mitigating the visual impact of these project elements.

UDOT must ensure it provides adequate road maintenance resources on SR 210 if it installs peak period shoulder lanes. These roadway segments could be susceptible to more rapid road surface deterioration during snowstorms, since they will not benefit from constant vehicle traffic, which can mitigate the buildup of snow and ice on the road surface in some conditions.

Do not hesitate to reach out to me or to Town of Alta staff if you would like to discuss our comments.

Sincerely,



Harris Sondak
Mayor



Chris Cawley
Assistant Town Administrator