

MAYOR
ROGER BOURKE

TOWN COUNCIL
ELISE MORGAN
SHERIDAN DAVIS
JOHN BYRNE
CAROLYN ANCTIL



TOWN OF ALTA
P.O. BOX 8016
ALTA, UTAH
84092-8016
(801) 363-5105 / 742-3522
FAX (801)742-1006
TTY 711

October 17, 2022

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

VIA EMAIL

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

Dear Little Cottonwood Canyon EIS Project Team,

Thank you for the opportunity to provide comments on the Final Little Cottonwood Canyon Environmental Impact Statement (the FEIS) 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 is grateful for UDOT's efforts to improve safety, reliability, and mobility on SR 210 for all users.

That being said, the primary purpose of this letter is to express and record my vigorous objection to UDOT's proposed Little Cottonwood Canyon gondola. As Alta's mayor, I do not support the proposed gondola because of the environmental and social impacts it would create, and because the cost to build and operate it would outweigh the benefits it may provide. However, I strongly support UDOT's intent to pursue a phased approach to implementing components of the preferred alternative. Due to these reasons, which are described in more detail below, UDOT must pursue and exhaust less expensive, less impactful, and more flexible interventions to improve safety, reliability, and mobility on SR 210 before implementing something as permanent as the proposed gondola.

The proposed gondola's purpose of reducing 30% of projected winter-season traffic in 2050 is too narrow to justify the projected cost of the project and the permanent impact the gondola would create on the canyon, especially in the context of so much uncertainty about the future of Little Cottonwood Canyon. Whether the ski industry at-large, or our regional ski industry in Utah, can

survive as climate change proceeds is uncertain. What is more predictable, however, is that climate change and demographic trends in Utah will create problems much more significant than difficulties associated with ski area access. Public expenditures of the magnitude required to construct the proposed gondola should be devoted to problems such as wildland fire mitigation, protecting Great Salt Lake, improving air quality along the Wasatch Front, funding public schools, or more widely beneficial transportation infrastructure, rather than to projects that would benefit a narrow and privileged class of Utahns—those who can afford to ski and choose to do so—at the expense of all taxpayers.

Alta and Little Cottonwood Canyon are one of Utah's most famous and important landscapes. To install the proposed gondola on the floor of the canyon, including several towers up to 230 feet tall adorned with blinking red lights, would radically and permanently tarnish Alta's appearance. Because of this, it is perplexing that as part of its analysis of visual resource impacts, UDOT chose just a single key observation point in Alta, from which the gondola is obviously not visible. UDOT should have chosen a key observation point along SR 210 in Alta or nearer to one of Alta Ski Area's base facilities; every person that comes to Alta experiences views from these locations, including every Alta resident, all of whom would see the gondola from their homes and neighborhoods, every day. The proposed gondola would dominate and degrade these vistas, which have been marketed around the world to bring people to Utah.

Since the adoption of the 2003 Wasatch-Cache National Forest Plan, the US Forest Service restriction on adding parking in Little Cottonwood Canyon has functioned as the primary limit to visitor capacity. The gondola would circumvent that restriction and significantly increase the capacity of the transportation system to deliver people to the canyon. UDOT's conclusion in the FEIS that the gondola would only deliver people to ski areas not subject to the Forest Plan appears to be based on an assumption that patterns of recreation visitation will remain static over time, yet it is widely acknowledged that patterns in recreation use and demand are rapidly changing. Alta in particular is already a hugely popular point of origin for recreation activities that take place outside the ski area, and as backcountry skiing and summer outdoor recreation become even more popular, demand for non-resort recreation access in Alta and Little Cottonwood Canyon would inevitably lead people to take the gondola for reasons other than just to visit Alta Ski Area or Snowbird. Since Alta and Snowbird are the only two upper termini of the system, the proposed gondola will preferentially load those two locations and concentrate these impacts.

In comments to UDOT regarding the 2021 Draft Little Cottonwood Canyon Environmental Impact Statement, the Town highlighted technical issues with the proposed gondola that do not appear to be adequately addressed in the FEIS. The Town of Alta conducted an architectural feasibility study on a parcel across SR 210 from the location of the proposed Alta gondola station. The study included modeling the characteristics of a 100-year avalanche event in avalanche paths that affect both the Town of Alta-owned parcel, and the location of the proposed Alta gondola station. The Town's study determined that both the town's parcel, and the location of the Alta gondola station, are subject to very significant avalanche hazard; on the town's parcel, debris flow core heights of over 3 meters are possible, with powder blasts reaching up to 30 meters above the ground. In the modern history of Alta, very large avalanches have crossed both of these locations on several occasions, with debris spanning the entire distance between the Alta Lodge and the Rustler Lodge

and running all the way over and past the proposed gondola terminus location to Little Cottonwood Creek.

The Town's avalanche study did not directly contemplate the location of the proposed Alta gondola station, nor the location of UDOT's proposed Alta bus terminal, but it did suggest that the location and the Town's parcel are subject to similar avalanche hazard. And the Town's study proceeded to determine that constructing a building on the Town's parcel upslope from the proposed gondola terminus would be perhaps prohibitively expensive, technically challenging, and ethically questionable, given the threat to human life and property posed by a potential avalanche in this area. Given all of this, the Town requests more information subsequent to the statement contained on FEIS Section 32.2.6.5K, that "The gondola system, including the terminal stations, would be designed to account for [...] canyon avalanches." Specifically:

- Has UDOT modeled the characteristics of an empirical destructive scale 5 (D5) avalanche event originating in the Flagstaff Shoulder, Flagstaff Face, and Binx's Folly avalanche starting zones, to determine the impact pressure, debris flow height or thickness, debris flow velocity, and other characteristics of such an avalanche, in the location where UDOT proposes to locate the proposed bus terminal, the proposed gondola terminal, and the final span of gondola cables?
- If UDOT has conducted such an analysis, did it conclude that it is technically feasible to locate such facilities where they are shown on plans contained in the FEIS, especially the final span of gondola cables?
- Has UDOT evaluated whether constructing elements of the preferred alternative, including the final gondola tower and bus and gondola termini, would divert flowing avalanche debris into adjacent properties, including the Alta Lodge and the Rustler Lodge?

UDOT should consider the following details as it begins a phased approach to improving transportation conditions on SR 210:

- UDOT should develop a local maintenance shed in upper Little Cottonwood Canyon with a dedicated plow truck. If snowplows are already working in the canyon when snow begins to stick to the road surface, it is much easier to maintain adequate surface conditions for efficient traffic flow. But when plows from the UDOT Cottonwood Station are assigned to other roadways as storms in Little Cottonwood Canyon escalate, conditions can become unmanageable much more rapidly.
- Consider updating traction device regulations in order to keep inappropriate vehicles out of the canyon as storms approach and invest in enforcement of the existing traction law.
- UDOT must carefully evaluate the feasibility and effectiveness of implementing the proposed toll below Snowbird Entry 1. UDOT should evaluate whether any reasonably priced toll will be high enough to dissuade canyon users who are already planning to spend a significant amount of money on skiing related activities and lodging. UDOT should evaluate traffic impacts that could occur if visitors attempt to turn around before passing a toll station. UDOT should exempt canyon residents, essential workers, and service vehicles from paying the toll.

- UDOT should thoroughly evaluate opportunities to optimize traffic flow and driveability on the existing roadway, specifically at merge points and curves with impaired line-of-sight.

Regardless of the outcome of the Little Cottonwood Canyon EIS, I am certain that UDOT and the Town of Alta will need to continue to work together to understand all the details of UDOT's proposals and mitigate impacts to Alta and our community. The Town of Alta looks forward to future collaboration between our agencies and we thank you once again for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Bourke". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Roger Bourke, Mayor