April XX, 2024

RE: Recreation Hotspots not addressed in UDOT's Environmental Impact Statement regarding transportation system improvements for S.R. 210 in Little Cottonwood Canyon.

Dear UDOT team,

We acknowledge the considerable effort and resources invested in the UDOT's Environmental Impact Statement (EIS) released on August 31, 2022, aimed at enhancing transportation in Little Cottonwood Canyon. We extend our gratitude for the detailed analysis and dedication demonstrated in reviewing alternatives and completing the EIS.

Following a comprehensive review of the EIS, proposed phased implementation plan, and the preferred Gondola Alternative B, we've identified several significant transportation congestion issues, that have not been addressed in the EIS and will not be solved by the transportation improvements proposed in the EIS.

Issues that impede the flow of traffic on S.R. 210 and are not address in the EIS include:

(1) The number of roadway entry points and roadside parking (including illegal U-turns and failure to yield to oncoming vehicles on the roadway) between Entry 1 and Entry 4 at Snowbird.

(2) Closure of S.R. 210 between Snowbird Entry 4 and Alta (the "Mainline") during peak exit travel times and routing all traffic through Snowbird via the Bypass Road.

(3) Vehicles with inappropriate traction devices in the canyon during winter storms.

Each of these issues impacts the flow of traffic leaving the Town of Alta and individually can result in periods of gridlock which paralyzes emergency services, snow removal equipment, and public transit and has resulted in accidents by vehicles traveling downhill in the uphill lane. Collectively, they can result in gridlock for 2-3 hours within the Town of Alta. Unfortunately, the transportation improvements selected in the UDOT's EIS do not address these current transportation congestion issues.

We respectfully urge UDOT to address these issues before implementing the transportation improvements outlined in the EIS. From our perspective, the traffic congestion and gridlock created by these issues is more frequent and significant than many of the issues being addressed in the EIS.

The congestion created by these issues not only impacts the skiing experience at Alta Ski Area but also tarnishes the overall travel and tourism experience in Utah. Long time visitors to Alta and employees alike are expressing their frustration and seeking alternatives due to these issues.

To address these issues, we specifically request the following:

(1) Reduce traffic flow impediment and provide more equitable merging for traffic leaving Alta through modifications to S.R. 210 between Snowbird Entry 1 and Entry 4 and/or management of the traffic exiting Snowbird.

(2) Keep the Mainline open during peak exit travel periods (between 3:00 pm and 7:00 pm daily) through the installation of snowsheds on the mainline or managing and mitigating the Mainline like the mid and lower canyon using technology and more aggressive avalanche mitigation.

(3) Keep vehicles without proper tractions devices out of the canyon during storm periods through use of a traction law that requires all passenger vehicles in the canyon on any day there is a forecast for snow to have a UDOT sticker indicating the vehicle has approved traction devices.

A detailed explanation of the purpose and need for these requests and potential solutions follow this cover letter.

It is our understanding that there are funds available that were allocated to address "Recreation Transportation Hotspots" that could be used to address these issues. We plead with you to do so. Please let us know how we can work with your teams to address these issues.

In conclusion, we wish to emphasis that reducing or eliminating the gridlock in the Town of Alta by keeping the mainline open during peak exit periods and providing a more equitable merging of Alta traffic on S.R. 210 passing through Snowbird and keeping vehicles out of the canyon without appropriate tractions devices during storm periods and are immediate needs that should be addressed before the transportation improvements identified in the EIS are implemented. If not addressed, they will still exist even after the EIS improvements are made.

Please, please, please address these issues ASAP.

Sincerely,

LOGO, Name and Title of Alta Businesses

Traffic Merging Improvements

Purpose and Need

The flow of traffic exiting the Town of Alta via S.R. 210 is significantly impeded and often stopped by roadside parking between Snowbird Entry 1 and Snowbird Entry 4 and unmetered/unmanaged traffic exiting Snowbird Entries 1 through 4. This creates a preferential situation for visitors to Snowbird that has financial ramifications for businesses in the Town of Alta and disrupts public transit schedules. It also impedes snow removal and creates public safety issues.

Up to two hundred cars can park along the roadside between Snowbird Entry 1 and Entry 4. Many of these cars will make an illegal U-turn (often a three-point-turn) into oncoming traffic exiting Alta on S.R. 210. This impedes the flow of traffic and often creates a stop that ripples up the line of traffic on S.R. 210 exiting Alta.

In addition, the four unmetered/unmanaged entry points to S.R. 210, Snowbird Entries 1 through 4, impede the flow of traffic by allowing up to 9 vehicles to merge between 2 vehicles traveling down the canyon from Alta on S.R. 210. When roadside parking also occurs, up to 25 vehicles will merge between 2 vehicles traveling down the canyon from Alta on S.R. 210. This impedes the flow of traffic traveling on S.R. 210 from Alta. It creates stop and go delays and results in an inequitable exit of traffic from Alta and Snowbird. Thirty minutes to an hour is often added to the travel time from Alta to the mouth of the canyon by the roadside parking and inequitable merging through Snowbird.

Extension of the merging barrier at Entry 1 twelve hundred feet down canyon has been nicknamed the "Snowbird Priority Merge Lane" as it allows traffic exiting Snowbird from Entry 1 to pass up 50 vehicles on S.R. 210 before merging into traffic. This is very frustrating to people in vehicles traveling on S.R. 210.

Frustration from this situation has resulted in employees in Alta quitting their job, some visitors no longer visiting Alta on weekends, visitors cutting their day short at Alta to avoid the congestion, and other visitors indicating they don't plan to return to Alta until this situation is fixed.

Requested Action

1. **Provide equitable merging of traffic exiting Snowbird and Alta by making road modifications between Snowbird Entries 1 and 4 and/or managing traffic merging onto S.R. 210 between Snowbird Entries 1 and 4. Eliminate the impediment of traffic flow on S.R. 210 at Snowbird and the associated preferential merging and financial advantages.**

Possible Solutions

1. Provide a second downhill lane between Snowbird Entry 1 and Entry 4 that allows all traffic leaving Alta on S.R. 210 to merge with all traffic exiting Snowbird below Entry 1. This solution will be more successful than trying to manage merging of traffic at each entry point and roadside parking.

Key components

a. Sufficient width for another lane between Snowbird Entry 1 and 4 currently exists for most of this section of S.R. 210. However, there is currently not enough width for roadside parking and another lane. To minimize road width expansion, Snowbird would need to be allowed to replace the roadside parking for up to 200 cars in another location.

b. If replacement of the roadside parking between Snowbird Entry 1 and 4 is not achievable, widening S.R. 210 to accommodate the roadside parking and another lane could be considered. It appears most of this section of S.R. 210 could be widened to accommodate another lane and provide roadside parking. Approximately 20 roadside parking spaces may be lost in areas where the roadside parking and another lane could not be accommodated, reducing the number of parking spaces that would need to be replaced in another location.

2. Install traffic signals at Snowbird Entries to S.R. 210 to facilitate equitable merging of traffic leaving Snowbird with traffic already on S.R. 210 exiting Alta. Schedule the signals and merging patterns to provide a 1:1 merging pattern for traffic exiting Snowbird with traffic exiting Alta. This solution may be less effective traffic lower in the canyon backs up through Snowbird.

Key components

a. The signaling pattern should result in the number of vehicles merging from Snowbird Entries to equate to the same number of vehicles allowed to pass through Snowbird on S.R. 210 from Alta. With four entry points the merging ratio would need to be 1:4, which may be difficult to accomplish or enforce. The signaling solution also does not address the impact of roadside parking and illegal U-turns.

3. Replace the roadside parking between Snowbird Entry 1 and Entry 4 by creating a 200 vehicle parking lot between the Big Bend in S.R. 210 below Entry 1 and Little Cottonwood Creek. Replace the current Entry 1 with a new Entry 1 below the Big Bend which would service the new 200 vehicle parking lot, the current Entry 1 parking, and Entry 2 parking. Close Entry 2 to traffic exiting to go down canyon. Provide a traffic signal at Entry 4 with a 2:1 merge pattern and the new Entry 1 with a 3:1 merge pattern to achieve an equitable merge pattern.

Key Components

a. The option will require involvement by the USFS, Snowbird, and UDOT to move the roadside parking to a new location and make a new access roads. This solution also requires lights for merging at all Snowbird entries, however the signaling patterns for

this solution would be more amenable and easier to understand by the general public than those presented in the previous signaling solution.

Keep the Mainline Open during Peak Downcanyon Travel Periods

Purpose and Need

The Mainline refers to the section of S.R. 210 between Snowbird Entry 4 and the Town of Alta that passes under Mount Superior and its associated avalanche slide paths. When the Mainline is closed due to avalanche risk, all traffic going to or exiting Alta must use the Bypass Road, which passes through Snowbird via Entry 4 and its associated parking. The are 23 merge points on the Bypass Road and 100 roadside parking spaces.

The 23 merge points plus the roadside parking on the Bypass Road allow up to 975 vehicles to merge between 2 vehicles exiting Alta via the Bypass Road. This creates gridlock in the Town of Alta for 1-3 hours depending on road conditions and the rate of traffic flow in the lower canyon. The gridlock traps public transit and snow removal equipment, impacts emergency services and creates public safety issues. When the mainline is closed, this allows 90% of the vehicles parked at Snowbird to access S.R. 210 and travel down the canyon before the vehicles at Alta move more than a few hundred feet. It is very frustrating for Alta employees and visitors to sit in gridlock for 1-3 hours and then when they finally can move down the canyon on S.R. 210 they observe all of the parking areas at Snowbird are nearly empty.

The Bypass Road also has the steepest grades in the canyon which further contributes to gridlock times and traffic flow when it is slick.

Requested Action

Keep the Mainline open for traffic exiting the Town of Alta on S.R. 210 during peak downhill travel times (3:00 pm to 7:00 pm daily) by eliminating or mitigating the public safety risk.

Possible Solutions

1. Use an Avalanche Snow Shed on S.R. 210 to keep the mainline open during peak periods. To minimize cost and size, a snow shed for the downhill lane only could be considered or using diversion berms and more active avalanche mitigation to minimize the length of snow shed needed.

   Key components

   b. Since this is not in the current EIS, another EIS may be required and funding would need to be secured.

2. Manage and mitigate the slide paths above S.R. 210 between Snowbird Entry 4 and the Town of Alta like the mid and lower canyon. On days when conditions or the weather forecast indicate avalanche risk and public safety concerns may necessitate mitigation, close the Superior to backcountry use, close the mainline and mitigate mid-day if conditions warrant, and then plow have the mainline open for the peak exit period (3:00 pm to 7:00 pm daily). This has historically been done before. Identify issues and concerns with this solution and figure out ways to overcome them.

   Key components

   a. The use of Remote Avalanche Devices (RAC's) for avalanche mitigation on Mount Superior are an essential part of this solution. They reduce the time required to do the mitigation work and allow it to be done without the firing of a military weapon over structures and vehicles.

   b. Backcountry access to this terrain would need to be controlled and monitored to allow mid-day avalanche mitigation work. Backcountry use of this terrain is currently problematic and if improvements are not made, it is just a matter of time before someone is seriously injured or killed by an avalanche in this terrain. Establishing appropriate uphill routes and access points,and implementing closures when conditions warrant are needed. Use of a permit system and technology (i.e. Geoprevent Radar) are tools that could be considered to help UDOT forecasters manage this terrain and keep S.R. 210 open during peak exit times.

   c. Areas in the Superior slide path (i.e. the Superior Lot, Hellgate Condos) that could be impacted by UDOT's mitigation would need to be put under interlodge and cleared to allow the mitigation work. Preferably, the Superior Lot would not be parked any day that mid-day mitigation work above the mainline was forecasted. Closing the mainline and impacting over 1,000 cars exiting the Town of Alta should trump providing parking for a few hundred cars.

   d. UDOT forecasters would need to be comfortable making the decisions the day before or early in the morning whether mitigation work on Mount Superior would be needed to keep the mainline open. This would allow them to close the backcountry and let Snowbird know that mitigation on Mount Superior was probable during operating hours.

Traction Law Modification

Purpose and Need

The current traction law (Utah's administrative rule (R920-6) requires vehicles to be equipped with traction devices appropriate for severe winter driving conditions in Little Cottonwood Canyon on S.R. 210 when the road surface conditions warrant as determined by UDOT. Travelers are notified when traction devices are required via road signs and UDOT's traveler information system.

While this law as written and applied works well for sections of State roads that pass-through areas where severe winter driving conditions can occur between destinations, however, it does not work well for a state road, such as S.R. 210, that ends at a destination where severe winter conditions can quickly develop before vehicles without appropriate traction devices can exit the area. This can result in hundreds of cars trying to navigate a slippery road surface in severe winter conditions without appropriate traction devices in violation of the traction law, creating traffic congestion and public safety issues. Issues with the current traction law and its application for S.R. 210 in Little Cottonwood Canyon include the following:

1. Since the traction law is not invoked until the road surface conditions warrant it, hundreds of vehicles without appropriate traction devices can legally travel up Little Cottonwood Canyon on S.R. 210 even when it is snowing, or the forecast indicates winter weather will be occurring during the day. Consequently, at the end of the day when the road surface conditions require appropriate traction devices, hundreds of vehicles without appropriate traction devices must creep down the canyon to avoid sliding off the road or getting in an accident. This creates significant travel delays for the hundreds of other vehicles that have appropriate traction devices in the canyon.

2. There is little to no enforcement of the current traction law. To invoke the traction law, the lights at the traction law road signs at the top and bottom of the canyon are turned on, but there is no restriction to prevent vehicles without proper traction devices from traveling up or down S.R. 210 once conditions warrant it. One of the challenges of enforcement is that physically stopping and checking vehicles entering the canyon creates significant traffic congestion in the neighborhoods near the mouth of the Little Cottonwood Canyon. Without enforcement, vehicles without appropriate traction devices are found regularly in the canyon when the law has been invoked, creeping up or down the canyon, impeding the flow of traffic and creating public safety issues.

Requested Action

Keep vehicles without proper traffic devices out of the Little Cottonwood Canyon and off of S.R. 210 when conditions warrant traction devices through implementation of a traction law that requires traction devices whenever there is snow in the weather forecast for the next 12 hours. Implement the traction law in a manner that does not impede the flow of traffic on S.R. 210.

Possible Solutions

1. Require all passenger vehicles using Little Cottonwood Canyon (S.R. 210) between November 1st and April 30th to have a UDOT traction approved sticker.

2. Require all passenger vehicles using Little Cottonwood Canyon (S.R. 210) to have a UDOT traction-approved sticker on any day that snow is forecasted to occur during the next 12 hours.

   Key Components

   a. Supplement the current UDOT traction sticker distribution system at tire shops in the Salt Lake Valley with a traction sticker distribution station in the Park and Ride lot at the mouth of Little Cottonwood Canyon. This will allow visitors traveling from out of State needing a traction sticker to have their traction devices checked and receive a sticker or be directed to use public transit.

   b. Validate that vehicles have valid traction stickers at destinations in the canyon (Snowbird and in the Town of Alta) to avoid impeding the flow of traffic in the canyon and out the mouth of the canyon. This solution could include giving the owners of vehicles identified without stickers in the canyon on Traction Sticker Required Days a warning the first time and then a significant fine for subsequent infractions. A third party could be hired to validate the sticker and scan plate number on vehicles at Snowbird and in the Town of Alta. Another option would be to use scanners to read scan stickers and license plate numbers to identify violators traveling up the canyon.

   c. This solution would require an administrative rule change for S.R. 210.

   d. Provide additional chain-up areas at various points in the canyon to allow those using chains for traction devices additional places to safely put chains on their vehicles.