



CENTRAL WASATCH COMMISSION

December 13th, 2019

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

Dear John Thomas and project team,

The Central Wasatch Commission would like to thank Utah Department of Transportation for the opportunity to comment on the October 30th release of the Little Cottonwood Canyon Environmental Impact Statement Purpose and Need and Screening Criteria chapters.

The Central Wasatch Commission (CWC) is comprised of eight local jurisdictions from the Wasatch Front and Back. The CWC members include the Town of Alta, Salt Lake County, Sandy, Cottonwood Heights, Salt Lake City, Millcreek, Summit County, and Park City. Additionally, the CWC has a thirty-four-member stakeholder council that advises on the work of the CWC. Members include representatives from the environmental, recreation, ski resorts, business, science, and academic fields.

Mountain Accord Background

The CWC's mission is to implement the Mountain Accord and to coordinate among jurisdictions and stakeholders to find solutions for the Central Wasatch Mountains. Mountain Accord was signed in 2015 to make decisions and implement solutions to protect the Central Wasatch and ensure its long-term vitality. This unprecedented collaboration of diverse groups created solutions for the future of the Central Wasatch. Mountain Accord's goal is to create and build a consensus that would include responsible stewardship of natural resources, preservation of quality recreation experiences, establish an environmentally sustainable transportation system, and contribute to a vibrant economy.

The Mountain Accord represents the culminating commitment of more than 20 jurisdictions and organizations who, through a voluntary, multi-year, public, consensus-based planning process agree to proceed with a suite of actions designed to ensure that future generations can enjoy all the activities we do today, while preserving our watershed and natural environment. The signers intend the Accord to influence future, local, regional and statewide decisions and to initiate efforts to enact meaningful solutions for the Central Wasatch in the face of growing pressures on this beloved mountain range. The process and outcome of the Mountain Accord and the mission of the Central Wasatch Commission aligns with UDOT's vision to partner and build the community of our dreams.

For Transportation solutions, the Accord reflected the work of hundreds of stakeholders over two years. Specific direction included:

“The [Mountain Accord] Blueprint proposes to connect residents and visitors to mountain destinations and connect communities and people to jobs via efficient and sustainable transit choices. The solutions would manage the impacts of a rapidly growing population in ways that will reduce reliance on automobiles and decrease impacts on the environment. The proposed transit network would not only provide a more sustainable way to travel, it would also provide a powerful tool for the region to shape growth, reduce sprawl, and promote transit-oriented development that supports economic growth, quality of life, and environmental protection.”

This memo incorporates comments from the CWC Board, member jurisdictions, and input from the CWC Stakeholders Council utilizing the Mountain Accord as the lens. The process to solicit comments included hosting a facilitated discussion with the Stakeholders Council and coordination with all the local governments in an around the Central Wasatch Mountains. During this time Stakeholders provided feedback and comments for the Purpose and Need and Screening Criteria. Finally, the CWC Board reviewed and approved these comments.

Purpose and Need

The following comments represent a comprehensive summary of the comments CWC has received from the CWC Board, member jurisdictions, and Stakeholders Council:

- Expand cooperating agencies
 - Request that Central Wasatch Commission be elevated to a Cooperating Agency throughout the EIS process. According to the Purpose and Need Chapter, “A cooperating agency is an agency, other than a lead agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. A state or local agency of similar qualifications may, by agreement with the lead agency, become a cooperating agency (40 Code of Federal Regulations Section 1508.5).” It is our Commission’s belief that the CWC does in fact have special expertise and jurisdictional responsibility for the Central Wasatch Mountains.
- Adding emphasis on improving air quality
 - Incorporate how any alternatives will help reduce automobile emissions
- Protecting watershed should be a top-level priority, as reflected in federal and state law and not a secondary criterion that is currently stated
 - Please enhance and elevate the importance of protecting this critical resource
 - Impacts related to Clean Water Act elevated to Level 1 Screening Criteria
 - Addition of Safe Drinking Water Act elevated to Level 1 Screening Criteria
 - Local regulations for protection of drinking water
 - Local jurisdiction land and water rights be included in the screening criteria

- Considering the requirements of NEPA and the regulations of the Council of Environmental Quality (CEQ), UDOT's approach to indirect and cumulative impacts, connectedness to other actions, and other issues important to the Central Wasatch Mountains may not be adequate. Input and funding for disciplines other than engineering are required by NEPA; we assume that UDOT is incorporating the many disciplines that are needed to address impacts on the Central Wasatch Mountains.
- Project area
 - Study area seems inadequate. The decisions of the LCC EIS will inevitably affect a broader geographic area than the roadway. That needs to be reflected in the P&N and screening criteria. For example, whatever mode is selected to achieve the objectives and purposes sought will tie to the rest of the transportation system. Those impacts and the effectiveness of each mode need to consider the broader, connected geography.
- Best practices on implementation of alternatives to minimize environmental impacts
- Decrease in the number of vehicles, especially those that have single occupants
- Include additional local plans (e.g., Alta Commercial Core, Mountain Accord, Salt Lake City Watershed Management plans, Salt Lake County Wasatch Canyons Master Plan)
- Purpose and Need chapter does not clearly address pedestrian facilities along Wasatch Boulevard
- Visitor Carrying Capacity. There is no requirement that UDOT conduct a carrying capacity study and CWC is not advocating that UDOT undertake such a study as part of the LCC EIS, A thorough understanding of the potential ROD on the affected environment is important and should be evaluated as part of the LCC EIS.

Screening Criteria

- Incorporate the principles of the Mountain Accord for the projects screening criteria
 - Equally evaluate all the options from Mountain Accord: aerial, trains, buses
- Consider the impacts on sound and noise
- Consider visual impacts
- How will alternatives create/deviate current runoff and create new hydrology system and what impacts will that have on the water quality
- Incorporate impacts of Climate Change
 - Impacts of climate variability on the resilience of infrastructure to natural disasters such as extreme weather events
- Cost and benefits analysis
- Operations and Maintenance
 - Roadway maintenance and operations- prioritize acquiring dedicated maintenance equipment for LCC
- Timing, Feasibility, Phasing
 - Consider implementation in the context of near-term projects and the results on traffic congestion mitigation
 - Timeline of alternatives
- No net adverse impacts to natural environment

- Substantially reduce vehicles
- Include study on latent demand
- Consider additions to the draft documents that reference the impact to residents living along the corridor in addition to tourists, commuters, and recreation traffic

In addition to the comments regarding the Purpose and Need and Screening Criteria, alternatives were mentioned during the process for UDOT to consider. Alternatives mentioned include:

- Focus on mass transit
 - Effectiveness, priority, optimize
- Mitigate parking
- Please include transit connections to Big Cottonwood Canyon
 - Currently, alternatives that will be considered are transit connections between Little Cottonwood Canyon and Wasatch Boulevard from the mouth of Big Cottonwood Canyon. The relationship to the transportation system in the Salt Lake Valley is not identified. For Park City, UDOT has only identified gondola connections; other modes aren't identified for evaluation or as possible alternatives.
- Expansion of Highland Drive
- Consider a variable, multimodal 3rd lane
- Ingress/egress from LCC for emergency
 - Consider incorporating disaster resilience, emergency operations, and evacuations
- Improper vehicles (snow tires, 2wd)
- Pulling parking away from the mouth of canyons
- Updated wayfinding & parking signage
- Tolling
 - Potential revenue and resources for the management of transportation impacts
- Improved and enhanced enforcement
- Improve transit capacity and prioritization along Wasatch Boulevard that adds value to the surrounding neighborhoods
- Consider traffic calming measures or speed limit reductions that would slow traffic, allow safer/easier neighborhood access, without negatively impacting roadway level of service
- Create a network of shared-use pathways and pedestrian crossings along the corridor for active transportation and recreation
- Strongly consider creative travel lane ideas instead of standard road widening (e.g. dedicated transit lanes, flex shoulders, etc.) to retain the character of the Wasatch Boulevard corridor while accommodating additional traffic during peak travel hours)
- Preserve/make consistent bicycle facilities

Other Impacts

Finally, The Blueprint of the Mountain Accord includes actions in accordance with the National Environmental Policy Act (NEPA). This includes preparing an environmental impact statement (EIS) or other environmental reports evaluating the impacts of the proposed action and alternatives:

- High capacity transit in the Little Cottonwood Canyon/Big Cottonwood/Park City corridor.
- Transit incentives and automobile disincentives including parking/pricing strategies.
- Year-round local bus service in Big Cottonwood Canyon.
- Fast transit service from the airport to the Park City area via I-80.
- Improved transit service on US 40 and I-80 between Quinn's Junction and Kimball Junction.
- Improved transit connections in Summit County.
- Shuttle service in Mill Creek Canyon.
- High capacity transit connections in the eastern Salt Lake Valley.
- Safety and access improvements for bicyclists and pedestrians.

The CWC requests that UDOT consider these long-term objectives in evaluating LCC solutions and their impacts. The CWC recognizes that UDOT is preparing an EIS on LCC and Wasatch Boulevard. But the decisions stemming from this EIS and ensuing investments will dictate the transportation system of the future for the Central Wasatch Mountains.

The CWC would like to thank UDOT for the opportunity to comment on the Purpose and Need and Screening Criteria chapters for the Little Cottonwood Canyon Environmental Impact Statement. It is the Commission's hope that the comments in this memo are helpful, considered, and incorporated moving forward.

The CWC is committed to supporting and engaging with UDOT throughout the EIS process. The CWC is available to assist UDOT through whatever forums best serve UDOT's needs.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Christopher Robinson" followed by a stylized mark that could be interpreted as "Candless".

Chris McCandless
Central Wasatch Commission Chair, and Sandy City Council

Cc:
Jackie Biskupski, Salt Lake City
Jim Bradley, Salt Lake County
Christopher Robinson, Summit County

Mike Peterson, Cottonwood Heights

Andy Beerman, Park City

Jeff Silvestrini, Millcreek

Harris Sondak, Town of Alta

Jenny Wilson, Salt Lake County

Ralph Becker, Central Wasatch Commission Executive Director

Blake Perez, Central Wasatch Commission Deputy Director

Lindsey Nielsen, Central Wasatch Commission Communications Director