

MONICA ZOLTANSKI MAYOR

SHANE E. PACE CHIEF ADMINISTRATIVE OFFICER

To: Utah Department of Transportation From: Sandy Mayor Monica Zoltanski

Re: Mayor's Public Comment on Little Cottonwood Final EIS

Date: October 17, 2022

I am writing to state my opposition to the Gondola B option as a recommended transportation solution for Little Cottonwood Canyon. As mayor of Utah's 7th largest city, which sits immediately adjacent to the canyon itself, I wish to share not only the sentiments of the people who elected me based on my active platform of responsible stewardship of our environmental and public tax resources, but I also wish to offer details on how the EIS recommendation for the gondola runs contrary to Sandy City's interests.

In a survey conducted by Sandy City in January of 2022, only 23% of Sandy residents supported a gondola system in Little Cottonwood Canyon. 41% of respondents preferred expanded bus service without widening the road and 72% of respondents were in favor of expanded parking with a multi-story parking garage at the current park and ride at 9400 South and Highland Drive. See full survey here.

Sandy City's interests in managing transportation in Little Cottonwood were outlined in a letter dated August 13th 2021 from the past administration and I affirm the same. Sandy City identified the main concerns that needed to be addressed by the EIS, including:

- 1. Protecting our watershed and water quality
- II. Connecting to Sandy City transportation system.
- III. Getting cars off the road and reducing congestion.
- IV. Improving the experience of canyon visitors.

Phase 1 Recommendations

Some of Sandy City's concerns have been addressed in Phase 1 recommendations, but it does not go far enough. I am encouraged that UDOT has recommended allowing time for improved transit operations, innovation, and partnership between the canyon users, resorts, UTA and government. I am confident that by working together we can and will achieve the EIS goal of reducing vehicle traffic on the canyon road by 30%, and we can accomplish this short of the massive price tag of the gondola.

Sandy, Salt Lake County, and the State of Utah need time for the phased approach to take root and deliver meaningful, measurable results. With strategic planning that starts by first addressing proper canyon capacity instead of maximizing the visitor volume, we can protect our majestic canyon while improving the visitor experience.

Since any choice requires funding, and until the phased approach is funded, I ask that UDOT fully commits to a reasonable timeframe of 5-10 years to implement new ways to manage traffic under the phased approach,



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including incentivizing reservations, carpooling and tolling as well as strategic mobility hubs to move people year-round in a safe, convenient manner. There is no downside to focusing resources to make the phased approach the best approach. When all parties put their best efforts to meeting sensible traffic demand, we will have time to explore, implement, and measure new technology, electric buses, and strategic mobility transit hubs.

Once we've exhausted the phased options, a gondola or other options may be reconsidered when we have a clearer picture of canyon capacity, consumer behavior and the incremental demand on the canyon depending on growth.

Furthermore, Sandy City has major concerns about Phase 2 as detailed in the Final EIS, including:

I. Water quality

Little Cottonwood Canyon provides 100% of our city's peak season drinking water supply. It is our primary water source for over 100,000 residents and visitors from November through July. This requires diligent protection of the Little Cottonwood Canyon water supply. There are many times of the year where Little Cottonwood water is distributed to customers throughout Salt Lake County through cooperative water management agreements between Metro Water of Salt Lake & Sandy and the Jordan Valley Water Conservancy District. Jointly they serve, and water from Little Cottonwood supports, over 1 million people in Salt Lake County.

The pristine water you see in Little Cottonwood Creek today will be at a Sandy or Salt Lake County customer water taps within 4 to 8 hours. Any contamination becomes an immediate health threat to our community, where concentrated contamination from vehicle accidents, storms, snow runoff events can pollute our drinking water, and/or require shutdown of the water treatment plant. Unlike a water treatment plant on a slow-moving stream or beneath a reservoir that are aware of contaminants days in advance, hazards in Little Cottonwood are upon the plant immediately and often without notice.

Tower construction is risky and can disturb the ecosystem which will negatively impact water quality. UDOT states that watershed protection is not a primary objective. Still, the needs of clean drinking water for 1 million people must be considered. Construction of a major project such as the gondola could have lasting impacts on the environment and a quickly shrinking resource in the State of Utah. Therefore it is absolutely imperative to Sandy that UDOT prioritizes watershed health over transportation, even though UDOT is a transportation agency.

Sandy is encouraged to see UDOT's inclusion of several water quality best practice improvements in the Phase 1 interim recommendations, notably including but not limited to water quality catchment and sizeable treatment buffer areas around all concentrated parking areas, improved sanitation facilities at trailheads and parking areas, as well as installation of concrete vehicle barriers located at areas of high risk for vehicle slide off and accidents that may result in injury or hazardous material spills. The marginal widening of roadway shoulders to accommodate better roadway runoff treatment, reduce erosion, and improve safety for the growing cyclist and road running recreation in the canyon should be included and not overlooked in the project. The management



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of the traffic into the canyon, and management of the recreation intensity and impacts upon the natural vegetation and treatment capacity of the watershed, is important in protecting our water supply, both to prevent spills in the first place, and to allow buffer distances for hazmat and other responders to identify, contain and remove any contaminants before they become a public health or environmental impact.

Finally, on a related matter, the declining water levels of the Great Salt Lake signal serious concerns about snowfall and air quality for everyone along the Wasatch Front. If the State of Utah is serious about protecting snow volume in LCC, it should prioritize funding for the protection of the Great Salt Lake over the gondola. dollar-for-dollar, the money spent to combat the shrinking of the Great Salt Lake will have much broader economic and public health impacts than a gondola for resort-goers.

II. Connection to Sandy City transportation system

The 9400 S. Highland Dr. transit hub was specifically removed from the recommended solution, with the EIS recommending the location remain a surface parking lot only. No future stall increases, nor other improvements are recommended here. However, the La Caille base station is in an area that is geologically sensitive, geographically constrained, overlaps an EPA Super Fund site and master planned for non-commercial uses in Sandy City jurisdiction adjacent to the site. Sandy City has a strong commercial site on 9400 S Highland Drive that is less constrained in all measures, and more adequately able to handle a transit hub with its associated future development pressures. UDOT has failed to include 9400/SR-209 in its study, even though the EIS says it's the source of 40% of the ski traffic and the plan for the 2,500 vehicle parking structure will add to congestion issues and private property impacts and we feel this was a critical omission in the Final EIS.

The LCC EIS 2050 modeling assumes Highland Dr. will be built, which places the 9400 S. mobility hub at the intersection of two regionally significant major arterial roads. Wasatch Blvd is classified as a major collector road. We understand that if Highland Dr. and the mobility hub at 9400 S. are not built, the probability of widening Wasatch Blvd south of SR-209 is more likely, along with increased SR-209 congestion. However, Sandy does expect lower trip generation to the mobility hub without the Highland Dr. connectivity. Widening Wasatch Blvd will come with significant right of way takes and entire homes being purchased. These decisions and recommended solutions are critical to the future of Sandy regarding land use, geography, and transportation.

III. Reducing congestion

Several milestones of the EIS preferred solution have significant negative impacts for Sandy City and its residents. By locating a 2500 stall parking garage at the mouth of LCC, it creates a point source for vehicle trips, pollution, congestion, and development pressure in a location poorly suited for such a project. Such a design runs counter to mass transit objectives of getting people out of personal vehicles crossing the valley through Sandy convening at the mouth of the canyon. Unlike the previous mobility hub proposals, the 2,500-vehicle parking structure in the mouth of the canyon does nothing to reduce traffic congestion on the 9400 S. corridor where 40% of the ski traffic originates.

Additionally, the La Caille location is geographically constrained by:



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- a tight footprint
- substantial vertical grades
- adjacency to Little Cottonwood Creek with its associated floodway
- potential debris flow hazard area
- proximity to the Wasatch Fault
- overlapping a former Superfund site and will expose elevated heavy metal deposits in the vicinity
- adjacency to single family residential zoning
- sole accessibility by 3-lane roads (Single travel lane in each direction)
- requiring additional traffic lights on Wasatch further impacting traffic

While SR-210 is proposed to be widened to five lanes to handle the projected ADT's, SR-209 was not considered for improvements. The impact will be equivalent, with no proposal on how to handle the loading and impacts to Sandy City residents. Early in the EIS process, the traffic split coming into the canyon during heavy travel days was identified as 54% SR-210, 40% SR-209, and 6% Wasatch Blvd to the south. This means the EIS only studied 54% of the problem while determining the gondola base station location and left 46% of the loading outside the scope of the EIS. Both SR-209 and SR-210 are on WFRC's Long Range Plan for improvements. A single point destination at the mouth of the canyon concentrates westbound trips to a geologically constrained location and increases delay to users at peak loading/unloading times. This is the exact opposite of what is desired.

IV. Improving the experience of canyon visitors

The gondola system recommendation in Phase 2 would undoubtedly become an attraction and bring even more visitors to Little Cottonwood Canyon as UDOT states as a positive feature of the gondola in Ch. 6 of the FEIS. Certainly, people will be curious to ride but as it draws visitors who come for the amusement, it will push away visitors who come for the natural experience. UDOT projects a significant population increase in the state and makes the claim that the canyon can and must accommodate this increase without the support from any type of study and analysis. Without a capacity study to understand what kind of traffic the canyon can reasonably sustain without long term damage to the environment, we should not undergo such a massive project.

The FEIS states in Ch. 6 that the preferred alternatives, including the gondola, will bring approximately 2,500 more people to the resorts each day. It is counterintuitive to state that the capacity study is not necessary while aiming to increase the capacity of the ski resorts. We think it is imperative for UDOT to commission a capacity study before implementing Phase 2 and moving more people into the canyon.

A gondola system with 200-ft towers will forever alter the landscape of Little Cottonwood Canyon. Visitors come from around the world to enjoy the beauty of these pristine mountains. The gondola would change that view scape and obstruct the splendor of these mountains in the canyon for all who live in the valley and all who visit. Additionally, the 200-ft towers and overhead cables puts in danger Little Cottonwood Canyon's status as a state designated Utah Scenic Byway.



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For these reasons, Sandy City is asking UDOT to work through the Phase 1 improvements with full commitment and adequate time to explore the phased approach solutions to meet the goal of reducing car traffic on the canyon road by 30% before irreversible changes are made in the canyon that benefit a limited user group. Improved bus service along with no on-road parking in the ski areas, tolling and reserved parking are likely to meet UDOT's traffic reduction goals by themselves. They should be tried and assessed for some period before deciding to proceed with the gondola.

Future generations will judge the wisdom of how we protect our environment and manage valuable public resources. It is my hope that we can stand proud, together, to say we've done the best for our generation of decision makers by exhausting the phased approach and avoiding the boondoggle of the gondola. Thank you for your time and consideration.

Sincerely,

Monica Zoltanski Sandy City Mayor

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