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SaltLakeClimbers.org

April 18, 2023

Utah Department of Transportation (UDOT)  
2825 East Cottonwood Parkway, Suite 200  
Cottonwood Heights, Utah 84121

RE: Environmental Impact Statement (FEIS) Supplemental Information Reports: Salt Lake Climbers Alliance (SLCA) Comments

Dear UDOT LCC EIS Project Team:

The Salt Lake Climbers Alliance (SLCA) appreciates the opportunity to comment on UDOT's FEIS Supplemental Information Reports. The SLCA maintains that there continues to be critical flaws to the FEIS in total; specifically, that the total scope of the project is too narrow and the purpose and need are not satisfied by the proposed solution. Furthermore, the proposed preferred gondola alternative cannot be exempt from the Roadless Rule.

The SLCA has and will continue to advocate for enhanced electric bus service, with no roadway widening or large-scale infrastructure, that runs year-round and stops at trailheads, thereby serving all user groups in Little Cottonwood Canyon and satisfying mobility demands. The enhanced electric bus system will not impact any IRAs within Little Cottonwood Canyon and would still provide traffic relief during the winter months and therefore should be reconsidered as the preferred alternative.

**The SLCA makes the following comments and requests of UDOT pertaining to the Supplemental Reports on Air Quality and Roadless Areas.**

Roadless areas are protected under the 2001 Roadless Rule. The following values or features characterize inventoried roadless areas: *High quality or undisturbed soil, water, and air; Sources of public drinking water; Primitive, Semi-Primitive Non-Motorized, and Semi-Primitive Motorized classes of dispersed recreation; Natural appearing landscapes with high scenic quality.*

The gondola alternative does not maintain any of the characterized values of features listed. The gondola alternative will disturb soil, will be within a source of public drinking water, is not a form of semi-primitive motorized recreation, does not blend in with natural landscapes with high scenic quality.

More specifically:

1. The FEIS and supplemental reports fail to acknowledge that the gondola alternative does not support recreation except that occurring at privately owned ski resorts.
2. Inventoried roadless areas act as buffers for designated wilderness areas. The gondola will be immediately adjacent to multiple wilderness areas. The FEIS fails to take into account this proximity and the significant impact on these areas. The impacts include visual and audio impacts.
3. The FEIS and supplemental reports fail to fully analyze the impacts to the ecology, drinking water quality, and dispersed recreation opportunities within the inventoried roadless areas.
4. The FEIS and supplemental reports fail to fully account for recreation restrictions/limits within the inventoried roadless areas that will occur due to the proximity of gondola infrastructure to dispersed recreation.
5. Though the FEIS notes a strategy to use helicopters for gondola tower construction, in all likelihood the construction of the gondola towers will require temporary roads and timber removal resulting in impacts to water and soil quality. The FEIS and supplemental reports fail to fully analyze these impacts.
6. The FEIS and supplemental reports fail to account for the impacts of the gondola tower foundations which will require timber removal. Additional timber removal will be required to maintain the regulated variance for aerial ropeways.
7. The FEIS and supplemental report fail to address the need for access to gondola infrastructure within the roadless area for ongoing maintenance, inspections and rescue situations.
8. The FEIS and supplemental report claim that impacts to roadless areas will be 'incidental' but fail to fully account for impacts from the construction and from the gondola infrastructure to environmental values that the roadless area designation is supposed to protect: watershed, views, dispersed recreation, timber, vegetation, and habitat.
9. Roadless areas are protected under the 2001 Roadless Rule. While the 2003 Revised Uinta-Wasatch-Cache Forest Plan allows for some development in selected roadless units, the units impacted by the gondola alternative are not among those units listed.
10. Though the gondola cannot be classified as a roadway, it would be built for transportation purposes, thus being a de facto highway in the sky, making it inconsistent with the 2001 Roadless Rule and the 2003 Uinta Wasatch Cache National Forest Plan.

In regards to the FHWA requested evaluation of a scenario under the existing modeling where all ski buses would be powered by diesel fuel. The following comments are in pertinent:

1. The current operational model assumes that all (65) buses will be in operation in the first year. This operational model is not reflective of the actual need which will not require all buses be in operation until year 30. The operational model should reflect the predicted yearly needs.
2. The current operational model assumes that buses will be in operation only during the ski season, approximately five months of the year. As such, the 14 year operational life, which assumes continuous usage is not accurate.
3. The FHWA request that the bus fleet be evaluated at the maximum expected service life of 14 years rather than a variable age bus fleet is nonsensical.
4. As it has been demonstrated that diesel and electric buses can both be utilized, a range of alternatives should be presented. That is an all electric fleet being the best case in terms of emissions. Whereas as an all diesel fleet being the worst case in terms of emissions.

Additional comments regarding modeling of emissions for all scenarios.

1. During the three to four peak hour uphill and down periods a steady state arrival/departure model cannot be assumed. The arrival/departure data presented in the FEIS reflects a bimodal distribution and as such should be used for all associated modeling.
2. Emission modeling should include scenarios that include normal operations as well as temporary canyon closures for avalanche control work.

#### **Links to SLCA's Previously Submitted Comments during the LCC EIS:**

- [Little Cottonwood Canyon Draft Environmental Impact Statement \(DEIS\) Salt Lake Climbers Alliance \(SLCA\) Comments](#)
- [SLCA's Comments Regarding Revised Chapter 26 to Little Cottonwood Draft Environmental Impact Statement](#)
- [Little Cottonwood Canyon Final Environmental Impact Statement \(FEIS\) Salt Lake Climbers Alliance \(SLCA\) Comments](#)

Sincerely,  
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