

Mountain Accord Blueprint Comments

by the

Little Cottonwood Canyon Communities (LCCC)

EXECUTIVE SUMMARY

We strongly object to both the process and substantive conclusions of the Mountain Accord Blueprint.

- 1. The Mountain Accord process has been inadequately designed and implemented. We believe this has led to unbalanced and special interest driven conclusions. The process needs better checks and balances.**
 - a. The “public” process has failed to give adequate notice and opportunity to be heard and has been insufficiently inclusive.
 - b. Mountain Accord’s work products are suspect because there is a lack of transparency as to who originated Mountain Accord and what their biases are, for establishing internal decision accountability, for a detailed program plan, and for an explanation of how binding any public policy decisions made by this group will be upon all Utahns.
 - c. Mountain Accord violated foundational principles within the stated process they chose to follow thereby diminishing the soundness of their work products.

- 2. The Plan lacks any form of goal prioritization, is based on faulty assumptions along with inadequate or poorly defined data on current state scenarios. Faulty inputs will always result in bad outcomes.**
 - a. The case for change driving the MA initiative is flawed. MA bases its sense of urgency and focuses effort on assumptions not universally held. Both time and effort needs to be taken to use correct data before moving forward.
 - b. No attempt has been made to determine the carrying capacity of the Little Cottonwood Canyon.
 - c. The size of the transportation problem in LCC are not well defined by supporting data. Proposed solutions seem oversized for the problem.
 - d. The report fails to prioritize the many listed goals in any meaningful way and assumes that increased tourism in the Canyons is an unmitigated good.
 - e. Prior to the 2002 Olympics, venue development was considered and then rejected, claiming such activity posed potential environmental damage to the Cottonwood Canyons. Without supporting data, the Accord’s Plan would contradict those conclusions.
 - f. The Blueprint only includes only highly intrusive, expensive transportation recommendations into LCC. Simpler, lesser environmentally invasive, and less expensive alternatives need to be included in the plan so they can be appropriately considered during the EIS.

- g. This proposed deal is being undertaken and pursued outside of the normal processes that would evaluate alternatives in terms of their opportunity costs vis-à-vis other possible uses of these funds. There are far better uses to which these funds could be put that would benefit all Utahns and be robust across various possible futures that might unfold.
- h. A preliminary Cost-Benefit analysis must be done before any alternatives are considered for study in a NEPA process. Otherwise, we are wasting money studying alternatives that we cannot afford.

3. The MA Blueprint Plan represents misguided conclusions regarding the environment and transportation. It favors a select few, is detrimental to a unique environmental system, and comes at great expense of the many.

- a. The report fails to adequately consider alternatives or adequately explain why some alternatives are being excluded from further consideration.
- b. The plan for the Canyons will only benefit a small number of Utahns at potentially tremendous cost to both average recreational users and taxpayers.
- c. Building additional permanent and expensive infrastructure up our canyons will almost inevitably create serious pressure for future growth.
- d. The proposed deal represents a great risk to the major watershed on which millions of Utahs rely and represents a profligate and unjustifiable use of Utah's precious and increasingly scarce water resources.
- e. The proposal flies in the face of good science and policy about confronting climate change risk. In the face of the risks and uncertainty associated with climate change, Utah should be investing its resources in robust, resilient strategies that allow us to respond flexibly to changing conditions, rather than committing massive amounts of money to an irreversible infrastructure project that may well be inconsistent with future needs and may saddle Utah's citizens with a project with no return on investment.
- f. Doubling up on infrastructure in the Canyon by building a new rail line in addition to the existing road will put new infrastructure money at significant risk in the event of an earthquake, rock slide, mudslide, wildfire, or other disaster.
- g. Doubling up on infrastructure also comes at significant cost to the historic neighborhood of Wasatch Resort and to other neighborhoods and properties along the proposed rail-line.
- h. The swap of backcountry private/public lands should not be linked to the Little Cottonwood Canyon transportation plan. Such a link is a 'hostage taking' by the resorts and should not be tolerated.
- i. The transportation plan should not be designed to be a marketing tool for the resorts. We don't need to create something "that can't be found anywhere else in the world".
- j. Biking and Hiking trails next to the train tracks is a bad idea. Trains next to these recreational activities will ruin the experience.

We strongly object to both the process and substantive conclusions of the Mountain Accord deal.

These comments represent only a few of the many important issues that this proposal raises, in part because of the difficulty of getting good information about what is actually being proposed (and the true cost to taxpayers of that proposal) and because of the shortness of the timeline for public comment.

- 1. The Mountain Accord process has been inadequately designed and implemented. We believe this has led to unbalanced and special interest-driven conclusions. The process needs better checks and balances.**

We believe the process implemented by Mountain Accord process has allowed a small group of interested parties to steer and direct its blueprint to reach a predetermined conclusion. Inputs from the systems groups, partners, and the public at large have been manipulated, controlled, and ignored to achieve the objectives of these special interests.

- a. The “public” process has failed to give adequate notice and opportunity to be heard and has been insufficiently inclusive.**

Many of the most directly affected communities have been given little notice about the process and little opportunity to be heard, and have been largely ignored by the parties that have driven this proposal. At the very least, these communities should have been included from the beginning as a separate stakeholder group whose interests should have been considered. This recommendation was given to Mountain Accord in early 2014.

MA communication practices have been largely inadequate. Random people in the valley, when questioned, may have heard something of MA but have little or no understanding of the objectives of the project and its current timeline. MA has relied on existing media for press releases and on its website for communicating program details. Given the potential environmental impact and the costs linked to the MA blueprint this initiative demands a larger, more broad based, advertising campaign to get the attention of all stakeholders.

Likewise, MA has not been effective in notifying the public about meetings to review project progress and Blueprint recommendations. Meetings have been held in the SL City Library as well as in localized areas. These scheduled public review meetings have been publicized in the two local papers via news story format, not half or full page advertisements as would be expected for a project of this magnitude. As such, attendance has varied.

Previous to the current 2015 comment period, Mountain Accord made one attempt to gather input from the general public in a multiple-choice survey. However, it was biased as all the choices were those MA predetermined. None of the options included choices that might limit growth or maintain current recreation use levels. Regardless, the results of this survey were ignored. MA said that they only received 900 responses and that the results were not statistically valid. Why didn't Mountain Accord extend the survey time period and advertise more broadly to get greater participation?

In the few public meetings that have been held, community members who came and tried to participate have been left with the distinct impression that the public question and answer was "staged," such that the facilitators answered only those hand-picked and pre-selected questions that they wished to address. Such a process creates a façade or veneer of public participation without any real content or involvement and is the worst of all worlds.

Initially MA set an end to receiving public comment at March 16. The Executive Board was requested to extend this time period to which they agreed to push it to end of May/mid June during a Board meeting held in early March. But a new end date was recently published as May 1. Why the departure from end of May/mid June? What is the urgency?

We ask that there be a real public process, with full engagement with stakeholders, and a fair and open consideration of all alternatives.

- b. Mountain Accord's work products are suspect because there is a lack of transparency as to who the originating MA members are and what their biases are, for establishing internal decision accountability, for a detailed program plan, and for an explanation of how binding any public policy decisions made by this group will be upon all Utahns.**

There has been a significant lack of transparency surrounding Mountain Accord in terms of its founding, its decision making process, and the special interest of those steering the decisions. The Program Manager describes the Accord as a confederation of approximately 20 "entities" coming together for the common good.

But such a miraculous spontaneous gathering is usually not the case. What was the genesis of MA? Who were the primary instigators for this effort, how did they come together, and what biases and agendas do they represent?

Block diagrams portraying MA program plan during public meetings showed process steps of Gather/Organize Data, Initial Blueprint Recommendations, Final Blueprint, and Begin Implementation. No subsequent plans were spelled out for continued review, input, or revision. We need to know if we will have further opportunities to comment and influence the MA decisions.

The output or “blueprint” decisions made by the Board, in many cases, did not follow the proposals made by the respective System Group Committees who studied the different elements of the project. We request that the process includes accountability of the Board back to the System Groups.

MA identified an organization structure that includes an Executive Board (23 members), a Management Team (8 members, 7 of which are Exec Board members), Steering Committee (staff members of the Executive Board), Coordinating Team (Steering Team plus assigned staff from Mgmt Team organizations), and a technical consultant under contract administered by UTA. All decision-making power is vested with the Executive Board. MA documents describe a desired consensus decision-making process but include majority voting as a fallback position. Executive Board meeting attendance ranges in the neighborhood of 13-17 members and it is this body that is making the MA decisions. It is not clear how binding public policy decisions made by the Executive Board with the type of membership and governance that they have established for themselves are upon the Salt Lake valley community. Additionally, if the vote requires only a majority then the membership of the executive committee needs to be carefully weighed to achieve the correct balance between public and non-public and between commercial and non-commercial interests.

c. Mountain Accord violated foundational principles within the stated process they chose to follow thereby diminishing the soundness of their work products

MA reportedly used a “systems model” which requires first studying and then looking at the “fit and relationships” of all the parts of a larger system. Any proposed new solution set would include considerations on how these pieces working together would improve overall desired outcomes. MA established four System Group Committees (Transportation, Recreation, Economy, and Environment) each made up of approximately 45 participating members to study each of the sub system elements. Unfortunately, these groups never interacted or communicated directly with each

other. Any sharing of the group work products was coordinated and filtered by individual MA staff members. This is a violation of the use of the “systems model” and resulted in a sub-optimized solution set. Additionally, the System Groups did not present their recommendations directly to the Executive Board. Staff members presented the recommendations to the Board.

2. The Plan lacks any form of goal prioritization and is based on faulty assumptions along with inadequate or poorly defined data on current state scenarios. Faulty inputs will always result in bad outcomes.

a. **The case for change driving the MA initiative is flawed. MA bases its sense of urgency and focuses effort on assumptions not universally held. Both time and effort needs to be taken to use correct data before moving forward.**

Initiatives must have a presenting problem that creates for each a “case for change”. For Mountain Accord (MA) it is the projected growth of the Salt Lake valley and the anticipated strain such growth will have on central Wasatch Mountain recreation areas. MA’s assumptions in building their case for change need to be refined.

First, MA used inflated growth projections of 500,000 while Envision Utah uses a longer, less biased view of how much and where that growth will occur. They project Salt Lake valley growth at 200,000.

Second, MA suggests that the increased demand from valley population growth will all be focused on the relatively smaller areas south of Parley’s Canyon, north of Little Cottonwood Canyon, and that of the larger Park City community. But the reality is that recreation area growth has been, will, and should be dispersed in the full range of mountains, canyons, and foothills surrounding the whole Salt Lake valley as development takes place.

b. **No attempt has been made to determine the carrying capacity of the Little Cottonwood Canyon**

No studies have been made or discussions held concerning the carrying capacity of Little Cottonwood Canyon. This question is paramount and has been largely ignored.

When questioned about this, Mountain Accord's response has been "we don't know". This is a massive oversight. The carrying capacity must be determined before deciding how to get more people into the canyon.

There are a number of different carrying capacities. The 'Pristine' carrying capacity of zero would leave the canyons untouched. The 'Maximum' carrying capacity would put the most people physically possible in the canyon, but would allow significantly damage the watershed and canyon environment. The 'Sustainable' carrying capacity would allow only as many people in the canyon as possible without causing any long-term damage to the watershed and canyon ecology. And finally, the 'Appropriate' carrying capacity would limit the number of people in the canyon to a level that would allow a peaceful enjoyment of the canyons as well as minimize the transportation impact to communities. This 'Appropriate' would be less than the 'Sustainable' carrying capacity. We believe that the 'Appropriate' carrying capacity of Little Cottonwood Canyon must be discussed and determined *before* any transportation systems are determined.

c. The size of the transportation problems in LCC are not well defined by supporting data. Proposed solutions seem oversized for the problem.

Mountain Accord proposes that there is a significant traffic problem in LCC. What they have failed to do, however, is specifically articulate exactly what that problem is. Until we can correctly identify the problem, appropriate strategies cannot be formulated. We strongly believe the problem is being exaggerated for the benefit of special interests and that reliable data is needed as requested by the transportation system group.

d. The report also fails to prioritize the many listed goals in any meaningful way and assumes that increased tourism in the Canyons is an unmitigated good.

No sense of relative priority is given and the report fails to explain, for example, why creating a unique "traveler experience" in the canyon should be given equal weight with reducing congestion and parking demands. Relatedly, the report also assumes that increasing tourism in the Canyons is an unqualified good without any explanation for why that is so. We desire to see the preservation of the canyon clearly stated as a top priority.

- e. Prior to the 2002 Olympics, venue development was considered and then rejected, claiming such activity posed potential environmental damage to the Cottonwood Canyons. Without supporting data, the Accord's Plan would contradict those conclusions.**

As stated by the Wasatch Backcountry Alliance: "The Cottonwood Canyons were determined to worthy of protection prior to the 2002 Winter Olympics. Olympic organizers, Government officials and local environmental groups all decided that no Olympic-related development or events would occur in the canyons. The development proposed by the Mountain Accord is a complete reversal of this consensus-based decision." We want to see data to support this public policy change.

- f. The Blueprint only includes only highly intrusive, expensive transportation recommendations into LCC. Simpler, lesser environmentally invasive, and less expensive alternatives need to be included in the plan so they can be appropriately considered during the EIS.**

EIS (NEPA) studies are soon to be launched to assess the impact of the MA Blueprint. These studies can only consider alternatives presented in the Blueprint. Simpler, less invasive, or less expensive options will not be assessed unless they are included as possible alternatives in the study. They would be excluded from consideration and subsequent public debate. It would be a mistake and an injustice to all Utahns to not have independent review of and reliable data on a full range of future transportation options.

- g. This proposed deal is being undertaken and pursued outside of the normal processes that would evaluate alternatives in terms of their opportunity costs vis-à-vis other possible uses of these funds. There are far better uses to which these funds could be put that would benefit all Utahns and be robust across various possible futures that might unfold.**

A project that considers only the best transportation alternative for the Canyons fails to address and evaluate the many other pressing needs facing Utah that are more important than providing quicker transportation to the ski resorts. If you asked the average Utahn whether they would spend hundreds of millions or billions of taxpayer dollars on building a train up the canyon rather than any number of incredibly important alternatives (expanding rail and bus service throughout the valley, improving

education, building infrastructure necessary to ensure water supply, etc.) we doubt many would identify building the train as the best use of those funds. Rather than framing the choice as “what’s the best infrastructure investment” in Canyon transportation, we ought to be asking what is the best, highest return investment of our infrastructure dollars much more broadly. That is a very different question, which is almost certain to yield a very different answer than Mountain Accord proposes. And, indeed, the true question is even broader: where is our money best spent to ensure the best quality of living for current and future Utahns?

The issues that are most critical to Utah’s future—including growing the economy and attracting good, well-paying, jobs (instead of just the kind of service jobs that a tourist economy usually generates)—are education, water, air quality, and the like, not “better” canyon transportation. We ought to be focusing on making Utah the best place to live, not merely the best place to visit, and for most residents improved canyon transportation is a low priority. Addressing these other pressing issues is a far more robust strategy (promising good outcomes over a wide range of future possibilities) than building a train up Little Cottonwood Canyon or investing significant sums to substantially expand the road.

The proposal suggests that funding for this project will come from a variety of sources, but fails to give any real idea or accounting of where the funds are likely to come from. It is all but inconceivable that a project of this size would proceed without massive state and federal funding. Additionally, even if some federal funds could be obtained in a land-trade deal (with some currently private land becoming national forest land), it is naïve to think that that federal government wouldn’t offset those funds against any other federal transportation funds Utah was otherwise likely to receive.

This means, of course, that federal and state funding will effectively be diverted from all other transportation and infrastructure needs in Utah to fund this project, regardless of how the funding source is framed. These opportunity costs are too stark to ignore. Moreover, the costs to taxpayers will include not only the upfront capital costs of building the rail line, but also a large, ongoing subsidy to cover maintenance and operation, as most rail ticket prices are able to cover only about half of ongoing expenses.

- h. A preliminary Cost-Benefit analysis must be done before any alternatives are considered for study in a NEPA process. Otherwise, we are wasting money studying alternatives that we cannot afford.**

Mountain Accord has continually refused to evaluate the cost-benefit of the options it is pushing to the forefront. When queried, the answer is always “we will look at that in

the next phase". This is wrong-headed. By not evaluating the cost-benefit, and considering how much we, as a community, can afford, it is very likely that we will end up studying at great expense options that taxpayers will be unable to fund.

We ask that before we spend money on a NEPA study, that we first determine a target budget for the Mountain Accord Blueprint. Then, we ask that each proposed alternative is evaluated to determine if the costs associated with that alternative are likely to fit within the proposed budget.

3. The MA Blueprint Plan represents misguided conclusions regarding the environment and transportation. It favors a select few, is detrimental to a unique environmental system, and comes at great expense of the many.

a. The report fails to adequately consider alternatives or adequately explain why some alternatives are being excluded from further consideration.

The report fails to adequately consider alternatives or adequately explain why some alternatives are being excluded from further consideration. For example, one of the most obvious solutions for managing traffic in Little Cottonwood Canyon is increasing "bus service in mixed traffic up Little Cottonwood Canyon." This alternative, however, like many others has gotten short shrift in Mountain Accord's analysis.

Specifically, the Transportation Purposes and Alternatives Report available on the Mountain Accord website proposes to drop this alternative from further consideration based wholly on a conclusory assertion, with no accompanying analysis or facts, that this alternative succeeds only in "reducing avalanche-related risk and delay" and would "fail to meet the other 13 purposes." No explanation is given as to why this option would not "reduce auto use and congestion in Little Cottonwood Canyon," "reduce vehicle emissions in the Cottonwood Canyons to improve air quality," "reduce parking impacts on environment, safety, and economy," "support land use goals for reduced sprawl and concentrated development," "improve access and connections for pedestrians and bicyclists," "protect or enhance the natural and scenic resources of the Cottonwood Canyons," "protect and enhance community character" or any of the other articulated goals for the plan.

It defies logic to assume that more frequent and better timed bus service, coordinated with bus service schedules throughout the valley, would not decrease auto use, vehicle emissions, and parking demands in Little Cottonwood Canyon. This failure to

grapple fairly with the issues at hand suggests a rigged, agenda-driven analysis rather than a careful, fair consideration of potential alternatives.

Moreover, one wonders how the proposed approach “protects watershed health, water supply, and water quality” better than increased busing, given that the negotiated proposal requires providing increased water for culinary purposes to Alta and increased water (in unquantified amounts) for snowmaking at the resorts.

Additionally, while Alternative D, Transportation system management alternatives—which “are combinations of incentives for transit use and disincentives to auto use, without adding new transit guideways or expanding roadways”—is mentioned as an alternative that will continue to be considered, the Report evinces very little actual consideration of this alternative. It seems that a deal has already been struck between the existing players (who do not represent all relevant stakeholders) and that other alternatives are falling by the wayside without careful study. There seems to be little actual data in the report, so it seems unlikely that any alternative has received enough consideration to be eliminated from consideration at this stage.

b. The plan for the Canyons will only benefit a small number of Utahns at potentially tremendous cost to both average recreational users and taxpayers.

One of the primary focuses of the deal is to preserve “backcountry areas for dispersed recreation,” a goal which benefits an increasingly small percentage of Utah residents. Only about 7% of Utahns ski and the number that have the time, training, and resources to backcountry skiing in the high regions between Alta and Park City is much smaller.

Yet, in order to benefit the admittedly small number of people who can take advantage of such backcountry skiing, the proposal sacrifices the beauty and enjoyment of the lower part of the canyon – the part that the general public would likely access most frequently, including trails like the Quarry Trail along Little Cottonwood Canyon.

For most Utahns, the Canyons are a journey and an experience, and destination resorts like the ski-resorts are largely beside the point. Utahns love their canyons for the ability to hike with their families on trails that can be accessed from the valley quickly and for other similar recreational opportunities.

Scarring the beloved Canyon landscape with additional, irreversible infrastructure development is contrary to the interests of these many Utahns who enjoy using the

lower Canyons and benefits only a select, powerful, and wealthy few with the resources to take advantage of expensive skiing opportunities. Moreover, all taxpayers will be saddled with the enormous cost of this additional and unnecessary infrastructure.

c. Building additional permanent and expensive infrastructure up our canyons will almost inevitably create serious pressure for future growth.

The public will demand a return on its infrastructure investment, and that return is most likely to be guaranteed if increased development is allowed. Even if some areas are “off-limits” to that future growth, there will be tremendous pressure either to go back on those deals or to allow ski resorts and other entities to develop their private property at much higher densities than are currently allowed. We have seen neither persuasive argument for risking the complete transformation of Little Cottonwood Canyon into a playground for ski tourists nor any careful consideration of the carrying capacity of Canyon for such expanded resort activity and development.

Some Mountain Accord participants are under the mistaken belief that an agreement today with the ski resorts will result in a “permanent” halt to canyon development. This is unlikely to be the case. We believe that the resorts, as a business, will always seek to maximise their profits and increase their returns. It is naive to believe that they will ever stop trying to increase their land holdings, their hotel space, or their hill capacity. Increasing the flow of skiers up the canyon is paramount to their goal of more ticket sales and higher revenues. This objective for ‘more’ will never cease.

The current transportation situation acts as a natural “throttle” to canyon capacity. And, although this throttle may need to be adjusted, it should not be significantly changed or removed without serious study. Those backcountry areas will never be economically feasible to develop as long as that throttle exists. To trade away that throttle on the promise that resorts will not develop those areas is counter-intuitive. These areas clearly won’t be as desirable for development without further transportation expansion. Major transportation expansion unduly favors and promotes resort expansion.

- d. The proposed deal represents a great risk to the major watershed on which millions of Utahs rely and represents a profligate and unjustifiable use of Utah's precious and increasingly scarce water resources.**

One of the most pressing issues confronting Utah over the next few decades is water supply. In fact, more Utahns identify water as the most critical issue facing the state than any other issue (including air quality, education, energy, transportation, and a host of other issues). The deal struck by Mountain Accord promises Alta new culinary water and, more importantly, promises the ski resorts more of Utah's precious water resources for snowmaking. (The resort's demand for snowmaking water is likely to escalate if snowfall decreases significantly.) Given the difficult choices that Utah will face over the next several decades about how best to use this precious and increasingly scarce resource, any deal that promises ski resorts a greater share of this resource—especially without any consideration of competing needs—should be rejected outright. This needs rigorous study and if given, these rights should be conditional and not legally binding before other future competing water rights.

- e. The proposal flies in the face of good science and policy about confronting climate change risk. In the face of the risks and uncertainty associated with climate change, Utah should be investing its resources in robust, resilient strategies that allow us to respond flexibly to changing conditions, rather than committing massive amounts of money to an irreversible infrastructure project that may well be inconsistent with future needs and may saddle Utah's citizens with a project with no return on investment.**

Whatever one believes about the anthropogenic causes of climate change, there is little doubt that the climate is changing. What that means for Utah remains to be seen, but there is substantial risk that we will have many more winters like this one, in which limited snowfall and warmer winter and spring temperatures mean that ski resorts struggle to remain economically viable. There are also far more important risks associated with this potential climate change, including water shortages, increased wildfire risk, and inadequate capacity to store and collect water in existing reservoirs (which were designed to handle late snowpack melt rather than spring rains and early spring runoff).

No one knows exactly how climate change will affect Utah, and in the face of such uncertainty, wise public policy requires choosing strategies that are resilient and “robust” – that offer benefits across a wide range of possible future scenarios, including those that we all hope will not come to pass (and this is true even if one doubts that climate change will materialize at all). Wise policy-making in the face of uncertainty also favors incremental solutions, rather than long-term, irreversible infrastructure investments. Incremental solutions allow adaptation to evolving conditions, rather than locking communities and taxpayers into expensive investments that no longer serve current needs and will not provide any reasonable return on investment.

Of course, sometimes—even in the face of uncertainty—we have no choice but to make long-term, public infrastructure investments. In this case, however, there is no such urgency. Any need for increased transportation in the Canyons can be handled by incremental solutions like increased busing, shuttles, or perhaps “transportation system management alternatives,” which meet short-term needs but allow us to remain flexible and nimble in responding to changed conditions. We should not saddle ourselves to an unnecessary and massively expensive long-term infrastructure when uncertainty and risk counsels incremental, adaptable solutions that can be altered to adjust to changing conditions.

- f. Doubling up on infrastructure in the Canyon by building a new rail line in addition to the existing road will put new infrastructure money at significant risk in the event of an earthquake, rock slide, mudslide, wildfire, or other disaster.**

Existing infrastructure is, of course, already at risk of destruction during one of these natural events, at undoubtedly high cost to the taxpayer. Doubling up on this infrastructure by building a new rail line vastly increases the amount of infrastructure damage and loss we might experience in a large earthquake or other natural hazard event.

- g. Doubling up on infrastructure also comes at significant cost to the historic neighborhood of Wasatch Resort and to many other neighborhoods and properties along the proposed rail-line.**

These communities and the families that call them home will be substantially damaged if not displaced entirely by the proposal.

Wasatch Resort also has significant historical value, as many prominent Utahns (including, for example, Wilford Woodruff) spent summers there. Some of these

historic cabins still stand today. If the town of Alta is recognized for historical value, Wasatch Resort should also be shown consideration. Many of these families have been there for generations and there would be real emotional and financial hardship if forced to move. This should be noted and only occur if absolutely necessary for the public good, not for commercial gain.

The proposed routes for a increased transportation footprint from State Street to Alta also impact many established residential communities along its way. These established residential areas should be given consideration and not harmed if possible. Major transportation footprints should be kept in largely commercial areas.

- h. The swap of backcountry private/public lands should not be linked to the Little Cottonwood Canyon transportation plan. Such a link is a 'hostage taking' by the resorts and should not be tolerated.**

Mayor McAdams has stated that the willingness of the resorts to trade private for public land is dependant on the size of the transportation solution. Carl Fisher of Save our Canyons indicated that the "entire negotiation was predicated upon a rail and tunnels between Little Cottonwood and Big Cottonwood. This is how it was framed – go big, get big. " This apparent linkage between the backcountry land swap and the Little Cottonwood Canyon transportation plan is offensive and smacks of a hostage taking by the resorts. The resorts cannot be allowed to believe it is their right to widen the transportation corridor to meet the revenue and profit goals of their owners or to sweeten a land swap. The canyon carrying capacity should be based on factual and careful study not given as a bargaining chip, and should be limited to meet environmental and community goals.

It is not in the best interests of Salt Lake County residents to provide unlimited customers to the resorts at any costs. This apparent trade is not in the best interest of the community at large. With only 7% of Utahns as skiers (and falling), the land swap will benefit a small, minute few at the expense of a clean water supply, an ecologically sound canyon, a peaceful enjoyment of our canyons and communities. Enriching resort owners should not take precedence over the needs of the community at large.

- i. The transportation plan should not be designed to be a marketing tool for the resorts. We don't need to create something "that can't be found anywhere else in the world".**

Alta and Snowbird ski resorts want a train built up LCC is so they can then market their resorts as "having something no one else has in America". Helping sell hotel rooms

and lift tickets is a poor use of taxpayer money and a poor trade-off for a permanent enlarged transportation corridor up a valued and unique canyon environment.

Utah already can claim ski areas that can be accessed within 45 minutes of an arriving flight, where a person can ski all day and still catch an early evening departing flight.

j. Biking and Hiking trails next to the train tracks is a bad idea. Trans next to these recreational activities will ruin the experience.

The MA proposed train route parallels much of the beautiful Little Cottonwood Creek. The LCC “Quarry” Trail, which currently parallels the creek, is a popular year-round nature corridor enjoyed by many mountain bikers, hikers, climbers and snowshoers. The last thing outdoor enthusiasts want is to have a train that rushes by them as they try to enjoy the majesty and serenity of the canyon . A train will destroy the tranquility of the trail and will likely pose a safety risk for those recreating along its path.

Submitted April 29, 2015 to Mountain Accord by
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Karen Lundberg
Susan Marker
Brent McClellan
Sara McClellan
Robert and Carrie Meek
Michael T. Meyer
Monique G. Mezo
Dave Miner
Jason Miner
Kerry Miner
Whitney Miner
John and Amy Moore
Angie Morell
Braedon Murdock
Stefani Murdock
Clair & Jennifer Naylor
Anna Marie Neider
Matt and Shanna Nelson
Craig and Staci Newman
Annie & Tomas Nielson
Bob Norris
Matthew Olsen
Mike Olsen
Millie Olsen
Miranda Olsen
Sheri Olsen
Kimiko Osterloh

Phyllis Parrish
Aubrey & Trent Pearce
Gary and Nancy Peterson
Jackson Pingree
Rick & Shelly Pingree
Tyler Pingree
Chris and Gwen Poynor
Brian and Christy Pugh
Amber Radman
John & Jan Reese
Maegen Rindlisbacher
Ronnie and Lisa Romero
Kristen and Lucas Rudelich
Alice Schmidt
Jeff Schmidt
Jared Schmidt
Jon and Michelle Schmidt
Marshall Seal
Brandon and Trina Sheranian
John & Kimberlee Sieverts
Cami Sieverts
Keri Sieverts
Makenzie Sieverts
Michael Sieverts
Jessica & Trever Smith
Judy Smith
Eric & Shyla Sparks
Doug & Dyan Steimle
Amber & Jordan Thomas
Martin and June Vandersteen
Doug and Susan Vogler
Craig and Berty Wardle
Grant and Judy Webb
Scott and Toni Whipperman
Alex Whittingham
Clayton & Sherry Wilkinson
Rich Wyman
Mariah Yates
Mary and Monte Yedlin
Dee and Tami Young
Bryan and Sarah Young
Ashley Young
Alex & Bethany Zarbock
Brad & Heidi Zarbock
Nick & Danielle Zarbock
Markus and Shelley Zimmer
RaNae Zimmerman

Mountain Accord
375 West 200 South, Suite 275
Salt Lake City, UT 84101

April 28, 2015

Attention: Laynee Jones

We have organized our thoughts in this paper that we are submitting today for your comment period and we would request a time to meet with you to review our concerns.

Would you please call me Victoria Schmidt at 801 943-1419 or e-mail me at jeffschmidt11@msn.com so we can set up a time that would work for our Board Members and yourself. Thank you.



WASATCH FRONT REGIONAL COUNCIL

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Mike Caldwell
Vice-Chairman | Mayor, Ogden

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Adam Trupp
Utah Association of Counties

Robert Grow
Envision Utah

Alan Matheson
State Planning director

Andrew Gruber
Executive Director

April 30, 2015

Executive Committee
Mountain Accord
375 West 200 South, Suite 275
Salt Lake City, UT 84101
comment@mountainaccord.com

Dear Mountain Accord Executive Board:

The Wasatch Front Regional Council would like to thank the Mountain Accord Executive Board for the opportunity to comment on the Mountain Accord's proposed Blueprint for the Central Wasatch Mountains. The full process to date has been comprehensive, inclusive, engaging and a pleasure to be a part of.

We take great interest in helping to maintain the quality of life for the residents and visitors along the Wasatch Front and commend you for the broad level of engagement within the Mountain Accord process. We particularly appreciate the extensive involvement that has been offered to our organization and to the local governments and transportation agencies that we represent. The unprecedented number of forums and opportunities for participation at all levels has been refreshing and will undoubtedly result in better solutions for the region and state.

The Wasatch Front Regional Council is responsible for the long range transportation planning for the Salt Lake City-West Valley City and Ogden-Layton Urbanized Areas, and as such we have worked collaboratively with all of our partners to develop a multi-modal integrated transportation system to improve mobility for all users in the region. With that in mind we feel that a broad range of transportation options should be thoroughly considered in the Mountain Accord NEPA process. These options should be evaluated not just for their transportation impacts and performance, but also for their financial viability and for their relationship to and impact on the economy, the environment, and recreational opportunities.

We understand this is the beginning of a deeper and broader process, and are committed to continue to support and engage in the Mountain Accord effort to finding solutions to responsible stewardship of our natural resources, quality recreation experience, an environmentally sustainable transportation system and a vibrant economy.

Again, thank you for your leadership and inclusion of the critical stakeholders. We look forward to participating in the next phase(s) of the Mountain Accord process and working collaboratively with you to find solutions to the growing pressure on the Central Wasatch Mountains.

Sincerely,



Andrew S. Gruber
Executive Director



WASATCH MOUNTAIN CLUB
1390 SOUTH 1100 EAST #103
SALT LAKE CITY, UTAH 84105

Re: Trails Network in the Central Wasatch
Comments from the Wasatch Mountain Club

Dear Committee Members:

May 2, 2015

The Wasatch Mountain Club has concerns regarding the specific details of the trails network envisioned by the Mountain Accord. While we generally support this initiative as details emerge the devil also comes out. Currently most trails in the Wasatch are listed as multi use. This usually means that hiking and biking are allowed. In reality, many trails are rocky and steep and the majority of the use on these is hiking. In the case of single tracks, the majority of use migrates to biking.

We believe that where adequately designed multi use trails can serve both user groups. This means that there is good visibility for bikers and hikers to see each other so there are no surprises. It also means a trail wider than a single track so there is plenty of passing room and with fewer switchbacks and longer straight courses. Multi use trails will likely need a better construction standard and more frequent maintenance.

For example, if the trail from Alta to Solitude/Brighton through Twin Lakes Pass is to become a true multi use trail there are rough sections that clearly need to be improved. Since it is also a key hiking trail the above recommendations should be followed. The trail to Katherine Pass is currently listed as multi use. This trail receives heavy hiking use from both the Alta and Brighton sides. This trail should really be for pedestrian use only. There are simply too many people on it.

Another concern is what opens up when a trail is improved to be more biking compatible. The Grizzly Gulch trail will make upper Silver Fork and points west available to the increased traffic over Twin Lakes pass. We think that the trails in Silver Fork and Days Fork should be restricted to foot travel so there would need to an increased level of information and potentially enforcement.

There are other examples where increased bike use due to trail improvement will lead to user conflicts. Now is the time to address these. We know that adding restrictions later creates more ill will and conflict than working it out early. We feel this discussion needs to be added to the trail network discussions.

Regards:

William McCarvill
President, Wasatch Mountain Club

Forrestgladding@gmail.com

4/29/15

As Vice President of Wasatch Equality and speaking on behalf of the organization, we are disappointed in Mountain Accord's plans. How can this process that is supposed to decide the future of the Wasatch not take into account the snowboarding community? Snowboarders are an important part of the local community (as well as the tourist industry) that are severely affected by these plans! Snowboarders comprise approximately 40% of the snow-sliding population, and an even higher percentage of families or groups of skiers have a snowboarder among them. Currently, there are only three ski resorts in the world that do not allow snowboarding, and two of those are in the Wasatch. The Mountain Accord plans should seek to ensure that public use of the Wasatch is inclusive rather than exclusive. Under the proposed blueprint (which states that Alta's proposed expansion into Grizzly Gulch is ³under consideration²), the Central Wasatch would have less terrain open for snowboarding in the future if Alta expands. Who would have thought that snowboarding terrain in the Wasatch could become more limited than it is today? Under these plans, the Wasatch would become even more exclusive than it currently is. How can the long-term plans for the future of the Wasatch disenfranchise such a large percentage of the snow-sliding public? Why would local families or businesses that contain snowboarders want to have their taxes pay for a transportation system that excludes them? Do we really want to let Alta expand into even more terrain and build a transportation network that services Alta's exclusionary policies? We feel like the 85% of National Forest land that Alta operates on is more than enough, and anything more is a land grab! Has Mountain Accord even considered that with Alta's expansion that the areas like Silver Fork Bowl, Wolverine Cirque, and Twin Lakes Pass could become by default skier-only sidecountry and backcountry? How will snowboarders access this terrain if the surrounding lift access is skier-only? How can you say this is a good plan for the future of the Wasatch? Also, please note that during this low-snow year, accessible terrain with adequate snow in upper Little Cottonwood Canyon was limited much of the year to the north-facing terrain already occupied by ski resorts and in Grizzly Gulch. So, if Alta is allowed to expand, the only place to backcountry snowboard and ski during low-snow years will no longer exist. Please take into account how Alta's proposed plans affect the snowboard community.

Thank you,
Forrest Gladding
Vice President Wasatch Equality
<http://wasatchequality.org/>



March 17, 2015

Mountain Accord
375 West 200 South, Suite 275
Salt Lake City, UT 84101

Dear Executive Board,

Please consider this letter as the official comments from the Utah Physicians for a Healthy Environment (UPHE) for the Mountain Accord planning process. UPHE board member, Dr. Howie Garber, has been an active participant of the Accord's environmental committee and as such has been intimately involved in the development process of the Accord.

UPHE applauds the comprehensive planning effort of Mountain Accord with regard to protection of the Wasatch Mountains, certainly the lifeblood of our community. We strongly endorse the goals of improving air quality to benefit public health, environmental protection, and scenic visibility. As a related issue, we find it imperative that Salt Lake County and the metropolitan area do its part to mitigate the consequences of the climate crisis. Hence, we certainly agree with the metrics of the associated transportation planning: Reduce Vehicle Miles Traveled (VMT) to improve air quality. We recognize that it is a challenging task to come up with a transportation system that serves both locals and tourists alike.

UPHE has serious concerns about the proposed blueprint. Overall, for multiple reasons, we feel that the blueprint provides a disproportionate amount of consideration and leverage towards the resort ski industry, as exemplified by such proposals as a train going from Sandy up Little Cottonwood Canyon (LCC) and the proposed tunnel from Big Cottonwood Canyon to Park City. Simply put, it would appear that both of these proposals are designed to benefit first the ski industry first, with consideration for our air quality, watershed protection and the public being second.

According to their own study, the flat/declining trends of the resort skiing industry is one of many reasons to provide a more balanced approach to all stakeholders with regards to influence in the process. When the consequences of climate change with warming temperatures are acknowledged, the ski industry's viability in terms of revenue and employment rates will continue to decline over time. Given this reality alone, committing public funds to what appears to be for subsidizing the ski industry is short sighted, wasteful, and bad policy. No amount of infrastructure or resort amenities will compensate for steadily shortened ski seasons, less and less snow, and warmer and warmer temperatures.

With the Wasatch Front facing shrinking mountain snow pack, earlier snow melt, and rising stress on diminishing water resources, preservation of those resources becomes increasingly

important. Watershed protection for the sustainability of Utah's population should be the paramount priority. The vested interests of the ski industry and any other business entities including those related to tourism, while important to Utah's economy, should not be allowed to infringe upon that priority. Everyone needs water. In contrast only six to eight percent of Salt Lake County residents ski or snowboard. Additionally, statistics clearly show that locals make much greater use of the canyons during the summer months, a time when the proposed train and tunnel options would likely see far less demand, since they do not preclude continued automobile traffic.

Canyon trains and tunnels might be a benefit to tourism and a very small segment of our population, but obviously a critical question is whether there are any valid projections on ridership or number of cars that the train could take off the road. LCC sees a maximum of 9,000 cars on peak ski days, a small fraction of the vehicles using the 1-15 corridor. Given that this project could cost billions of dollars, this amount of money to improve air quality could be much better spent on mass transit improvements and expansion in the Salt Lake Valley and along the Wasatch front. Spending billions of dollars to transport skiers seems like an extraordinary expense to benefit a relatively small special interest.

The consequences of infrastructure required to connect the canyons, and the increase in usage that would be the result have not been properly evaluated. Connecting the canyons would likely jeopardize watershed health, wildlife habitat quality, diminish user experience and the long-term preservation of the aesthetic/wilderness value of the canyons. A tunnel linking LCC and BCC is a “want” of the ski industry but there is no demonstrated “need.” The tunnel would basically be a taxpayer-funded connection that would exist to benefit four private ski resorts. There are no significant “problems” that an LCC/BCC tunnel would solve. The same argument applies to a fixed guideway system connecting BCC to Park City. It would not necessarily save time for PC-BCC travelers, is not supported by Park City officials, and would again be a taxpayer-subsidized benefit to a handful of businesses (ski resorts).

The transportation problem in Little Cottonwood Canyon and the Wasatch Canyons in general would be more economically solved by the use of buses. A more efficient, optimized bus system has a greater potential to get more vehicles off the road and to improve air quality. With proper implementation, buses could service both the ski resorts and dispersed recreation users on a year-round basis far more effectively than a train. Transit patterns and schedules of buses can be adjusted to fit demand on an as-needed basis, therefore providing more flexibility than trains and could more easily adapt to changes in ridership from different parts of the valley. Additionally, improved public transit in the canyons would greatly alleviate the traffic and safety issues while reducing the number of hours of blocked canyon roads due to traffic accidents.

Strategies to increase bus ridership and car-pooling are likely to be much more cost effective than trains and tunnels, and do not entail enormous upfront infrastructure costs. Such strategies could include the following:

- Discounted lift tickets for using mass transit or carpooling
- Dedicate an entire fleet of clean fuel buses only to canyon transportation

- Per-vehicle parking fee charged by the county or the ski resorts (either a daily fee or an annual pass) to help subsidize the optimized bus/parking system and provide an incentive to ride the transit system.
- An optimized bus system to include express buses to individual resorts in LCC and BCC.

Snowsheds or bridges over slide paths could be added for increased avalanche mitigation for the highway. Any infrastructure improvement in the canyons should also consider bicycle safety and bicycle lanes. Additionally, enforcement and doubling of speeding fines in BCC, LCC, and Millcreek would do much to improve both bicycle and general public safety.

UPHE *does* supports a train/light rail system linking the Salt Lake Valley with Park City. We believe such a system would be used far more extensively by commuters and lower-income resort workers on a more regular schedule than a LCC canyon train associated with seasonal ski recreation. Further consideration should be given to extending this train to Heber and Provo. We believe that this option would provide for a much wider ridership and hence, go much further to improve air quality than a train in Little Cottonwood.

To summarize, UPHE cannot accept the blue print as is because it does not follow the recommendations made by varied groups. The Mountain Accord's final recommendations should give broader consideration for the public at large and the other varied stakeholders besides just the ski industry. It can and should do much more in order to decrease vehicle miles and improve air quality than is currently recommended in the blue print. This should include the consideration of a rail system in Parley's Canyon. Finally, the protection of the Wasatch Front's watershed should be the number one priority of the Mountain Accord.

Respectfully submitted by the following

Howie Garber, MD, Board member, Utah Physicians for a Healthy Environment
Brian Moench, MD, President
Cris Cowley, M.D., Vice President
Ellie Brownstein M.D., Board Member
Richard Kanner, M.D., Board Member
Gary Kunkel, M.D., Board Member
Janice Evans, Board Member
Zach Frankl, Board Member
Michael Woodruff, MD., Board Member
Tim Wagner, Executive Director

4/29/15

Utah's ski industry supports ONE Wasatch and/or an over-the-snow connection of Utah's central Wasatch ski resorts.

We also support improved transportation options both to and from the four resorts in the cottonwood canyons and from the three resorts in Park City.

Nathan Rafferty
Ski Utah | President
801 433-2014 | direct
801 209-7883 | mobile
nathan@skiutah.com





Utah Chapter

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801.467-9294 x102 | www.utah.sierraclub.org

26 March 2015

Mountain Accord

375 West 200 South, Ste 275
Salt Lake City UT 84101

To Whom It May Concern:

Throughout its century-plus history, the Sierra Club has been at the forefront of the movement to protect America's wild places and the beauty, clean water, wildlife habitat, restorative and recreational opportunities they provide. Here in Utah, the Wasatch Mountains are a unique resource to the citizens of Utah and visitors from all parts of the world.

The Utah Chapter of the Sierra Club supports the Mountain Accord blueprint process and the efforts to preserve the quality of experience in key backcountry terrain, provide enduring protection against ski resort and residential expansion and resolve transportation issues involved in accessing the mountains. The discussion of environmental concerns in the Blueprint is conceptually sound but we feel needs to be more central to planning. Protecting the Wasatch environment should drive other parts of the Blueprint and be a pre-condition to any development strategies seriously considered.

We believe that some aspects of the Mountain Accord process have the potential to yield positive outcomes for both conservationists and developers. However, we oppose other parts of the February 2015 Mountain Accord Blueprint and believe other areas deserve further study before informed comments can be made.

Train versus Bus in Little Cottonwood Canyon

A railway would be visually intrusive, very noisy, and diminish the wilderness character of the canyon.

Construction and operation would likely have damaging impacts to water quality and wildlife.

Understandably the ski resorts would like better guest access during times of heavy demand. Public transport up the canyon must be frequent, comparable in travel time to driving, affordable and potentially protected from road-sweeping avalanches. We believe better access might be achieved with improved bus service. A dedicated bus lane could be considered, constructed by widening the road to three lanes where practical, with an alternate flow lane to accommodate bus traffic during morning and afternoon peak times in the winter. Avalanche protection might be added in Little Cottonwood to improve reliability of access, if built with a visually acceptable design. Fare costs must be kept low or people will continue to drive.

As compared to an expensive, slow, likely cog-railway service, bus service would be preferable because:

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Protect and promote Utah's outdoors and natural landscapes;
Educate and advocate for the responsible preservation of clean air, water and habitats
Support the development of sustainable renewable energy for the benefit of present and future generations.



- The frequency of rail service would probably not be as good as buses because trains would carry more passengers per trip than a bus.
- In low demand times during the year and during each day, operating a train may not be economical, or result in expensive fares and infrequent service.
- Bus service could be scaled to match demand more flexibly than a train, by using vans and various size buses, while maintaining a frequent schedule.
- A special maintenance facility for the railway may be needed near the mouth of Little Cottonwood in a prime residential area or in the scenic upper part of the canyon.

Tunnels and other Transit Issues

The Sierra Club does not see any persuasive evidence that the ski industry marketing concept of “One Wasatch” would benefit the region. Such a major change to the existing ski resort infrastructure should be evaluated on a needs-and-cost basis as well as an environmental impact basis. At this stage, the need is not a given and the cost and environmental impacts are not known.

Instead, we believe the Blueprint should address the greatest transit needs for residents and guests, above and distinct from ski resort marketing and profitability. We therefore would look favorably upon improved transit between Salt Lake City and Park City, such as improved bus service or train. However, we are highly skeptical of tunnels in Little Cottonwood, Big Cottonwood, and Park City and cannot support inter-canyon/resort train service as articulated in the Blueprint. We believe that this aspect of the plan:

- serves primarily as a ski resort marketing device that would do little to address regular transit needs for city residents and guests, and
- would pose multiple environmental concerns during and after construction such as water pollution, air pollution, noise, and permanent visual disturbances in our scenic canyons, and
- would incur significant construction and maintenance costs, presumably paid by Utah taxpayers who would not generally benefit from them.

Land Swaps

The Blueprint proposes a number of land parcel exchanges. The Utah Chapter agrees in principle to preserving pristine backcountry in the Wasatch while allowing limited additional development in less sensitive locations. However, it was difficult to see at the scale provided exactly where the various land parcels are located, what visual and other environmental impacts might result, and what the process would be for each change in ownership. Therefore, we support the general concept of land swap but

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reserve final judgment until we see the details. Further, the land swap should be reviewed and approved parcel-by-parcel rather than *in toto*.

Further Study Needed

How accurate are growth forecasts for recreational skiing/snowboarding given the following factors?

- **Climate Change.** The Utah State Climatologist projects spring snow disappearing by 2100. This might result in demand for skiing being much below the projections of Ski Utah, a massive increase in water supply desired for snowmaking, or use of artificial ski surfaces at lower elevations.
- **Declining Interest of Youth in being Outdoors.** Today's youth spend half as much time outdoors as their parents (America's Great Outdoors 2011). How will this affect future ski area attendance?
- **Cost of Lift Tickets.** The economic impact of Mountain Accord has yet to be determined. However it is reasonable to assume that skiers/snowboarders will bear the costs of improved access and expanded facilities through more expensive lift tickets. How will these increased costs impact demand for skiing? How much usage would shift to other areas such as Sundance, Snowbasin, Powder Mountain, etc.? Skiing is already unaffordable for most middle income Utah families; only 7% of Utah residents currently ski in resorts. How much will lift ticket price increases further reduce access for Utahns?

What would be the economic impact on access to the canyons?

- Part of the plan for reducing vehicle access to the Cottonwood canyons is an "economic disincentive" or fee per vehicle. This could make access to the canyons more challenging or impossible for youth and economically disadvantaged people.
- Having toll booths at the mouth of the canyons, either when entering or exiting, would be unfavorably received by canyon users.
- Is increasing the cost of using the canyons worth the tradeoff to improve resort skier access for a few winter months? Would every canyon user be subsidizing a ski industry that caters to wealthy non-residents?

Without further studies on long-term climate and population/demographic trends, accurate environmental and economic projections for many aspects of the Blueprint can only be guessed at.

Conclusion

The Utah Chapter of the Sierra Club appreciates the inclusive Mountain Accord process. We agree with protecting land that is currently threatened with development and limiting the footprint of future development in the Wasatch. Any Mountain Accord agreement that increases transportation capacity should ensure protection of the environment, ensure that transit improvements primarily benefit residents

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Utah Chapter

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and visitors while secondarily improving ski resort marketing, and are cost effective to those bearing the costs.

Finally, the Sierra Club believes that doing the least harm to our unique environment is the prudent course for Mountain Accord in the face of uncertainties over what the actual demand will be for ski resort access in the future. The future demand discussed in the in the Blueprint is an uncertain projection due to economic, societal and climate change impacts. Further independent study is recommended regarding future visitation patterns and potential impacts of development.

Very truly yours,

Dan Mayhew, Chair
Utah Chapter, Sierra Club

cc: Carl Fisher, Save Our Canyons

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Support the development of sustainable renewable energy for the benefit of present and future generations.



April 8, 2015

Mountain Accord is tasked with seeking an appropriate future balance among the various uses and environments within the Central Wasatch, including the backcountry.

The current balance has been established by the Uinta-Wasatch-Cache Forest Plan. This plan was implemented after a thorough NEPA process which extensively studied Forest use and found the right balance and provided both permanence and flexibility over time.

To plan for the future Mountain Accord must understand what is at risk before significantly modifying the current condition. The Carrying Capacity of Wilderness, backcountry, side country and ski areas is what defines each zone's acceptable level of activity. The Carrying Capacity of each use area needs to be measured and optimized before any wholesale implementation of changes are made to the shared environment.

Although adjacent to each other the various recreational uses are quite different and each use has its own particular values.

An increase of thousands of skier days within a ski area is likely welcomed from an economic point of view. And because it represents a small percentage increase in the overall visitation rate it would not fundamentally change the experience. The ski areas are where we cluster high density activities. The Carrying Capacity of ski areas is quite high and much of the near future use can be managed by addition of lifts and runs.

However, a similar numerical increase in winter backcountry use would be disastrous to the experience and the safety of users. In these undeveloped areas even a limited increase in visitation will cause congestion and visitors will feel very crowded.

The multiple use portions of the backcountry are very important to Forest health. They provide a buffer between Wilderness and ski areas and are where various user groups can share terrain. These are the only locations where the diverse recreational opportunities desired on the Forest occur. They also are sensitive and protected environments for wildlife etc. that could be easily compromised by ski area expansion.

The land exchanges proposed by Mountain Accord are not all the same. Some protect the backcountry from development and some put the backcountry at risk. Since any incremental loss of backcountry is irreplaceable each proposed land exchange should be studied individually and with care; not combined and authorized through a broad brush legislative land exchange process.

The exception being those ski area proposed land exchanges that protect the backcountry. These are welcomed and can likely be legislatively mandated.

However, proposed land exchanges that adversely impact the backcountry should go through the NEPA process to examine desired conditions and insure good solutions.

These include those that would provide lift service to the eastern Little Cottonwood - Big Cottonwood ridge line which would destroy the character of the backcountry due to an increased ease of access. This would essentially turn prime backcountry into sidecountry. Just the potential burden on local Search and Rescue alone is enough to deter this idea. Other proposed Mountain Accord solutions such as tracks, or tunnels are better.

In addition it's not just the currently popular backcountry areas that need protection. As yet to be popularized multiple use areas such as those found in American Fork will be needed in the future as an increasing population forces those seeking a less crowded, yet accessible, experience to venture outside of the Central Wasatch. Large land exchanges for these areas should not be granted without examination and study through the established Forest Plan and NEPA processes.

There are other threats to the multiple use areas of the backcountry.

Currently there is an abundance of Wilderness on the Forest which is vastly underutilized. No more Wilderness acreage need be added at the expense of the multiple use backcountry. Lands can be protected through other Mountain Accord proposed means which are less restrictive on current activities.

Even if the size of the backcountry remains as it is, predicted increases in population may destroy the character of the winter environment. Maintaining an acceptable level of quality use, based on Carrying Capacity, can only be sustained by limits on visitation.

Backcountry overuse, and resultant potential conflict, needs to be addressed for aesthetic and most importantly safety reasons. In very popular areas, on particular days, Carrying Capacity has already been reached. Too many people in the same drainage can cause problems. Ski lines, desired for their powder, are limited and easily exhausted. There is real danger that overcrowding can push users into avalanche threatened areas or of one group of users potentially endangering members of another group.

After more than 40 years Powderbird still represents the single largest group of backcountry skiers in these areas and we do our share to enhance the backcountry experience and safety of the public.

We provide the unique service of escorting skiers through this beautiful yet avalanche prone terrain. We are the most regulated user group on the Forest and we exercise overcrowding resolution through mobility and avoidance.

We are very much in favor of maintaining every single backcountry ski run since any reduction at all in available terrain to Powderbird or others will simply increase crowding in the remaining areas. The more places we have to go the easier it is for us to avoid others. Our clients, as well as other users, are all members of the public that rightfully deserve, and prefer, limited encounters with others in a relatively safe shared environment.

Through an extensive permitting process, including two Environmental Impact Statements, Powderbird's use of these areas has been, and is now, restricted in both time and place. Our use has been stable since the 1980's and capped since 1999. Our use is not growing...we are not the problem.

Other backcountry skiers claim their groups' use has been increasing and is expected to further increase. It is fundamentally unfair of an unregulated, growing entity to ask the members of the public who have utilized our guide service since 1973 to step aside so their group will have more room to expand.

The Mountain Accord process is the ideal venue, and now is the ideal time, to begin placing conditions on backcountry access in high use areas in order to keep an enjoyable and risk manageable environment for everyone.

Restrictions should be considered for all users. Use restrictions similar to those already in place on rivers, trails, and campgrounds throughout the country, including, registration, performance standards compliance, code of conduct agreements and permits. A combination of these will ultimately be helpful in preserving a rich experience.

Not all uses are the same. Ski areas are very very popular, Wilderness is where one should expect solitude, and multiple use terrain is where you can expect a somewhat in between, but high quality, experience. For the experience to remain acceptable the backcountry cannot be decreased in size, it should not be made more easily accessible and it needs to quickly be protected from over crowding through access restriction.

Mountain Accord can achieve all these goals through applying an environmentally driven preferential treatment that this limited resource deserves.

Powderbird Helicopter Skiing

Mtn Accord Public Comment
Wendy Fisher, Executive Director
Utah Open Lands

Introduction

The concepts within the Mountain Accord are sufficiently vague causing an overall concern that any support for the concepts is premature. Understanding the complexity of planning that will be necessary for implementing the varied aspects considered by Mountain Accord, the very premise of the Mountain Accord its process is concerning as well. Taking a broad swath of land and jurisdictions and allowing a select group (partially made up of for profit companies whose bottom line will be benefitted by the outcome) to come to consensus on how these areas should be planned, circumvents the public process. It applies undue pressure and influence to any project by project analysis and public hearing that subsequently occurs.

Most visioning processes, though useful in understanding broad concerns and needs, often fail to implement with integrity the environmental or community benefits envisioned by these processes. Too many visioning efforts result in the economic development and transportation elements getting funded and moving forward while meaningful preservation is sidelined, partially accomplished, left to chance or worse development occurs instead.

Land preservation and Watershed protection needs to be the highest priority for all those at the table. It is fundamental to long term economic vitality and should not be undermined by short term economic concerns as the recreational opportunity, clean water and environmental health once compromised cannot be replaced. Transportation solutions should not be driving the process. It is disheartening to see the scoping document appear on the register indicating that Transportation solutions will drive the process and further questions the validity and viability of the process.

Land Swaps—Having protected land from development for the past 25 years, anytime there is discussion regarding taking protected land and making it developable there are concerns. The bar needs to be sufficiently high, so that this idea does not become routine. This land swap has the potential to set a dangerous precedent. Consideration should be given not just to the amount of acreage being swapped but also the relative development potential, the planning and zoning currently existing and the eventual development considerations given to the property. Additionally a concept which has been part of other federal regulatory process is that it shouldn't be a one to one match but rather a ratio where there is a several fold increase of protected land.

Additional protections for already protected land—Additional layers of protection for already protected land is fundamentally a good thing. Utah Open Lands has long held that conservation easements are critical as a layer of defense and protection when land is purchased or zoned as open space. With this said no one would pay a full market value for a piece of land that had already had the development rights stripped away. Whatever the additional layer of protection turns out to be whether it be Wilderness designation or something similar the trade off should be commensurate with the recognition that it is protected already and therefore trade offs should not be considered as if the land protected was somehow in danger of being developed.

Economic Centers or Transit Oriented Development—this concept in theory is dynamic and should aid in reducing air pollution, traffic congestion and create walkable communities. In practice there are several concerns. Blindly supporting this concept without proper regard for the consequence of how

these areas actually get rezoned and the potential lawsuits that it might open up is foolhardy. The concept of economic centers is troubling as most of these communities lack requisite and appropriate ordinances to ensure that these centers, which will necessarily benefit the landowners within these centers, will actually provide a benefit to the community reversing decades of positive planning in which clustered developments or upzoned properties had to provide multiple community benefits. There are several examples in the Salt Lake Valley where transit oriented developments resulted in a windfall to developers with no community benefits, so a very poor precedent, by one of the leading agencies in this process, as already been set. By way of example one project was originally zoned 1 unit per acre and once a transit oriented development was planned it was rezoned with unlimited height and unlimited density.

Train or transportation solution—A recent New York Times article explored the train versus bus transportation solution in many cities. The conclusion, buses are not as sexy but they are more efficient, are not fixed and therefore can actually accommodate a ridership that gets people where they need to go and are more cost effective. We are not Europe we are a car centered community which suggests that buses accommodate the need better. A train that aims to solve a transportation problem that exists perhaps 20 days out of any given year in the cottonwood canyons, doesn't make sense. A train in the canyons will not pay for itself in ridership and therefore will potentially increase undesirable development as a means to finance shortfalls. Current fares are too costly to truly capture the family of four wanting to recreate in the mountains. \$5 per trip -- \$40 for the day will not be cost effective for any family. Additionally, as climate change alters current recreational pursuits in ways we may not be able to envision a bus line will be far more adaptive to those changes than a fixed solution.



April 29, 2015

Mountain Accord Executive Board members,

As Utah's statewide chamber of commerce representing more than 8,000 businesses, we strongly recommend a full consideration and advancement of the proposed Mountain Accord blueprint to an environmental impact study. Being part of the process has made it clear that doing nothing is not an option for the future of this valuable asset.

We want to commend and thank the executive board, management committee and the hundreds of participants for the progress thus far for ensuring that the Central Wasatch remain an asset for generations to come. This process has provided a needed forum for long-term decisions and is an exemplary example of what makes Utah great: our ability to collaborate and compromise for the greater good.

The Central Wasatch is critical part of our state's spectacular natural environment and an economic engine for our entire state. This asset provides recreational opportunities and natural beauty that attracts visitors, great companies and employees. Making sure we protect and enhance that asset is critical to our future.

In addition to our support of the current blueprint, we would like to draw specific attention to the following:

- **Need for a clear path forward:** In the face of a rapidly growing population, we risk losing our Central Wasatch to death unless action is taken now. The blueprint is the beginning of what needs to become more than a planning document, it needs to be a comprehensive and collaborative action plan with clear milestones, supported by the public.
- **Economy:** The role of the Central Wasatch to Utah's economy cannot be understated. Mountain Accord presents a generational opportunity to strengthen our local, regional, state and national economy.

We believe that the current blueprint is a good step in this direction by connecting these decisions to:

- The impact on Utah's global brand;

- Utah's growing outdoor recreation industry;
- The proximity and connection of Salt Lake International Airport and the hotel industry along the Wasatch Front, specifically Downtown Salt Lake City;
- Enhancement of Utah's quality of life for business recruitment;
- Utah's convention and visitors industry overall;
- More directly connecting the Wasatch Front and Back;
- Increased density near in community's at the base of the Canyons;
- The proper role and contribution of investments in infrastructure.

As this process moves forward we continue to support further discussion, documentation and quantification to provide a complete and robust analysis of the economic value of these assets.

- **Environment:** The value of the Central Wasatch to our economy and quality of life is dependent our ability to manage the impacts of growth on the environment. We are hopeful that the objectives in the blueprint, once further studied will establish:
 - A long-term plan to ensure this remains a vibrant natural resource;
 - Protect our critical watersheds;
 - Allow for the appropriate enhancement of our ski industry;
 - Provide transportation alternatives that result in net-positive to the environment.
- **Recreation:** One of Utah's key economic assets is our quality of life. The quality and quantity of recreation opportunities is key to that. Over time, population growth, increases in recreation demand and growth in new types of recreation will continually put greater pressure on the developed and undeveloped recreation areas of the Central Wasatch. We believe that the blueprint lays out an appropriate path forward to avoid diminishing this key component of our community. Specifically, we support the following steps:
 - Investing in recreational assets and infrastructure;
 - Balancing the needs to preserve open space and enhance our ski areas;
 - Improve transit service to recreation areas.
- **Transportation:** The Chamber has supported Mountain Accord as a means to explore transportation options in the Wasatch Mountains that increase accessibility, are a net-positive for the environment, encourage transit, enhance Utah's global brand and pass a rigorous environmental and local process.

We believe the current blueprint reflects that position and we strongly encourage moving to the next phase of study and that this should include:

- All modes of transportation identified in the blueprint, including rail and bus rapid transit;

- Possible connections between Little and Big cottonwood canyons, including tunneling;
- Improved links between key economic generators in the region, including connections between Salt Lake and Summit Counties through improved transportation options.

Once properly vetted through the next phase, we believe that these key study items and resulting critical decisions must be supported and approved by the public.

These comments highlight key areas of interest to Utah's business community as part of the proposed blueprint. This process will ensure that we will enjoy this critical asset for generations to come through a commitment to community property.

Championing our community's prosperity is part of our mission and is our commitment to our children and grandchildren. This commitment is that they will inherit a stronger, safer and more prosperous Utah. Mountain Accord presents an opportunity to just that.

We thank you for the opportunity to comment on this process and express our support for moving forward.

Sincerely,



Lane Beattie

School for International Expedition Training

1338 S. Foothill Dr. STE 177
 Salt Lake City UT 84108
 760-920-3464
info@expeditiontraining.org



To Whom It May Concern:

On behalf of the School for International Expedition Training, a registered Utah 501(c)3, I would like to share our position on the land use of the Wasatch Backcountry.

Overall, we feel that conserving and protecting as much land as possible is extremely important for environmental, economic and recreational reasons. We feel that the protection of the Superior Ridgeline, starting in the Twin Peaks Wilderness should extend as far eastward as possible and with the most protection possible. We feel that the current Blueprint places too much emphasis on development and not enough on preservation of the environment and human powered recreation.

- We do not support an interconnection project between BCC and LCC and/or PC, including tunnels.
- We feel strongly that the Grizzly Gulch area must be preserved and kept intact so that human powered recreation continues to be an enjoyable opportunity for generations to come.
- We do not favor the expansion of ski area boundaries, especially those that impact the uphill traffic of human powered recreation.
- We support land transfers and land swaps, from private to protected public land, that help protect what's left of human powered recreation areas.

Transportation:

In general, we support development of low cost, low impact transportation system in the Wasatch. We support a bus-based transportation system as outlined in the Wasatch Backcountry Alliance / Winter Wildlands Alliance's comments on the Mountain Accord's Blueprint (http://wasatchbackcountryalliance.org/wp-content/uploads/2015/04/Blueprint_CommentsWithAppendices_WBAWWA_4_14_15.pdf), Transportation Alternatives appendix C; that is,

- We support high quality/capacity bus systems in the LCC and BCC area but without a connection to PC
- We support the use of clean fuel in all busses

- We feel that more information needs to be gathered before trains are considered in the canyons, particularly the issues outlined on page C-7 to 8 of the aforementioned WBA/WWA document
- We support incentives for carpooling and disincentives for single occupancy vehicles
- We support increased parking at the base of BCC and LCC
- We support an express but that makes no more than 2 stops between the mouth and head of each canyon
- We do not support year-round use of Guardsman Pass Rd

Thank you for taking the time to read our thoughts.

Sincerely,

Joshua Beckner
Founder and Director

Etm149@aol.com

4/30/15

In case any members of the Executive Board did not receive or have a chance to read our comments early in March, we are resubmitting them for review prior to the May 1st deadline. Thank you in advance for taking our comments seriously and for acting upon them in approving the final Blueprint.

Comments from Log Haven Restaurant

April 30, 2015

These comments are on behalf of the owners of Log Haven's business and its land. Although we are located in Millcreek Canyon, the first two of our comments apply generally to the Executive Board's Proposed Blueprint.

1. Respecting Private Property Rights.

The Executive Board's Proposed Blueprint does not include even a single sentence about respecting private property rights. There were express statements made in some of the committee reports, but they have been excluded in the proposed Blueprint. Is this the "balanced" approach that MA purports to be taking? Even FCOZ, with its broad restrictive provisions and intent, includes references to respecting private property rights.

Revising MA's Blueprint to expressly state that it intends to respect private property rights is extremely important not only today but for the way that future government officials will interpret MA's intent. So if MA's Executive Board really means to respect private property rights, then you need to say so.

The restrictive zoning statutes in the canyons, as increased by FCOZ, already make private property repairs and improvements extraordinarily difficult. A truly balanced approach would not make necessary repairs or desirable improvements even more difficult for private property owners to achieve.

2. Broadening the Definition of "Diverse" Recreation.

MA says that it is promoting diverse recreational activities, yet its definition of "diverse" is limited solely to athletic and exercise activities. That is a narrow definition, not a broad one.

Working in Millcreek Canyon every day, we can testify that only a small percentage of the bikers and joggers in the canyon are over forty. Only a slightly larger fraction of the hikers are over fifty. So MA's current definition of "diverse" is limited primarily to young athletes and to exercisers. What about the much larger portion of the population that is

over forty, disabled, or non-athletic? Aren't they entitled to have a definition of diversity that includes them too?

One of the most pleasurable ways for people of all ages and abilities to enjoy the beauty and relaxation of nature is to eat meals in a rustic setting among the mountains and trees. The National Forest Service and other federal and state park administrators recognize the recreational importance of eating outdoors by virtue of the large number of picnic sites that they maintain. Yet eating in a rustic setting is not limited to picnics.

People of all ages and abilities also find it particularly enjoyable to dine in a more formal setting, especially if it includes a lodge-type building and beautiful waterfalls, as we have here at Log Haven. Celebrating birthdays, anniversaries, weddings and other special events in such a setting is a form of recreation that is available to everyone. In addition, this type of dining is used as an important recruiting tool by local businesses and the University of Utah to attract the talent that they need to maintain and improve the economy.

So we ask that the Executive Board expressly include picnicking and outdoor dining as diverse and desirable forms of recreation in MA's final Blueprint. This is particularly relevant for Millcreek Canyon, given its proximity to Salt Lake City and its long history of supporting both picnicking and outdoor dining.

3. Making the Millcreek Shuttle System Optional Rather Than Mandatory.

The Executive Board's draft Blueprint cites the creation of a Millcreek Canyon shuttle service as one of the easiest and fastest projects to implement. Yet the success of any such system will be determined by its details.

One of the most important aspects of the proposed shuttle system for Log Haven and its owners is that the system be kept optional rather than mandatory. As local governments and transit systems realize better than anyone, very many people will just not give up their cars and use public transportation today. While governments have the financial resources to slowly educate people, private owners do not.

So we fear that any public shuttle system that would completely exclude driving would have a devastating impact upon our business and land ownership. It would likely constitute a taking for which fair market compensation would be required. We do not want to see that day, and we hope that you do not either. Therefore, we ask that the final Blueprint expressly specify that the proposed Millcreek Canyon shuttle system be optional.

Thank you for taking our concerns seriously and for your making the preceding revisions in the final Blueprint.



SUBMITTED VIA EMAIL

April 30, 2015

Mountain Accord Executive Committee:

The Salt Lake Climbers Alliance (SLCA) appreciates the opportunity to comment on “The Proposed Central Wasatch Blueprint” (Blueprint) offered by the Mountain Accord stakeholder process. From the SLCA’s perspective, the Blueprint marks a good starting point for this process. The SLCA offers the following comments and recommendations to help inform the Mountain Accord process as well as communicate with its members, the rock climbing community in the central Wasatch, and the general public who may be affected by implementing proposed actions arising out of this process as discussed in the Blueprint.

Background on the SLCA

Founded in 2002, the SLCA is a non-profit 501 (c) organization that exists to provide a unified voice for climbers in the Wasatch and surrounding regions through advocacy, stewardship, community, and education. The SLCA’s members have actively used the area that will be affected by the Blueprint, and will continue to do so in the future. For many SLCA members, climbing in Little and Big Cottonwood Canyons is a weekly, if not daily ritual. Please visit SaltLakeClimbers.org for more information.

Introduction

Below the SLCA identifies its support for certain concepts being considered through the Mountain Accord process. This section is followed by a list of concerns that the SLCA has with certain concepts being explored in this stakeholder process. In each section, the SLCA offers specific recommendations on how the Mountain Accord process might further examine these issues to ensure that the public, and in particular the climbing community, receives adequate information to contribute to the Mountain Accord process as well as future proposed actions that emerge out of the Mountain Accord process. The last section offers general recommendations on how the Mountain Accord process should consider proceeding to best engage the public to garner public support recognizing that all stakeholders will have to compromise to balance competing interests for this treasured area covered by the Blueprint.

Concepts Supported by the SLCA:

- **Federal Land Designations:** The SLCA supports a federal land designation being passed by Congress that identifies the recreational value of rock climbing within Big and Little Cottonwood Canyons to ensure preservation and enhance climbing areas and the surrounding environments. Any such legislation will need to be carefully crafted to maximize the ability of

climbing maintenance activities to occur to ensure proper future management of climbing resources. The SLCA supports such legislation as a means to end future potential for ski area expansion disputes.

- **Mass Transit Solution:** The SLCA recognizes that a mass transit system and trail network systems will cost a great deal of money and supports Mountain Accord seeking federal funding to implement these systems through federal legislation.
- **Land Swaps:** The SLCA works with land managers and private landowners to protect access to climbing areas, and we support the Mountain Accord process to examine and carry out land swaps to better ensure access to climbing that is on private land. The Gate Butress owned by the LDS Church in Little Cottonwood Canyon is one property the SLCA recommends Mountain Accord Cottonwood Canyon Taskforce explore for a land swap.
- **Trail Connectivity:** The SLCA promotes better climbers' access trails, therefore we are excited about the inclusion of a trail connectivity component in Mountain Accord. Mountain Accord has the opportunity to help establish additional sections of the Bonneville Shoreline Trail, make improvements to the Great Western trail, and support much needed maintenance of existing trail systems as well as shovel-ready projects in need of funding for implementation. We support the establishment of the multi-user "Wasatch Traverse" concept if stakeholders, land owners, and the USFS can agree upon an appropriate alignment in upper Little and Big Cottonwood canyons.
 - **SLCA Recommendation:** Specific to climbing resources, the SLCA looks to stabilize climbing access trails and staging areas in the Central Wasatch and in particular at climbing areas that are adjacent to proposed and existing designated trails. The SLCA also supports the establishment and maintenance of canyon length, multiple user trail systems in Parleys, Big Cottonwood, and Little Cottonwood canyons as integral to connectivity with potential, future transit.
- **Grit Mill as a 'Shovel Ready' Mountain Accord Project:** Lower Little Cottonwood Canyon is a heavily used recreation node that has been virtually ignored by Mountain Accord. As a treasured climbing and hiking resource and the entrance to Little Cottonwood Canyon, this area has been neglected for many years. The SLCA is encouraged by Mountain Accord's support for the Grit Mill & Climbing Master Plan Project. This project is "shovel ready" because it has undergone National Environmental Policy Act (NEPA) and a record of decision has been issued by the U.S. Forest Service. This multi-use loop trail with adjoining climber access trails contemplated under the Grit Mill & Climbing Master Plan Project will set the precedent for better climbing access trails and better overall trail connectivity throughout the Wasatch. Directly across the highway, this part of the stream and Little Cottonwood Canyon trail corridor is the epicenter of vandalism in the canyon. Hydroelectric and utility infrastructure in this area further complicates matters.
 - **SLCA Recommendation:** The Mountain Accord process should continue support of implementing the Grit Mill & Climbing Master Plan Project and additionally focus on developing a master plan to ensure recreational uses in these areas are compatible with this privately and publicly owned infrastructure.
- **Imposition of Fee Structure:** The SLCA recognizes the need for funding to maintain and develop recreation areas in the Wasatch and is open to fees that directly support and improve recreational sites within the canyons. While the SLCA recognizes the environmental impact caused by motor vehicle use and in particular the impacts to the air-shed, such restrictions without adequate assurances on the location of public transit stops in close proximity to key climbing areas in Big and Little Cottonwood Canyons is not an acceptable approach for the SLCA.
 - **SLCA Recommendation:** The SLCA will participate in further studying such a fee

system and how it may be implemented to ensure access to dispersed climbing areas and the experience while at these areas in Big and Little Cottonwood is at the very least preserved or potentially enhanced by such a fee system. The SLCA will offer its knowledge of climbing areas in Big and Little Cottonwood Canyons to develop a well-conceived parking plan in conjunction with mass-transit stops.

- **Parking:** The SLCA is interested in getting more cars off the canyon roads and is interested in mass transportation ideas that serve dispersed recreation users as well as the resorts. The SLCA sees opportunity for better trailhead parking throughout the canyons through the Mountain Accord process.
- **Environmental Scorecard:** The SLCA recognizes a need for an environmental monitoring system in the canyons and is in support of Mountain Accord's efforts to create this promptly to advise future NEPA work.

Areas of Concern for the SLCA:

- **Watershed Impacts:** Impacts to the watershed from new infrastructure for mass transit are unknown and will need to be better understood prior to implementing proposed actions.
 - **SLCA Recommendation:** The environmental scorecard should focus on creating a baseline understanding of existing watershed conditions. A desired future watershed condition should be identified.
- **Ski Area Expansion:** The SLCA is concerned about future ski area expansion and the cumulative effects of such expansions on the environment.
 - **SLCA Recommendation:** The ski areas should clarify expansion desires, such as Snowbird's expansion desires into American Fork Canyon. Additionally, this potential ski area expansion should also be addressed in the American Fork Vision Process that is currently underway.
- **Mass Transit Impacts to Climbing Resources:** The SLCA is very concerned about potential transportation solutions that may negatively impact existing climbing resources and in particular bouldering areas located in lower Little Cottonwood Canyon. Lower Little Cottonwood Canyon hosts some of the most heralded bouldering in all of America, and these boulders are accessed by SLCA members throughout the year. This high pressure winter has resulted in bouldering occurring steadily through the winter months. At this very preliminary phase, the SLCA does not believe a "rail trail" alignment would be appropriate, because, based on our understanding, this alignment would cause the greatest impact to climbing as well as the environment by not taking advantage of the existing disturbance of the road that would be better utilized by a "side running rail" alignment. The SLCA would like to acknowledge and express its appreciation that Mountain Accord lead transportation engineer, Newel Jensen, promptly met with SLCA representatives for a field visit and was encouraged that most, if not all, boulders adjacent the highway would not be lost to potential, future expansion of the transportation corridor.
 - **SLCA Recommendation:** The SLCA requests the transportation subgroup and Utah Transit Authority continue to reach out to the SLCA to discuss potential alignments so that the SLCA can best inform alignment decisions to eliminate or at the very least minimize impacts to rock climbing and in particular bouldering in Little Cottonwood Canyon. Further, the SLCA requests that Mountain Accord provides resources to assist in documenting all potential impacts to climbing resources in Little Cottonwood Canyon.
- **Adaptive Management Approach to Future Proposed Actions/Cumulative Effects Considerations:** Mountain Accord envisions a myriad of proposed actions, many of which are

interrelated.

- **SLCA Recommendation:** Proposed actions arising out of the Mountain Accord process should analyze previously implemented actions to ascertain the cumulative effects of those actions as they relate to the intended purpose of a future action being proposed. Consequently, the Mountain Accord process should adopt an adaptive management approach that recognizes how certain proposed actions may not be warranted or perhaps need to be modified to account for certain actions that have already be implemented and are producing effects that dictate altering the course of future proposed actions. For example, a long-term mass transit solution will need to account for how recreation is managed in lower Little Cottonwood Canyon, and, specifically, how the implementation of the Grit Mill & Climbing Master Plan Project might affect siting for transit stops in this area of the canyon.
- **Public/Private Support for the Salt Ranger District for the United States Forest Service:** Having collaboratively worked with the Salt Lake Ranger District for a over decade, the SLCA is concerned with the massive amount of workload that the Salt Lake Ranger District will face to conduct NEPA for certain proposed actions arising out of Mountain Accord as well as implementing these actions once the necessary NEPA and regulatory decisions have been performed. The Wasatch Legacy Project (WLP) has been somewhat effective by leveraging a public/private partnership, but even if Mountain Accord generates much needed additional funding for WLP projects, Salt Lake Ranger District oversight and participation could come at the expense of existing workloads. The SLCA will continue to support maintenance efforts through volunteer efforts, but the SLCA and Salt Ranger District's ability to support such maintenance will likely become strained if the large-scale programs envisioned by Mountain Accord come to fruition. Consequently, the Mountain Accord process should examine and provide recommendations on how potential proposed actions arising out of this process will be studied, implemented and maintained once implemented.
 - **SLCA Recommendation:** The inclusion of a climbing ranger and climbing management plan as part of a greater trails plan for the Wasatch. Instituting a Climber Ranger in the Salt Lake Ranger District will help minimize some of the workload constraints already facing the Salt Lake Ranger District, which will only be heightened as the proposed actions discussed by Mountain Accord are implemented. The SLCA suggests a public/private funding arrangement for a Climbing Ranger for the Salt Lake Ranger District akin to the funding structure by the Utah Avalanche Center for the USFS Avalanche Forecaster should be a priority. The majority of the trails to climbing areas within these canyons do not qualify as USFS system trails, and a climbing management plan that takes a programmatic approach to dealing with these trails will likely allow for more efficient analysis in one NEPA document while best assessing the cumulative impacts of climbing in these two canyons. This approach will also provide clearer management directives for the Salt Lake Ranger District, which should improve its administrative efficiency in its management of climbing resources under its purview.

General Process Recommendations:

- **Decision Tree Framework:** The Blueprint identifies fourteen (14) proposed actions that may occur as next steps. It is unclear the timeframe for these actions occurring and how these actions will be undertaken. For example, there are many activities identified that appear to have a federal nexus to trigger an environmental analysis under the NEPA. The SLCA suggests that Mountain Accord develop a comprehensive schedule for completion of all these

activities and relatedly, some type of NEPA strategy document that identifies when NEPA will be performed for certain activities and what federal agency will act as the lead agency. Laying this framework out in some type of 'decision tree document' will greatly improve the public's understanding of how these actions may unfold.

- **MOU as a Deliverable from the Cottonwood Canyons Task Force:** The available information from Cottonwood Canyons Task Force states that the ski areas are willing to make exchanges of certain private parcels to the public domain in exchange for five enumerated benefits. (e.g., 416 acres in American Fork, additional water for snowmaking, etc.) It is unclear from this proposal whether this agreement between the ski areas and presumably, the United States Forest Service has been formalized in any way. While the SLCA recognizes that neither a private party, such as a ski area, or a public agency like the USFS could agree at this time to the proposed exchanges without going through the appropriate processes (NEPA, board approval by ski area companies, etc.), the SLCA is concerned that this process and negotiation be conducted as transparently as possible. To this end, the SLCA suggests that a MOU with suitable off-ramps may be appropriate to give this process the requisite transparency to engender public support.

Closing Remarks

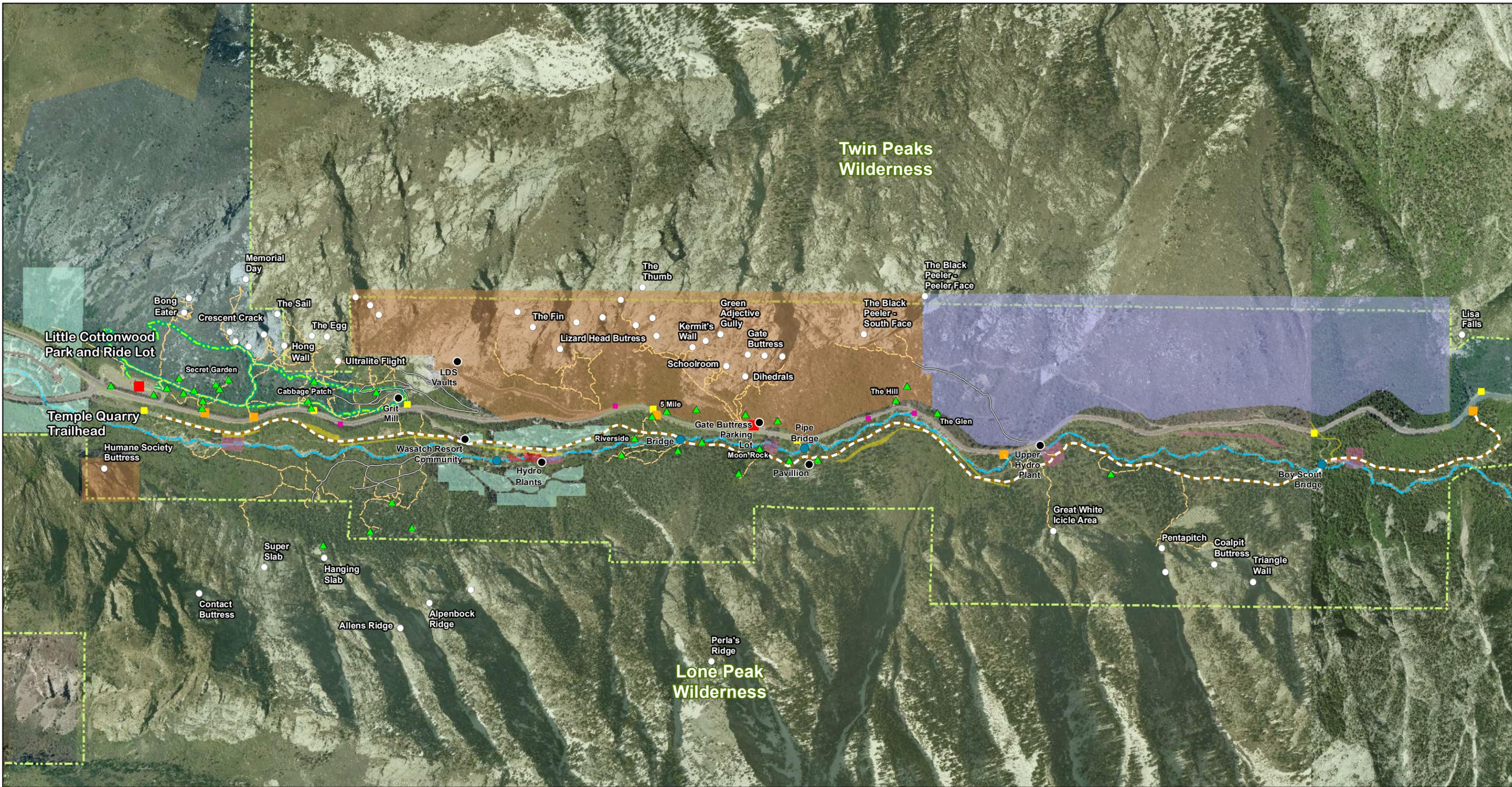
The SLCA, again, would like to thank Mountain Accord for the opportunity to comment on its stakeholder process and its consideration of these comments. Lastly, the SLCA provides two maps depicting existing climbing areas in lower Little Cottonwood Canyon as well as proposed trail work to be performed as part of the Grit Mill & Climbing Master Plan Project for the benefit of the Mountain Accord process. If there are any questions in regards to these comments or the maps, please do not hesitate to contact us. The SLCA looks forward to continuing to actively participate in this stakeholder process.

Sincerely,

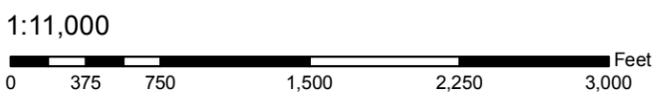
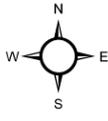
Julia Geisler

Executive Director
SLCA Board of Directors
SLCA Policy Committee

Enclosures



Sources: HRO 2009 1 Foot Aerial Photography
 State of Utah Automated Geographic Reference Center
 Rock Climbing Utah's Wasatch Range, Ruckman 1998;
 A Bouldering Guide to Utah, Baldwin, Beck, Russo 2003;
 Salt Lake County; Salt Lake Climbers Alliance; USFS



● Miscellaneous	— Grit Mill/Climbing Access Project	Climber Parking	Salt Lake County Parcels*	USFS Ownership/Designation
● Bridge	— Existing User Trails	■ 1	■ Cottonwood Hydro	■ USFS Ownership
▲ Bouldering Area	— Road Grade	■ 2	■ LDS Church	■ USFS Twin Peaks IRA
○ Climbing Area	— Little Cottonwood Trail	■ 3	■ Murray City	■ Wilderness Boundary
	— Little Cottonwood Creek	■ 4	■ Perpetual Storage	
			■ Private	
			■ SLCO	

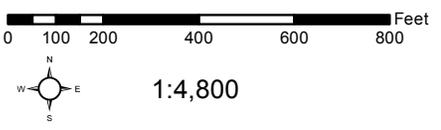
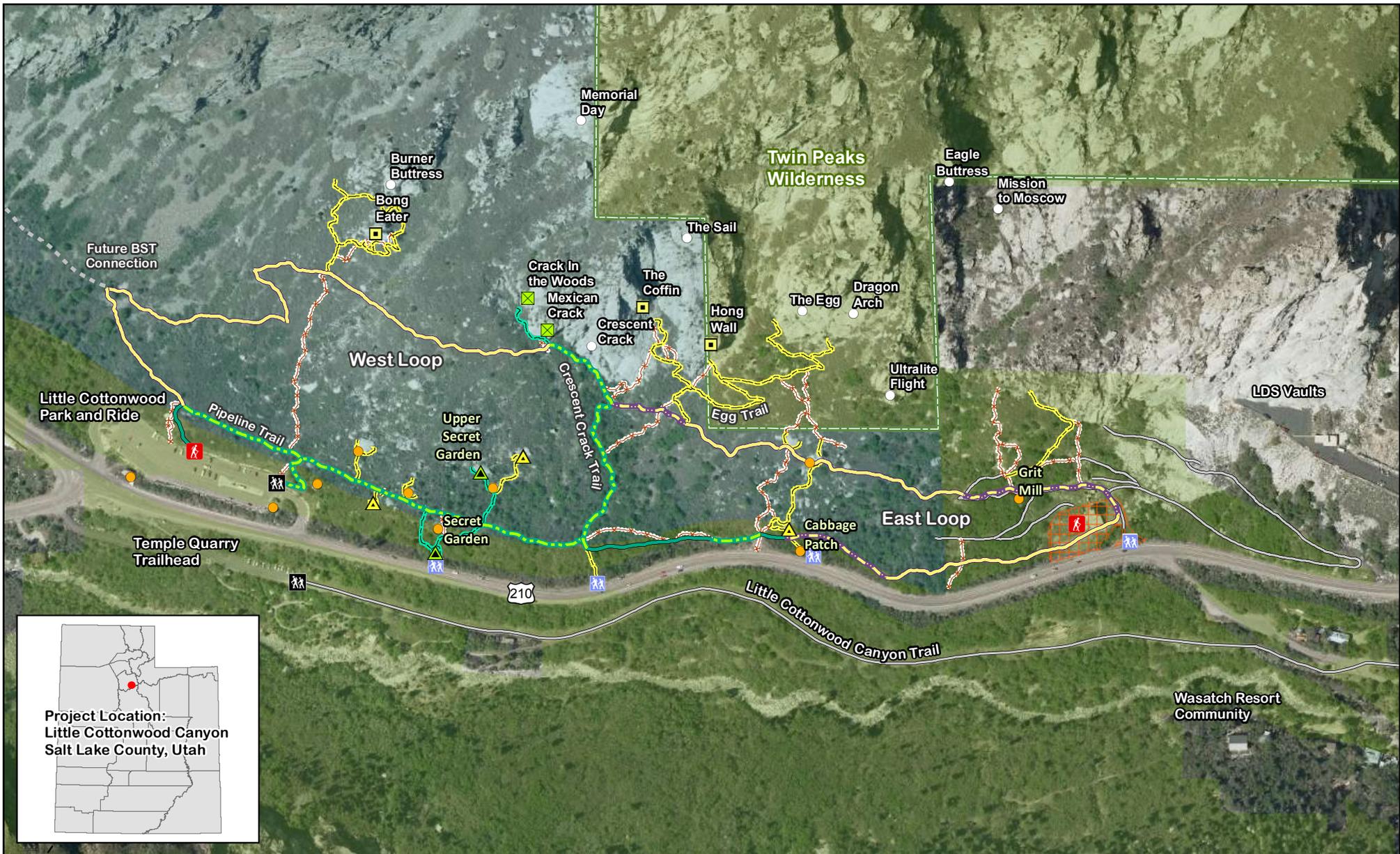
Little Cottonwood Canyon Recreational Resource Planning

Map 1 - Lower Canyon

4/2015

* Lack of precision inherent in Salt Lake County parcel boundaries.





Sources: HRO 2009 1 Foot Aerial Photography
State of Utah Automated Geographic Reference Center
Rock Climbing Utah's Wasatch Range, Ruckman 1998;
A Boulderling Guide to Utah, Baldwin, Beck, Russo 2003



Legend

- | | | |
|---------------------------------|--|---------------------|
| Access Trail Development | Boulderling Area - Stabilize Staging 2015 | Reference |
| Existing Core Route 2015 | Boulderling Area - Stabilize Staging 2016/2017 | Boulderling Area |
| Existing Core Route 2016/17 | Climbing Area - Stabilize Staging 2015 | Climbing Area |
| New Trail 2015 | Climbing Area - Stabilize Staging 2016/2017 | Road Grade |
| New Trail 2016/2017 | Existing Roadside Access | USFS Ownership |
| Closed Routes | Established Trailhead | USFS Twin Peaks IRA |
| Stabilize Access 2015 | Future Trailhead | Wilderness Boundary |
| Stabilize Access 2016/2017 | Future Trailhead/Parking | |

Little Cottonwood Canyon, Grit Mill and Climbing Access Management Plan Project

Trails / Staging Planning and Development

Salt Lake Climbers Alliance
4/2015

* All route designations, potential alignments, designs, and closures, are preliminary and subject to change.



Citizens' Committee
to Save Our Canyons
P.O. Box 112017
Salt Lake City, UT 84147-2017
Tel/Fax: (801)363-7283

Dedicated to Protecting the Beauty and Wildness of the Wasatch Canyons, Mountains and Foothills

April 28, 2015

Mountain Accord
c/o Laynee Jones
375 West 200 South, Suite 275
Salt Lake City, UT 84101
comment@mountainaccord.com

Dear Mountain Accord Executive Board,

Please accept these comments, submitted on behalf of Citizens' Committee to Save Our Canyons, concerning the Draft Blueprint for the Mountain Accord process.

Save Our Canyons is a non-profit corporation dedicated to protecting the wildness, natural systems, and beauty of the Wasatch Mountains, its canyons and foothills. Founded in 1972, it currently has over 1,700 members, who share a deep appreciation of the quiet, solitude, and recreational opportunities the Wasatch Mountains provide, and an interest in maintaining these qualities. Members of Save Our Canyons are dedicated to adoption and implementation of careful landscape management in order to maintain the biological integrity of the unique and fragile mountain ecosystems that make up the Wasatch. Many of Save Our Canyons' members frequently recreate in the Wasatch, and their recreational and aesthetic experience will be affected by the proposals currently being considered through the Mountain Accord process. Most of Save Our Canyons members live along the Wasatch Front and depend on the headwaters of the Wasatch to provide clean drinking water. Many of the proposals being considered could have a significant impact on the health of the watershed and could negatively affect the quality of the drinking water derived from the Wasatch. For these reasons, Save Our Canyons appreciates the opportunity to comment on the Blueprint proposals under consideration.

The Wasatch Mountains are a finite and precious resource. No other urban city in the United States, dare we say in the world, provides a parallel opportunity for recreation in a wild and scenic mountain environment within minutes from a highly urbanized and built environment. Furthermore, life in the Salt Lake Valley depends on maintaining the health and integrity of the watershed in the Wasatch. Fifty to sixty percent of Salt Lake City's water supply comes from streams and aquifers whose waters originate in the Wasatch. To preserve this resource, proposals selected during the Mountain Accord process must put a premium on preserving these essential ecosystem services, maintaining the biological integrity of riparian areas, and protecting the environmental values that make the Wasatch unique and precious. It is critical that the multiple jurisdictional authorities implement integrated management, long range planning, and innovative landscape-level protections.

Save Our Canyons would encourage Mountain Accord to carefully consider landscape-level conservation planning and, in particular, land exchange as tools to promote conservation and environmental

protections with permanent effects over large areas of land within the Wasatch. Landscape conservation and land exchanges can reduce and avoid mountain sprawl and increasing visitor impacts. As population increases, increased pressure on the natural environment will increase. By engaging in landscape-level conservation planning, the Mountain Accord can assure protection of the highest quality and quantity of land so that the natural environment is robust and that future generations can enjoy the bountiful natural resources that we enjoy today. These ideas will be outlined further in Section I.

In light of the importance of the natural Wasatch region, some of the proposals developed during the brainstorming phase should be rejected without further analysis or consideration because it is already obvious that they would have profound negative effects on environmental resources like wildlife, riparian habitat, in-stream flows, and aquifer recharging. Specifically, Save Our Canyons is opposed to current plans for rail lines, tunneling and road expansion in the canyons. Save Our Canyons is opposed to new aerial lifts connecting multiple resorts or connecting Park City to the Cottonwood Canyons. Depending on its alignment, the proposed rail line and associated tunnels could significantly degrade the watershed and wildlife habitat. The topography of Little Cottonwood Canyon forces development in rich habitat and riparian areas of Little Cottonwood Creek and its tributaries. It is unlikely that there will be a reasonably conceivable alignment for the proposed rail line that could avoid significant degradation of critical watershed values and wildlife habitat. For the same reasons, any significant enlargement or realignment of the road in Big Cottonwood Canyon would have similarly derogatory effects. Proposed tunnels are a massively invasive project that could dramatically alter drainage patterns, disrupt aquifers, and drain wetlands. Finally, aerial lifts have profound negative impacts on wildlife habitat, watershed, migratory species, natural vistas and wetlands. Such dramatic risks should be rejected at the outset. Section II articulates these concerns in more detail.

As the Mountain Accord process moves forward from the brainstorming phase to the analysis and selection phase, Save Our Canyons emphasizes that Mountain Accord's selection of proposals should be done within the context of existing laws, policies, and procedures. Additionally, it is our expectation that the projects forwarded on to receive additional analysis receive equal footing in the NEPA process. We don't believe that any one option has enough support to be considered the "proposed action" and that the NEPA process should be used, as it was intended to inform decision making, not be biased by proposing a singular action, giving it preference above the rest. The Mountain Accord process is not the first time that long-term planning for the Wasatch has been undertaken. For example, since the 1970s, Salt Lake County has engaged in long term planning to develop an Area Wide Water Quality Management Plan, consistent with Clean Water Act Section 208 guidelines. That plan, most recently updated in 2009, which established management priorities and binding restrictions for development within the Salt Lake County Watershed, has the force of law. Proposals that are inconsistent with existing laws, policies, management priorities, including those articulated in the Salt Lake County Water Quality Stewardship Plan, should not move beyond the brainstorming phase to the analysis and selection phase. Save Our Canyons' justification for this position is set forth in more detail below in Section III.

Furthermore, transportation for the Wasatch Canyons must be developed in coordination with the existing transportation system. It cannot be considered in isolation. Failure to integrate the transportation plans for the Wasatch with effective transportation systems through the valley will limit the quality and effectiveness of the chosen transportation system. As currently proposed, the rail line is poorly integrated into the current and proposed transportation lines and infrastructure. Thus, the proposal fails to address the transportation needs of the Wasatch population and only caters to a small portion of the population. Also, the proposed aerial line, which is being characterized as a “transportation” option, is not a viable form of transportation and it is poorly integrated into the larger transportation system. It will not provide high-capacity, broad-based service to the general population, yet it would impose significant environmental consequences. Similarly, the proposed rail options have been conceptualized in isolation and are not designed to integrate with the larger transportation system. Instead, the rail appears designed to cater primarily to visitors, who are only a portion of the canyon users needing an effective transportation system. In contrast, there are feasible, easily-implemented transportation options that could integrate with existing transportation infrastructure, serve a broader spectrum of society, and provide the needed capacity to canyon users, but these options have been eliminated from consideration without justification. The Blueprint should consider more transportation alternatives that do not require increased infrastructure in the Cottonwood Canyons and that avoid major negative impacts to the environment. Specifically, the Mountain Accord should take a serious look at shuttle systems like those used in some of our National Parks. Finally, Mountain Accord should explain why certain options are no longer on the table, instead of dismissing them without justification. Section IV discusses these issues in more detail.

Save Our Canyons, strongly supports the efforts within Mountain Accord to increase federally designated Wilderness and strengthen other protections for this iconic landscape. A few short years ago, we were able to introduce consensus comprehensive compromise legislation to the US House of Representatives, however the efforts were stymied for political gain. Our hope is to proactively engage the Mountain Accord, at the request of the system groups to expeditiously realize federal protections for this landscape. It has been concerning to us that while overwhelming support of this idea from local communities has been prevalent throughout the process, not much in the way of legislation has been crafted. We hope legislation will be drafted soon to demonstrate the sentiment is genuine.

Looking forward, there are several elements in the Draft Blueprint that should be altered in order to better serve the future of the Wasatch Region. Save Our Canyons reemphasizes the importance of providing strong, permanent conservation measures to protect vital environmental resources. This should include Land Exchanges that focus on consolidating publicly held lands, establishing permanent conservation measures and limiting mountain sprawl. Mountain Accord is a new process, is unique in how it intends to invoke the National Environmental Policy Act and has been a learning experience for all involved parties and the public. We hope these comments help to disclose and articulate the concerns of us and the thousands of people we’ve interacted with since the process began.

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- I. **Mountain Sprawl should be avoided in the Wasatch. Mountain Accord should engage in Landscape-level conservation planning. Land Exchange is a critical tool for avoiding sprawl, as well as promoting land conservation, protecting natural habitat, watershed and landscapes, preventing mountain sprawl and for assuring a more permanent solution to ongoing threats to natural resources.**

Save Our Canyons finds great value in the Mountain Accord process. It is a process which can address problems in the Wasatch region through meaningful engagement and comprehensive solutions. As our population grows, Save Our Canyons has become increasingly concerned that sprawling development in the mountains will degrade the natural characteristics of the Canyons. Over the course of the past few decades, elected leaders have echoed our forty-year caution that the Wasatch is being “loved to death” and that our prior land use decisions making processes promote “death by a thousand cuts.” As such, Save Our Canyons supports the Mountain Accord process and the possibility of developing and implementing landscape-level conservation plans that will protect the integrity of the watershed and preserve the recreational value of the Canyons for the future. The Draft Blueprint must incorporate landscape-level conservation planning or the current plans could exacerbate increased sprawling developments and unmanaged use of the mountains. To accommodate projected population and visitor growth without degrading the scenic beauty and ecological integrity of the canyons, Mountain Accord should take advantage of landscape-level conservation and land exchanges as ways to protect the landscape and establish permanent conservation measures. New development should be limited and concentrated on already developed land or transferred outside of the canyon environs.

The Wasatch Mountains already suffer from urban mountain sprawl. Dispersed private land inholdings threaten more of the same. The Draft Blueprint does not explicitly limit new development. Instead, the current Draft Blueprint’s aerial and rail lines in Little Cottonwood Canyon exacerbate the risk of future mountain sprawl. Aerial lifts and rail lines can be an excuse to increase development and expand ski resorts, but the Blueprint does not pair these transportation proposals with development restrictions. The aerial lift plans discussed in the Transportation White Papers includes up to 17 new towers at a height of 200 feet.¹ The Economy System’s enthusiastic emphasis on aerial lifts and the rail line (even though there is no indication that the proposals would be economically beneficial) suggests that these corridors would be used for further development that would exacerbate sprawl. Because economic goals are centered on these projects, development around the lines appears to be anticipated and intended. It is likely that interested parties will seek to expand development around lift stations and add more stations in undeveloped areas. Even without extra development around the lift hubs and rail stations, the new lines will need land on which to build. Similarly, the tower corridor will require access and maintenance roads, as well as infrastructure for the stations themselves. This infrastructure will cause habitat fragmentation for flora and fauna. Finally, the Draft Blueprint plans include changes to

¹ Mountain Accord, *Draft Transportation White Paper*, 42, 2014. (Hereinafter Transportation White Paper).

the ski resort boundaries. In multiple instances, the ski resorts have expressed desires for expanded ski boundaries, the acquisition of new land, and the trading of land. There is a danger that expanded ski boundaries exacerbate the mountain sprawl problems.

The Mountain Accord should focus on landscape-level conservation planning, and land exchanges are ways to provide permanent, meaningful solutions. Landscape-level conservation planning is a “process of locating, configuring and maintaining areas that are managed to maintain viability of biodiversity and other natural features.”² The process develops a portfolio of areas that represent the full distribution of diversity in a system and then establishes standards to maintain biodiversity.³ Any Landscape-level conservation should include a hierarchy of mitigation techniques. The planning should seek first to avoid harm, then minimize effects, restore damage and finally offset the damage.⁴ Landscape-level conservation planning in the Mountain Accord process should focus principally on avoidance and minimization. As a method for restoration and offsetting damages, the Mountain Accord should use land exchanges. Land exchanges should focus on exchanging private lands for other lands that fill landscape-level conservation goals. Exchanges should provide permanent conservation status sufficient to protect the natural landscape, assure safe and ample wildlife habitat and to protect the watershed.

Landscape-level conservation and thoughtful concentration of new development is consistent with the Mountain Accord goals and with regional management priorities. Containing and restricting development is already an established priority for Mountain Accord stakeholders. For example, Salt Lake County manages the canyons through the Wasatch Canyons Master Plan of 1989, and special zoning for the Foothills area. Salt Lake County’s goal is to “provide diverse opportunities for public enjoyment of the canyons within the constraints of a limited geographic setting and the capacities of the natural environment to accommodate uses without significantly diminishing the quality of the canyon resources or the quality of the canyon experience.”⁵ The Foothills and Canyons Overlay Zone (FCOZ) protects the Wasatch from degradation. FCOZ ordinances avoid erosion and scarring in the canyons, require developments to match natural slope,⁶ prohibit degradation of fragile soils on steep slopes, preserve water quality, minimize vegetation disturbance, preserve wildlife habitat, and protect aquifer recharge areas.⁷ The US Forest Service’s policy is to maintain communities within their historic range,⁸ limit ski resorts to the permanent boundaries provided in the Forest Plan, except where small changes are necessary for important management issues.⁹ Additionally, the USFS prohibits realigning wilderness

² Joseph M. Kiesecker et al., *Development by design: blending landscape-level planning with mitigation hierarchy*, *Frontiers in Ecology and the Environment*, Vol. 8 No. pp. 261, 262 (June 5, 2010).

³ *Id.*

⁴ Shirley Saenz, et al., *Development by Design in Colombia: Making Mitigation Decisions consistent with Conservation Outcomes*, 8(12) *PLoS One*, e81831, e81831 (2013).

⁵ Salt Lake County, *Salt Lake Countywide Watershed Plan- Water Quality Stewardship Plan, Headwaters Element*, 4-9-5, 2009. (Hereinafter Water Quality Stewardship Plan).

⁶ *Id.*

⁷ *Id.* at 4-9-6.

⁸ United States Department of Agriculture, *Revised Forest Plan Wasatch-Cache National Forest*, 4-18, 2003.

⁹ *Id.* at 4-161. (Hereinafter Wasatch Forest Plan).

boundaries.¹⁰ Some of the proposals, like new aerial lifts, rail lines and expanded ski area boundaries, appear contrary to these existing policies.

Land Exchanges are a powerful way that the Mountain Accord process can provide permanent, meaningful solutions limiting mountain sprawl and preserving the ecological integrity of the canyons. Save Our Canyons encourages efforts to conduct land exchanges in which private lands are exchanged for public lands under the condition that the formerly private lands will enjoy permanent conservation status guaranteed to protect the natural landscape, watershed qualities, and provide safe and ample wildlife habitat. Of particular importance to Save Our Canyons is that the Mountain Accord process includes land exchanges for areas such as Guardsman Pass, Grizzly Gulch, Flagstaff Mountain, Mt. Superior, Reed and Benson Ridge, and White Pine Canyon.

In summary, Save Our Canyons supports land exchanges as a tool to keep development within concentrated pockets and prevent mountain sprawl. By reducing inholdings and dispersed landownership, landscape-level conservation can be more feasibly implemented. Consolidation of public lands will protect watersheds, avoid wildlife habitat fragmentation, and maintain scenic natural beauty. Concentrating development in already impacted lands will allow economic development without compromising the scenic and ecological quality of the Canyons. For these reasons, Save Our Canyons encourages the use of Land Exchanges as a strong tool to provide permanent environmental protection to critical areas while accommodating anticipated future growth.

- II. Many of the proposed transportation solutions (building a rail line, widening the existing roads to create a dedicated bus lane, and constructing an aerial lift to connect canyons) should not be considered further because it is obvious that they would have significant negative environmental impacts that cannot be reconciled with Mountain Accord's goals or existing laws, regulations, and policies that prioritize watershed protection and other environmental values.**

The Draft Blueprint outlines new rail and road infrastructure in Big and Little Cottonwood Canyons and aerial lifts or tunnels connecting Big and Little Cottonwood Canyon to Park City. Although these projects have not yet been studied, it is already obvious that the proposals will require extensive infrastructure and will likely result in significant and undesirable environmental impacts. The proposed rail through Little Cottonwood Canyon would have serious negative effects on the stream corridor, water quality, and recreational experiences. Widening the road for a dedicated bus lane in Big Cottonwood Canyon poses similar problems. These effects cannot be mitigated due to the topography of both canyons. Proposed tunnels will likely alter drainage patterns, compromise the integrity of wetlands, and interfere with aquifer and groundwater recharge zones. The risks associated with the construction of these tunnels are unpredictable and irreversible, making mitigation unrealistic. Aerial lines should be rejected because they compromise the integrity of the watershed landscape, fragment

¹⁰ *Id.*

wildlife corridors, and diminish the visual aesthetics of these iconic mountain landscapes without actually solving transportation problems. Because the environmental impacts of these projects are already obvious and cannot be feasibly avoided, they should not move forward.

A. A rail line through Little Cottonwood Canyon should not be constructed because of the negative impact to watershed, wildlife and wetlands.

The rail line for Little Cottonwood Canyon presents significant threats to watershed integrity, stream flow and wetlands areas. Unless the rail line can be built on the existing road, or unless the environmental impacts can be thoroughly mitigated—conditions that are probably not feasible—it should not be built. Any rail line proposals should be required to coincide with the legal standards currently found in local, regional, state and federal organizations as outlined in Section III. Furthermore, as described in more detail in Section IV, the rail line does not do enough to truly connect people to the canyons. The system is poorly integrated into current transportation infrastructure and the rail does not cater to a large enough percentage of potential users.

- i. Rail lines through Little Cottonwood Canyon will negatively impact in-stream flows, lead to greater pollution and increase impacts on ecological systems.

The problem with a rail line is alignment. Little Cottonwood Canyon is narrow and steep, leaving few alignment options. Construction in the riparian zone is most likely, and that has several obvious environmental impacts that should be avoided from the outset. Construction will require channeling the river, shoring up river banks, culverts and other alterations. Clearly these alterations will negatively affect the riparian corridor, water quality, and in-stream flows. Additionally, the proximity of the line to the creek will affect water quality through erosion, runoff, and the elimination of riparian vegetation. On the recreational side, the rail line will cut off access to recreation areas and could have a detrimental impact on wildlife. Furthermore, construction of the rail line would likely violate existing setback provisions that prohibit construction next to waterways.

Admittedly, the existing road, which relies on private vehicles for transportation, already poses threats to the water quality and needs to be upgraded. Some watershed impacts associated with the existing transportation system would be reduced or eliminated through the implementation of an improved public transportation system. For example, threats to public safety, excessive emissions, and degraded recreational experiences could be addressed by implementing an effective public transportation system in Little Cottonwood Canyon.¹¹ However, building a rail line adjacent to the stream, without eliminating private vehicle usage will not address these existing problems with the current transportation system. Including a rail line in addition to existing roads will only incentivize greater uncontrolled use of the

¹¹ Compare Salt Lake County Watershed Stewardship Plan § 4.9.17 (identifying transportation challenges caused by the use of private vehicles in the canyons that threaten water quality and watershed health including (1) reduced public safety; (2) increased soil erosion; (3) spills into the creek; (4) reduced air quality; and (5) reduced recreational experience).

canyon causing even greater environmental impact from new users. In contrast, prohibiting or discouraging private vehicle use and implementing a shuttle system up the Canyons could increase public safety, avoid excessive emissions, and improve the recreational experience, without imposing additional, substantial, negative effects on the riparian corridor. Section IV describes these alternatives in more detail.

Stream bank stabilization alters sediment dynamics, aquatic and riparian habitats, and channel geometry.¹² A study of the impacts of construction and project areas on the White River in Colorado concluded that streams with development in close proximity are more likely to see sediment deposits.¹³ After comparing base streams to ones close to human alterations, the study concluded that project streams have higher sediment content, more unstable river banks and a higher likelihood of undercut banks.¹⁴ These same consequences would likely be seen if the rail line were built in close proximity to Little Cottonwood Creek.

The existing road already compromises watershed values by encroaching on the riparian corridor in Little Cottonwood Canyon. Construction, maintenance, and operation of a rail line inevitably further degrade water quality through erosion, sediment transport, and elimination of riparian vegetation. The Salt Lake County Watershed Plan recognized that transportation-related impacts, like increased soil erosion and spills into the creek, already threaten water quality.¹⁵ Construction of the rail line adjacent to the stream will exacerbate these identified risks. Such foreseeable impacts should not be permitted and are contrary to Mountain Accord's environmental goals.

Additionally, construction and maintenance of the rail line will violate existing laws that restrict development adjacent to the streams.¹⁶ According to the Water Quality Stewardship Plan, maintaining minimum stream set-backs "is crucial in protecting riparian vegetation" and is "essential for fish, wildlife, and water quality requirements."¹⁷ Existing laws also prohibit development on slopes that exceed 30%,¹⁸ prohibit alteration of in-stream flows,¹⁹ and prioritize protecting mature riparian vegetation.²⁰ The topography of the canyon indicates that the rail line will violate the set-back provisions in at least some areas. Additionally, construction cannot be accomplished without destroying mature riparian vegetation, and it will likely require alteration of in-stream flows. With such obvious problems at the outset, the rail line should not move forward for detailed analysis or study. More detail

¹² Ellen Wohl, *Human Impacts to Mountain Streams*, 79(3) *Geomorphology*, 217, table 1 (Sept. 30, 2006).

¹³ Gabrielle C.L. David *et al.*, *The impacts of ski slope development on stream channel morphology in the White River National Forest, Colorado, USA*, 103 *Geomorphology* 375, results (2009).

¹⁴ *Id.*

¹⁵ Water Quality Stewardship Plan, § 4-9-17.

¹⁶ Water Quality Stewardship Plan, §4-9-2.

¹⁷ Water Quality Stewardship Plan, § 4-9-18.

¹⁸ Salt Lake County Ordinances, 19.72.030(A)(5)(b)(i).

¹⁹ *Id.* at, 19.72.030(A)(5)(b)(ii).

²⁰ *Id.* at 19.72.060(A)(2)(a)(i).

of potential environmental impacts is provided below and a detailed discussion regarding conflicts with legal standards is discussed in Section III.

Construction of the rail line will almost certainly eliminate much of the existing vegetation along the rail corridor. Riparian vegetation naturally filters pollutants, reduces erosion, maintains water quality, aids floodplain development, improves floodwater retention, improves groundwater recharge, and stabilizes stream banks.²¹ If the rail line is adjacent to the stream these environmental benefits will be compromised or even eliminated. The resulting lack of pollutant filtration will impair important drinking water sources and the natural habitats that are dependent on suitable water quality.

Currently, the Wasatch Mountain streams are the “least altered streams in Salt Lake County.”²² This is a designation we should not only cherish, but protect! The alignment of the rail line would likely require changes to in-stream flows through channeling and diversion. Utah law prohibits the relocation of a natural stream channel or the alteration of a bed or bank of a natural stream without first obtaining written approval from the state engineer.²³ The state engineer may decline the application if the relocation or alteration will unreasonably or unnecessarily adversely affect a public recreational use or the natural stream environment, endanger aquatic wildlife, or diminish the natural channel’s ability to conduct high flows.²⁴ In this case, any significant relocation or diversion of Little Cottonwood Creek is unreasonable and unnecessary because there are feasible transportation solutions that do not affect public recreational use, degrade the natural stream environment, or endanger wildlife resources. For example, assuming that the purpose of the proposed rail line is to provide efficient transportation for large numbers of visitors and to reduce the number of private vehicles in the canyons, the same result could be achieved by prohibiting private cars in the canyon and implementing a bus shuttle system like the one used at Zion’s National Park. This will be discussed further in Section IV. Because there are feasible public transportation alternatives that achieve the same desired result as the proposed rail line, it is unnecessary and unreasonable to relocate or divert Little Cottonwood Creek in order to construct the proposed rail line.

Construction of the rail line adjacent to the riparian corridors will also reduce recreational opportunities. A rail line will cut off access to the stream banks of Little Cottonwood Creek. Furthermore, safety concerns will also restrict public access because in many places it would likely be unsafe to have individuals recreating next to the rail line. Utah law protects recreational access to streams and other waters of the state. For example, the Utah Supreme Court specifically recognized that the public has an interest in the use of state waters for recreational purposes including hunting, fishing, and participating in legal activities when utilizing the water.²⁵ Similarly, Sandy City, which has extraterritorial jurisdiction over the Canyon, explicitly prioritized “the preservation of public access to mountain areas and natural

²¹ Water Quality Stewardship Plan, § 4-9-18.

²² *Id.* at, § 4-9-1.

²³ Utah Code Ann. § 73-3-29(1).

²⁴ Utah Code Ann. § 73-3-29(4)(a)(b).

²⁵ *Conaster v. Johnson*, 2008, UT 48, ¶ 8.

drainage channels.”²⁶ Eliminating public access and recreation adjacent to Little Cottonwood is not only inconsistent with existing laws and management priorities, it is also unreasonable and unnecessary where alternative transportation options exist that do not have such extreme effects on public access and recreation.²⁷

Finally, the rail line threatens wildlife habitat as well as recreational activities involving wildlife both on site and through habitat fragmentation. Diversion or relocation of the creek would harm aquatic wildlife, reduce the quality of fish habitat, and deny species access to water sources. Proposed rail lines will also intersect major wildlife migration routes. The migration routes through the Wasatch are not just for animals moving from one side of the canyon to the other but are used by species that traverse large portions of the Rocky Mountains. Rail lines may not be crossable by all migratory species and the rail lines could bottleneck migration into only a few areas which increases the likelihood of species conflicts and can alter the predator/prey dynamic. Furthermore, the train itself, running up and down the canyon many times a day for perhaps 20 hours per day could also be disruptive and destructive to wildlife populations. If the alteration is significant, it is feasible that migratory populations throughout the entire Rocky Mountain Range could be negatively affected.

In summary, the proposed rail alignment in Little Cottonwood Canyon poses significant environmental risks on many levels including: wildlife, water quality, recreational access and in-stream flow. Building a new rail line along the riparian corridor in Little Cottonwood Canyon, particularly without discouraging private vehicle usage, conflicts with existing laws and priorities as discussed in Section III. Due to the obvious and extensive negative impacts on the environment associated with this option, it should not move forward to the detailed analysis phase unless it is accompanied by specific, detailed, enforceable mitigation strategies.

- ii. The tunnels for the proposed rail lines in the Draft Blueprint will negatively impact the watershed, wetlands, and aquifer recharge.

The proposed tunnel construction is extensive and poses risks to the watershed, wetland areas and water quality. According to the Town of Alta General Plan, there are many seasonal or intermittent wetlands within the Albion Basin.²⁸ These wetlands are critical to the natural ecosystem, drinking water sources and the recharge of mountain aquifers.²⁹ While the Environmental Idealized System Metric prioritizes sensitivity to wetlands and underground aquifers, the current plans give no detail how tunneling will avoid potential harm to wetlands or underground aquifers. It is likely then that extensive tunneling will alter the flow of the watershed and aquifer recharging in unknown ways. For example, the only study conducted on the interplay between wetlands and aquifer recharge in Albion basin

²⁶Sandy City Ord. § 15A-15-01(D).

²⁷ Compare Utah Code Ann. § 4-9-1 (allowing State Engineer to deny diversion requests that unreasonably or unnecessarily detract from public access and recreation).

²⁸ Town of Alta, *Town of Alta General Plan*, 4 (November 2005).

²⁹ *Id.*

suggests a strong connection between surface water and recharge of the water table, but the connection is not well-understood.³⁰ Because little is known about the placement or operation of aquifer recharge zones, the risks posed by tunneling cannot be effectively mitigated, and the potential harm may not be visible until it is too late. Accordingly, this option should be rejected at the outset.

Minimizing impacts to the watershed and aquifers is even more important when considering the likely effects of climate change. Given the anticipated reduction in snowpack caused by climate change, it does not make sense to implement projects that could cause entirely avoidable degradation of groundwater recharge.

In addition to posing a risk to important wetlands and habitat, the tunnels also threaten the function of groundwater recharge, which could affect water quality and quantity. Because wetlands serve as recharge zones, damage to wetlands could affect the water table, underground aquifers, and other critical water resources. Reduced recharge capacity could have an impact on the availability and quantity of water resources from year to year. The very sensitive nature of our watershed, combined with Salt Lake County's dependence on this resource, requires the greatest degree of care and caution when discussing infrastructure projects. In light of the obvious risks to the watershed posed by the proposed tunnels, these options should be rejected at the outset unless they are combined with specific, enforceable mitigation measures.

B. Widening the existing road in Big Cottonwood in order to build dedicated lanes for buses will unnecessarily degrade water quality, modify stream flow, and violate set back provisions. The dedicated lanes will not reduce traffic but will increase it in the Canyons.

Road expansion in Big Cottonwood Canyon could cause degradation to the environmental by infringing on the riparian corridor and harming important habitat. Road expansion will cause increased erosion and pollution problems in the watershed. Although the increased road capacity will allow more buses, it will not reduce existing traffic-related impacts to the watershed. Instead, the widened road will simply allow more vehicles in the canyon thereby increasing already identified environmental harms associated with widespread private vehicle use in the canyons.

A wider road in Big Cottonwood Canyon will have very similar effects as those of the proposed rail line in Little Cottonwood Canyon. The road in Big Cottonwood Canyon is already very close to the canyon stream. Expansion will affect riparian vegetation, destabilize stream banks, increase erosion, and will likely alter stream flow.

Roads transport pollution (like spilled oil and other leaking fluids, trash, and other traffic-related waste problems) to streams through storm water runoff. A larger road and increased traffic is likely to lead to increased pollution transport. Whereas a rail line only has a few electric trains on the track, a road will have thousands of gas powered cars and hundreds of buses constantly going up and down the road.

³⁰ Water Quality Stewardship Plan, Section 4-9-7 (describing results of study).

Settled exhaust emissions, leaking fluids and all manner of waste will easily drain off of the road into waterways.

A wider road does not eliminate, or even reduce the traffic problem. Instead, it is designed to allow more vehicles in the canyon. In other words, widening the road to add a dedicated bus lane will increase, rather than reduce, traffic in the canyon. Although there is evidence to show that Bus Rapid Transit is more attractive than normal buses, there is no evidence to show that dedicated bus lanes, without concurrent measures to reduce or eliminate private vehicle use, would lead to significant reduction of traffic in the canyons. As proposed, there is no incentive for people to use the bus instead of their private vehicles. Consequently, the current proposal will not reduce any of the existing environmental impacts associated with the current transportation system. Instead, it will exacerbate the problems associated with traffic and create additional problems created by the construction of the widened road (like destruction of riparian vegetation, increased erosion and sediment transport, and altered slope grades). Additionally, as will be discussed in more detail in Section IV, the effectiveness of Bus Rapid Transit in Big Cottonwood Canyon depends on integration with the current transportation system, which is not included or contemplated in the current proposal.

Assuming that the purpose of the transportation system is to efficiently transport large numbers of people up the canyon and reduce the current traffic problems, other feasible options exist that could be easily implemented without exacerbating environmental problems. For example, prohibiting or seriously restricting private vehicle use in Big Cottonwood Canyon, and implementing a shuttle system could achieve the same result without negative environmental impacts associated with widening the road (See Section IV for more details). Because it is obvious that the current proposal will exacerbate, instead of reduce problems associated with vehicle use in the canyons (like excessive emissions, storm water runoff, public safety risks, and decreased recreational experiences), the option of widening the road to implement a Bus Rapid Transit system should be rejected at the outset. Instead, the proposal should focus on maximizing the value of the existing infrastructure by dramatically reducing private vehicle use, implementing a shuttle or Bus Rapid Transit system on the current road, and integrating the canyon bus system into the transportation system throughout the valley.

C. Aerial lifts will impair the watershed, threaten water quality, affect forest health and wildlife habitat, and degrade the visual attractiveness of the canyon.

Proposals incorporating aerial lifts to connect parts of Big and Little Cottonwood Canyons to Park City are very likely to be detrimental to the Wasatch environment and should be rejected as inconsistent with existing laws and management priorities discussed in Section III. The aerial lifts would be detrimental to critical habitats and wildlife corridors, cause erosion and flooding problems, damage to the watershed and negatively impact the visual attractiveness of the mountains. As discussed in Section IV, aerial lifts are not transportation solutions, but are merely a tourist attraction for ski resorts. The proposed lifts lack the characteristics of effective aerial lift transportation solutions utilized in other

areas. Due to the negative environmental impacts, combined with the non-viability as a mode of transportation, aerial lifts should not be considered further.

- i. The proposed aerial lifts will require extensive grading and clearing which will impair the watershed landscape.

Construction and operation of aerial lifts and tower access roads will require extensive grading, maintenance road creation, and deforestation. These activities will cause negative environmental impacts. One study regarding the White River National Forest in Colorado stated that machine grading slopes removes top soil and inhibits revegetation. The lack of vegetation adversely affects infiltration; increases flooding and erosion; and can alter in-stream flow.³¹ Negative impacts from removing vegetation will last for years and may not be subject to mitigation. Many of the species in the Wasatch are sensitive and unique. As the General Plan for the Town of Alta recognized, vegetation grows slowly in the alpine environment. Changes in top soil could dramatically inhibit successful growth of native species. Therefore, the effects associated with building an aerial lift system are likely to result in poorer downstream water quality.

- ii. The new aerial lifts and accompanying increase in snow making will alter the watershed and aquatic habitats in the Canyons.

The Draft Blueprint proposes more rights for snow making at the ski resorts, and it is unclear whether the increased snowmaking would occur along the new aerial lifts. According to the White Rivers study, snowmaking does impact the quantity of flow in the river.³² Changes in the quantity of water can harm in-stream species as well as surrounding habitat. The Draft Blueprint gives no indication whatsoever as to the effects that the expanded snow making will have on watershed, yet it is critical to know what kind of impact this proposal will have before it is approved. Any infrastructure plans need to adequately consider the changes in watershed as a result of snow making.

- iii. The new aerial lifts will result in deforestation, habitat fragmentation and disrupted wildlife migration.

Aerial lifts will lead to deforestation and habitat fragmentation. The Transportation System's Draft White Paper stated that current plans could require as many as 17 towers at over 200 feet tall.³³ The towers will require access, grading and maintenance roads. These roads could clear and fragment forested areas and wetlands that serve as critical wildlife habitats. Although it is unclear how much impact this will have on habitats and wildlife, significant disturbance is inconsistent with existing laws and priorities (See Section III for more a more detailed discussion of existing legal standards).

³¹ David et al. *The impacts of ski slope development on stream channel morphology in the White River National Forest, Colorado, USA*, 103 *Geomorphology* 375, introduction (2009).

³² *Id.* at 5.

³³ *Transportation White Paper* at 42.

The US Forest Service generally prohibits deforestation and grading. Cutting, selling and removing timber is prohibited in most areas.³⁴ Where allowed, harvesting timber must be sustainable.³⁵ Many species depend on the forested areas as habitat and protection from predators. A study from 2002 examined the impact of ski resorts on habitat fragmentation, concluding that “Effects of mountain resorts may, however, be relatively severe in concentrated areas, especially for species that are restricted to fragile alpine habitats.” According to the study, the nature of ski resorts maximizes fragmentation of a habitat.³⁶ Trails are meant to enhance visual isolation and provide a variety of trails. These trails spread all over the face of the mountain.³⁷ “The result is a landscape that is not fragmented randomly, but one in which habitat fragmentation is indeed maximized.”³⁸

Another article examined the impact of ski resorts on native species. They used the black grouse as an indicator species for the rest of the ecosystem.³⁹ The authors concluded that winter sports and ski lift density was a principal determinant of the abundance of their test species in the Swiss Alps.⁴⁰ The ski lift density reduced vegetation and faunal species richness.⁴¹ Although this study was conducted in the Swiss Alps, it is relevant for the Wasatch Range and similar impacts should be expected. The Wasatch Range is a finite area with many resorts in a compact area. In fact, the Wasatch is much more compact than the Alps. Therefore, the effects observed in the Swiss Alps can be expected with equal or greater consequences here, particularly if new aerial lifts are constructed that connect the resorts and eliminate current wildlife corridors.

Aerial lifts could also cut off important migration routes. Many regional and migratory species use the Wasatch Range as habitat and migratory routes. Some of these species migrate almost the entire length of the Rocky Mountain Range. The proposed aerial lines run perpendicular to many of those migratory routes and could cut off important migratory routes, which could affect population dynamics. Depending on the effect, ecological systems throughout the entire Rocky Mountain Range could be negatively impacted. Even if accommodations were made to allow for some migratory paths, the infrastructure may bottleneck migration and increase the likelihood of danger to the species from human interference or other predators.

Finally, these known impacts will likely be further exacerbated due to the effects of climate change. As snow lines continue to be higher and higher in future years, alpine habitats and migratory species will see further restrictions on suitable geographic areas. Any man-made fragmentation, like a ski lift, will have increasingly negative effects on isolated species with shrinking habitat. It is better for the

³⁴ Wasatch Forest Plan at 3-2.

³⁵ *Id.* at 3-5.

³⁶ Strong et al., *Effects of Mountain Resorts on Wildlife*, 26 *Vt. L. Rev.* 689, 692-93 (Spring 2002).

³⁷ *Id.*

³⁸ *Id.*

³⁹ Patthey, et al., *Impact of Outdoor Winter Sports on the Abundance of a Key Indicator Species of Alpine Ecosystems*, 45 *Journal of Applied Ecology* 1704, 1708 (2008).

⁴⁰ *Id.* at 1704.

⁴¹ *Id.* at 1709.

achievement of wildlife and habitat conservation goals if ski resorts are kept within their current boundaries and prevented from increasing interconnectivity. Therefore, these negative impacts should be avoided when possible.

- iv. The aerial lifts will damage opportunities for solitude and the scenic character of the canyons.

The new ski lifts (and rail) in the Draft Blueprint cannot be completed without violating the Mountain Accords goals of protecting solitude, naturalness, and other backcountry values of the canyons.⁴² The Mountain Accord Vision and Goals for the Recreation Systems Group commits to a recreation system that accommodates outdoor recreation “while protecting solitude, naturalness, and other backcountry values.”⁴³ Similarly, the Environmental Systems Group commits to protecting and improving air quality for protection of public health, environmental health, and scenic visibility.⁴⁴ The Transportation Systems Group of the Mountain Accord proposed that the transportation system supports the natural and intrinsic values of the Central Wasatch.⁴⁵ Seventeen new towers at 200 feet each will almost certainly detract from the natural beauty and the solitary nature of the mountains.⁴⁶ This kind of impact is inconsistent with the Vision and Metrics articulated during the Mountain Accord process and therefore should be avoided.

III. Due to the potential for significant and irreversible environmental harm, multiple existing laws and policies should not be disregarded during the planning process. Instead these laws should direct and guide the Mountain Accord as it determines which projects should be considered.

Due to the nature of the Mountain Accord process, only brainstorming sessions have taken place. There have been no in depth studies as to impacts of certain projects. Similarly, no transparent analysis of the comparative costs of proposals has occurred. Furthermore, the cumulative impacts of the various proposals have not been taken into account. However, many existing laws and policies require consideration of environmental impacts as integral or substantive criteria before approving projects. Consequently, it is premature to select a particular project, without thoroughly understanding its environmental impacts, how the impacts will interact with existing laws, whether there are feasible alternatives, and whether the impacts can effectively be mitigated. The Mountain Accord process should not commit to major projects without understanding environmental impacts or whether the project could comply with existing environmental laws.

Although the Mountain Accord is meant to shape and develop policy and law for the future use and enjoyment of the Wasatch Mountains, the extensive work done to safeguard key environmental

⁴² Mountain Accord, *Vision, Goals, and Metrics*, 6 (August 25, 2014).

⁴³ *Id.*

⁴⁴ Mountain Accord, *Vision, Goals, and Metrics*, 4 (August 25, 2014).

⁴⁵ *Id.* at 5.

⁴⁶ *Transportation White Papers* at 42.

resources should not be disregarded. Existing laws share a strong common theme of protecting the watershed and maintaining high quality drinking water. Existing laws seek to minimize, mitigate or eliminate anything that would threaten the watershed. They carefully regulate major development, pollution, impacts to habitat and other invasive actions. The overall importance that existing laws place on protecting the environment should shape the Mountain Accord process and be further integrated into the theme of Mountain Accord's decision. The Mountain Accord should pay close attention to the many local, regional, state and federal laws regarding the Wasatch Mountains and seek to foster more legal protections for the Wasatch's natural environment.

As the Mountain Accord process moves forward, environmental protections should not be set aside, and an analysis of environmental impacts should not be postponed. Instead, a detailed analysis of the environmental impacts associated with each proposal should inform the selection process along the way. Additionally, the Mountain Accord process should not select any proposals that have obvious environmental impacts that are contrary to existing environmental policies or protections. If projects are selected without considering current environmental protections, procedural momentum could move these projects forward, even though existing law may not have allowed them to proceed. Such a result would be a step backwards, rather than forward, in protecting and improving the integrity of the unique and finite landscape in the Wasatch. Mountain Accord should follow the general themes of existing laws as it implements projects and proposes changes to laws. It should seek to foster stronger environmental protections. The following discussion identifies some laws, priorities, procedures, and plans that should be considered before selecting proposals for more detailed analysis.

A. Salt Lake County developed a comprehensive Water Quality Stewardship Plan that recognizes and synthesizes a network of existing laws, management plans, and recommendations to ensure excellent water quality now and in the future.

Proper management of the Wasatch is integral to ensuring the continued provision of clean drinking water to the Wasatch Front. The Wasatch Mountains provide water supply, habitat, recreational, and aesthetic resources in Salt Lake County. Twenty six percent of the water supply for Salt Lake County comes from streams that originate in the Wasatch Mountains.⁴⁷ Fifty to sixty percent of Salt Lake City relies on the Wasatch for its culinary water. A variety of interlocking state and federal laws protect the chemical, biological, and physical integrity of these streams.⁴⁸

Consistent with Section 208 of the Clean Water Act,⁴⁹ Salt Lake County developed an Area-Wide Water Quality Management Plan in 1978 that proposed "implementable solutions to area-wide water quality

⁴⁷ Water Quality Stewardship Plan, §4.9.1.

⁴⁸ *Id.* Section 3.4 (identifying federal, state, and local authorities with jurisdiction and management responsibility over issues that affect water supply, watershed health, and water quality).

⁴⁹ 33 U.S.C. § 1288. Section 208 requires states to create area-wide waste treatment plans. These plans coordinate efforts with the federal, state and local authorities to identify areas that have substantial water quality

and pollution problems from both point and non-point sources.”⁵⁰ In 2006, the Salt Lake County Council allocated funds to initiate a three year process to update the 1978 plan and bring it into compliance with EPA’s published guidance for Watershed Plans.⁵¹ The updated Water Quality Stewardship Plan was finalized in 2009. It has the force of law, as well as persuasive authority derived from its informed and collaborative creation. Accordingly, proposals that are inconsistent with the Water Quality Stewardship Plan should not move forward.

The purpose of the Water Quality Stewardship Plan is to “provide a framework of goals and policies that will forge water quality stewardship consistent with Congressional, State and local agency goals and represent the needs of the population in Salt Lake County.”⁵² The guiding principles of the Water Quality Stewardship Plan include “protection of the physical, biological, and chemical components of watershed health.”⁵³ To develop and implement the plan, Salt Lake County established three universal goals: “(1) provide for high quality waters that support the nationwide goals of ‘fishable’ and ‘swimmable’; (2) provide leadership and facilitate implementation and coordination of water quality projects with stakeholders; and (3) develop a dynamic plan and process, with stakeholder support, that will guide Salt Lake County’s water quality improvement efforts.”⁵⁴ The Water Quality Stewardship Plan incorporated the best available science and data, taking into account existing conditions and projected growth.⁵⁵ Rather than the traditional focus on water chemistry and pollutant loads, the plan adopted a more holistic approach to watershed health that recognized the connection between riparian health, bank stability, and biological communities.⁵⁶

A healthy watershed provides four major functions to the local population: water quality; habitat; hydrology; and social/recreational services.⁵⁷ To protect and improve these functions, the Water Quality Stewardship Plan identifies seven strategic targets,⁵⁸ four of which apply directly to the proposals being considered during the Mountain Accord Process. Those four are described in more detail below:

- (1) Water Quality: Reduction of pollutant loads is “at the heart of watershed planning in Salt Lake County.”⁵⁹ Pollutant loads are reduced through storm water, nonpoint source management,

control problems. 33 U.S.C. § 1288(a)(2). The plan must include provisions to establish a program regulating any modification or construction of facilities which may result in a discharge. *Id.* at § 1288(b)(2)(C)(ii).

⁵⁰ Water Quality Stewardship Plan, § 1.1.

⁵¹ See *Handbook for Developing Watershed Plans to Restore and Protect Our Waters*, (EPA 2006).

⁵² Water Quality Stewardship Plan, § 1.6.

⁵³ *Id.* § 1.7.

⁵⁴ *Id.*

⁵⁵ See, e.g., *Id.* Section 1.8 (identifying relevant studies, including the finalized Total Maximum Daily Load study for Little Cottonwood Creek and the TMDL study identifying Big Cottonwood Creek as impaired); Section 3.5 (discussing projected population and development forecasts)

⁵⁶ *Id.* § 2.1.

⁵⁷ *Id.*

⁵⁸ *Id.* at § 2.2.

⁵⁹ *Id.* at § 2.2.1.

and water supply planning elements.⁶⁰ As discussed in more detail below, all of these planning elements apply to proposals being considered through the Mountain Accord process.

- (2) Wetlands and Stream Bank Protection: Improvement and protection of wetlands and stream bank stability prevents degradation of water quality, habitat, and hydrologic functions from erosion and sediment transport.⁶¹ Wetlands and stream geomorphology, particularly the integrity of stream corridors and riparian habitats, have significant impacts on water quality, habitat, and the hydrological functions of a watershed.⁶² As discussed in more detail below, several of the proposals being considered through the Mountain Accord process, in particular some of the transportation alternatives, could have significant impacts on wetlands and stream bank stability. Proposals with negative impacts to wetlands or riparian areas, in particular stream geomorphology and stream bank stability, should be rejected at the outset as inconsistent with the Water Quality Stewardship Plan.
- (3) Stream Corridor and Watershed Recharge Preservation: The Water Quality Stewardship Plan prioritizes increasing stream corridor and watershed recharge area preservation and the improvement of habitat, social, recreational, and water use functions.⁶³ This target cannot be achieved without careful management decisions in the Wasatch, which is the headwaters and the recharge area for a large percentage of the drinking water supply to Salt Lake County. Mountain Accord proposals that would not facilitate the plan's goal of improving protections for stream corridors and watershed recharge areas should not move forward. For example, transportation plans that invade the setback provisions protecting the stream corridors for Big and Little Cottonwood streams should be rejected as inconsistent with existing protections and contrary to the plan's goal of *increasing* stream corridor protection.
- (4) Instream Flows: Increasing instream flows under normal and drought conditions to support aquatic habitat and recreational functions is another target of the Water Quality Stewardship Plan.⁶⁴ Several proposals being considered through the Mountain Accord process, like expanded snowmaking opportunities, development within the riparian corridor associated with some transportation options, and increased water usage accompanying expanded development, may affect instream flows. Proposals that would decrease or divert existing instream flows should be rejected as inconsistent with the Water Quality Stewardship Plan.

⁶⁰ *Id.*

⁶¹ *Id.* at § 2.2.4.

⁶² *Id.*

⁶³ *Id.* at §2.2.5.

⁶⁴ *Id.* at §2.2.6.

Section 208 of the Clean Water Act prohibits the issuance of a point source discharge permit that is inconsistent with an approved watershed management plan.⁶⁵ Any proposal in the Mountain Accord process that is obviously inconsistent with the Water Quality Stewardship Plan and would require a discharge permit, would be inconsistent with existing law and should not move forward.

B. Local municipalities in the Wasatch Range participate in regional water quality plans and have local regulations that protect the environmental integrity of the watershed.

Proposals that move forward from the initial brainstorming phase should be reconciled with the laws of several cities that share jurisdiction over the Canyons. Salt Lake City, Sandy City and the Town of Alta all have jurisdiction over large sections of the Wasatch Range. All three communities prioritize water quality and environmental protection through laws that limit impacts to their water sources.

- i. Salt Lake City has jurisdiction over large sections of the watershed and has many laws to protect the watershed corridor including prohibiting any nuisance in the watershed.

Salt Lake City has legal authority to exercise extra-jurisdictional authority over the watershed. According to Utah Code Section 10-8-15, the City has jurisdiction of the waters 15 miles up from the point where the water is taken, with a 600 foot wide corridor. At a minimum, this provision gives Salt Lake City jurisdiction over large parts of the stream corridors for Big and Little Cottonwood Creeks. Salt Lake City's ordinances recognize that "Canyon waters are extremely valuable to the city because they are the city's closest high quality water supplies; water from canyon streams can be delivered to most city customers by gravity flow without pumping."⁶⁶ In other words, the stream flows of Big and Little Cottonwood Canyon are central to the quality of life in the Salt Lake Valley, particularly in light of anticipated population growth. Mountain Accord proposals that threaten to degrade the high quality water supply from Big or Little Cottonwood Creek should not move forward.

To protect its water supply, Salt Lake City passed ordinances prohibiting the pollution of the canyon waters.⁶⁷ It is prohibited for a person to bathe, swim or wash clothes, or other objects within the watershed.⁶⁸ Depositing garbage is prohibited within the watershed.⁶⁹ Finally, it is unlawful to create a nuisance in the watershed.⁷⁰ Consistent with these ordinances, the Salt Lake City policy for the watershed (under the Watershed Management Plan) is that "Salt Lake City will evaluate development proposals and other activities in the canyons in light of the cumulative impact of such development or activities on water quality and the watershed. To the extent that . . . a proposed development or

⁶⁵ 33. U.S.C. §1288(e).

⁶⁶ Salt Lake City Ord. § 17.04.020.

⁶⁷ Salt Lake City Ord. § 17.04.320 et seq.

⁶⁸ *Id.* §17.04.330.

⁶⁹ *Id.* §17.04.370.

⁷⁰ *Id.* §17.04.310.

activity, either individually or collectively, poses an actual or potential impact to the watershed or water quality, Salt Lake City will either oppose or seek to modify, manage, control, regulate, or otherwise influence such proposed development or activity so as to eliminate or mitigate potential impacts.”⁷¹ The plan also recognizes that land exchanges can either be beneficial or harmful to the watershed. Specifically, land exchanges that fragment protected landscapes or introduce new development have the potential to degrade watershed protection. In contrast, land exchanges that increase the amount of public watershed lands should be encouraged.⁷² The Mountain Accord process should take these ordinances and management plan priorities into consideration, and reject proposals that would be contrary to Salt Lake City’s regulations or management priorities. As discussed above, some of the transportation options, like building the rail line along the riparian corridor in Little Cottonwood Canyon, tunneling between canyons, and expanding the road in Big Cottonwood Canyon, obvious environmental consequences that have the potential to degrade the watershed. These proposals would be contrary to Salt Lake City’s ordinances and policies and should not move forward without clearly identified and enforceable mitigation measures that will eliminate the potential harm to the watershed posed by the cumulative effect of these projects.

- ii. Sandy City prioritizes thoughtful development that retains the integrity of the watershed, protects water quality, and preserves recreational opportunities.

Sandy City also has extra-jurisdictional authority over watershed areas.⁷³ Within its city boundaries, Sandy has adopted drinking water source protection ordinances that have been codified in the Sandy City Land Development Code.⁷⁴ Their purpose and intent is to “protect, preserve, and maintain existing and potential public drinking water sources in order to safeguard the public health, safety, and welfare of City residents and visitors.”⁷⁵

Sandy City also adopted a Watershed Management Plan in 2002 that articulates the City’s watershed management objectives and clarifies that “[d]ue to the City’s extraterritorial jurisdiction rights to protect its watershed resources, watershed management ordinances adopted by the City apply to all areas within the City’s identified watershed boundaries.”⁷⁶ Sandy City’s plan prioritizes the protection of watershed resources and recognizes that watershed protection depends on thoughtful land use management. One objective of the Sandy City Watershed Plan is to “ensure that development occurring within the watershed does not adversely impact watershed resources or water quality.”⁷⁷ Accordingly,

⁷¹ Salt Lake City Dept. of Public Utilities, *Salt Lake City Watershed Management Plan*, xviii (1999).

⁷² *Id.*

⁷³ Utah Code Ann. § 10-8-15.

⁷⁴ Sandy City Land Development Code § 15A-17-01 et seq.

⁷⁵ *Id.* § 15A-17-02.

⁷⁶ Sandy City Watershed Management Plan 2002: Recommendations [*hereinafter Sandy Watershed Plan*], 13 available at

http://sandy.utah.gov/fileadmin/downloads/comm_dev/planning_and_zoning/long_range_planning/area_master_plans/BC_Appendix.pdf.

⁷⁷ *Id.*

Sandy City also restricts development within the “Sensitive Area Overlay Zone.”⁷⁸ Recommendations for achieving this objective include development setbacks for water feature and wetlands, a 30% slope development restriction, and extraterritorial enforcement of the City’s Sensitive Area Overlay Zone, and critical evaluation of all proposals that may attract new user groups or large numbers of individuals.⁷⁹

Further ordinances and standards help to minimize flooding, erosion, and to protect the natural scenic character of the sensitive areas.⁸⁰ Sandy City regulates: storm water runoff and erosion through minimal removal of natural vegetation;⁸¹ preservation of natural features, wildlife habitat, and open space,⁸² preservation of public access to mountain areas and natural drainage channels,⁸³ retention of natural features such as drainage channels, streams, hillside areas, ridge lines, rock outcroppings, vistas, trees, and other natural plant formations;⁸⁴ preservation and enhancement of visual and environmental quality by use of natural vegetation, minimization of grading in hillside areas, and a transportation system designed to minimize cuts, fills, or other visible scars.⁸⁵ Every property and business owner has the responsibility to conform and comply with the protective provisions in the code.⁸⁶

The Sandy Watershed Management Plan recognizes that recreational opportunities, including trail networks, should be accommodated, so long as those opportunities do not compromise water quality.⁸⁷ Consistent with the foregoing, Sandy City developed specific recommendations for Little Cottonwood that prioritize protection of water quality in relation to management and maintenance of canyon roads, expansion of ski areas, land acquisition and expanded development projects, and building permits.⁸⁸ The Plan also recognizes that spring runoff from the Wasatch Mountains poses a significant risk of flooding, particularly in years where the springtime temperatures increase rapidly, rather than gradually.⁸⁹ The dense, mature vegetation along the riparian corridors help control the flooding. Mountain Accord proposals that will exacerbate the risk of flooding through removal of mature vegetation and degrade water quality during spring runoff and other storm events by increasing erosion and sedimentation should be rejected.

In light of Sandy City’s extra-territorial jurisdiction, and the consistent prioritization of watershed management to protect and preserve water quality, it does not make sense to allow proposals that pose a risk of degrading water quality to move forward beyond the brainstorming phase. It is especially

⁷⁸ Sandy City Land Development Code *Id.* § 15A-15-01 et seq.

⁷⁹ *Id.* at 14 (Recommendations 2-5).

⁸⁰ *Id.* § 15A-15-01.

⁸¹ *Id.* § 15A-15-01(A).

⁸² *Id.* § 15A-15-01(C).

⁸³ *Id.* § 15A-15-01(D).

⁸⁴ *Id.* § 15A-15-01(E).

⁸⁵ *Id.* § 15A-15-01(F) & (G)

⁸⁶ *Id.* § 15A-17-01(B).

⁸⁷ *Id.* at 15-23.

⁸⁸ *Id.* At

⁸⁹ *Id.* at 26.

important for all transportation alignment options to be evaluated within the framework of Sandy City's regulations.

- iii. The Town of Alta's regulations and ordinances recognize Alta's unique role as steward for the headwaters of part of the watershed and focus on preserving the unique natural resources intrinsic to the setting including wetlands, vegetation, visual beauty, and open space.

Alta receives the highest precipitation of any similar area in the state and has extensive wetland areas.⁹⁰ These unique characteristics make Alta very important to the general ecological health of the Wasatch Mountains. The Town of Alta developed a General Plan in 2005. The Plan's objectives are to be a long term, comprehensive plan to management and conservation of land and water resources.⁹¹ The Town of Alta's General Plan recognizes that "the 'Alta Experience' will not be preserved by our best wishes, but by good planning diligently implemented."⁹² Specific policies to protect Alta's unique setting include the following:

1. No net loss of wetlands;
2. Acquisition of vacant and undeveloped privately owned lands in Albian basin for conservation, open space, and recreational purposes;
3. Development of land over 20% slope should be carefully reviewed;
4. Development of land over 30% slope should be prohibited;
5. Removal of trees and other vegetation should be carefully considered;
6. The view of major natural features should be protected; and
7. Open spaces should be preserved and maintained.

The plan ties Alta's water quality and conservation efforts to those of Salt Lake City and Sandy City. It commits the Town of Alta to supporting and enforcing the policies, regulations, and plans of Salt Lake City, the Salt Lake Valley Health Department, the State Health Department, the U.S. Forest Service and other agencies.⁹³ In relation to wetlands, Alta's General Plan requires strict compliance with the Clean Water Act and the National Environmental Policy Act in order to protect wetlands within the town's jurisdiction. Mountain Accord proposals that could affect the health and resilience of wetlands, including expanded development opportunities, and proposals to create connective tunnels, should not move forward for detailed analysis if they are inconsistent with these priorities and restrictions.

The plan calls for strict enforcement of existing ordinances and regulations regarding slope, soil erosion, and soil stability in order to protect the watershed, wetlands, visual impacts, and the environment in

⁹⁰ Town of Alta, *Town of Alta General Plan*, 1 (November 2005).

⁹¹ *Id.* at 4 (Section 3.1).

⁹² Town of Alta, *Town of Alta General Plan*, 4, November 2005.

⁹³ *Id.* at 5 (Section 3.2).

general.⁹⁴ The plan recognizes that trees retain snow, water, and topsoil, making them a critical component in managing the watershed.⁹⁵ Because trees grow slowly at high altitude, preservation of existing vegetation and revegetation of existing scarred areas is recommended.⁹⁶ Finally, the Plan prioritizes protection of the scenic quality of Alta, including “the proliferation of wild flowers, stately conifers, and lovely meadows.”⁹⁷ “The vistas of this exquisite mountain community should not be compromised by unplanned development.”⁹⁸ Mountain Accord proposals, like the proposed aerial lifts, that exacerbate soil erosion; violate slope restrictions; eliminate existing vegetation; or compromise the scenic quality of Alta’s wildflowers, conifers, meadows, and mountain landscapes should not move beyond the brainstorming phase.

C. State law restricts activities that will degrade the watershed landscape or impair water quality.

Several Utah State laws impose restrictions and standards to protect the watershed and natural environment in the Wasatch Region. These laws potentially prohibit many of the Mountain Accord proposals like: expanding the development footprint at the resorts, building connecting tunnels or aerial lifts, and expanding transportation corridors within Big or Little Cottonwood Canyon. These projects need to be considered within the framework of existing State laws. If compliance with existing laws is not possible, the proposal should not move beyond the Draft Blueprint.

i. TMDLs

Consistent with the Federal Clean Water Act, Utah has established a Total Maximum Daily Loads (TMDL) plan for Little Cottonwood Creek which seeks to improve its water quality by managing point and non-point sources within the watershed.⁹⁹ The TMDLs establish strict requirements as to what pollutants and in what quantities are permitted in the creek at any given time. Any interaction with the stream that may cause the creek to exceed TMDLs would not be allowed. The State monitors the creek’s pollutant levels and regulates accordingly. Development and transportation projects that are likely to threaten the TMDL of Little Cottonwood Creek should not be considered beyond the Blueprint.

ii. Safe Drinking Water Act

The Safe Drinking Water Act sets standards for maximum contaminant levels in public water systems.¹⁰⁰ The Act also protects watersheds and water sources used for public water systems.¹⁰¹ The

⁹⁴ *Id.* at 6-7 (Section 3.3).

⁹⁵ *Id.* at 8 (Section 3.5).

⁹⁶ *Id.*

⁹⁷ *Id.* at 9 (Section 3.6).

⁹⁸ *Id.*

⁹⁹ *See* 33 U.S.C. §1313(d); R317-1-7.17.

¹⁰⁰ Utah Code Ann. § 19-4-104(1)(a)(i).

¹⁰¹ *Id.* at (iv).

Drinking Water Board has the power to set drinking water standards and monitor drinking water quality.¹⁰² The standards are extensive and cover inorganic material, pesticides, volatile organic compounds and others.¹⁰³ Violation of these standards can lead to financial and criminal penalties.¹⁰⁴ Since many of the Draft Blueprint projects are within the watershed used for drinking water, no project may cause a violation of established drinking water standards. Projects should be evaluated and considered in the light of the kinds of impacts that they are likely to have on drinking water. If the proposal would cause a violation of state standards, the project should not be considered.

iii. Water Quality Act

The Water Quality Act prevents the discharge of pollution into the waters of the state without a permit and prohibits a discharge that may constitute a menace to public health and welfare.¹⁰⁵ Under the Act, the Board is charged with developing prevention, control and abatement measures for new and existing causes of pollution of the waters of the state,¹⁰⁶ water quality standards¹⁰⁷ and establishes long term planning processes for pollution control.¹⁰⁸ Any Mountain Accord project that cannot meet the long term goals and the water quality standards of the Water Quality Board should not be considered beyond the Draft Blueprint.

D. The United States Forest Service has a comprehensive plan must be considered when deciding which projects move on to the next stage of development.

The United States Forest Service (USFS) has a Revised Forest Plan for Wasatch-Cache National Forest produced in February 2003.¹⁰⁹ Versions of this plan have been in place for over 15 years.¹¹⁰ The Forest Plan is designed by the USFS to guide all natural resource management activities and it describes the agency's desired future conditions and goals for the forest.¹¹¹ Under their Revised Forest Plan for Wasatch-Cache National Forest, the Forest Service prioritizes restoration of watershed health.¹¹² The plan establishes three requirements for a healthy watershed: maintain the integrity of water systems and soil quality; meet the needs of terrestrial and aquatic ecosystems; and supply values for people like drinking water, recreation and commodities that do not compromise watershed health.¹¹³ Additionally, the plan addresses the following issues, among others: the impacts to biodiversity and viability,

¹⁰² Utah Code Ann. §19-4-104(1)(a)(i).

¹⁰³ *Id.*

¹⁰⁴ Utah Code Ann. §19-4-109(2)(a).

¹⁰⁵ Utah Code Ann. § 19-5-107(1)(a).

¹⁰⁶ *Id.* at 104(3)(a).

¹⁰⁷ *Id.* at (3)(b).

¹⁰⁸ *Id.* at (3)(c).

¹⁰⁹ Wasatch Forest Plan, 1-1.

¹¹⁰ *Id.* at 1-1.

¹¹¹ *Id.*

¹¹² *Id.*

¹¹³ *Id.* at 2-2.

conserving diversity,¹¹⁴ the impacts from roads and trails,¹¹⁵ recreational uses,¹¹⁶ specially designated areas,¹¹⁷ maintaining wilderness and roadless areas,¹¹⁸ and timber extraction.¹¹⁹ Of particular note are a few provisions: the ski resorts are to stay within their current boundaries.¹²⁰ Changes to the boundaries are only allowed if for minor administrative reasons and not for recreational expansion.¹²¹ Additionally, timber harvesting is strictly regulated. Deforestation to accommodate lift lines should be considered within these restrictions. The Mountain Accord process should ensure that all projects that move forward will abide by the rules and guidelines of the Forest Service.

E. Mountain Accord's own goals seek to protect a natural and resilient ecosystem for future generations.

In addition to multiple legal protections, Mountain Accord has set significant environmental goals which should be heeded. The Environment Systems Group of the Mountain Accord envisions a Central Wasatch that supports a healthy, functional, and resilient ecosystem capable of serving current and future generations.¹²² The Environmental Systems Group established a goal to protect, maintain and improve watershed health, water supply, and water quality.¹²³ In addition to the many controlling laws and organizational plans, Mountain Accord needs to pay particular attention to its own environmental goals and not allow projects which threaten the environment to be considered any further than the Draft Blueprints.

IV. The Blueprint's transportation options inexplicably disregard feasible, efficient, and inexpensive transportation options that could be designed to serve the entire Salt Lake Valley, and instead focus on inefficient and environmentally detrimental options that only serve a small segment of the population.

The Draft Blueprint's proposed projects are not the best transportation solutions. The projects are not well-integrated into the current transportation system and do not help expand public transportation to meet future needs. The proposed projects call for too much new construction, without considering whether existing infrastructure can be used more efficiently to serve the goals of the Mountain Accord. The Blueprint should explore transportation options that are better connected to urban Wasatch Front and do not require as much new infrastructure, like restricting the use of private vehicles in the canyon and implementing an efficient bus or shuttle system. If the Mountain Accord is serious

¹¹⁴ *Id.* at 2-6.

¹¹⁵ *Id.* at 2-10.

¹¹⁶ *Id.* at 2-12.

¹¹⁷ *Id.* at 2-16.

¹¹⁸ *Id.* at 2-17.

¹¹⁹ *Id.* at 2-19.

¹²⁰ *Id.* at 4-161.

¹²¹ *Id.* at 4-49.

¹²² Mountain Accord, *Vision, Goals, and Metrics*, 4 (August 25, 2014).

¹²³ *Id.*

about providing an economical, unique, attractive and efficient transportation system, then it should consider new ideas like the Zion Canyon shuttle.

A. The proposed rail lines are not an efficient use of public transportation resources because they are expensive, inefficient, disconnected from critical urban hubs, and poorly integrated into the whole transportation system. More efficient solutions should be considered.

The proposed rail is too expensive and does not efficiently meet the economic, transportation and recreation goals for the Mountain Accord. The projects require a lot of infrastructure and are not sufficiently integrated into the rest of the transportation systems in the Wasatch Range. A rail line should not be considered unless it can efficiently meet all of the goals of the Mountain Accord.

The Economy System Group proposes to achieve broadly shared economic growth, high-quality development and high-value transportation infrastructure that is attractive, sustainable, and provides opportunity for visitors and residents.¹²⁴ The Transportation System Group's vision calls for a system that is integrated within the fabric of community values and lifestyle choices, supports land use objectives, and connects to the overall regional network. The group also envisioned a system that would meet growing demand for access to and within the Central Wasatch Mountains through a dynamic and sustainable multi-modal mountain transportation system. The group envisioned a system that was year-round, safe, efficient, and compatible with environmental characteristics. The Transportation System Group outlined the following goals: (1) provide integrated multimodal transportation choices for residents, visitors, and employees, (2) provide reliable transportation that facilitates a positive experience, (3) ensure the transportation experience is safe and promotes health, (4) ensure that the transportation system supports the natural and intrinsic values of the Central Wasatch.¹²⁵ As explained below, the rail line will not be able to meet these goals due to the lack of integration and because it caters to a small portion of the population.

The Draft Blueprint's proposed rail line is not well connected to the existing transportation system and does not address key transportation concerns in the region. The lack of integration leaves many of the Mountain Accord goals unmet by very expensive infrastructure projects. The Transportation System Draft White Papers indicate that rail lines will require large investments, many years, and several phases to complete.¹²⁶ Unfortunately that investment will have limited utility and is designed with minimal connectivity. Based on the Draft Blueprint, rail lines through Little Cottonwood Canyon only provide transportation from Sandy to the Little Cottonwood resorts.¹²⁷ This leaves major hubs like Salt Lake City, the Airport West Jordan, West Valley, Draper and Murray disconnected. For public transportation to be an attractive option for residents and visitors, the logistics of traveling with skis and bags must be

¹²⁴ Mountain Accord, *Vision, Goals and Metrics*, 3 (August 25, 2014).

¹²⁵ *Id.* at 5.

¹²⁶ Transportation White Paper at 5.

¹²⁷ Mountain Accord, *Proposed Blueprints*, 7-map (February 2015).

accommodated, which means minimizing transfers between transportation modes. The proposed rail line does not incorporate this type of foresight or planning for most users. Additionally, the rail line neglects transportation concerns within the Salt Lake Valley, especially in the southeast region. There are no rail lines or bus lines proposed along the south east corridor to connect Cottonwood Heights with other areas of the Salt Lake Valley. The lack of integration poses a threat that increased visitors and development will be less controlled than they ought to be and will result in undue pressures on the natural resources of the Wasatch. The Blueprint should focus on the potential for new rail lines or other forms of transportation on the south east side of the Salt Lake Valley that would provide a type of belt route for public transit. In summary, before adopting a multi-year, expensive, invasive infrastructure project to address existing transportation problems, the Mountain Accord process should engage in more planning to ensure that the new transportation system is effective and efficient and addresses the existing transportation problems within a reasonable timeframe, at a reasonable cost.

B. The proposed aerial lift system is not a good transportation system because it is not well integrated into the transportation system, does not serve major portions of the population including immobile populations and fails to connect important points of interest.

In addition to posing environmental risks, aerial lifts are not a viable transportation system. Instead, they are only a tourist attraction for ski resorts. The lifts neglect major transportation needs and do not solve the problems identified during the Mountain Accord process. Comparing the Mountain Accord proposal to successful aerial lift transportation systems throughout the world demonstrates that the lifts have little in common with successful transportation systems.

Several key organizations prioritize providing transportation options to the entire population and integrating the movement of people within the region. The UTA's mission statement is to strengthen and connect communities, enabling individuals to pursue a fuller life with greater ease and convenience.¹²⁸ Their vision is for an integrated system of innovative, accessible and efficient public transportation services that increases access to opportunities and a healthy environment for *all people of the Wasatch region* (italics added).¹²⁹ Mayor Becker has been an advocate for expanding Salt Lake City's mobility and transportation options. Under Sustainable Salt Lake Plan 2015, the City has the goal to develop "sustainable high performance transportation for robust economy and enhance quality of life by integrating transportation with the built environment."¹³⁰ The Federal Transit Authority's role is to work with regional communities to plan, apply, execute and complete transit projects that enhance quality of life. Transportation systems are meant to serve large portions of the population and to be a viable option for many uses not just one or two special interests. In contrast to these goals, the aerial

¹²⁸ Utah Transit Authority, *UTA Mission Statement*. Available at <http://www.rideuta.com/mc/?page=AboutUTA-MissionStatement>.

¹²⁹ Utah Transit Authority, *UTA Vision Statement*. Available at <http://www.rideuta.com/mc/?page=AboutUTA-MissionStatement>.

¹³⁰ Salt Lake City Division of Sustainability, *Sustainable Salt Lake 2015*, 8 (2015).

lifts do not connect communities in a meaningful way. They serve a limited population for a discrete, expensive, recreational activity and do not integrate transportation with the built environment.

While it is possible for aerial lifts to be a viable transportation option, the proposed aerial lifts exhibit none of the characteristics of a good transportation solution. According to Jean Mercier, a good transportation system has five dimensions: land use, environment, transportation, health and equity. All of these dimensions should be taken into account when evaluating the social benefits of the transportation projects.¹³¹ The characteristics of a successful system can be generally categorized into three overlapping characteristics: connecting residential areas, providing poor and immobile communities with a viable transportation option, and connecting major points of interest.¹³²

- i. Good aerial lifts should connect major residential areas to points of interest. The Wasatch aerial lift will not do that because it is not well integrated into the overall structure of the current transportation system.

The proposed lifts connect almost no residential communities to points of interest such as recreation or employment. All the lifts do is connect two or three different ski resorts. Even indirectly, the lifts do a very poor job at reaching major residential areas. Compared to successful lift systems around the world, the proposed lifts in the Wasatch can only be described as a tourist attraction.

A good aerial lift, one that is more than just a tourist trap, will effectively connect residential areas to important areas. For example, the Roosevelt Island Tramway in New York; a lift system in Constantine, Algeria; an aerial lift in Medellin, Colombia; and a lift system in Rio de Janeiro, all provide this service. The Roosevelt system was designed as the only means for transportation on and off the Roosevelt Island in New York.¹³³ For many years the metro line did not extend to the island from Manhattan.¹³⁴ When the island was redeveloped for low and middle income housing, the planners decided that the tramway was the only viable transportation option to get people from the island to Manhattan. Although it was designed to attract tourism, it was also designed to move large amounts of commuters.¹³⁵ The system eventually became a great success. When the metro line eventually was extended to Roosevelt Island the tramway remained so popular that it was revitalized instead of removed.¹³⁶ The system in Constantine, Algeria was built as a way to overcome major traffic congestion problems plaguing travel between the east and west banks of the city.¹³⁷ The system is very popular among residents and moves some 10,000 people a day. The vehicle traffic from residential communities was greatly reduced by the

¹³¹ Jean Mercier, *Equity, Social Justice, And Sustainable Urban Transportation in the Twenty-First Century*, Universite Laval, Administrative Theory & Praxis, Vol. 31, No. 2, 148 (June 2009).

¹³² Baha Ashalalfah, *Experiences with Aerial Ropeway Transportation Systems in the Urban Environment*, Vol 140(1) J. Urban Plann. & Dev., 04013001-1 (2014).

¹³³ *Id.* at 04013001-5.

¹³⁴ *Id.*

¹³⁵ *Id.*

¹³⁶ *Id.*

¹³⁷ *Id.*

first line. The line was so successful that four more lines are planned to connect major urban and residential areas over rugged terrain in order to relieve traffic problems. The first proposed line is expected to serve a population of over 120,000 residents.¹³⁸ In Medellin, Colombia, the city built an aerial system that connected poor suburbs to the center of town. The suburbs are built on steep hills full of underdeveloped neighborhoods. These neighborhoods are inaccessible by metro lines.¹³⁹ Once built, the lines were a huge success almost immediately.¹⁴⁰ This was not for their tourist appeal, but because they were a critical transportation element for a large, previously unserved population. As a result of the metro line, crime in the poor suburbs dropped significantly and employment has increased by 300%.¹⁴¹ A similar story played out in Rio de Janeiro, where new aerial lifts were built in preparation for the Olympics.¹⁴² The terrain was similar to that in Medellin; inaccessible by conventional modes of transportation. The new aerial line allowed immobile populations to have access to the city centers.¹⁴³ The new mobility was key in helping wrestle control of the favelas from drug cartels.

In contrast to these successful transportation options, the proposed lifts in the Wasatch are not directly or indirectly connected with major residential areas and are poorly integrated with the existing transportation network. The aerial line is only a tourist attraction with no consideration for integrating the system into the Salt Lake and Summit Counties' public transit needs. A few examples: there are no plans for significant transportation improvements in the south east of Salt Lake Valley and there are no meaningful plans to connect the west side of the Salt Lake valley to the canyons. The Blueprint does not anticipate how to move people from the cities to the aerial line without a car. The aerial lift is simply not designed to be an effective transportation system, and it should not move forward as a transportation option.

- ii. The proposed Wasatch aerial lines do not connect major points of interest but only focus on ski resort interests.

The Wasatch aerial lines do not connect important economic, other recreational and residential hubs. This lack of consideration for the economic needs of the rest of the Wasatch region makes the aerial line an ineffective transportation option.

In the survey by Ashalalfah, there are several examples of aerial systems that are good at connecting major areas of interest. The Portland system connects a University and accompanying hospital on top of a steep hill to the rest of the city.¹⁴⁴ The hospital serves more than 200,000 people.¹⁴⁵ A tram in Hong

¹³⁸ Baha Ashalalfah, *Experiences with Aerial Ropeway Transportation Systems in the Urban Environment*, Vo. 140(1) J. Urban Plann. & Dev., 04013001-10 (2014).

¹³⁹ *Id.* at 04013001-8.

¹⁴⁰ *Id.*

¹⁴¹ *Id.* at 04013001-8.

¹⁴² *Id.* at 04013001-9.

¹⁴³ *Id.*

¹⁴⁴ Baha Ashalalfah et. al., *Experiences with Aerial Ropeway Transportation Systems in the Urban Environment*, Vol. 140(1) J. Urban Plann. Dev., 04013001-6 (2014).

Kong is used to connect an island to the main part of the city and then connects directly to major shopping centers and the airport.¹⁴⁶

The proposed aerial lines in the Blueprint do not share much in common with the above mentioned examples. Although, the proposed lines are marginally connected to shopping centers and the airport, it is hardly the kind of efficient and direct system found in Hong Kong. The Mountain Accord's lift system only connects a few ski resorts directly. Beyond that it is only marginally connected to only two or three economic hubs. The other 6 to 8 other important hubs are left neglected. While ski resorts are important destinations, they are not the same as hospitals, universities and airports which maintain steady flows of people throughout the year. Connecting two ski resorts together should not be characterized as a transportation system that connects communities. Because the aerial lifts do not connect communities or economic hubs in a meaningful way, they should not move forward as a transportation option.

C. The Mountain Accord should consider other options that are more integrated with the transportation system; that serve a wide variety of the population; that are more accessible; and that will not have such damaging impact on the canyons.

The Blueprint should reconsider transportation options in Parleys Canyon as an alternative to major infrastructure through Little or Big Cottonwood Canyons. Mountain Accord should also include a transportation option that utilizes a shuttle system up Mill Creek Canyon, Big Cottonwood Canyon and Little Cottonwood Canyon. The shuttle system has proved to be highly effective and popular at some of the most visited national parks in the country. The similarities between those parks and the Wasatch canyons make a shuttle a natural fit for the Wasatch.

- i. More substantial methods of public transportation should be considered through Parley's Canyon as an alternative to major infrastructure in Big or Little Cottonwood Canyons.

For the environmental reasons and integrative problems discussed above in Sections II and IV, the rail lines and aerial lines through Little Cottonwood Canyon do little to meet the goals of the Mountain Accord. Further, they fail to address the transportation problems through Parley's Canyon. Parley's Canyon is the main corridor for transportation at this time and moves many visitors, residents, employees and other commuters. A more substantial transportation option through Parley's Canyon is more likely to attract more ridership. Parley's Canyon is much wider than either Little or Big Cottonwood Canyons and would be much more conducive to larger infrastructure like a rail line. A rail through Parley's Canyon would be easier to integrate with current transportation systems. It would do much more to connect economic hubs and would appeal to a larger portion of the population. It is possible that a Parley's Canyon rail line could connect five to six economic hubs directly based on the

¹⁴⁵ *Id.*

¹⁴⁶ *Id.* at 04013001-9.

Blueprint's identified economic hubs.¹⁴⁷ Finally a rail line in Parley's could serve a population beyond just recreationalists, but could help transport commuters on a daily basis, potentially reducing traffic-related air quality problems in Salt Lake Valley. Building large infrastructure in major transportation corridors would fit better with landscape level conservation and would help to concentrate negative impacts instead of spreading human activity into currently more pristine areas. Despite all of these desirable attributes, a rail line through Parley's Canyon was rejected without justification or explanation.

- ii. Shuttle systems similar to those used in National Parks would be an excellent option for Mill Creek Canyon, Big Cottonwood Canyon and Little Cottonwood Canyon.

Mandatory and optional shuttle systems have been effective in reducing pollution, negative impacts to the surrounding environment, noise pollution and congestion in many national parks. Given the similarities between the significant natural resources and tendency for visitation between national parks and the Wasatch Mountains, a shuttle system through the canyons would be an excellent option to solve all of Mountain Accords main goals and vision.

Shuttle systems (both mandatory and optional) have been used in numerous national parks throughout the United States. Among these parks are: Denali, Yosemite, Acadia, Grand Canyon, Bryce Canyon and others.¹⁴⁸ Although success rates vary among the shuttle systems, many have been quite successful. One in particular is the Zion shuttle system. The Zion's National Park shuttle is a mandatory shuttle system. Cars are not allowed on the road in the main part of the canyon: only shuttles operated by the Park. Zion National Park is a 6.5 mile canyon with breathtaking vistas throughout the park. There is one road going into the main canyon of the park and it is one lane each way. The road eventually dead ends at the Temple of Sinawava where there is a parking lot where vehicles can turn around to go back down the canyon. The shuttle system operates shuttles carrying up to 66 people at 10 to 15 minute intervals.¹⁴⁹ The system has 30 buses and includes 15 stops along the 6.5 mile canyon.¹⁵⁰ It is estimated that one bus replaces approximately 25 private vehicles in the canyon.¹⁵¹

Before the mandatory shuttle the road was very congested and there were long wait times to get into key visitor attractions. Sound levels were high, air quality was impaired and there was significant damage to natural resources in the park as a result of the congestion. The mandatory shuttle system was instituted in 2000.¹⁵² The shuttle improved air quality—there was a 26 to 77 percent drop in carbon monoxide emissions in the park.¹⁵³ Sound levels went down by 6 to 10 decibels.¹⁵⁴ Congestion virtually

¹⁴⁷ Mountain Accord, *Proposed Blueprint*, 15 (Feb 2015).

¹⁴⁸ Britton Mace, et al., *Visitor Assessment of the Mandatory Alternative Transportation System at Zion National Park*, 52 Environmental Management 1272, 1273 (2013).

¹⁴⁹ *Id.*

¹⁵⁰ *Id.*

¹⁵¹ *Id.*

¹⁵² *Id.* at 1275.

¹⁵³ *Id.* at 1281.

¹⁵⁴ *Id.*

disappeared. For those who have been there before and after the shuttle, the overall tourist experience has not been negatively affected; instead, it has improved in many ways.¹⁵⁵

An article investigating the reasons for the success of the Zion shuttle system, provides several reasons why the system is successful in Zion and can be elsewhere. A shuttle system's effectiveness depends on several key variables: perception of freedom, cost, wait times, convenience, comfort, accessibility, frequency of buses and number of stops.¹⁵⁶ Any successful system has to have low wait times.¹⁵⁷ Additionally, a shuttle system's success depends on whether it is perceived as a mode of transportation or as a tourist attraction.¹⁵⁸ For example, the Zion's system incorporates an audio tour for riders.¹⁵⁹ A successful shuttle system will help visitors be more connected with the natural environment that they seek to visit.¹⁶⁰

According to the study, many people showed high levels of resistance to any mandatory shuttle system.¹⁶¹ However, over time, visitors to the park were able to experience firsthand the benefits of the mandatory system.¹⁶² When people realized that there were frequent stops and wait times no greater than fifteen minutes, most of the surveyed population's perception of their freedom of movement *increased* compared to before the shuttle system.¹⁶³ Visitors reported having very positive experiences with the system. Feelings of freedom of mobility, connection to the natural setting and comfort on the shuttle increased over time.¹⁶⁴

The article offers some advice for further improvements to the already successful Zion system. The article recommends clear topped shuttles for more site-seeing opportunities.¹⁶⁵ Minimal wait times—no longer than 15 minutes—are critical.¹⁶⁶ Additionally, public education is important. The public needs to have ample access to information about the system so that they feel comfortable, can tailor their expectation, and lay their reservations aside. Information should be available at major commercial centers. Wait times should be posted at stops, and the system should be publicly promoted as a fast and efficient alternative to private travel with extra benefits that cannot come from private vehicles.

The Cottonwood Canyons are ideal locations for a mandatory shuttle system like that in Zion and other national parks. Both canyons are beautiful natural attractions that are not much longer than Zion Canyon. Like Zion Canyon, there are a large number of visitors every year. There is no through-travel in

¹⁵⁵ *Id.*

¹⁵⁶ *Id.* at 1273-74.

¹⁵⁷ *Id.*

¹⁵⁸ *Id.* at 1274.

¹⁵⁹ *Id.* at 1281.

¹⁶⁰ *Id.* at 1280.

¹⁶¹ *Id.* at 1274.

¹⁶² *Id.*

¹⁶³ *Id.*

¹⁶⁴ *Id.* at 1274.

¹⁶⁵ *Id.* at 1282.

¹⁶⁶ *Id.* at 1281.

either canyon (the top of the canyon is the final destination). Finally, as in Zion, there are significant problems with the current system of private vehicle use, including congestion, air quality, noise, parking, delays, and negative environmental impacts. Like Zion, most travel is recreational or geared toward the service industry. A shuttle system in the Cottonwood Canyons would meet all of the visions and goals for the Mountain Accord. It would be economical for large portions of the population, it would not require invasive infrastructure, it would protect the environment and it would provide a unique riding experience unlike any other area in the world outside of National Parks. The article analyzing the Zion shuttle experience indicates that as long as a shuttle in the Cottonwood Canyons is low cost, maintains a perception of freedom of movement, has low wait times and frequent bus stops it will work well.¹⁶⁷

Implementing a shuttle system up the Cottonwood Canyons that is integrated to the existing public transportation system should be considered as a transportation solution evaluated during the Mountain Accord Process. The shuttle will meet critical economic goals to (1) grow year round destination-based travel, tourism, and recreation economy, (2) maximize financial resources available to reinvest in improving and protecting Central Wasatch assets, (3) Improve the quality of experience for residents and visitors, and (4) improve quality of life for residents.¹⁶⁸ Like the Zion shuttles, propane shuttles could be used. Even better, the new shuttles could be electric powered buses. This would reduce air emissions and congestion problems. Shuttles would also not be nearly as harmful to the riparian environment as the large volume of private vehicles expected up the canyons. Families and large groups usually carpool to Zion National Park whereas, vehicles up the Cottonwoods are often less full. If each Zion's shuttle take 25 private vehicles off the road, it is likely that each shuttle in the Cottonwoods would take at least 25 vehicles off the road. Because the shuttles would be the only vehicles in the canyons, there would be no need to widen the road or add rail or aerial lifts. This would automatically eliminate the most environmentally detrimental elements associated with the current transportation options, and it would still meet the transportation needs for the Canyons. Furthermore, eliminating private vehicles would free up space that is currently used for parking, and that space could be used for concentrated development. In general, a shuttle would be more in line with landscape-level conservation efforts because of the lower environmental impacts.

Beyond protecting the natural environment, the shuttle would truly connect visitors and residents to the beautiful landscape that we often miss as we drive along the Wasatch. Shuttles would get people out from behind the driver's seat and allow them to see the canyons. Shuttles with clear tops would provide another opportunity to enjoy the beauty of the canyons. Instead of getting into separate cars at the end of the day, visitors and locals could continue to socialize as they travel down the canyon, fostering a greater sense of community. If the shuttles run frequently enough; have enough stops; and are integrated into the existing transportation system, riders will be able to come and go with relative ease and speed. Finally, full integration with existing public transportation hubs throughout the valley will

¹⁶⁷ *Id.* at 1274.

¹⁶⁸ Mountain Accord, *Vision, Goals and Metrics*, 3 (August 25, 2014).

eliminate the need for large parking lots at the base of the canyon, because riders could pick up the shuttle at a variety of hubs throughout the city, thereby dispersing the impact associated with parking.

Recreation throughout the year would be best served by this system. Shuttles don't need the massive infrastructure investment that rail or aerial lifts need. This leaves the shuttle systems free to include more or less stops as needed. During the winter months, the shuttle could bypass many stations and go straight to the resorts. During the summer months, the shuttles could include many more stops at popular biking, climbing and hiking trailheads. This is much more appropriate than any rail or lift line because it accommodates all types of recreation and economic use not just ski resorts.

Shuttles do not have to be a perennial mandatory system. Mandatory shuttle use could be all-year or only part of the year depending on the congestion problems and which points of interests are receiving the most traffic at any given time. The lack of need for infrastructure makes it flexible enough to adjust over the years based on popularity and need. Shuttle stations can be added and removed with greater ease and the shuttle system could even operate on a bell system where riders can get on and off anywhere and not just designated stops. Or the system can be designed to only stop in designated areas in order to encourage more visitation to some areas and protect other areas that are threatened.

The shuttles can still serve as a unique tourist attraction for visitors and skiers and provide good modes of transportation. It can become seen as an integral part of the visiting experience to the Wasatch Mountains. The shuttles can be designed with interesting tour guide information, they can be outfitted to any level of luxury desired. The Zion study indicated that comfort is important factor and that many do not find the Zion's shuttles to be comfortable. Shuttles up the Cottonwoods can be designed to improve on comfort with sufficient space for recreational equipment, comfortable seats and great viewing opportunities. The shuttle would give a unique perspective on the canyons themselves since it is an opportunity to really see the canyons instead of focusing on the tailgate or the brake lights of the car next car. Mandatory shuttles would be faster than cars because they would be the only ones on the road. Accordingly, the shuttle system would serve the same purpose as the rail line in Little Cottonwood or the widened road in Big Cottonwood, at a fraction of the cost and with none of the associated environmental risks.

Shuttles are much more likely to be well integrated into current and future transit systems than a rail line or aerial lift. One of the interesting features of the Zion Canyon shuttle is that the shuttle does not start and stop just at the visitor center. The shuttle extends out beyond the Park itself into the surrounding communities. It uses parking lots of local businesses as pick-up stations, which helps the micro-economy of each stop. A system like this for Cottonwood Canyons would not only eliminate the need for large parking lots at the mouths of the canyons, it could conveniently connect major points of interest and integrate itself more fluidly with existing high speed transit. For example, the shuttle system could go all the way from the top of Little Cottonwood Canyon to the Sandy Trax line, the South Town Mall and the Front Runner station. Connection to the Blue Trax line and the Front Runner instantly connects many major economic hubs identified in the Blueprint, as well as major economic and

residential hubs in Davis, Weber and Utah Counties. As for access on the east side of Salt Lake County, the shuttle routes could overlap through the valley for convenient transfers.

Rail lines cannot provide any of these benefits as easily, cheaply or in such a short time. Rail lines would have to be built, right of way would have to be established in the cities and eminent domain/condemnation battles could delay the process. A shuttle system can use the existing roads and be put into action as soon as the shuttles are purchased. For these reasons, the Mountain Accord process should seriously analyze and consider a transportation option that involves a shuttle system in the Canyons; a method for eliminating or seriously discouraging private vehicle use; and a framework for integrating the shuttle with existing transportation infrastructure in the region.

V. The Mountain Accord should not dismiss viable alternatives without justification.

The Draft Blueprint rejects several proposals without explanation or justification. The Mountain Accord should justify why these options have been rejected. In particular, the Blueprint does not include better transportation for Parley's Canyon, even though that was a proposal in earlier stages of the Mountain Accord Process. Based on the Mountain Accord Charter, consensus-based decision-making is designed to build trust, encourage sharing information and provide for an environment for collaborative problem solving.¹⁶⁹ Additionally, the communication principles include transparency, collaboration, productivity and efficiency.¹⁷⁰ In the spirit of the charter, Mountain Accord should do more to explain the reasoning behind its decisions to continue with some projects and abandon others. According to the new Blueprint, many ideas have been rejected with no explanation. The Blueprint does not justify why a rail line through Parley's Canyon was rejected. The Blueprint does not explain why local buses are not appropriate for some of the canyons. The Blueprint makes no more mention of the proposed light rail line along Foothill and does not explain why this proposal was rejected.

VI. Conclusion

Save Our Canyons supports the Mountain Accord process and the possibility of developing and implementing landscape-level conservation plans that will protect the integrity of the watershed and preserve the recreational value of the Canyons for the future. Looking forward, there are several elements in the Draft Blueprint that should be altered in order to better serve the future of the Wasatch Region. Save Our Canyons reemphasizes the importance of providing strong, permanent conservation measures to protect vital environmental resources. This should include Land Exchanges that focus on consolidating publicly held lands, establishing permanent conservation measures and limiting mountain sprawl.

Some of the proposed projects in the Draft Blueprints will have significant and long lasting impacts on the Wasatch environment. The impacts associated with the proposed rail alignment, road expansion,

¹⁶⁹ Mountain Accord, *Mountain Accord Program Charter*, 8 (2014).

¹⁷⁰ *Id.* at 13.

and aerial lift projects are unacceptable and inconsistent with existing laws and policies. Of principle concern to Save Our Canyons is that the Blueprint and the Mountain Accord must be guided by protecting the watershed. The environmental benefit of a healthy watershed is precious and irreplaceable. Protecting water quality, and compliance with existing standards to preserve water quality, must be at the forefront of all planning decisions for the Mountain Accord. Additionally, natural beauty, scenic vistas, as well as opportunities for solitude and recreation have already been identified by the Mountain Accord Process and many stakeholders as values that should be protected. The many laws, plans, and policies in place to protect key watershed resources, minimize pollution, protect the national forest and reduce development should help guide the Mountain Accord process.

Save Our Canyons have serious concerns about the failure of proposed transportation systems to be adequately integrated into the transportation systems and needs of the Wasatch. The rail and aerial lines will not connect many urban hubs or residential areas and do not address congestion problems at the mouth of the Canyons. Aerial lifts do not truly address transportation problems nor do the lifts benefit the economy as a whole. They are not about transportation but more of a tourist attraction for a few ski resorts that will not be used widely on a year round basis or by local commuters. At their core, these projects are not designed for the greater good and needs of the vast majority of the population. In contrast, there are other, less expensive and invasive solutions that could address transportation problems in the Canyons, like closing the road to private vehicles and implementing a shuttle system. These options should be seriously explored as a viable transportation option as the Mountain Accord process moves forward.

Finally, Save Our Canyons looks forward to continuing to participate in the Mountain Accord process. It also appreciates the need for further comments and is pleased that Mountain Accord extended the comments deadline in order to elicit more opinions and information from the public. Please accept these comments. We hope that they prove useful and insightful in shaping the future of our precious and finite mountainous region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Fisher', written in a cursive style.

Carl Fisher



April 14, 2015

Executive Board
Mountain Accord
375 200 South, Suite 275
Salt Lake City, UT 84101

ATTN: Laynee Jones, Program Manager
RE: Mountain Accord Blueprint Comments

Dear Mountain Accord Executive Board:

Thank you for the opportunity for meaningful participation in the Mountain Accord process – to date and going forward – that is so critical to our communities, livelihoods and quality of life. We are particularly pleased with the opportunity we are presented with to achieve additional permanent protections for our priceless Wasatch backcountry.

Please accept these joint, formal comments of Wasatch Backcountry Alliance, and Winter Wildlands Alliance on the “The Proposed Central Wasatch Blueprint”. After a year of committed public involvement, including direct participation by representatives of our organizations, we are pleased to see the Mountain Accord process moving forward and appreciate this vital opportunity for the public to weigh in. We have encouraged our members to do so, and the public message seems clear – preservation of the unique mountain environment and recreational opportunities in the Central Wasatch must be at the root of both the purpose and need of the Mountain Accord, and this draft misses that mark. Our comments expand on that idea here by offering rationale, solutions and clear descriptions of our vision for how the Mountain Accord can move forward successfully.

Wasatch Backcountry Alliance (WBA)

Wasatch Backcountry Alliance was formed less than two years ago out of recognition that local backcountry use was both growing rapidly and in need of an organized voice representing their interests to policy makers and land managers. In that short time, WBA now counts over 4,000 members and supporters and has become the go-to organization on backcountry matters both in the Mountain Accord, and for a broader swath of local stakeholders, elected officials, land managers, media and others. While many of our interests align with the broader conservation community – and Save Our Canyons in particular – our membership is unique in our

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Winter Wildlands Alliance
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208.336.4203
info@winterwildlands.org

commitment to protecting and preserving the recreational experience in the Wasatch backcountry.

Winter Wildlands Alliance (WWA)

Winter Wildlands Alliance is a national non-profit, whose mission is to promote and protect winter wildlands and a quality human-powered snowsports experience on public lands. Formed in 2000, WWA has grown to include over 35 grassroots groups in 12 states – including Wasatch Backcountry Alliance – and has a collective membership exceeding 50,000. WWA members and supporters live in Utah, as well as across the country, and deeply value the world-class backcountry recreation in the Central Wasatch.

Our Basic Position

- We do not support an interconnection between Big Cottonwood Canyon, Little Cottonwood Canyon and Park City, or any combination thereof. This includes tunnels. The resulting direct, cumulative and indirect impacts to dispersed recreational experiences and the environment are potentially significant, while economic costs and benefits to the public are not known. As a next step, we strongly support development of a purpose and need statement that balances the ‘Systems’ Mountain Accord is addressing, without giving undue bias to any one element or proposal. Only then can an environmental analysis that considers an appropriate range of alternatives be conducted. We believe this range includes measures designed to provide reliable, low-cost, low-impact transportation to both dispersed and developed recreational nodes in the Canyons.
- We support the general outline of the Cottonwood Canyon Task Force proposal in concept, with several important considerations:
 - Private land transfers and/or preservation actions must include Grizzly Gulch.
 - Land swaps should be pursued immediately, as a precursor to future development. Lands would be placed into a designation providing a higher level of protection than under the current forest plan.
 - All ski areas expanding their footprint on public land would establish an uphill route inside their permit boundary, and will consider boundary restrictions. These efforts will help minimize the impacts of expansion on backcountry terrain and compensate for lost access.
 - We support the other provisions – water rights and development – proposed by the CCTF, contingent on land use regulations and approval following public environmental review.
 - Alignment of the new lift in Honeycomb Canyon will not drop below the elevation of the current lift and will not terminate in the Silver Fork drainage (e.g. it will remain in Honeycomb).
 - We support a bus-based transportation system as outlined in our proposed Transportation Alternative presented in Appendix C.

Situating Our Position

Our members value the Wasatch Mountains for many reasons – as a backdrop to daily life, a refuge to recharge, a playground to enjoy with friends and family, as a source of clean water that melts from our fabled snow, and in myriad other ways. We value the ski resorts, other developed recreation opportunities, and our prized backcountry landscapes. The Wasatch Mountains are the reason some of us moved here, or started businesses, and surely a part of what keeps people rooted here. We have a vibrant and growing outdoor recreation economy in Utah¹, and winter backcountry recreation is a growing player in that². We also recognize that inaction isn't good enough – recreation pressure, traffic, environmental challenges and increasing population are putting demands on the landscape that we must address. The Wasatch are too special to do nothing, but they deserve better than the vision laid out in the draft Blueprint.

As drafted, the Blueprint needs much improvement – it simply places too much emphasis on development over preservation of the environment and dispersed recreation. Access and protection of key backcountry landscapes, and the recreation opportunities they provide, are the core issues to our constituency of backcountry skiers and riders, snowshoers, and others who love to explore outdoors under their own power. Because of that, we strongly support the concept of proposed land swaps to protect key backcountry terrain and offer revisions so that proposed development does not outweigh the conservation benefit.

Additionally, many components put forth in this draft would bring sweeping and permanent changes – with significant indirect and cumulative impacts, as well as potential benefits – on both public and private lands, but few details exist to address their viability. Significantly more information is necessary to understand the full implications of some MA elements, and to make wise choices between Alternatives. We fear that some future plans – regarding mountain transportation, for example - are being inappropriately winnowed down without full information. In this respect many of the concepts in the Draft Blueprint appear to us as "wants" as opposed to the data driven needs required by NEPA. In our comments we identify a number of components of the plan we support because of environmental or recreational benefit, elements we do not support moving forward, and those deserving further study.

Our position is straightforward – we support an action, or package of related actions, insofar as it serves to protect the unique character and balance of recreational opportunities in the Wasatch. As written, the draft does not achieve this balance and so we propose a suite of solutions in our detailed comments regarding land swaps, ski area development within existing boundaries, recreational access, and transportation that provide the necessary color to this relatively straightforward position. We are not opposed to ski area development within existing

¹ https://outdoorindustry.org/images/ore_reports/UT-utah-outdoorrecreationeconomy-oia.pdf

² <http://winterwildlands.org/wp-content/uploads/2014/09/Economic-Impact-of-Human-Powered-Snowsports.pdf>

boundaries or improved transit, far from it, but we are wary of how these and other related actions are packaged in the draft. Many of our members have similar environmental and recreation ideals, basically desiring for existing patterns of land use to remain relatively unchanged, while allowing for select development in exchange for conservation of important backcountry landscapes.

Balancing recreational opportunities and preserving a healthy Wasatch are not new ideas. Conservation is the status quo in the canyons right now, supported by both regulation and the weight of public opinion. One example of this overwhelming public opinion is the fact that all parties involved with the 2002 Winter Olympic Games agreed that the development/impacts associated with holding Olympic events was not appropriate for Big and Little Cottonwood Canyons. There needs to be an extremely compelling reason to veer away from that – represented in this case by an extraordinary opportunity to protect thousands of acres of undeveloped land in the Wasatch. We describe conditions under which this all may make sense in our comments below, and in greater detail in Appendix A & B (CTF Comments and Blueprint Revisions, respectively).

Below are just a sampling of past planning efforts, existing land use regulations and surveys of public attitude that cast a light on just how seriously we all take the preservation of the Wasatch, opportunities for backcountry winter recreation, and why the Blueprint is such a significant departure from some elements of public sentiment:

Mountain Accord, Idealized Systems – Public Comment Summary³

- The two highest ranked choices in response to the idealized recreation map are 1) "Place areas into special management to protect against future development and preserve natural landscapes" (majority of all respondents) and (2) "Preserve lands that provide unique recreation experiences, are currently used for recreation, and are adjacent to existing open space"
- In response to the idealized Economic scenario, a vast majority of respondents (~75%) stated their top priority as: "Protect the aesthetic and natural environment of the Wasatch from degradation"

Wasatch Canyons Tomorrow⁴

- In response to the question regarding their most frequent winter use activity, more respondents chose human-powered winter recreation (backcountry skiing, XC skiing and

3 Mountain Accord Idealized Systems - Public Comment Summary, 11/2014. Available online: <http://mountainaccord.com/wp-content/uploads/2014/09/IS-Public-Comments-11212014.pdf>

4 Wasatch Canyons Tomorrow. December, 2010. Online here:

http://wfrc.org/Previous_Studies/2010%20Wasatch%20Canyons%20Tomorrow%20Final%20Report%20Dec10.pdf

snowshoeing) than resort skiing (43.2% as Backcountry Skiing: 23%, Snowshoeing: 14.3%, XC Skiing 5.9% vs. Ski areas: 35%)

- In summer, only 6.7% of respondents said they most frequently visited the resorts
- 92% of respondents support expanded bus service up Big and Little Cottonwood Canyon
- 82% of respondents support a TRAX spur to a transit hub/visitors center at the base of the Canyons
- “Limits resort expansions to existing Forest Service permit areas and some master-planned projects, including limited base area improvements such as a new lodge and operation center. Does not include any infringements on existing winter backcountry ski areas and should have little or no effect on environmental resources (94% of survey respondents support)”
- a scenario with a slightly higher level of development – still within Forest Service permit area and on private land – which includes “some new base lodges and operation centers (77% of survey respondents support)”
- 82% support enforcement of the Foothills and Canyons Overlay Zone, and restricting variances that circumvent these protections, which include provisions preserving aesthetic qualities and limiting environmental degradation
- One of the major recreation recommendations articulated here as well is “Acquire strategic land and/or easements for recreation access.”
- Envision Utah hired an independent firm to conduct polling, finding "the level of support for policy recommendations was substantially consistent between the polled sample and the WCT participants, although the polled sample tended to be less supportive of mountain rail.”

Outdoor Industry Letter to Governor Herbert

Last year, over five dozen local, regional and national outdoor businesses sent a letter to Governor Herbert, as well as many Mountain Accord Executive Committee members, expressing support for balance in the Wasatch. The letter also states, in part “[given] the significant growth in backcountry skiing and snowshoeing in the face of declining or flat resort skiing numbers, it is evident that backcountry skiing, snowshoeing, winter mountaineering and other forms of human-powered winter recreation are increasingly important contributors to Utah’s economy and quality of life. Indeed, the future of Utah’s recreation and tourist economy may very well lie more in what is protected than in what is developed.”⁵

5 Outdoor Industry Letter to Governor Herbert, organized by WBA and WWA. Available here: http://winterwildlands.org/wp-content/uploads/2014/03/Outdoor-Industry-Letter-to-Governor-Herbert-3_2014-FINAL.pdf

Wasatch-Cache Forest Plan

- “New resort developments on National Forest System lands will be confined to the permit boundaries in effect at the time of revision, though small-scale site-specific adjustments could be considered to address important management issues.”⁶

Wasatch Choices 2040

- "Encourage conservation of open space and irreplaceable natural resources in land use decisions"⁷

In summary, the Mountain Accord draft Blueprint seems to have departed significantly from public sentiment supporting preservation and recreation, towards a narrower set of interests predicted on development.

Mountain Accord Process

Mountain Accord is a monumental planning effort – the scope and range of stakeholders involved make it necessarily so. As subgroup system members, we noted a number of discrepancies between outcomes at that level and recommendations in the Blueprint. WBA board members who served on the subgroups have documented these discrepancies, as well as reflections on the MA process so far, and ask that they be included in the official project record (Appendix C).

We offer the following constructive comments in the spirit of strengthening the process moving forward:

- Regardless of intent, the Blueprint was seen by many in the public as the consensus recommendations of a collaboration which we, and many other stakeholders not on the Executive Committee, participated in. We understand that this is not true, and Mountain Accord has stated as much, but care must be taken to ensure that the Blueprint and other future recommendations are not misrepresented. The Blueprint would ideally be improved to reflect broader collaborative input – including our own – and in any case must clarify which stakeholder(s) or groups are proposing to advance certain elements.
- We sincerely appreciate the time, outreach and attention that have gone into seeking public input during the draft phase. We only hope this same level of commitment is applied to updating the Blueprint to better reflect the desire of stakeholders who have made their opinions known. We do fear that if changes along the lines of what we

6 Revised Forest Plan Wasatch-Cache National Forest - February 2003

Online here: https://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5347083.pdf

7 p.18, Wasatch Choices 2040 report. 2005. Available here: <http://www.wfrc.org/publications/wasatchchoices2040report.pdf>

propose are not made, some members of the public may become disillusioned before Phase 2 and implementation even begin.

- The questionnaire developed for public comments on the Blueprint had a number of fundamentally flawed structural and wording issues that may inappropriately “guide” the reader towards an outcome. Similar issues existed with the Idealized Systems polling questions, which is something we have previously raised. We are concerned that these issues may carry through and influence the type of public comments received, and have therefore directed our memberships to send comments directly to comment@MountainAccord.com

Next Steps

- Revise, finalize, and memorialize CCTF negotiations. Pursue land swaps, land protection bill, and once successful proceed with ski area development aspects. (See Appendix A).
- Clarify and expand elements in the Blueprint to address public concerns. Where necessary to delay full explanation until the collection of new information, explain that clearly. (See Appendix B).
- Begin drafting Purpose and Need statements for a multi-agency EIS that will comprise part of Phase 2. We recognize that certain project elements such as recreation trails and infrastructure improvements may be appropriate for separation in the NEPA process. However there must be a formal mechanism for addressing direct and indirect cumulative impacts both as a legal requirement, and to avoid splintering the projects and therefore stakeholders. The challenge here is to place appropriate bounds on the scope of the project so that there are not infinite reasonable alternatives, but not so narrow as to exclude perfectly viable options at the onset. Similarly, the planning efforts moving forward should remain inclusive of a wide variety of stakeholders and interests. Fracturing the planning process into multiple tiers, phases or separate projects will alienate and confuse an interested public, while also making it significantly harder to meet NEPA obligations to consider indirect and cumulative impacts of related projects. We would like to work with you in the near term to provide input on the purpose and need.

Conclusion

The Blueprint could represent an acceptable compromise if it is modified to address the concerns detailed here, supported by further economic and environmental study (read: data), and carried out by implementing the land protections in advance of new large scale development. Securing land swaps, increased federal protections and in some cases easements are appropriate next steps, and a necessary precursor to any large scale development or transportation project.

This Blueprint could dramatically shape the way we use, protect, restore and access both public and private lands in the region. We are equally excited and concerned about both the potential for good - and for unintended consequences - of such a massive undertaking, and remain committed to working with other stakeholders to ensure that the unique character of the Wasatch we all cherish is retained.

Sincerely,



Jamie Kent
Board Chair
Wasatch Backcountry Alliance



Mark Menlove
Executive Director
Winter Wildlands Alliance

CC: Mountain Accord Executive Committee

Appendices

- | | | |
|----|------------------------|--------------------------|
| A. | CCTF Revision Comments | C. System Group Comments |
| B. | Blueprint Comments | D. Land Preservation Map |

Appendix A – Cottonwood Taskforce Comment Request (WBA/WWA – April 14, 2015)

The following comments have been prepared by WBA and WWA specific to CCTF process and deliverables, at the request of the Mountain Accord team.

Landholder -Proposed Terms and Conditions

We don't feel that a rail system connecting Big and Little Cottonwood Canyon is a necessary precursor to the elements that follow (1-17), and framing it as such has likely mislead the public comment process (at a minimum), and potentially threatened the integrity of the NEPA process to follow. Proposing a rail system as the only (or primary) option is biased, and precludes other transportation alternatives that are viable. The purpose and need should be clarified in a multi-agency EIS, and careful study should follow. Conversations with other core stakeholders over the last several weeks have shown that a rail system – or ANY system – connecting canyons is not a must-have. We recommend keeping all options open for study, including train and tunnels.

1 & 2. Timing should be before development occurs. The experiential value and total acreage of lands in the public domain should not be reduced. Consider a full range of protections from general Forest Service land to Wilderness. Permanence is key, and Congressional action is the most likely path to get us there.

3/4c. We are highly supportive of this element with the following modifications:

Grizzly Gulch - this is the highest priority area that we want to see protected that is not part of the initially proposed package. Our support of the land trade is contingent upon its inclusion in the package.

Solitude/Silver Fork – Solitude's proposed lift alignment would bring the east half of Silver Fork into the Solitude side country. This is high-value Intermediate terrain, whereas Grizzly Gulch is great introductory backcountry terrain. Bringing the lift alignment of a new lift into the bottom of the Silver Fork drainage would effectively destroy the backcountry terrain. Any new base terminus cannot be below the current Honeycomb terminus for us to support it.

Ski areas are getting exponentially higher value lands even though total acreage is less. A land swap must reflect equal value, which could potentially be supplemented with cash reserved for local recreational and environmental use in the affected area, for example.

4b. We support this, but with no further expansion in American Fork Canyon. Land exchange in Mary Ellen Gulch, but not expansion towards Tibble Fork. No ski area expansion below bottom of current lift. Transit use only.

- Subject to further environmental analysis.

- Pursue willing buyer willing seller land acquisitions, include these landowners that are currently outside this process (this is not being addressed).
- Terms and conditions should be permanent, and carry through to any future changes in ownership.

4d. We are supportive of additional snowmaking for the resorts as part of this package.

5. We do not support interconnect between Big & Little Cottonwood Canyons and Park City – either by aerial tramway or tunnels with bus or rail. The unique character, recreational value, public sentiment and potential for environmental damage make such connections unwarranted. Additionally, it also seems inappropriate to suggest this if local government authorities are not supportive – as documented in both public records and by recent local media coverage.

6. We will advocate for outcomes that are in the interest of our constituency, and for the advancement of this agreement as a whole if it is modified to meet those interests.

7. We expect ongoing negotiations, and are interested in remaining party to them.

8. Preservation of backcountry land should be a precursor to development, and can occur before full environmental analysis of proposed transportation alternatives. Protection needs permanence in time, management and ownership. A legally binding agreement would be one way to demonstrate that land protection will come first and is important to the parties involved, with development contingent on protection.

A single, multi-agency EIS should be pursued in Phase 2. Segregating this effort into smaller projects would not only make the task of evaluating indirect and cumulative impacts incredibly challenging, but could also splinter participation and cause stakeholder burnout.

9. Lands exchanged to public ownership will remain open for recreation access and a flagship trail network that connects to future transit stations in Big and Little Cottonwood Canyons. (This is a deletion of “consideration of”)

10. We agree, again with a focus on permanence and public ownership.

11. Some free public access needs to be maintained to all public land in the Wasatch Mountains, year round. Uphill travel on skis could be part of the mitigation for ski area development. When a member of the recreating public does not use a resort’s service or improvement, that use should not be subject to any fee. Summer use should be consistent of directives for year-round use that came out of the Ski Area Opportunity Enhancement Act. Access alternatives and solutions that significantly change the balance of or cost to users risk

failure when assessed for environmental justice impacts. Public lands access must be free of discrimination.

14. The negotiated agreement should be binding for future changes in ownership as well, and include a phased approach where land swaps and protection are pursued immediately while further environmental review is conducted on transportation and development alternatives.

15. Yes – we are supportive.

17. Yes – we are supportive.

Ski Area Lands – Additional comments

- Consider inclusion of future Snowbird expansion in the Mountain Accord Process
- Alta dispersed user trailhead should be free, and of sufficient size to meet recreational demand
- Alta (6) - Finalizing this overall recommendation depends upon achieving agreeable consensus on the long-term use, ownership, and protection of Grizzly Gulch. We agree.

Appendix B
Proposed Blueprint Revisions by Wasatch Backcountry Alliance & Winter Wildlands Alliance
April 14, 2015

Environment Proposed Actions	Comments/ Revisions/ Conditions
<ul style="list-style-type: none"> ● Preserve land, protect watersheds and water resources 	
<ul style="list-style-type: none"> ○ Secure additional protections on federal lands to provide permanent and predictable management. 	<p>We are supportive of conservation of additional lands in the upper Cottonwood Canyons. Protective public ownership could mean a variety of things – from general lands covered under the Forest Plan, to designated wilderness – but a defining characteristic we are looking for is permanence. Congressional designation offers a good opportunity for that, through National Recreation Area designation for example. We look forward to continue exploring these protections with other stakeholders, and along the lines of a renegotiated CCTF agreement.</p>
<ul style="list-style-type: none"> ○ Work with ski areas to place lands in the upper Cottonwood Canyons into protective public ownership. 	
<ul style="list-style-type: none"> ○ Prioritize and acquire private lands from willing sellers. 	
<ul style="list-style-type: none"> ○ Identify and protect key wildlife corridors. 	
<ul style="list-style-type: none"> ○ Broaden watershed protections. 	
<ul style="list-style-type: none"> ● Monitor environmental health 	
<ul style="list-style-type: none"> ○ Implement an environmental monitoring program and create adaptive management plan. 	
<ul style="list-style-type: none"> ○ Analyze and mitigate environmental impacts prior to implementing proposed actions. 	
<ul style="list-style-type: none"> ● Protect and restore the environment 	
<ul style="list-style-type: none"> ○ Implement an environmental restoration program. 	
<ul style="list-style-type: none"> ○ Provide transportation alternatives that result in environmental benefits to the mountains. 	<p>The benefits must be “net”, and alternatives must meet the purpose and need in the least impactful, least costly manner. These must avoid the artifice of representing additional benefits that do nothing to meet the purpose and need, while introducing unnecessary impacts.</p>
Recreation Proposed Actions	
<ul style="list-style-type: none"> ● Improve and connect the regional trail network 	

<ul style="list-style-type: none"> ○ Construct and improve trail segments. 	
<ul style="list-style-type: none"> ○ Connect recreation destinations with trails. 	
<ul style="list-style-type: none"> ● Preserve key backcountry terrain 	<p>We are strongly in favor of this goal, and request assurances that continued backcountry access is considered along with other recreational improvements moving forward. There is a need to retain existing access for winter users, as well as improve access to meet future demand.</p> <p>Reword this as “Preserve key backcountry terrain and access” or add a sub-bullet addressing the comments above.</p>
<ul style="list-style-type: none"> ○ Work with ski areas to place lands in the upper Cottonwood Canyons into public ownership to preserve backcountry access. 	<p>Strong support – see above, and suggestions in Appendix A.</p>
<ul style="list-style-type: none"> ○ Secure new designation on federal lands to protect areas from development while allowing current recreational uses. 	<p>Strong support – see above.</p>
<ul style="list-style-type: none"> ● Improve transit service to recreation areas 	
<ul style="list-style-type: none"> ○ Increase transit service to recreation destinations to reduce traffic, parking congestion, and automobile dependence. 	<p>Ensure that public transportation serves the needs of dispersed recreation users as well as visitors to developed resorts.</p>
<ul style="list-style-type: none"> ● Direct future growth in recreation use to areas with infrastructure that can accommodate and manage growth 	
<ul style="list-style-type: none"> ● Explore user fee options to manage use and reinvest in recreation infrastructure 	<p>Some free access should be preserved, to ensure that all members of the public are able to enjoy the Wasatch regardless of socioeconomic circumstances. To the extent that fees are charged, they should be reinvested locally to benefit end-users who are paying fees (plowing parking lots for winter use, trail maintenance in summer etc...)</p>
<p>Economy Proposed Actions</p>	
<ul style="list-style-type: none"> ● Encourage development patterns that preserve community character and quality of life 	<p>Preserve the integrity and unique box-end nature of Upper canyons.</p>

<ul style="list-style-type: none"> ○ Invest in transit solutions that ease congestion and allow for walkable development in desirable locations. 	
<ul style="list-style-type: none"> ○ Design infrastructure that is locally authentic and compatible with the character objectives of each community. 	
<ul style="list-style-type: none"> ○ Focus most future development in urban areas, as identified in 	
<ul style="list-style-type: none"> ○ Provide the option for a car-free experience for residents, workforce, and visitors. 	
<ul style="list-style-type: none"> ● Generate sustainable economic growth to reinvest in the Central Wasatch mountains 	
<ul style="list-style-type: none"> ○ Increase tax revenue that can be captured for reinvestment in the Central Wasatch (e.g., preservation, restoration, improvements, etc.). 	
<ul style="list-style-type: none"> ○ Prioritize and fund opportunities to protect and enhance the environment. 	
<ul style="list-style-type: none"> ● Ensure Utah’s tourism market is competitive now and into the future 	
<ul style="list-style-type: none"> ○ Connect fragmented economic markets. 	<p>This is the first mention of connection in this document, and it is unclear what is meant. To restate, WBA & WWA are not supportive of connecting BCC, LCC and Park City. There is no articulated purpose or need to address this item.</p> <p>Please clarify a specific action or set of actions that would further this goal.</p>
<ul style="list-style-type: none"> ○ Develop an urban-mountain brand that is unique in the world. 	<p>Wasatch range currently enjoys a unique mountain brand as defined by a mix of world-class resort and backcountry opportunities, abundant snowfall, ease of access and variety of experiences awaiting users.</p>
<ul style="list-style-type: none"> ○ Improve the visitor experience for residents and recreationists in summer and winter with high quality transit choices to mountain activity centers. 	<p>Add dispersed recreation hubs, or similar language, to ensure transit will serve the needs of a full swath of the recreating public.</p>

<ul style="list-style-type: none"> o Allow limited new development in the mountains, focused around thoughtfully designed transit stops that provide excellent access to many types of recreation. 	<p>There is no clear purpose or need to address this item. We suggest that instead of creating a development objective that is not based in purpose or need, that the Blueprint instead commit to preservation of the existing environment and maintain or improve the existing user experience in a primary manner.</p>
<p>Transportation Proposed Actions</p>	
<ul style="list-style-type: none"> ● High capacity transit in the Little Cottonwood Canyon/Park City corridor. 	<p>There is not a corridor between Little Cottonwood Canyon and Park City, and further no such proposed action was agreed to by Transportation system group. We do support high quality/capacity transit solutions to LCC and PC independently.</p>
<ul style="list-style-type: none"> ● Transit incentives and automobile disincentives including parking/pricing strategies. 	
<ul style="list-style-type: none"> ● Year-round local bus service in Big Cottonwood Canyon. 	<p>Serves both resort and dispersed recreation sites.</p>
<ul style="list-style-type: none"> ● Fast transit service from the airport to the Park City area via I-80. 	
<ul style="list-style-type: none"> ● Improved transit service on US 40 and I-80 between Quinn’s Junction and Kimball Junction. 	
<ul style="list-style-type: none"> ● Improved transit connections in Summit County. 	
<ul style="list-style-type: none"> ● Shuttle service in Mill Creek Canyon. 	
<ul style="list-style-type: none"> ● High capacity transit connections in the eastern Salt Lake Valley. 	
<ul style="list-style-type: none"> ● Safety and access improvements for bicyclists and pedestrians. 	

PROPOSED NEXT STEPS

<p>Increase protections on U.S. Forest Service land</p>	
<ul style="list-style-type: none"> ● Evaluate the designation/protection options. (listed here) 	<p>As previously stated, we are supportive and would like to be involved in this process.</p>
<p>Increase preservation by acquiring private lands from willing sellers</p>	<p>We strongly support this goal, and feel additional land preservation is a necessary precursor to any new large scale development in the Cottonwood Canyons beyond the scope</p>



	of what is currently allowed by local and USFS planning regulations.
<ul style="list-style-type: none"> • Develop coordinated, comprehensive program. 	
<ul style="list-style-type: none"> • Identify priorities and work with willing sellers to secure lands. 	
Evaluate recreation user fees to manage use and increase recreation infrastructure funds	Recreation fees are not an appropriate tool for “managing use”. We are supportive of evaluating potential recreational fees to support infrastructure, staffing and recreational opportunities but fees should not be used as a deterrent to use of public lands.
<ul style="list-style-type: none"> • Identify and evaluate fee options. 	
Protect key wildlife corridors	
<ul style="list-style-type: none"> • Identify key corridors. 	
<ul style="list-style-type: none"> • Evaluate impacts of proposed actions on corridors. 	
<ul style="list-style-type: none"> • Evaluate avoidance, protection, and restoration measures. 	
Work with ski areas to place lands in the upper Cottonwood Canyons into protective public ownership	
<ul style="list-style-type: none"> • Finalize proposed agreement with ski areas, jurisdictions and stakeholders. 	Please see our comments in Appendix A regarding specific land transfer comments.
Implement an environmental restoration program	
<ul style="list-style-type: none"> • Identify priorities and develop program. 	
Develop a monitoring and adaptive management plan for environmental resources	
<ul style="list-style-type: none"> • Develop monitoring parameters, develop program and identify funding sources. 	
Improve the regional trail system	Preserve winter access and improve where possible due to newly acquired lands, or meet recreational goals.
<ul style="list-style-type: none"> • Identify specific trail needs, design system, and secure funding. 	
Conduct a detailed economic study	Return on investment must be compared with investment elsewhere in region, and should consider analysis of recreational and ecosystem costs and benefits of proposed actions as well.
<ul style="list-style-type: none"> • Identify and evaluate the economic benefits and impacts of the Blueprint. 	
<ul style="list-style-type: none"> • Identify new revenues to fund environmental, transportation, and recreation initiatives. 	

<p>Encourage development patterns that reduce automobile use and achieve desired community character</p>	
<ul style="list-style-type: none"> ● Evaluate existing and potential local land use policies, incentives, and regulations. 	
<ul style="list-style-type: none"> ● Advance transit connections and develop designs that support local and regional land use, environmental and economic goals. 	
<p>Evaluate transit Improvements in Little Cottonwood Canyon/Park City Area Corridor</p>	
<p>Finalize the range of alternatives and initiate an EIS. The purposes (intended outcomes) for this corridor, and the full range of transit alternatives being considered are described here. Alternatives currently proposed to advance for additional consideration and potential analysis in an EIS include:</p>	<p>Purpose and need statement for the EIS should be crafted so as to include an appropriate range of transportation improvements that would support sustainable growth in recreation use, support local economies and do minimal harm to the environment of the Central Wasatch, and the existing collective user experience. That necessarily includes improvements to bus service (separate from (dis)incentives) as well as a no action alternative.</p> <p>Viewed in this manner, there should be one if not several viable alternatives that do not consider connecting the canyons and Park City (aerially, or by bus or rail) but which may include roadway improvements.</p> <p>We support further study of a range of options, but cannot support any ‘corridor’ or connection at this time.</p>
<ul style="list-style-type: none"> ● Light rail transit (LRT) (or mountain rail) in exclusive guideway up Little Cottonwood Canyon to the Park City area, including tunnel connections between Alta, Big Cottonwood Canyon and Park City. 	
<ul style="list-style-type: none"> ● Bus rapid transit (BRT) in exclusive guideway up Little Cottonwood Canyon to the Park City area including tunnel connections between Alta, Big Cottonwood. 	
<ul style="list-style-type: none"> ● Same as above (LRT/BRT in exclusive guideway up Little Cottonwood Canyon to Big Cottonwood Canyon) but with aerial rather than rail or bus in tunnel connection 	

between Big Cottonwood Canyon and Park City.	
<ul style="list-style-type: none"> • Transportation system management alternatives, which are combinations of disincentives to auto use and incentives for transit use, without adding new transit guideways or roadway expansion. 	
Evaluate transit Improvements in Salt Lake Airport to the Park City Area via I-80 Corridor	Support.
<ul style="list-style-type: none"> • Conduct feasibility and design analysis on proposed Express bus service in mixed traffic on I-80 from the Salt Lake City airport to Park City. Evaluate potential transit access improvements at key interchanges, such as Kimball Junction. The purposes (intended outcomes) for this corridor, and the range of potential transit alternatives being considered are described here. 	
<ul style="list-style-type: none"> • Over the longer term (latter part of 25 year planning horizon or later) HOV (high occupancy vehicle) lanes and rail alternatives on I-80 to Park City could be appropriate and are recommended to be considered in future phases of analysis and implementation. 	
Evaluate transit Improvements in Summit County (Summit County Connectors)	Support.
<ul style="list-style-type: none"> • Conduct feasibility and design analysis on the following alternatives: <ul style="list-style-type: none"> ○ Bus rapid transit (BRT) in exclusive guideway on SR 224 and/or SR 248. 	
<ul style="list-style-type: none"> ○ Light rail transit (LRT) in exclusive guideway on both routes R 248. 	
<ul style="list-style-type: none"> • Conduct feasibility and design analysis on improved transit service (local bus) from Quinn’s Junction to Kimball Junction via I-80 and US 40. 	
Evaluate other transportation actions	Support.
<ul style="list-style-type: none"> • Define plan for proposed year-round bus service in Big Cottonwood Canyon. 	
<ul style="list-style-type: none"> • Further define proposed shuttle system in 	

<p>Mill Creek Canyon, identify funding, and secure necessary approvals.</p>	
<ul style="list-style-type: none"> ● Identify and evaluate regional parking and pricing strategies to incentivize transit use. 	
<ul style="list-style-type: none"> ● Identify and evaluate new safety and access improvement for bicyclists and pedestrians. 	
<ul style="list-style-type: none"> ● In future phases, consider potential new high capacity transit service on east valley corridors including Foothill Drive, Wasatch Boulevard and/or Highland Drive. 	

**Appendix C – Mountain Accord Subgroup Reports
April 14, 2015**

As documented by the following appointed WBA representatives:

Transportation – Todd Leeds
Environment – George Vargas
Recreation – Tom Diegel
Economic – Scott Reichard

The following comments are offered in the spirit of carrying forward a more complete picture of the input from WBA thus far into the project record. We understand that the draft Blueprint is not an outcome of the subgroup systems, but a document ultimately developed, interpreted and promoted by the Executive Committee. We remain committed to working with all stakeholders to find a viable path forward, and hope these detailed comments provide some context on our path and position to this point.

Transportation Subgroup Comments

Note this Appendix begins with the presentation of the proposed WBA Transportation Alternative for further analysis under NEPA. Little Cottonwood and Big Cottonwood canyons are abbreviated as LCC and BCC respectively.

WBA TRANSPORTATION ALTERNATIVE

SUMMARY

The WBA envisions a year-round economical transportation scenario based on an interconnected system of hubs using a flexible and dynamic fleet of energy efficient buses. The transportation system should serve all users groups equally on a year-round schedule. The transportation system should not place an undue tax burden on any single socioeconomic or demographic group. Future transportation should be designed to reduce the number of cars in the canyons and strive to improve air-quality. Bicycle safety should be an integral part of this system.

SPECIFIC ELEMENTS OF WBA’S PROPOSED TRANSPORTATION ALTERNATIVE

BUSES

WBA proposes that future mass transit be conducted using a fleet of energy efficient clean fuel buses. We have performed a feasibility analysis to compare bus and rail. WBA has determined that the option of using a rail based system is unnecessarily costly and does not permit sufficient flexibility, though further analysis is necessary for all viable transportation options in future NEPA phases.

Our reasoning for supporting buses is as follows:

Economics - Buses are less costly than trains and do not require construction of a new type of infrastructure. Buses can be purchased ready for use at a fraction of the cost.

Environmental Impacts - Trains would require the construction of rail lines in adversely steep canyons. Construction would likely have to occur in environmentally sensitive and possibly wilderness areas. National conservation groups would likely object to a reduction in wilderness areas. Train tracks also have the potential to form a hard barrier for dispersed users. This scenario manifested itself in Glacier National Park, BC, Canada. Backcountry ski routes have been modified to allow skiers to access certain areas. The original situation of skiers walking on tracks created a dangerous situation with several near-miss encounters between skiers and trains.

Scheduling - Buses can be purchased and put into service in one to two years. The planning (including NEPA) design and construction of train infrastructure could take up to 5 years. A bus system can be implemented and phased in starting the winter of 2015-2016.

Flexibility - Bus transit patterns and schedules can be adjusted to fit demand on an as-needed basis. Stops and routes can be added/reduced seasonally to service both resort and dispersed users. Trains would have to rely on a limited number of fixed stops.

CLEAN FUELS

WBA envisions that all public transportation will be conducted using the best available clean fuel technology. Fuel technology should be updated as required. Currently clean fuels are likely limited to use of natural gas over diesel. WBA's vision would support emerging technologies as they become feasible.

TRANSIT HUBS

Transit hubs should be established in logical locations including but not limited to:

- Proximal to the base of Little Cottonwood Canyon
- Proximal to the base of Big Cottonwood Canyon
- Proximal to the base of Millcreek Canyon (3900 South)
- Within the boundaries of each Wasatch Front and Back Ski Area (7 total)
- Downtown Salt Lake City
- Salt Lake City International Airport
- Mountain Dell
- Utah County
- Downtown Park City
- Heber City

Each transit hub should be connected by a well-scheduled system of buses as described above. Each hub should contain sufficient parking based on anticipated future growth. The hubs need to be located at easy to access areas close to the mouth of each canyon (where applicable).

These hubs may also include recreation and resort based amenities. One example may include a kiosk for the purchase of lifts tickets which include free transit to the resort.

The use of transit hubs will help reduce the need for additional growth-based parking at the ski resorts. WBA does not support increased parking at any of the resorts.

SUPPORT FOR DISPERSED RECREATIONAL USERS

The transportation system envisioned by WBA must provide support for year-round dispersed recreational users. This may include a system of "Flag Stops" as used in Alaska and elsewhere. This could be conducted with the use of small buses and vans on a semi-regular or demand based schedule. The possibility of calling ahead to arrange these types of stops should be evaluated. Large groups would be able to reserve and travel on customized schedules.

RIDE SHARE ZONES

WBA proposes a network of Ride Share Zones. These zones could be located in parking areas and the mouth of the canyons. The Ride Share Zones could act in a similar manner to the informal ride share system that has been successful in cities such as Washington DC, San

Francisco and Houston. Ride Share Zones would replace the hitch-hiking that is common in all canyons of the Wasatch Front.

SCHEDULING

All major transit routes should operate at a frequency that would not require riders to interpret complex schedules. Riders should be able to assume that transportation is available at all times of operation at a reasonable frequency. This is a common occurrence in Europe. One example of this situation would be a reduction of gaps in current ski bus schedules during the midday period which make it difficult for half-day skiers to access public transportation.

BICYCLES

WBA envisions a safe environment for bicycles in the Mountain Accord Study area. Each canyon should contain independent bike lanes and/or paths that meet American Association of State Highway and Transportation (AASHTO) and Federal Highway Administration Standards at a minimum. In addition a regularly scheduled system of canyon car closures during the summer months should be evaluated until bike lane/path infrastructure could be completed. These paths and closures also have the potential to benefit disabled users who require a paved surface to enjoy the canyons.

REDUCTION OF CARS IN THE CANYONS

Any transportation plan must include incentives for public transport. This should include providing affordable or free transportation. It is in the best interest of the ski resorts to help fund this program. This will provide for an increase in use during periods where resort use is constrained by on-site parking. Incentives for use of mass-transit would include destination specific express buses (e.g. Brighton or Alta specific routes bypassing lower resorts). This will reduce the transit time and hence provide a more positive experience.

The implementation of a program to reduce car traffic may need to include disincentives for car use. This may include charging a fee (e.g. toll) for automobile traffic. The fee may be structured based on the number of passengers if technology allows. This can be conducted digitally using an EZ Pass type of system. Waivers for low-income populations will need to be evaluated. This program may be initially applied during high-use periods only.

GUARDSMAN PASS ROAD

The WBA does not support year-round use of the Guardsman Pass Road for the following reasons:

- The road is not currently designed or suitable for year-round traffic.
- UDOT's middle cost estimate to design, permit, purchase right-of-ways and construct a road suitable for year-round traffic is over 100 million dollars (UDOT, 2014). This cost coupled with annual maintenance, snow removal and avalanche control does not provide a suitable return for taxpayer investment.
- A member of the WBA was involved in the construction of the runaway truck ramp in Ontario Canyon. It is our understanding that the road into Park City was not designed to accommodate the additional traffic load that would occur if the road was used for year-round traffic between Big Cottonwood Canyon and Park City.
- Parking issues both within avalanche zones and the summit area have not been evaluated. The impacts of dispersed parking need to be fully evaluated.
- Based on data provided by UDOT (2014), time savings by use of the Guardsman Pass Road are only realized for locations within Big Cottonwood and Empire canyons.

MILLCREEK CANYON

Millcreek Canyon needs to be included in all transportation planning. Millcreek Canyon would serve as an ideal location for fast-track implementation of transportation enhancement for the Mountain Accord. Any improvements in Millcreek must accommodate bicycles.

ADDITIONAL INFRASTRUCTURE IMPROVEMENTS

WBA understands that significant improvements will be required to implement an efficient bus-based public transit system. The following infrastructure improvements should be evaluated:

- Increased road width and/or travel lanes in Parleys, Big Cottonwood and Little Cottonwood canyons. This could include reversible traffic lanes designed to accommodate peak traffic periods. One option may include limiting canyon roads to one-way traffic during peak loading periods (e.g. weekend mornings from 8.30 am to 9.30 am).
- A train up Parleys Canyon, connecting to the Wasatch back and Provo should be evaluated.
- Increased parking at the base of each canyon.
- Millcreek Canyon road improvements.
- Additional parking areas as described above with transit hubs. Additional parking areas will need to be evaluated in conjunction with future transportation planning.

- Both passive and active avalanche mitigation. This may range from use of remote controlled equipment such as Gazex to snow sheds and bridges. Where possible, WBA prefers the use of bridges as opposed to snow sheds. The goal of future avalanche mitigation should be to provide an increase in efficiency and safety for all transportation systems. This includes a reduction in the Avalanche Hazard Index.

The costs and benefits of each improvement must be fully evaluated prior to design and construction.

SUMMARY

The WBA is confident that effective transportation systems capable of addressing the needs of all recreational users of the Central Wasatch are possible with careful planning. We feel that well-planned, thoughtful increases in bus use and the associated infrastructure are far superior to train construction and should be envisioned as a flexible, efficient, year-round system. We look forward to seeing a thorough analysis of transportation options – including elements presented herein – during Phase 2 of Mountain Accord.

WBA Transportation Comments:

Lack of Data in the Transportation Planning Process (e.g. Data Gaps)

The Mountain Accord has not been a data driven process. Without a sufficient and rigorous data set, the selection of an idealized scenario is speculative, arbitrary and not based on true needs. Therefore, the idealized scenario is based on wants and not necessarily needs. One example of this is in the Transportation Systems group. The 1st few meetings were based on determining nodes for a computer model. The model would have allowed the group to make informed, data-driven decisions. Without data, the group was asked to determine an idealized scenario not based on any realistic scenario. This is the equivalent of being asked to design a sports stadium and not being told how many fans will be attending or what types of sports will be played. One other example includes being asked to design a stormwater retention basin and not being told how much rain to expect.

It is the opinion of WBA that this scenario will lead to a Purpose and Want statement instead of Purpose and Need as required by NEPA.

Lack of True Stakeholder Participation

Based on our experience in the Transportation System group, it appears that the selection of idealized scenarios was based more on the wants of the consultant team as opposed to the

needs and results of group discussion. One example of this is the final vote to move forward on both Concepts A and D without an opportunity to vote on the merits of each alignment.

Canyon Connectivity

It would be a mistake to connect Park City, Big and Little Cottonwood canyons with a train, road, tunnel, or aerial device. Each canyon has its own character and a connection between canyons makes the Wasatch a smaller place. The carrying capacity of the canyons may not be able to support the influx of additional visitors. The Mountain Accord has not provided sufficient data to justify the need for these connections.

Solitude Train

Cottonwood Canyons Task Force (CCTF) has described the want for a train stop at Solitude. This was not discussed or mentioned during the stakeholder process. Moving forward with this concept negates the collaborative efforts of stakeholders on all four system groups. Based on WBA conversations with Deer Valley, it appears that a train was added to Solitude without being requested. This is further evidence of a bias towards a train and leads WBA to conclude that the train has been added by the Executive Committee as a "want".

Little Cottonwood Canyon Train

A train in Little Cottonwood Canyon has several inherent problems:

- Environmental Impacts will be significant, especially if an alignment separate from the road is used.
- Viewshed impacts, the train will have to be essentially enclosed or bridged to prevent infrastructure damage from avalanches and large weather events.
- Costs, the cost of the train could be used to more efficiently offset air quality pollution in the Salt Lake Valley. This is due to the larger percent of the population that would use the system as compared to the small overall portion of the population that accesses LCC.
- Service for dispersed users. The train has a bias for resort users. WBA would prefer a system that works for dispersed users. The train may limit access to areas currently used by dispersed users. The train may form a hard boundary for dispersed users and wildlife. The train will have to travel through Snowbird, and coupled with stops for dispersed users, will delay skiers to Alta and make it a less attractive transportation option.

- Up to 12 stops may be required for dispersed users.
- Tourists coming from the airport may require multiple modal changes.
- The train will not eliminate use of the road.
- Once the train is constructed, it will be difficult to limit future development at train stop nodes. Contrary to the notion that a fixed guide way could limit development, the train could also act as a conduit for future development outside the scope of the Mountain Accord.
- Out-of -town visitors will require multiple transfers or modes of travel to access the resorts from the airport or downtown. This will act as a deterrent for use.
- An express bus system will serve multiple destinations efficiently. For example a visitor arriving at the airport could simply board a bus for their destination of choice.
- Based on the 2,400 person per hour capacity provided by Newel Jensen, UTA consultant on March 16, 2015, it appears that a train does not have sufficient capacity to move skiers up LCC in a timely manner.

A bus system, operated efficiently can provide a higher level of services to a wider range of the population with a wider variety of ridership origin choices.

A comparative Analysis for Trains and Buses in LCC is provided below:

Little Cottonwood Canyon Transportation Comparative Analysis

Assumptions:

1. Bus option includes one additional reversible lane dedicated for buses.
2. Train options include either single rail with passing sidings; or twin tracks.
3. Two potential train alignments; adjacent to road and separate. Both alignments are similar below Lisa Falls.

Note: This is a qualitative comparison with significantly more information than was provided during the stakeholder process. The Mountain Accord has not provided sufficient information for a data-based analysis. The Mountain Accord has not provided sufficient data to justify that a train is needed in LCC.

Element	Train	Bus	Advantage
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Element	Train	Bus	Advantage
Airport Visitors	Two to three modal changes will be required. Example: Train from the airport with transfer to a 2nd train in Sandy. Shuttle from resort train station to lodging (e.g. one stop at Snowbird). Modal changes will be difficult for people with multiple pieces of luggage.	Direct bus/van service from airport to resorts is possible. Bus service may stop at central resort location requiring a shuttle to lodging. No luggage handling between airport and resort.	Bus
Elimination of Road	Road will remain open.	Road will remain open.	Even
Reduction of Cars in the Canyon	Insufficient details at this time. Will depend on disincentives and accommodation of dispersed users.	Insufficient details at this time. Will depend on disincentives and accommodation of dispersed users.	Even (currently)
Dispersed Users	UTA is evaluating the potential for "flag" or "whistle" stops. These stops would require a train to stop from 25 mph on the uphill to 40 mph on the downhill (speeds provided by UTA) on short notice. Is this actually possible and safe? "Random" stops would cause disruptions in schedules which may be critical for a one-rail/passing siding system. This could delay and impact the user experience of those trying to reach the resorts.	Dispersed users would be served by a system of smaller buses/vans with better merging capabilities. Buses stopping in traffic and dedicated bus lanes could still be problematic. Pullouts may need to be constructed. UTA cites safety issues for not currently providing this service as they have in the past.	Bus

Element	Train	Bus	Advantage
Canyon Closure Mornings (can also occur with train systems)	Service to resorts will be limited by the number of available trains and 2,400 people per hour capacity. All loading must be done at a centralized hub or along a single alignment. Groups exceeding the capacity of each train will have to wait until the next train is available.	Service to resorts will be limited by the number of available buses. However bus availability may be more flexible than trains (e.g. addition of and redirection of buses from other areas). Buses can be routed from multiple locations; this can prevent overcrowding of individual parking lots.	Bus
Peak Traffic Flow	Due to specialized nature of cog assisted trains, adding additional units at times of peak demand may not be feasible. System would have to be built to accommodate peak traffic flow periods.	System and number of buses would have to be built to accommodate peak traffic flow periods.	Bus
Express Transportation to Resorts	Alta/Brighton skiers will be delayed by service to lower resorts and dispersed users.	Express buses for each resort are possible.	Bus
Parking Impacts	To reduce the number of modal changes, large parking facilities will be required at the start area or along the alignment of the LCC train. Capacity for 1,000's of cars will be required in one location or in a limited area served by the train. Dispersed parking along the train alignment means more stops and longer travel time, this equates to a decreased quality of user experience.	Bus service could be staggered from a series of smaller parking facilities. This can reduce congestion near the mouth of the canyons as well as Sandy and Cottonwood Heights. Dynamic routing of buses will allow for parking lots not limited to one alignment.	Bus

Element	Train	Bus	Advantage
Air Quality Impacts	Electric based trains will shift air quality impacts to point of generation and downwind. High costs may reduce funding availability for other projects in the Salt Lake Valley that would provide a greater overall reduction of single occupancy vehicles and hence, their inherent pollution.	Air quality impacts will remain local. Costs savings realized during construction could be applied to other projects in the Salt Lake Valley that benefit commuters and a greater segment of the population and therefore will have a greater contribution to the improvement of air quality.	Depends on bus fuel and source of electricity for trains. If cost benefits are weighted, buses due to use of funds in Salt Lake Valley.
Construction Cost (overall)	Higher (1.0 to 1.5 billion dollars).	Lower (160 to 500 million dollars) High value assumes a re-route of the road to avoid major avalanche paths.	Bus
Cost benefit to Taxpayers	Low - Cost of construction and operation/maintenance will have to be heavily subsidized by taxpayers. High cost to serve small segment of population (4-5 percent of State population that skis/snowboards and uses the canyon on a regular basis and contributes to traffic congestion during periods of high traffic load.	Moderate - Cost and subsidy cost savings can be applied to projects in the Salt Lake Valley that will serve the full population.	Bus
Vehicle Longevity	Longer 30 years (per train car)	Shorter 10-15 years (per bus)	Train

Element	Train	Bus	Advantage
<p>Reliability in Poor Weather. This is the primary factor that the resorts have been asking for in Mountain Accord meetings.</p>	<p>The train system would have to be enclosed or bridged in avalanche paths to protect the cantilevered wires. The road side train alignment may be susceptible to some traffic disruptions depending on barrier types.</p>	<p>Roads typically require snow sheds or bridges on a less frequent basis than trains. Roads are more susceptible to traffic disruptions. Note: Designing the road side train alignment will improve the reliability of the road and may encourage use. Similar levels of protection from avalanches can also be constructed on the road without trains.</p>	<p>Train (Note: Road can be designed to be even.).</p>
<p>Environmental Impacts (shared alignment)</p>	<p>One additional lane and passing sidings will be required. Stations at high use locations will be required (e.g. Gate Buttress, White Pine Trailhead and storage vaults)</p>	<p>One additional lane and pullouts will be required. Stations at high use locations will be required (e.g. Gate Buttress, White Pine Trailhead and storage vaults).</p>	<p>Even, unless a second rail lane is added to the road alignment. If so Bus.</p>
<p>Environmental Impacts (separate Train Alignment)</p>	<p>A separate alignment and its inherent impacts will be constructed.</p>	<p>Road stays as-is with exception of bike lane and snow sheds/bridges.</p>	<p>Bus</p>

Element	Train	Bus	Advantage
Ease of Use (Convenience)	Will entail a significant change of mindset. Many day skiers find that their cars make convenient lockers for them and their families. Based on conversations with parents of children in Alta and Snowbird ski programs, many parents drive their kids to the resorts and pick them up at the end of the day (two trips per day). It is not known if they will use public transit instead. Unlike current ski buses, a new transit system would have to run at frequencies that allow maximum flexibility. Train stations are fixed.	Will entail a significant change of mindset. Many day skiers find that their cars make convenient lockers for them and their families. Based on conversations with parents of children in Alta and Snowbird ski programs, many parents drive their kids to the resorts and pick them up at the end of the day (two trips per day). It is not known if they will use public transit instead. Unlike current ski buses, a new transit system would have to run at frequencies that allow maximum flexibility. Buses can depart from multiple locations this may reduce a modal change.	Bus, due to the fact that there are more options for bus station locations.
Limiting Canyon Development outside the scope of the Mountain Accord.	Is the Executive Committee able to demonstrate that the Train will not become a Trojan Horse for justification for further future canyon development not accounted for by the Mountain Accord process?	Is the Executive Committee able to demonstrate increased bus service will not become a Trojan Horse for justification for further future canyon development not accounted for by the Mountain Accord process?	Bus due to lower capital expenditures.
Construction Impacts	Construction impacts on a shared alignment will entail road delays for both active and passive transportation modes.	Construction of an additional bus lane will impact both active and passive transportation modes. Construction of a bus lane will require less time.	Bus.

In summary, the table presented above demonstrates the advantages of a flexible and dynamic bus system.

Tunnels

WBA tunnel comments are prepared by a Utah Registered Professional Geologist with underground mining experience. Experience includes preparation of underground mining, surface discharge permitting and mine water management plans.

In this professional opinion, tunnels between the canyons have the following inherent problems;

- Hydrology, not enough is known. A detailed study should have been conducted prior to introducing the idea of tunnels. This would have confirmed the presence of or lack of fatal flaws. If tunnels are selected as an alternative and a fatal flaw is discovered at a later date, we are back to the drawing board, delaying the process.
- Mining in the Central Wasatch typically occurred using drain tunnels. Many of these drain tunnels still flow today. The effluent of these tunnels is responsible for metals loading throughout the Central Wasatch. There is insufficient data to determine if new tunnels will act in a similar manner during both construction and long-term operation. It is not known how additional draining may affect surface water and wetland features.
- Water rights, the tunnels which will cross surface and groundwater divides and may disrupt subsurface flow regimes. This may impact water rights and is another reason why a fatal flaw study should have been conducted prior to introducing the tunnel concept.
- Construction and operational dewatering. Treatment plants may have to be built.
- Water quality of drain tunnels. All of the drain tunnels in the Central Wasatch have water quality issues (e.g. Spiro, Judge, LCC tunnels).
- A tunnel between BCC and PC will have to cross a significant geologic contact between igneous and sedimentary rocks. Not enough is known about the hydrology of this contact.
- Bodies of mineralized rock may be encountered during tunnel boring. The heavy metals content of this material may cause the material to be classified as hazardous waste. This material will have to be handled and disposed of accordingly. This may increase the required transportation distance and disposal costs.
- Faults, It is not known how faults will impact the tunnels. The fractured zones in the vicinity of faults typically act as a high permeability flow conduits. These zones may have significant impacts if the fault plane is acting and a groundwater boundary or divide.

- The tunnels may provide a large influx of visitors which may exceed the carrying capacity of the canyons.
- The excavation of each tunnel (LCC to BCC and BCC to PC) may require the removal of approximately 40,000 truckloads of rock for each tunnel (see table below). This is based on 10 ton loads to increase the safety factor of hauling rock down a steep canyon. The current canyon infrastructure may be overwhelmed by this amount of trucking as a temporary construction impact. The traffic flow at the base of the canyons and in Park City may not be able to handle this amount of truck traffic. This construction impact must be fully assessed to determine the period of disruption to canyons users and businesses.

A table presenting anticipated rock volumes from tunnel is presented below:

Alta to Brighton Tunnel Waste Rock Calculations

	Diameter (ft)	Area (ft ²)	Tunnel Length (ft)	Volume (ft ³)	In-Situ Volume (yd ³)	Swell Factor	Actual (yd ³)	lb/yd ³ (Typical of Broken Granite)	Ton/yd	Total Tonnage	Contingency	Total Yd ³ with Contingency	Total Tons with Contingency	Total Truck Loads (Round-Trip, 10 tons per Load)
Base Calculations Bored Tunnel	24	452.16	1	452	17	25%	21	2,700	1.35	28	15%	24	32	3.2
Alta to Brighton	24	452.16	12,500	5,652,000	209,333	25%	261,667	2,700	1.35	353,250	15%	300,917	406,238	40,624
	Height (ft)	Width (ft)	Tunnel Length (ft)	Volume (ft ³)	In-Situ Volume (yd ³)	Swell Factor	Actual (yd ³)	lb/yd ³ (Typical of Broken Granite)	Ton/yd	Total Tonnage	Contingency	Total Yd ³ with Contingency	Total Tons with Contingency	Total Truck Loads (Round-Trip, 10 tons per Load)
Base Calculations Drill and Blast	18	24	1	432	16	25%	20	2,700	1.35	27	15%	23	31	3.1
Alta to Brighton	18	24	12,500	5,400,000	200,000	25%	250,000	2,700	1.35	337,500	15%	287,500	388,125	38,813

Assumes single trucks loaded "light" for safety driving down the canyon.

Standard estimation contingency of 15% was used.

Area information supplied by UTA in 12/24/2014 meeting with Newell Jensen.

Discounts for Using Mass-Transit

We support incentives or a fee structure designed to reward those who use public transportation or travel with 3 or more in a vehicle. Improving mass transit and discouraging auto use would help S.L County comply with EPA air quality standards.

Transportation Subgroup Meeting Concerns

This section identifies elements and concerns promulgated by the WBA during Transportation System Subgroup meetings. The intent of this Section is to ensure that the following concerns are included in the Pre-NEPA or Early-NEPA Scoping Record.

Lack of data to Determine Needs

The WBA agrees with Roger Armstrong, the Summit County Council Representative on the Transportation system that the Transportation System Subgroup was overwhelmed with process instead of data. The lack of data construes want and not needs.

Train Service in Parleys and the Wasatch Back

Train service in Parleys canyon connecting Summit County the Wasatch Back and Provo. This option would serve a wider segment of the population including commuters than the concept of connecting the Cottonwood Canyons. This option would go further to improve air quality, via wider ridership, then a train in Little Cottonwood

Final Idealized Scenario Vote

The final idealized scenario vote was setup in a manner that did not send an accurate representation of the many months of discussion and ideas to the Executive Committee. The catch-all combination of scenarios A and D did not permit an accurate reflection on how members felt about each scenario, specifically trains versus buses. An official vote on moving each of the four individual scenarios was not permitted. A show of hand vote, forced by WBA, for each individual element resulted in the following results:

Concept A	31
Concept B	19

Concept C	20
Concept D	25

This vote indicates that the highest support is for moving the bus-based concept A forward. This indicates that the System Group members showed a higher level of support for a bus-based transportation system.

Based on our experience in the Transportation System group, it appears that the selection of idealized scenarios were based more on the wants of the consultant team and UTA as opposed to data based needs and to the results of group discussion. One example of this is the final vote, as described above, to move forward on both Concepts A and D without an opportunity to vote on the merits of each alignment.

Allowing only the combined scenario of A and D to move forward may allow the Executive Committee to manipulate the final idealized scenario in a manner inconsistent with the finding of the Transportation Subgroup.

Dispersed Users

The consultant team did not provide sufficient data to allow the System group to determine the level of accommodation for dispersed users. WBA is not able to make an informed decision based on existing data provided by the Mountain Accord. All we have heard is that it will be addressed at a later date. Based on our diverse users' experience, WBA estimates that the following number of stops will be required in each canyon as follows:

- Little Cottonwood Canyon - 12 Stops between the LCC Park and Ride and White Pine Trailhead.
- Big Cottonwood Canyon - 16 stops between the BCC Park and Ride and Brighton.

At this time the level of comfort for the accommodation of is very low. In order for WBA to support any transportation scenario, we will need to see a hard and fast plan for accommodating our constituents.

Lack of a Fatal Flaw Analysis

The Mountain Accord should have performed a fatal flaw analysis prior to the process. Any fatal flaws discovered during Phase II and NEPA may require a lengthy redesign and delay of the

process. It will be difficult to reconvene the system groups to collaboratively determine a work-around to any fatal flaws.

Blueprint Comments -Transportation

This Section presents specific comments on the Blueprint dated February 4, 2015

Lack of Specifics

The lack of specifics in the blueprint is more indicative of a sketch or cartoon. Blueprints typically contain enough details and specifications to build a project.

Incomplete Data

The word data is not mentioned once in the blueprint. The Mountain Accord has stated its intention to follow NEPA on many occasions. With this intent the blueprint does not contain a statement as per 40 CFR 1502.22 that the blueprint was prepared using incomplete or unavailable data.

Lack of transportation to the Wasatch Back

The blueprint does not present transportation routes to the Wasatch Back including the Jordanelle and Heber areas which contain economic centers. The Blueprint States in bold *"Expand transit connections between The Salt lake Valley and the Wasatch Back"*. The WBA does not understand how this omission is consistent with the goals of the Mountain Accord. This is a significant omission.

Aerial Connections between BCC and Park City

The blueprint presents the option of an Aerial Connection between Big Cottonwood Canyon and Park City. This option was ruled out by the Transportation Subgroup. In addition, the Mountain Accord Transportation Corridor Purposes and Alternatives, presented as part of the current survey states in the Section titled: *Alternatives Proposed to Drop from Further Consideration* heading H includes *Add aerial transportation (gondola or tram) from Sandy to the Park City area via Little or Big Cottonwood Canyons*. This indicates an inconsistency between the Blueprint and supporting documentation.

I-80

The WBA recommends that rail should be switched from Little Cottonwood Canyon to Parley's Canyon. This will allow the rail to serve a larger segment of the population. This will provide a better chance for improvement of air quality issues along the Wasatch Front.

Draper Transit Connection

The Blueprint does not specify direct connectivity between Draper and the East bench/Wasatch Canyons and East Bench. This will cause a decrease in the efficiency of transit elements, increase modal changes and generally discourage use. Light rail along the East Bench must connect to Draper. This is similar to when UTA eliminated many East Bench bus routes in the early days of Trax (Example. forcing skiers to take a west-bound bus to Trax and an east bound bus back to the Canyons). This forced many transit customers to use additional model changes and increased travel time, discouraging use. It appears that the consultant team did not learn from UTA's previous mistakes. This is unacceptable.

East Bench Light Rail

The Blueprint does not present East bench Light rail as an option. As stated above, light rail should start in Draper and run along the East Bench to the University of Utah. If improvements to air quality are considered as a ROI for limited funding, this would have far greater benefits than rail in the Canyons. This is due to the potential ridership use of the general population including commuters as opposed to canyon users.

Little Cottonwood Canyon Bias

The Blueprint, along with the whole Mountain Accord process, appears biased towards Little Cottonwood Canyon. The Blueprint and supporting documents negate the fact that Big Cottonwood Canyon receives more traffic during the summer months. This is actually one of the few actual data points presented to the Transportation Subgroup. However, the Blueprint only presents local bus service as an option. The fact that the BCC ski resorts do not get express bus services confirms this bias. Express buses to the BCC ski resorts must be included in any transportation plan.

Little Cottonwood to Park City Transit Analysis as Separate Elements

Transit connections in LCC and those connecting from the top of the canyon through Brighton to Park City need to be evaluated as single elements. This will open up the possibility for

improving service in LCC without an Interconnect connection to BCC. The WBA does not support interconnect in any manner. Each element contribution to cumulative impacts needs to be analyzed independently.

Sustainable Transit Choices

The Blueprint states "*...connect residents and visitors to mountain destinations and connect communities and people to jobs via efficient and sustainable transit choices*". Sustainable and efficiency are broad terms. The Blueprint does not describe the modes of efficiency/sustainability such as environmental or economic. The mention of jobs in the above quote raises the question of the choice of rail lines; rail lines in Parleys Canyon have the potential to connect far more people to jobs than a rail line in LCC.

Shaping Growth

The concept of using transit to "shape growth" can work in two ways: by limiting growth, or promoting it. This needs to be added to the blueprint.

Elements Discussed in Meetings and Omitted as Options in the Blueprint

The following elements were discussed as viable options during Transportation System Subgroup meetings and should have been acknowledged in the Blue Print:

1. No train in Parley's canyon. WBA understands that a need has not been demonstrated. In this respect how has a need been demonstrated for a train in LCC? Once again it appears that the LCC train is a "want" and not a true data-driven need.
2. Discussion of aerial transit from Brighton to Park City offloading options.
3. No express bus in LCC or BCC.
4. No optimized bus service in LCC.
5. No transit connection to the Wasatch Back (e.g. Heber and Jordanelle).
6. Discussion of the potential to connect SLC to Provo via a Parleys Canyon train.

Environment System Subgroup Comments

The Environment System was well represented by a spectrum of environmental organizations, agencies, communities and business interests. WBA generally supports the proposed actions and goals of the Environment system group.

However, the proposed Blueprint does not reflect many of the Environment Group positions. For example, connecting LCC, BCC and Park City via tunnels did not reach majority consensus and support. Installing aerial gondolas to establish a similar connection was not supported.

Adding ski lifts to connect ski areas and expand current resort boundaries was NOT felt to be consistent with the group's goals and actions, according to polling in October 2014.

Polling showed some support for adding base area development at *Alta and Brighton* (Solitude and Snowbird never mentioned in poll) within the existing disturbed area and *within existing water restrictions*. But, the Blueprint concedes *doubling* water for snowmaking, plus additional water for commercial development. This is inconsistent with the system group's position on water allocation and development sites.

Year round public transit was felt to be consistent with the Environment system goals. Preservation of lands to avoid loss of critical conservation values, restore degraded lands, protect and improve watershed health – are all system group positions WBA supports and applauds.

The environment of our mountains and canyons are the reason and basis for this entire discussion and proposed planning process. The Blueprint, as proposed, has some acknowledged environmental benefits (increased protected public lands). But there are concessions, as noted above, from the Environment Group positions that are inconsistent with many of the proposals in the Blueprint.

Overall, the Blueprint appears excessively development heavy in comparison to the environmental gains for the public and the membership of WBA. We look forward to seeing a final Blueprint that is better aligned with this subgroup's goals, which closely mirror that of our membership and the general public. Simply put, people want the Wasatch preserved.

Recreation System Group Comments

Overview of What Transpired

The Recreation System group of the Mountain Accord spent much of the first half of the year identifying uses and use intensity. Much time was dedicated – by both the WBA and Mountain Accord consultants – to developing maps identifying terrain/areas that were appropriate for various activities and differing use intensities. This was done as a precursor to the development of an “idealized system” that would be used in conjunction with the other System Groups’ idealized systems in developing a proposal.

There were three general recreational models referenced that were described as possible analogies to the Wasatch: Alaska, Zion, and Switzerland:

- Alaska – pristine environment, intrepid adventurers, and relatively primitive access and facilities.
- Zion – easy access to/through main artery, plenty of facilities close-in, lots of primitive adventure past the easy-access
- Switzerland – while high and wild country, access and amenities are everywhere; nothing primitive

These were referenced a lot early on in the process, but seemed to fall out of the vernacular.

High Use Nodes

There were also a lot of references to “High Use Nodes”: those areas that currently have - or in the future could have high intensity uses. Some are obvious (ski resorts, Cardiff Fork) but others are less obvious yet are natural magnets for high use and are getting overwhelmed. Theoretically, consistency of development of facilities of the high use nodes would have the effect of concentrating low-level recreationists while maintaining abilities for low-volume dispersed use. However, this concept was somewhat controversial, since *facilitating* increased use can be perceived as *encouraging* increased use.

Regardless, the concept of addressing high, medium, and low use nodes seemed to fade away somewhat and was not thoroughly addressed by the Executive Committee in the Blueprint in terms of what would be done to address these High Use Nodes.

The Blueprint did not sufficiently address High Use Nodes – this should be fixed.

Lack of Future Growth Scenarios

The WBA members who were on the Recreation System Group felt that there was too much time establishing baseline info and not enough time addressing the far-bigger question of what to do in the future?

The consultant team did not present sufficient data to determine a need for future options. Significant growth in backcountry winter recreation, in particular, is not sufficiently addressed.

One Wasatch

As noted above, we wanted to address the future of recreation in the Wasatch, particularly in light of the fact that Ski Utah boldly introduced their “One Wasatch” 7 ski resort connection concept essentially at the same time the Mountain Accord process was initiated. In its execution One Wasatch would fundamentally alter the recreation, economics, environment, and transportation in the Cottonwood Canyons and the Wasatch Back. The WBA feels that the Recreation System Group avoided addressing the One Wasatch concept through much of the process. The WBA kept wondering if/when the Rec Group would ever get to address the critical affects and inevitable conflicts of the One Wasatch proposal. WBA attended meetings where we felt that the power of the resorts and the audacity of the plan meant that One Wasatch was an inevitability. WBA is concerned that some stakeholders are assuming this inevitability and were going to act around that, despite marginal support for a connected resort “system” from the public. Ski Utah and the Consultant team did not present sufficient data to determine the need for One Wasatch, and this planning process is incomplete without addressing the future of One Wasatch head on. We hope that CCTF negotiations can address that in part before the final Blueprint is released.

Wasatch National Monument

Midway through the process Save Our Canyons resurrected the Matheson Wilderness bill in a new format: the Wasatch National Monument. Despite the fact that not only was SOC an equal member on Mountain Accord but its director was on the Executive Board (along with Ski Utah’s ED) this concept was inexplicably not given any similar recognition as One Wasatch was accorded. This demonstrates bias towards development. National Monument, as well as National Recreation Area and other federal protections deserve heightened attention as the MA process moves forward.

Wasatch PowderBird Guides (WPG)

Despite the facts that WPG has been an integral part of the central Wasatch for nearly 40 years and creates some of the highest-impacts recreational users, their operations were virtually left out of the Recreation discussions. The impacts of WPG's continued impacts of the growing numbers of dispersed recreations needs to be addressed as part of the Mountain Accord, even though actual permitting may be outside the scope of this plan.

Trails

There was general consensus that the massive popularity of trails in conveniently accessed mountain areas has not been adequately addressed in the upper Cottonwoods. Creating a trail network within and between the Cottonwoods to enhance users' experiences and further disperse trail users was an easy recommendation. However, trail development in equally-popular Mill Creek and more-popular Bonneville Shoreline trail was not addressed.

WBA supports an increase in trails and connectivity that addresses all areas and users equally.

Transportation - Insufficient Discussion

Endemic to recreation is transportation: it is literally impossible to recreate in the mountains without transportation up the canyons. However, because we were the Recreation System Group we were perpetually discouraged when we brought up transit as it related to recreation. Because recreation quality is an inherent function of the participants' ability to appreciate the natural environment, the concept of "Environment" was brought up a lot, again with the admonition that addressing environmental concerns were to be addressed by that System Group. Transportation was finally acknowledged as integral to recreation at the end of the Recreation System Group Meetings. This is documented in participant's records, but may not have been adequately captured by the consultant team in the project record.

Transportation - Bus Service for Dispersed Recreation

As noted above – the recreation Subgroup was discouraged from talking about transportation. However, the consensus from the dispersed recreation representatives on the System Group made it clear that an enhanced/optimized bus system for both canyons was the preferred way to address the agreed-upon traffic and parking issues prevalent in the Tri-Canyon area. Buses are able to address the fickle timeliness of dispersed recreational users and their desires for relatively unusual stops at both winter and summer trailheads (some are shared).

Transportation - Bus Service for Dispersed Recreation

Despite general opposition to the proposed train up LCC and the associated negative effect on dispersed users, we had many indications that a train was a pre-determined outcome and was not to be "derailed". This is documented in participant's records, but may not have been adequately captured by the consultant team in the project record.

Idealized System - Lack of Recreation Details in the Blueprint

The Recreation Subgroup spent months talking about the details of the recreational uses of the Wasatch, yet ultimately the Idealized System was quite broad, addressing elements such as the need for possible wilderness protection or other management tools for both the broader area

and key recreation areas, and create recreation oriented transit, with the only details being modification of wilderness boundaries to accommodate the Bonneville Shoreline Trail, development of an upper Cottonwood trail system, and establishment of a an outdoor educational fund. The effects of One Wasatch remain. This is documented in participant's records, but may not have been adequately captured by the consultant team in the project record.

Lack of Coordination with Cottonwood Canyons Task Force (CCTF)

Towards the end of the process the recreation Subgroup was notified that a higher-level task force (CCTF) was commissioned that actually discussed the details that the WBA and other stakeholders anticipated we would be discussing and deciding on throughout the year.

The Recreation Subgroup should have been presented with a chance to discuss the items discussed by CCTF prior to its release for general review. Although that earlier decision is regrettable, WBA appreciates the opportunity to discuss the CCTF recommendations now.

Polling Concerns

The final meeting of the Recreation System Group was focused on a poll that consisted of questions so vague and leading that most of the discussion centered on clarification of what the questions meant and how participants were supposed to answer to reflect their actual sentiments. This seriously compromised a meaningful group consensus and any meaningful outcome.

Lack of New Ideas and Out of the Box Creative Thinking

Most of what was determined in the Idealized System had been identified in the 2009 Wasatch Canyons Tomorrow project. Despite concurrence of the idealized system with past planning efforts some ideas still were not carried forward into the Blueprint.

Summary

However, the WBA recognizes the need and opportunity that this process represents, and despite some disappointment in the process and some of the current outcomes, we are committed to creating a true Mountain Accord.

Economic System Group Process Review

Agenda and Process Overview

The Economic Group of the Mountain Accord started off with quality overviews and direction. Meeting #1 started with introductions of Jeff Edwards and Natalie Gochmour and then the rest of the group. Each attendee was asked to offer their brief view on concerning the most significant challenge and opportunity for managing growth in the Central Wasatch Mountains. Most comments revolved around how to preserve the unique mountains we have while optimizing economic growth and diversity.

Bias Towards Development

It was apparent from the start that the majority of the group were pro-development (e.g. folks that are incentivized by growth in some form or fashion). The group included government business chamber and bureau people, economic development, planners, mayors, business development, real-estate, UTA, office of tourism, hotel associations, ski association, development consultants and all 7 ski resort managers. It was difficult for the limited number of those interested in the intrinsic and economic value of preservation to overcome this bias.

Balancing Growth

The significant majority had a major concern of how we balance growth in the Central Wasatch Mountains with preserving the mountains that drew us, and our vibrant economic community, here in the first place. One of the difficulties was that all system group members had a different view of what preservation meant.

Defining Goals and Metrics

Several meetings were spent on defining what is our economy, how has it evolved and where will it go from here. Population, tourism, strong economy, employment, productivity, transit and development were all economic opportunities identified, while protecting the mountains and water were seen as the major challenges and a priority. Insufficient time and resources were spent on the valuation of open space and watershed preservation. The WBA feels that the economic subgroup did not place sufficient priority on the value of open space and watershed preservation.

Out of this process the key findings were that many economic related measures were going to be used to quantify where we are now and where we want to go. Some of the environment and preservation groups tried to get metrics to quantify the value of scenery, open space, declining pristine ridgelines etc... and some initial categories were created while leaving out specifics on metrics until they could be better defined later. The WBA feels that these metrics are critical to the economic valuation of open spaces and watershed.

Each meeting we voted to mostly agree to the metrics and move forward with the preservation oriented folks voicing concern there was not enough measures and metrics for preservation. As a group they were more focused on economic issues and continued to move forward. During

the process they would write down our concerns and mentioned they would be addressed at some point. . This is documented in participant's records, but may not have been adequately captured by the consultant team in the project record.

During additional small group meetings, Wasatch Mountain Club and WBA were able to introduce ideas for metrics to value open space, view-shed, ridgeline development etc. However, in the end these were de-emphasized by the senior leaders of the economic committee as they chose to focus on more quantifiable economic metrics. Once again, the WBA feels that these important metrics that relate to preservation and land quality are being downplayed in favor for monetary gains that favor the ski resorts.

Lack of Data in Transportation Discussions

The consultant team did not provide real data used to come up with possible transportation scenarios or to determine which might offer the best ROI. This is indicative that the process is arbitrary and based on "wants" versus actual needs.

As we neared the end of the Econ Group Meetings in October, before the first Blue Prints were unveiled, we had a group discussion on transportation connectivity. The group consensus was that connecting with tunnels and trains was a viable direction to pursue. The WBA dissented and wanted more data before endorsing that direction. Specifically we asked for return on investment data to prove trains/tunnels up LCC to BCC and to PC was a better ROI than from SLC Airport up to the Wasatch Back or improving the main transportation corridor from Provo to SLC to Ogden. Where is the data to project which option services the public with an acceptable ROI? The Executive board said "that will be compiled in the second phase of the Mountain Accord". Once again, this leads WBA to conclude that the process is biased and based on "wants" and not actual data-driven needs, or worse, predetermined.

A major concern was that there was so little discussion and data on the value of preservation and how limiting development would offer a viable option for preservation of the CWM. Another concern was the limited discussion about letting there be a natural capacity limit in the canyon. It was often said that doing nothing was not an option. The WBA believes there should have been discussion and data to demonstrate that by optimizing rapid transit, using disincentives for driving/parking and keeping the box end nature of the canyons would create a natural capacity limit for user volume for in the canyon.

Pro Development Bias

While it is understandable that the Economic Group would focus primarily on economic development, the WBA is concerned that the whole process is biased and development driven by the consultant team. The consultant team seemed very pro-development for economic benefit. Each time preservation oriented comments were brought up they were frequently set aside, held for later discussion and not sufficiently addressed. The group proceeded to push all economic development ideas and not have meaningful discussion about the benefits of

minimizing development. . This is documented in participant's records, but may not have been adequately captured by the consultant team in the project record.

The perception of the WBA as a participant was that the executive Leadership Board and the Econ Leaders had followed their agendas, captured input from a wide variety of folks, made some minor adoptions and adjustments to accommodate those new ideas they liked, and then presented a blue print. The bottom line is the Economic System Group Leadership, and the group as a whole, was biased heavily with people that had an incentive and bias toward development.

Intimidation by Pro Development Team Leaders

As the Econ Group Meetings progressed it was noticed that attendance had diminished from the first couple of large group showings. It was noted many committee members felt the progress was too slow. It was also noticed that many people just seemed to go with the status quo of group leaders because most were unsure (inexperienced in this process) or possibly intimidated to speak against leadership direction because of political undercurrents. As a result the direction generally seemed to flow according to what the leaders wanted. Many questions were written or recorded as we went along with some being brought up for discussion. These questions have not been answered. In our opinion the quality of the group diminished as a result, and compromised outcomes.

Lack of Transparency

The perception of preservation minded attendees was that many things popped into Vision, Goals and Metrics conclusions after each meeting. It seemed like the Econ Leadership would review what went on in each Economic Group meeting and then make decisions to keep things moving and progressing so they could meet their respective deadlines and objectives. One example of this was the metrics for view-shed, ridgeline and open space development. In a sub work group we came up with a specific goal and vision statement with metrics. It was folded into other goals and statements and we could not get it back in place. Private land owners had some long discussions and had specific things they wanted incorporated. Economic Leadership deleted the perspective. It's understandable you cannot accommodate everyone's request. However, explanation as to why it was changed or not included would have provided more transparency and trust. . This is documented in participant's records, but may not have been adequately captured by the consultant team in the project record.

Another example that diminished transparency and trust was resort expansion. It was never discussed in any Econ Group meetings yet of the boundary expansion showed up on the future blueprint maps. It would have been appropriate to discuss pros and cons of resort expansion and what options were possible. The good news was that the Little Cottonwood Task Force was created to discuss possible negotiated agreements for development and preservation.

Lack of Taxpayer Benefits for Canyon Transportation and Ski Area Expansion

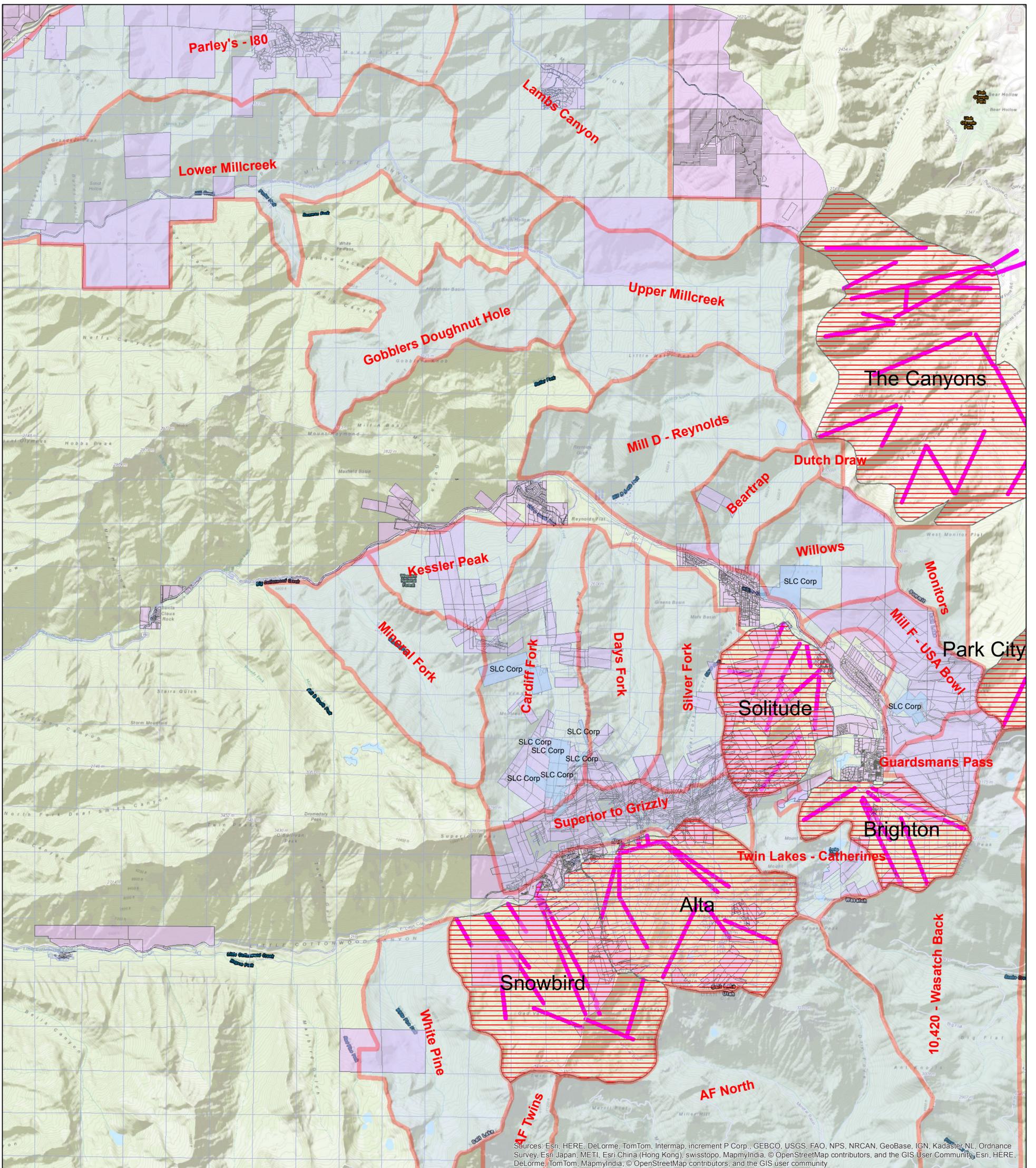
It is the belief of the WBA that the ski resorts were looking to gain major transportation gains, plus opportunity to expand at tax payer's expense. In the end very few taxpayers will benefit from development in the LCC/BCC canyons compared to improved transit in the CWM valleys and Ogden to Provo corridors.

Summary of Process and Recommendations

The perception of the encompassing process comes across as heavily weighted in ski resort progression without enough weight given to preservation. The Economic System Group solutions could include:

- Start with a better balance of preservation and predevelopment oriented Economic System Group leaders and committee members.
- To improve trust and transparency, changes that the leadership group made after committee meetings should be communicated to the group. Rationale for the changes should be offered.
- Utilize more allotted time to have smaller in person meetings to gain perspective from differing points of view. Use that time for discussion, problem solving and possible negotiation suggestions.
- While appropriate to spend so much time on economic goals and metrics more time should have been devoted to research and metrics for preservation.
- **More discussion and data for each possible transportation option.** Example: The Salt lake Tribune published an article from TRIP that estimates a \$11.3B funding shortfall in priority transportation projects through 2040. How does adding a billion or more to build trains and tunnels up LCC to BCC to the Wasatch Back make that priority list? Where would the money come from? How do you rank all the transportation priorities and where does a train up LCC fit?
- How can we help ski resorts grow and prosper with in their current designated footprints? At some future point resorts can no longer expand. How will they prosper when that point is reached? Possibly at base camps transportation hubs?
- The Economic System Groups results seem to heavily favor ski resorts compared to the taxpaying general public interests.

Wasatch Backcountry Alliance Land Status Map with Suggested Preservation Areas

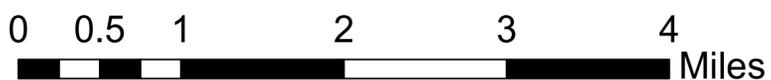


Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, DeLorme, TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS user community



Ownership based on Salt Lake County Online Parcel Viewer and State of Utah AGRC. Not verified.

Prepared by Subterranean Associates LLC



Legend

- BC Preservation Areas
- Ski Resorts
- SLC Corp Lands
- Private_Land
- Fed_land
- Ski Lifts



May 1, 2015

Dear Mountain Accord Project Team,

Thank you for your diligent work on this entire process.

Please accept the following comments on behalf of Bike Utah and our more than 2,000 contacts.

There seem to be minimal points addressing mountain and road bicycling. In a state where bicycling is so deeply entrenched in the culture, it is my hope that the needs of this user group would be more widely integrated into this plan.

Regarding road bicycling, there should be a specific recommendation for a bicycle master plan that encompasses all four canyons as well as the thoroughfares that connect users and residents to these areas. There are plans being developed within some of these canyons, but a comprehensive plan incorporating some of these preliminary efforts would more suitably and effectively meet the needs of bicyclists.

In regards to mountain biking, there is a similar need for a Central Wasatch plan for soft surface trails. This effort would help to improve these recreational resources and their tourism potential while preserving the environmental integrity of the area.

The recommendation of these two plans as part of the larger blueprint will only serve to be more inclusive of all Wasatch users and residents.

Thank you for your efforts and please don't hesitate to contact me with any questions.

Sincerely,

Phil Sarnoff
Executive Director

Board of Directors

Riley Cutler
KUER/Wasatch Touring
Rec. & Commuter Cyclist

Carrie Valentine Fuller
Corporate Partnerships Director
Cyclist for All

Jeremy Keele
Director, Policy Innovation Lab
Two-Wheel Junkie

Kanita Lipjankic
Underwriter at Celtic Bank
Commuter Cyclist

Tara McKee
Outdoor Recreation Office
Road Cyclist

Chad Mullins
Bicycle Advocate
Daily Commuter

John Reed
Amateur Transportation Engineer
Bike Geek

Diane Rosenberg
Strategy and Communications
Advisor
Roadie

Matt Sibul
UTA Chief Planning Officer
Active Transportation Geek

Shawn Teigen
Research Analyst at the Utah
Foundation
Cyclist that Doesn't Race

Phil Sarnoff
Executive Director
Road, Mountain, Commuter



Info@alta.com

4/30/2015

Dear Mountain Accord –

On behalf of our half-million winter visitors, Alta Ski Area is appreciative and supportive of any efforts to improve transportation ingress and egress in Little Cottonwood Canyon (LLC).

Connecting LLC to Big Cottonwood Canyon via surface or tunnel seems reasonable to us both for evacuation and commerce,

We are also supportive of a land trade that could be advantageous for dispersed users, ski areas and the Town of Alta.

And finally, we request continued focus on pure watershed health issues with an aim toward maintenance and improvement as a center piece of all recommendations.

Onno Wieringa

Alta Ski Area

Season Pass Office

P: 801.359.1078 ext 0

F: 801.799.2340

alta.com



Alta is for skiers



3/16/2015

Dear Mt Accord Executive Committee,

The Mountain Accord program has provided a unique and unprecedented challenge in planning for the future of the Central Wasatch. We appreciate the opportunity to participate and your willingness to consider many wonderful opportunities and the concerns raised by us and our community. Friends of Alta (FOA) participated in the Mountain Accord program understanding that there would be some give and get – our eyes and ears are open to compelling compromises that result in a “public” benefit.

Very quickly in the Mountain Accord program, it was recognized by the environmental stakeholders that there was not enough scientific data or analysis to adequately consider the environmental impacts of actions that were later proposed by the system groups. The right information and analysis is still not available - sound scientific data is imperative - we are encouraged by the effort to develop a framework for assessing and monitoring the environmental health of Alta and rest of the study area. Additionally, decisions made on the Blueprint should address the resulting impacts of visitation numbers (capacity) in order to preserve the unique character of Alta and enhance the quality of life while conserving wildlife habitats, ecosystems and the delicate watershed in order to prevent irreversible environmental and character degradation of the area.

The Alta experience can generally be characterized by stunning backdrops such as: Mt. Superior, Wolverine, Devil’s Castle and Baldy; high alpine ecosystems blanketed with 200+ species of wildflowers, 500” of snow annually, aspen and spruce forests; opportunities for solitude; and a chance to view moose, pika and other wildlife.

We acknowledging the need for more detailed information yet we have not held back in making broad statements about some of the proposals we feel will degrade the environment and threaten our community’s character. As we continue to move through this planning process we hope that there is room for the nitty gritty details to be openly discussed and considered so that as decisions are made unintended consequences can be avoided. Please see specific comments on each of the Blueprints four systems in the attached pages.

Sincerely,

Mimi Levitt, President & Jen Clancy, Executive Director

The Mission of Friends of Alta is to protect the environment of Alta, including watershed and wildlife habitat areas; to preserve Alta’s unique character and heritage; and to encourage stewardship and sustainability of Alta’s environment and community.

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Austin Hoyt; MA
Felicity Forbes Hoyt; MA
Loren Kroenke; UT
Fay Michener; NY
Jeff Niermeyer; UT
Felix G Rohatyn; NY
Dick Schatten; CT
Elfriede Shane; UT

In Memoriam

Bill Levitt, 1917 – 2009

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Environment

1. Under environment, the Blueprint's key actions of 1) conserving land, protecting watersheds and water resources, 2) monitoring environmental health, and 3) protecting and restoring the environment must be held at the HIGHEST PRIORITY when pursuing any action on behalf of Mountain Accord because the natural environment of the Central Wasatch is our Golden Goose – the thread if you will, that is common to the four systems of Mountain Accord.
2. The natural environment is an economic engine for the businesses and governments in the Central Wasatch, as well as the State of Utah. In addition to the unique product and experience being sold in Alta, it's the outdoor experiences and opportunities (being surrounded by Devil's Castle, Catherine's Pass, Secret Lake) to connect with nature that make Alta a unique destination.
3. Watershed protection is a critical investment in public health because it is a proactive tool in minimizing water treatment costs for the growing population.
4. Greater populations bring increased development pressures on undeveloped open spaces; population increases also increase impacts to the environment and put a greater reliance on our natural resources which could lead to environmental degradation. We aim to have the least impact on the environment by limiting our footprint and conserving important areas such as Albion Basin.
5. We strongly support the following next steps: protection of key wildlife corridors, implementation of an environmental restoration program, and development of a monitoring and adaptive management plan for environmental resources.
6. Every visitor, employee, and resident has an impact on our canyons character, environment, transportation system, and economy; each scenario proposed in the Blueprint will have different impacts. We request that decision makers in the Mountain Accord process VERY carefully study and consider the resulting impacts of visitation numbers in order to preserve the unique character of Alta, enhance quality of life, conserve wildlife habitats, ecosystems and the watershed to prevent irreversible environmental and character degradation of the area. The Blueprint references an annual increase in visitors from 5.7 to 7.2 million and population increase from 1.1 million to 1.6 million from 2014 to 2040. Without further study and analysis, we don't necessarily believe that the Blueprint should accommodate every new visitor coming to the Central Wasatch because every visitor, employee, and resident has an impact on our canyon's character, environment, transportation system, and economy that should be considered.
7. If the premise of Mountain Accord is to balance the four systems (Economy, Transportation, Environment and Recreation), then each system should receive the same financial investment. At this time, it appears that a larger portion of funding is committed toward the transportation proposed actions.
8. How will environmental impacts of the Blueprints proposed actions and alternatives be measured?

Land Swaps - Cottonwood Canyons Scenario Negotiation

1. As Alta's local land trust, FOA supports conservation of the land from Superior to Flagstaff to Emma Ridge to Grizzly Gulch for public benefit. It appears that this negotiation process is fluid and we continue to cautiously evaluate the details as they become available.

2. It is critically important to know how the lands received by the Alta Ski Area would be zoned by the Town of Alta.
3. FOA has generally been supportive of economic growth in the base facility zone as determined by the existing water contract between the Town of Alta and Salt Lake City.
4. FOA feels that there should be further discussion about increasing the Town of Alta's surplus water contract agreement with Salt Lake City Department of Public Utilities for Alta Ski Area's potential base facility zone development.
5. If one of the incentives for a land trade between the USFS and Alta Ski Area is to transfer lands so that the USFS can focus on upper mountain management and get out of base facility decisions, then ALL land owned by Alta Ski Area in the upper mountain area should be included in the land trade.
6. While FOA recognizes that Grizzly Gulch is private property we do not currently support putting a lift in that area or ski area interconnect with Big Cottonwood Canyon/Park City.
7. FOA supports the existing Alta Ski Area special use permit boundary with the Forest Service.

Federal Designations

1. FOA supports an additional layer of protection that preserves habitat connectivity and conservation of ecosystem services (benefits to humans from the environment) on USFS lands in the Central Wasatch that are not currently managed as Wilderness. Additionally, we support the continued efforts of Brad Barber and the land designation committee to identify specific opportunities for federal land designation that can be integrated in the Mountain Accord program.
2. One of the environment systems goals was to create a formally established structure to streamline coordination between overlapping jurisdictions and ensure that all jurisdictions are working together toward a common goal. The intent is not to create another layer of jurisdiction or to strip any jurisdiction or authority but communicate more effectively. This type of coordinated effort should be broad reaching across all types of management for the Central Wasatch. This is essentially what the Mountain Accord program is facilitating currently; FOA supports continued coordinated management of the Central Wasatch.

Recreation

1. FOA supports preservation of Alta's unique "top of the canyon" recreational experience which cannot be replicated but could be destroyed. The Alta Experience is broadly characterized by stunning backdrops such as: Mt. Superior, Wolverine, Devil's Castle and Baldy; high alpine ecosystems blanketed with 200+ species of wildflowers, 500" of snow annually, aspen and spruce forests; opportunities for solitude; and a chance to view moose, pika and other wildlife.
2. FOA supports enhancements to a Central Wasatch regional trail network that accommodates and reduces different user group conflicts. Enhancements may include additional trails, connectivity, and enhancing facilities such as pit toilets.
3. FOA encourages the Mountain Accord program to develop and make recommendations for an ongoing, coordinated effort to address trail stewardship, funding and implementation of operations and maintenance of trailhead facilities in the Central Wasatch.

4. FOA supports securing new designation on USFS lands to protect areas from development while allowing current recreational uses.
5. FOA supports conservation of wildlife habitat that also enhances the outdoor experience.
6. FOA supports preserving a variety of recreational uses because those opportunities are valued highly in our communities.
7. FOA supports the existing Alta Ski Area special use permit boundary.
8. FOA supports maintaining the current balance of dispersed and commercial recreation in Alta; we also support the Blueprint Key Action of preserving key backcountry terrain.
9. FOA supports improving transit service to recreation areas, as long as it also serves dispersed backcountry users.
10. FOA supports studying user fee options to incentivize transit options and generate funds for environmental and recreation stewardship efforts.
11. FOA is supportive of directing recreationists to identified high-use nodes with infrastructure that can accommodate those recreationists.

Economy

1. FOA supports the Blueprint's key action to "Encourage development patterns that preserve community character and quality of life" because watershed, wildlife and open spaces are the foundations of Alta's economy. We support focusing development outside of the mountain areas, in urban areas and within the existing surplus water contract between the Town of Alta and Salt Lake City.
2. Alta's perch at the top of Little Cottonwood Canyon provides an economic advantage to local businesses and also provides economic benefit to the greater Salt Lake Valley. FOA is concerned about changes that an interconnect transit system would have on the unique character and appeal of Alta. These concerns include losing the "end of canyon" charm by becoming a throughway. For many visitors Alta is a destination that should be preserved for future generations to be able to experience.
3. FOA is supportive of discussing minimal development in the mountains that is focused around thoughtfully designed transit stops at existing development nodes in the canyons (at the ski resorts).
4. FOA supports the development of an Alta Community Center as this is something our community has discussed for many years and has unified support.
5. FOA supports a limited scope of economic growth (within the Town of Alta's surplus water contract agreement with Salt Lake City Department of Public Utilities) to be able to fund protection of the natural environment of Alta.
6. FOA supports enhanced avalanche mitigation techniques above Alta for safety along Highway 210 as determined by professionals.
7. FOA does not support extraordinarily expensive, taxpayer-funded solutions to problems mainly benefitting private industry businesses.

Transportation

1. In considering transportation solutions watershed protection must be our highest priority!

2. FOA supports enhanced transit combined with incentives to reduce vehicles and traffic on the canyon road. The preferred transit system solutions should be safe, reliable, responsible and phasable with convenient parking near the base of canyon that provides stopping points for dispersed recreation. FOA supports studying a vehicle and/or user fee for transportation in LCC as long as it is consistent with the other canyons.
3. In determining mode, the Mountain Accord program should study what the appropriate capacity or number of visitors to the canyons is in order to maintain a quality experience while preserving the environment and ecosystem services which provide for our communities.
4. FOA opposes a train coming up LCC because of the anticipated cost, inflexibility in phasing, potential irreparable environmental harm to the canyon and changes to Alta's low key character. We are concerned about massive public financing for a train that will likely serve a small portion of the local population while deferring funding from potential transit connectivity improvements in the Salt Lake Valley, where the majority of tax payers reside.
5. FOA feels that Bus Rapid Transit (BRT) will be much less disruptive to the watershed than a train. We believe the BRT will be less costly and that a flexible and phased bus system would retain more of the environmental character of Alta's end of canyon location. With lane adjustments, BRT can make use of an existing roadway to provide a viable transportation solution. If the train is an acknowledged marketing effort, wouldn't it be more responsible to use marketing dollars to support BRT? We feel that an enhanced bus option, combined with transportation system management alternatives (such as incentives and disincentives) could be incrementally implemented and assessed, take advantage of updated technologies in a phased approach, and evolve with demand. Additionally, the current bus system is far from optimized (such as no Alta express option) and with better implementation, and incentives could service both the ski resorts and dispersed users on a year-round basis. Without trying an optimized bus system using the existing infrastructure we feel it is impossible to justify major infrastructure changes.
6. FOA fears that a connection with Big Cottonwood Canyon and Park City via a tunnel would be extremely detrimental to the character of Alta. Improved transit in LCC could alleviate some of the traffic and safety issues that have called for a tunnel.
7. FOA supports further examination of avalanche control mitigation along the LCC road corridor to enhance public safety. We also support improvements for the safety of road cyclists on the Little Cottonwood Canyon road.
8. FOA supports further examination of the critical component of parking in the valley and outside the canyons. More specifically 1) Temple Quarry trailhead which is now closed in the winter, could be utilized 2) Consider constructing parking garages (building up not out) 3) Explore using the gravel mine/quarry north of BCC to convert into parking/transit center.