



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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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 Utah<sup>1</sup>, and winter backcountry recreation is a growing player in that<sup>2</sup>. 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

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<sup>1</sup> [https://outdoorindustry.org/images/ore\\_reports/UT-utah-outdoorrecreationeconomy-oia.pdf](https://outdoorindustry.org/images/ore_reports/UT-utah-outdoorrecreationeconomy-oia.pdf)

<sup>2</sup> <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 Summary<sup>3</sup>

- 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 Tomorrow<sup>4</sup>

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

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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](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.”<sup>5</sup>

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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](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.”<sup>6</sup>

## Wasatch Choices 2040

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

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

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

Online here: [https://fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5347083.pdf](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](mailto: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**

<b>Environment Proposed Actions</b>	<b>Comments/ Revisions/ Conditions</b>
<ul style="list-style-type: none"> <li>● Preserve land, protect watersheds and water resources</li> </ul>	
<ul style="list-style-type: none"> <li>○ Secure additional protections on federal lands to provide permanent and predictable management.</li> </ul>	<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"> <li>○ Work with ski areas to place lands in the upper Cottonwood Canyons into protective public ownership.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Prioritize and acquire private lands from willing sellers.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Identify and protect key wildlife corridors.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Broaden watershed protections.</li> </ul>	
<ul style="list-style-type: none"> <li>● Monitor environmental health</li> </ul>	
<ul style="list-style-type: none"> <li>○ Implement an environmental monitoring program and create adaptive management plan.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Analyze and mitigate environmental impacts prior to implementing proposed actions.</li> </ul>	
<ul style="list-style-type: none"> <li>● Protect and restore the environment</li> </ul>	
<ul style="list-style-type: none"> <li>○ Implement an environmental restoration program.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Provide transportation alternatives that result in environmental benefits to the mountains.</li> </ul>	<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>
<b>Recreation Proposed Actions</b>	
<ul style="list-style-type: none"> <li>● Improve and connect the regional trail network</li> </ul>	

<ul style="list-style-type: none"> <li>○ Construct and improve trail segments.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Connect recreation destinations with trails.</li> </ul>	
<ul style="list-style-type: none"> <li>● Preserve key backcountry terrain</li> </ul>	<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"> <li>○ Work with ski areas to place lands in the upper Cottonwood Canyons into public ownership to preserve backcountry access.</li> </ul>	Strong support – see above, and suggestions in Appendix A.
<ul style="list-style-type: none"> <li>○ Secure new designation on federal lands to protect areas from development while allowing current recreational uses.</li> </ul>	Strong support – see above.
<ul style="list-style-type: none"> <li>● Improve transit service to recreation areas</li> </ul>	
<ul style="list-style-type: none"> <li>○ Increase transit service to recreation destinations to reduce traffic, parking congestion, and automobile dependence.</li> </ul>	Ensure that public transportation serves the needs of dispersed recreation users as well as visitors to developed resorts.
<ul style="list-style-type: none"> <li>● Direct future growth in recreation use to areas with infrastructure that can accommodate and manage growth</li> </ul>	
<ul style="list-style-type: none"> <li>● Explore user fee options to manage use and reinvest in recreation infrastructure</li> </ul>	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...)
<b>Economy Proposed Actions</b>	
<ul style="list-style-type: none"> <li>● Encourage development patterns that preserve community character and quality of life</li> </ul>	Preserve the integrity and unique box-end nature of Upper canyons.

<ul style="list-style-type: none"> <li>○ Invest in transit solutions that ease congestion and allow for walkable development in desirable locations.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Design infrastructure that is locally authentic and compatible with the character objectives of each community.</li> </ul>	
<ul style="list-style-type: none"> <li>○ Focus most future development in urban areas, as identified in</li> </ul>	
<ul style="list-style-type: none"> <li>○ Provide the option for a car-free experience for residents, workforce, and visitors.</li> </ul>	
<ul style="list-style-type: none"> <li>● Generate sustainable economic growth to reinvest in the Central Wasatch mountains</li> </ul>	
<ul style="list-style-type: none"> <li>○ Increase tax revenue that can be captured for reinvestment in the Central Wasatch (e.g., preservation, restoration, improvements, etc.).</li> </ul>	
<ul style="list-style-type: none"> <li>○ Prioritize and fund opportunities to protect and enhance the environment.</li> </ul>	
<ul style="list-style-type: none"> <li>● Ensure Utah’s tourism market is competitive now and into the future</li> </ul>	
<ul style="list-style-type: none"> <li>○ Connect fragmented economic markets.</li> </ul>	<p>This is the first mention of connection in this document, and it is unclear what is meant. To restate, WBA &amp; 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"> <li>○ Develop an urban-mountain brand that is unique in the world.</li> </ul>	<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"> <li>○ Improve the visitor experience for residents and recreationists in summer and winter with high quality transit choices to mountain activity centers.</li> </ul>	<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"> <li>o Allow limited new development in the mountains, focused around thoughtfully designed transit stops that provide excellent access to many types of recreation.</li> </ul>	<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><b>Transportation Proposed Actions</b></p>	
<ul style="list-style-type: none"> <li>● High capacity transit in the Little Cottonwood Canyon/Park City corridor.</li> </ul>	<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"> <li>● Transit incentives and automobile disincentives including parking/pricing strategies.</li> </ul>	
<ul style="list-style-type: none"> <li>● Year-round local bus service in Big Cottonwood Canyon.</li> </ul>	<p>Serves both resort and dispersed recreation sites.</p>
<ul style="list-style-type: none"> <li>● Fast transit service from the airport to the Park City area via I-80.</li> </ul>	
<ul style="list-style-type: none"> <li>● Improved transit service on US 40 and I-80 between Quinn’s Junction and Kimball Junction.</li> </ul>	
<ul style="list-style-type: none"> <li>● Improved transit connections in Summit County.</li> </ul>	
<ul style="list-style-type: none"> <li>● Shuttle service in Mill Creek Canyon.</li> </ul>	
<ul style="list-style-type: none"> <li>● High capacity transit connections in the eastern Salt Lake Valley.</li> </ul>	
<ul style="list-style-type: none"> <li>● Safety and access improvements for bicyclists and pedestrians.</li> </ul>	

**PROPOSED NEXT STEPS**

<p><b>Increase protections on U.S. Forest Service land</b></p>	
<ul style="list-style-type: none"> <li>● Evaluate the designation/protection options. (listed here)</li> </ul>	<p>As previously stated, we are supportive and would like to be involved in this process.</p>
<p><b>Increase preservation by acquiring private lands from willing sellers</b></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"> <li>• Develop coordinated, comprehensive program.</li> </ul>	
<ul style="list-style-type: none"> <li>• Identify priorities and work with willing sellers to secure lands.</li> </ul>	
<b>Evaluate recreation user fees to manage use and increase recreation infrastructure funds</b>	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"> <li>• Identify and evaluate fee options.</li> </ul>	
<b>Protect key wildlife corridors</b>	
<ul style="list-style-type: none"> <li>• Identify key corridors.</li> </ul>	
<ul style="list-style-type: none"> <li>• Evaluate impacts of proposed actions on corridors.</li> </ul>	
<ul style="list-style-type: none"> <li>• Evaluate avoidance, protection, and restoration measures.</li> </ul>	
<b>Work with ski areas to place lands in the upper Cottonwood Canyons into protective public ownership</b>	
<ul style="list-style-type: none"> <li>• Finalize proposed agreement with ski areas, jurisdictions and stakeholders.</li> </ul>	Please see our comments in Appendix A regarding specific land transfer comments.
<b>Implement an environmental restoration program</b>	
<ul style="list-style-type: none"> <li>• Identify priorities and develop program.</li> </ul>	
<b>Develop a monitoring and adaptive management plan for environmental resources</b>	
<ul style="list-style-type: none"> <li>• Develop monitoring parameters, develop program and identify funding sources.</li> </ul>	
<b>Improve the regional trail system</b>	Preserve winter access and improve where possible due to newly acquired lands, or meet recreational goals.
<ul style="list-style-type: none"> <li>• Identify specific trail needs, design system, and secure funding.</li> </ul>	
<b>Conduct a detailed economic study</b>	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"> <li>• Identify and evaluate the economic benefits and impacts of the Blueprint.</li> </ul>	
<ul style="list-style-type: none"> <li>• Identify new revenues to fund environmental, transportation, and recreation initiatives.</li> </ul>	



<b>Encourage development patterns that reduce automobile use and achieve desired community character</b>	
<ul style="list-style-type: none"> <li>● Evaluate existing and potential local land use policies, incentives, and regulations.</li> </ul>	
<ul style="list-style-type: none"> <li>● Advance transit connections and develop designs that support local and regional land use, environmental and economic goals.</li> </ul>	
<b>Evaluate transit Improvements in Little Cottonwood Canyon/Park City Area Corridor</b>	
<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"> <li>● 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.</li> </ul>	
<ul style="list-style-type: none"> <li>● Bus rapid transit (BRT) in exclusive guideway up Little Cottonwood Canyon to the Park City area including tunnel connections between Alta, Big Cottonwood.</li> </ul>	
<ul style="list-style-type: none"> <li>● 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</li> </ul>	

between Big Cottonwood Canyon and Park City.	
<ul style="list-style-type: none"> <li>• 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.</li> </ul>	
<b>Evaluate transit Improvements in Salt Lake Airport to the Park City Area via I-80 Corridor</b>	Support.
<ul style="list-style-type: none"> <li>• 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.</li> </ul>	
<ul style="list-style-type: none"> <li>• 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.</li> </ul>	
<b>Evaluate transit Improvements in Summit County (Summit County Connectors)</b>	Support.
<ul style="list-style-type: none"> <li>• Conduct feasibility and design analysis on the following alternatives: <ul style="list-style-type: none"> <li>○ Bus rapid transit (BRT) in exclusive guideway on SR 224 and/or SR 248.</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>○ Light rail transit (LRT) in exclusive guideway on both routes R 248.</li> </ul>	
<ul style="list-style-type: none"> <li>• Conduct feasibility and design analysis on improved transit service (local bus) from Quinn’s Junction to Kimball Junction via I-80 and US 40.</li> </ul>	
<b>Evaluate other transportation actions</b>	Support.
<ul style="list-style-type: none"> <li>• Define plan for proposed year-round bus service in Big Cottonwood Canyon.</li> </ul>	
<ul style="list-style-type: none"> <li>• Further define proposed shuttle system in</li> </ul>	

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

**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
<b>Airport Visitors</b>	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
<b>Elimination of Road</b>	Road will remain open.	Road will remain open.	Even
<b>Reduction of Cars in the Canyon</b>	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)
<b>Dispersed Users</b>	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
<b>Canyon Closure Mornings (can also occur with train systems)</b>	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
<b>Peak Traffic Flow</b>	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
<b>Express Transportation to Resorts</b>	Alta/Brighton skiers will be delayed by service to lower resorts and dispersed users.	Express buses for each resort are possible.	Bus
<b>Parking Impacts</b>	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

<b>Element</b>	<b>Train</b>	<b>Bus</b>	<b>Advantage</b>
<b>Air Quality Impacts</b>	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.
<b>Construction Cost (overall)</b>	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
<b>Cost benefit to Taxpayers</b>	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
<b>Vehicle Longevity</b>	Longer 30 years (per train car)	Shorter 10-15 years (per bus)	Train

Element	Train	Bus	Advantage
<p><b>Reliability in Poor Weather. This is the primary factor that the resorts have been asking for in Mountain Accord meetings.</b></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><b>Environmental Impacts (shared alignment)</b></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><b>Environmental Impacts (separate Train Alignment)</b></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
<b>Ease of Use (Convenience)</b>	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.
<b>Limiting Canyon Development outside the scope of the Mountain Accord.</b>	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.
<b>Construction Impacts</b>	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 <sup>2</sup> )	Tunnel Length (ft)	Volume (ft <sup>3</sup> )	In-Situ Volume (yd <sup>3</sup> )	Swell Factor	Actual (yd <sup>3</sup> )	lb/yd <sup>3</sup> (Typical of Broken Granite)	Ton/yd	Total Tonnage	Contingency	Total Yd <sup>3</sup> with Contingency	Total Tons with Contingency	Total Truck Loads (Round-Trip, 10 tons per Load)
<b>Base Calculations Bored Tunnel</b>	24	452.16	1	452	17	25%	21	2,700	1.35	28	15%	24	32	3.2
<b>Alta to Brighton</b>	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 <sup>3</sup> )	In-Situ Volume (yd <sup>3</sup> )	Swell Factor	Actual (yd <sup>3</sup> )	lb/yd <sup>3</sup> (Typical of Broken Granite)	Ton/yd	Total Tonnage	Contingency	Total Yd <sup>3</sup> with Contingency	Total Tons with Contingency	Total Truck Loads (Round-Trip, 10 tons per Load)
<b>Base Calculations Drill and Blast</b>	18	24	1	432	16	25%	20	2,700	1.35	27	15%	23	31	3.1
<b>Alta to Brighton</b>	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 Gochnour 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.

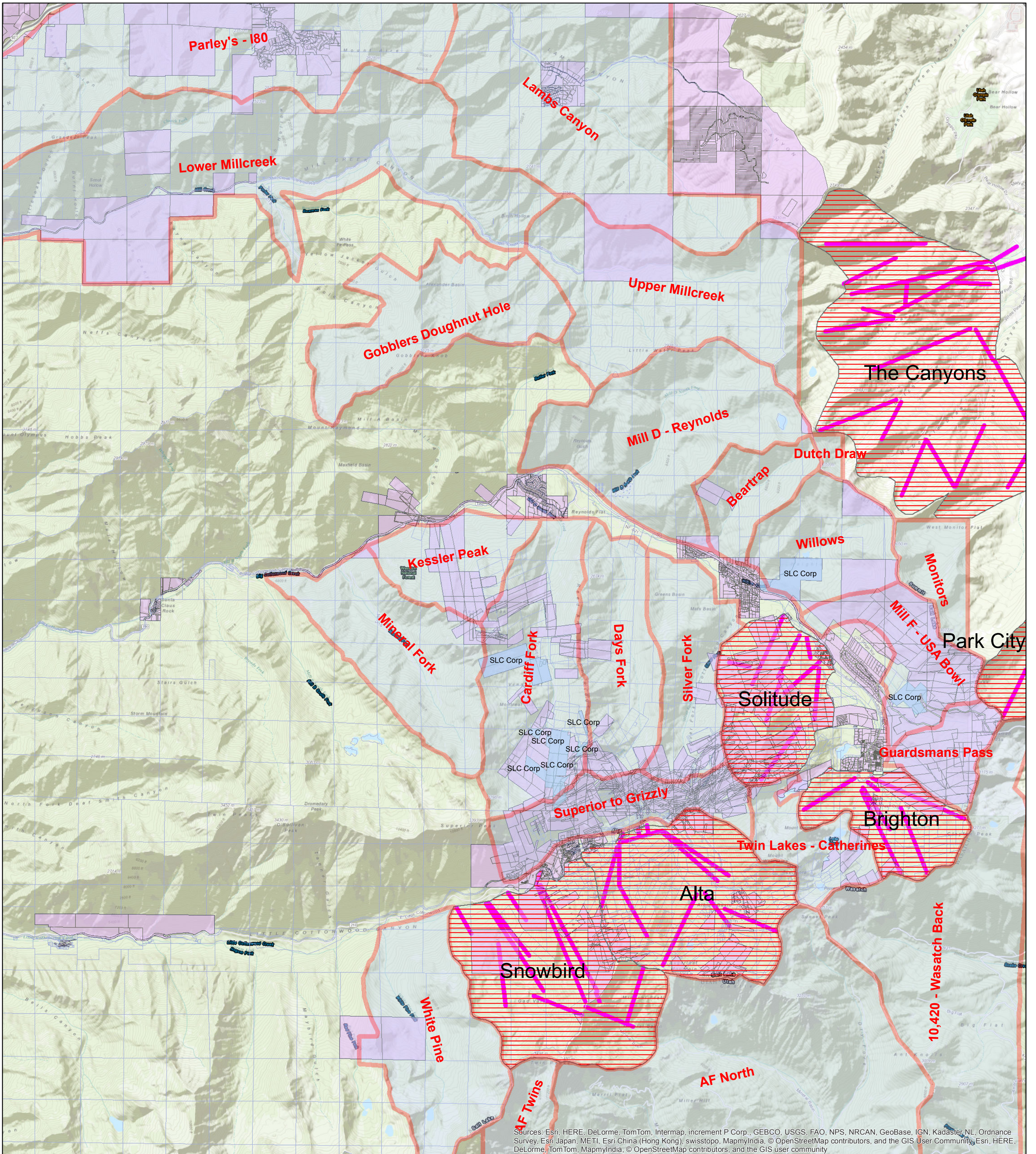
### **Summary of Process and Recommendations**

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

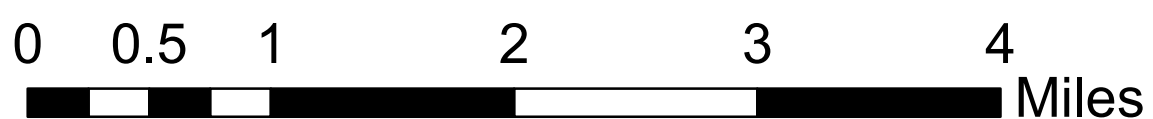


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Ownership based on Salt Lake County Online Parcel Viewer and State of Utah AGRC. Not verified.

Prepared by Subterranean Associates LLC



## Legend

- BC Preservation Areas
- Ski Resorts
- SLC Corp Lands
- Private\_Land
- Fed\_land
- Ski Lifts