passenger vehicles and light duty trucks—it is clear that Utah's air quality problems cannot be solved with regulation alone and that meaningful and strategic transportation planning is critical to ensure progress.

While we anticipate a greater air quality analysis in the full Draft Environmental Impact Statement, not including air quality measures as part of the screening when LCC exists, areas of non-attainment is concerning.[3] With population growth and VMT growth higher than the population growth rate, air quality will be significantly worse in serious inversions. New analysis is needed to plan a total system that reduces VMT in the air shed to a level that ensures the air is healthy to breathe and works toward meeting EPA National Ambient Air Quality Standards.

Alternatives Commentary

The three proposed alternatives do not meet the needs and purpose set out in the EIS, which are to improve mobility, safety, and reliability of auto use on SR 210 from Fort Union Avenue to the Alta Ski Resort. The three options suffer from 70% of travelers' use of personal vehicle traffic remaining on Wasatch Boulevard and the Little Cottonwood Canyon Road (LCCR) after significant investments in infrastructure. This is an insignificant reduction from the current 96% or so private vehicle use.

Therefore, these criteria primarily support automobile transportation planning, which conflicts with the Salt Lake County and Wasatch Front Regional Council (WFRC). Planning recommendations should apply to the highway and other transportation decisions. Among them are: provide transportation choices, preserve open space, and improve the air we breathe by reducing auto emissions. Also, reducing the use of travelers using private vehicles by only 30% does not support WFRC's primary goal of reducing VMTs.

We propose an alternative that emphasizes bus mass transportation by 2050. By this significant decrease in personal vehicle use, mobility and reliability will improve over the two proposed bus draft alternatives; And because buses are inherently safer than autos, more bus passengers can equate to greater safety.

In Summary:

- In 2050, 75% of people travelling up Little Cottonwood Canyon are on bus transit.
- In 10 years 25% will travel by bus, after 20 years 50%.
- The number of cars parking in the canyon will be limited to 1150 at any time.
- Tolling is used to incentivize mass transportation use.
- Promote Trax extensions to the two transportation hubs.
- Improve feeder bus service to the hubs across the valley.
- Express bus transit from FrontRunner and Trax stations to the hubs with priority over autos..
- Substantially decrease VMT

[3] *See Division of Air Quality 2019 Annual Report.*
https://documents.deq.utah.gov/air-quality/planning/air-quality-policy/DAQ-2020-001226.pdf

- Subsidize transit ticket costs.
- Ensure trailhead bus service
- Improve air quality by reducing VMT
- Hubs are designed for primarily valley bus to mountain bus transfers.
- Eventually private vehicle parking at hubs will also be limited.
- The north hub can be used to convert transportation up Big Cottonwood Canyon to bus mass transportation.
- The Alta Canyon road does not need to be widened.
- Wasatch Boulevard will require significantly less widening.
- Welcoming hubs and bus terminals at the ski resorts.

I. Bus Traffic Can Safely Handle the People Per Hour Rate Requirement

The special buses used for canyon travel are limited to 42 people. Regular buses cannot be used for canyon transportation, which means a feeder system using regular buses across the valley requires transportation hubs to move people to the special buses. Peak usage is estimated at 3257 people per hour for both bus alternatives. The 75% use of buses will require 60 buses per hour: 36 per hour from the north hub and 24 per hour from the south hub. For the traffic on Wasatch Boulevard south this means a bus every 100 seconds. 90 buses are estimated to be needed for this service. In addition, bus passengers are 10 times safer than auto passengers. Additional traffic lanes are not needed for the LCCR. The substantial reduction in overall vehicle use means the current roadway will be adequate.

Avalanche sheds will be necessary for public safety, mobility, and reliability.

II. The Substantial Reduction in Personal Vehicles Traveling Up-canyon Will Require Enhanced Valley Feeder Busses

Vehicle traffic should be minimized to the traffic hub as well as on Wasatch Boulevard. This can be done incrementally by adding local feeder bus service to the valley and express buses to Trax and Frontrunner stations. The personal vehicle reduction should be 25% in the first ten years, 50% reduction by 20 years and 75% reduction by 2050. As tolling reduces personal vehicle flow up the canyon, parking fees at the hub can incrementally increase to incentivize drivers to take the bus. Transit fare subsidies will help this transition.

Additionally, limiting parking capacity in the canyon to 1000 vehicles, with exceptions for landowners, service, and safety vehicles, can serve to incentivize bus use. With exceptions considered, it may be necessary to implement measures that require drivers to reserve a parking space before entering the canyon -- on a given day. The 75% reduction in people per hour at peak times in private vehicles results in 814 people per hour versus 2249 people per hour in private vehicles for the proposed 30% reduction. Valley floor parking will happen in smaller local lots associated with the feeder bus system routes. This substantial reduction in private vehicle use will

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reduce the need to expand Wasatch Boulevard in Cottonwood Heights. The 2050 UTA transit map depicts a light rail line from South Jordan FrontRunner and Trax station to and up Little Cottonwood Canyon. Instead, two lines need to connect to the two hubs. The replacement of personal vehicle traffic by mass transportation will also reduce VMT and improve air quality.

III. Enhanced Bus Service Means Trailheads Can Be Serviced

Several busses an hour can be dedicated to servicing trailheads as well as the resorts. No additional parking spaces will be needed and the trailhead parking lots will be modified for convenient bus ingress and egress as well as rest facilities and trash receptacles.

IV. The North Traffic Hub Can Eventually Be Used for Big Cottonwood Canyon Traffic

The north traffic hub will be designed for the number of parking spaces called for in the two bus alternatives. Over time, with parking fees, tolling in Little Cottonwood canyon, and increase in bus capability across the valley it can be used to convert Big Cottonwood Canyon traffic to mass transportation. The hub will have to be designed so it can eventually be used for bus to bus transfer by 2050.

V. Skiers Need Welcoming And Well Thought Out Terminals

The transportation hubs in the valley have to be convenient and easy to use. Instead of commuter traffic, passengers will have ski equipment and clothing. They will have small children. At the terminals at the ski areas passengers should be welcomed to a warm environment. They will need lockers, rest rooms, places to eat lunches that they brought. These terminals can be placed in the existing parking lots since car spaces will be greatly reduced. There are currently 4600 designated parking spaces in and around the ski areas. A 75% reduction means only 1150 are needed.

Conclusion

We are grateful for the opportunity to comment on the Draft Alternatives for the Little Cottonwood Canyon Environmental Impact Statement. Please don't hesitate to reach out with any question about our comments or to discuss any matters we've raised.

Sincerely,

Will McCarvill,

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