



May 24th, 2018

Objection Reviewing Officer
USDA – Forest Service
Intermountain Region
324 25th Street
Ogden, Utah 84401

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To Whom It May Concern,

Thank you for the opportunity to provide additional comments as a follow-up to comments submitted last year by Salt Lake County regarding Alta's Master Development Plan. Salt Lake County and the Uinta-Wasatch-Cache National Forest have enjoyed a long and successful partnership with the shared goal of protecting and managing the Central Wasatch Mountains. We have also appreciated the US Forest Services' commitment to recognize local interest in supporting the implementation of local ordinances and regulations.

We intend these comments to be in this continued spirit of cooperation. The following general comments apply to all proposed projects in Alta's Master Development Plan.

Visual resources and scenic quality – The Salt Lake County Resource Management Plan says "Land use goals, decisions and transportation and utility solutions should consider the impacts of development on visual resources and the overall experience the public has on public lands. Significant vistas and landscape that have special visual and aesthetics qualities will be preserved and maintained."

Basic services to increased resort/canyon visitors - The proposed lifts will bring a significant increase of visitors to Alta with the additional Mt Baldy Tram 150 p/h, Sunnyside lift replacement 1,200 (additional), Wildcat lift replacement (1,200 p/h) and new Flora Lift (1,200 p/h), totaling 3,750 p/h in new capacity. This represents a significant increase in the ability for Alta ski resort to provide lift service to customers. Nowhere in the planning document did we see an increase of public restrooms and locker/gear rooms. Just like a new, expanded or remodeled building requires a study to show adequate public restrooms, we also feel that ski resorts should go through a similar planning process. We request that the Forest Service require Alta Ski resort to provide a study of current restrooms and a plan for additional restrooms to meet the demand of increased visitation.

Also, we request that the Forest Service discuss additional services to assist with public transportation such as locker rooms and changing rooms. Our experience with the

Wasatch Canyons General Plan has shown that there is a common desire by the public

and government leaders to increase mass transit and provide accommodations such as, drop offs/waiting areas, base services, lockers and changing areas to make mass transit more accommodating, however, we do not see this demand being met in the planning document.

In addition to restrooms and lockers we request that the Forest Service require Alta to submit management plans to assist in the reduction of single occupancy vehicles, items to consider may include carpooling rewards or programs, skier education on transit/ride sharing, more transit usage, etc.

Additional planning and design information – After additional review of the document we request that the Forest Service require crucial planning and design information on the drawings/concepts including information such as building setbacks, stream setbacks, total parking stalls and proposed parking stalls design. Parking lot expansions must be designed to treat storm water runoff to clean it before percolating into the ground.

The following comments apply to the specific projects listed below.

Albion / Wildcat base parking lot- Traffic congestion in the canyon continues to be an issue. We commend Alta for outlining mass transit options and reducing the number of parking stalls in the wildcat parking lot and have no objection to the addition of parking stalls to the Albion lot. However, the plan does not contain enough information to determine the total number of appropriate parking spaces at the Albion or Wildcat parking lots. It also does not outline where the setbacks from waterways may be. We request that these lots be developed in a manner that does not impact water quality and would like to see the engineering protection measures that would be put in place.

Alf's Restaurant and Watson Shelter- Salt Lake County Health Department should be consulted on the renovation plans for Alf's Restaurant and Watson Shelter as it may impact the operating permits for these facilities as outlined in Health Regulation #5 Food Sanitation.

The master plan does not delineate stream setbacks or identify any wetlands that may need to be considered during these renovation projects as outlined in Health Regulation #14 Watershed.

Ski lifts /Tram- The addition of Flora Lift, Mt. Baldy Tram, and increasing speed of the ski lifts from 1,200 PPH to 2,400 PPH has the potential to increase use at the resort that may exceed the current restroom facilities not only for the public but employees staffing the more remote locations. The restrooms need to be evaluated to see if current facilities can handle the improvements based on the 2015 International Plumbing code section 403 Minimum Plumbing Facilities, Table 403.1 occupancy A-5. Any increase in restroom facilities would also have to comply with Health Regulation #13 Wastewater Disposal Regulation and Health Regulation #14 Watershed.

Flora Lift and Mt. Baldy Tram- To install the new Flora Lift, it is proposed to remove .23 acres of wetlands. We are not in support of removing any wetlands in our watershed. We also request for the delineation of the wetlands in question. This is due to the

unauthorized removal of wetlands during construction of the new Supreme Lift during the summer of 2017. We request a more solid and comprehensive valuation of the impacted wetlands in the area. As a result of the impacting wetlands, Salt Lake County Health Department and Salt Lake Public Utilities have a proved a 3 to 1 ratio for mitigation of wetlands on prior projects in Alta with a three-year monitoring report to be submitted to the departments.

As we have reviewed the two new proposed chair lifts, Mt. Baldy Tram and Flora Lift, we are concerned regarding the visual impact to Little Cottonwood Canyon and the Albion Basin. We have noted the comments "340 vertical feet below the top of Mt. Baldy" in the planning document; however, we feel it is the duty of the Forest Service to require a higher level of visual impact studies from the applicant to ensure minimal visual impact and absolutely no visual interference with the Mt. Baldy peak and ridgeline area from the Albion Basin and lower mountain.

Additionally, the Alta Master Development Plan relies heavily on the need for improved avalanche control to justify the construction of the proposed Mt. Baldy Tram yet, the US Forest Service Plan only references the word "avalanche" four times. The first reference is found on page 4-153 where it is used to help describe the diversity of the terrain in our ski areas. The next three references are found on page 4-162 incorporated into the following statement:

"Mountain weather and backcountry avalanche forecasting will continue to be provided through cooperation among the Forest Service, state and local government agencies, and private parties. Avalanche control activities for canyon highways will continue to be a cooperative venture involving the Forest Service, and state and local government agencies. New technologies for avalanche control will be reviewed and considered as they become available."

None of the references speak specifically to a major problem with current avalanche control practices. There has been speculation that the US military program that provides arsenal to ski areas for avalanche control may discontinue that program. That is speculation that is often used to justify more infrastructures, particularly by the Alta Ski Area in their promotion of Flagstaff Mountain, Grizzly Gulch, and now atop Mt. Baldy.

One of the considered alternatives to the Mt. Baldy Tram was the access to Mt. Baldy from the Snowbird Tram which would be a 0.5 mile hike. This alternative was discussed in Section 2.6 of the Environmental Assessment (EA) and ruled out because the "option would also require that Snowbird's tram be operational which is dependent on the weather on Hidden Peak." Hidden Peak lies approximately 0.5 miles southwest of Mt. Baldy with a comparable elevation (Mt. Baldy is approximately 100 feet higher in elevation). If the Snowbird tram is not in operation due to weather, it is highly doubtful that a Mt. Baldy Tram would not be affected by the same weather.

Devil's Castle- Devil's Castle is the iconic setting for the Alta Ski Area. Installing avalanche control installations such as Gazex, or a similar remotely controlled device, on

the Devil's Castle face would be in conflict with the rationale provided in the Environmental Assessment for not having such devices on Mt. Baldy. That rationale stated, ..." This concentration of installations would disturb a substantial proportion of the area's alpine habitat during construction and would degrade its scenic character." If such impacts would occur on Mt. Baldy it is reasonable to assume they could occur on Devil's Castle. It should be noted that the USFS has identified this area to be Canadian Lynx habitat yet impacts to this recovering species were not assessed in any detailed analysis.

In approving Snowbird's Hidden Peak facility, the USFS offered the rationale that it would provide enhanced reliability for snow safety personnel.


"Having facilities for mountain operations/patrol personnel to stay overnight will allow the ski area to operate much more effectively and safely." (Snowbird ROD, Dec. 1999, p. 7)

Snowbird and Alta partner and share many things: boundaries, a pass, Mt. Baldy, as well as coordinating on snow safety activities. If the USFS were to consistently apply the same rationale used to rule out the utilization of the Snowbird Tram as an unreliable means of getting to the tops of mountains in wintertime (which conflicts with the decision and rationale of the 1999 ROD), the Mt. Baldy Tram would be found to be equally unreliable. Proximity and more gentle terrain from the Snowbird side, and availability of around the clock snow safety personnel would suggest control of Mt. Baldy from Snowbird can be achieved the most "effectively and safely" (Snowbird ROD, p. 7).

The United States Forest Service Environmental Assessment reveals a bias towards the construction of the Mt. Baldy Tram and for the installation of remotely controlled avalanche devices on the face of Devil's Castle. We oppose the decision in the Environmental Assessment approving these two projects and we do not believe that the analysis presented justifies their acceptance. Furthermore, we believe that the implementation of these projects will fundamentally alter the top of Little Cottonwood Canyon and increase the risk of more intrusive ridgeline and alpine infrastructure-elements that we have worked for decades to minimize and control.

Thank you again for the opportunity to provide comments on Alta's Master Development Plan.

Sincerely,



Mayor Ben McAdams
Salt Lake County Mayor



Councilman Jim Bradley
Salt Lake County Councilman At-Large