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Objection Reviewing Officer, USDA  
-Forest Service Intermountain Region, 324  
25th Street,  
Ogden, UT 84401

RE: Alta Master Development Plan Improvement Project  
#48903, Environmental Assessment Uinta-Wasatch-Cache  
National Forest Salt Lake Ranger District, Salt Lake County

Dear Mr. Hinman and Objection Officer, USDA:

Thank you for the opportunity to comment on Alta Ski Lift Company's Master Development Plan Improvement Projects, the subject of the draft Environmental Assessment (EA) and the draft Decision Notice FONSI (DN) from May 2018. I request my name and contact information be withheld, and redacted from the comments once catalogued by you.

I write to comment and to object on certain aspects of the assessment and draft decision. Initially, Supervisor Whittekiend chose not review in detail "growth-related concerns" because growth was not the "intent" of the various projects. (DN, p. 3). This is of concern because the purpose and need section concluded the authorized projects are "logical and practical expansions of existing resort infrastructure," all to "provide the public with access to high-quality recreational activities...." (ID, p. 2) The assessment and decision seem unnecessarily focused on winter recreation at a time when the ASL resort, with the imprimatur of the forest service, is beginning to service summer recreation visitation.

Skier expectations seem to be the focus of the need for the changes (DN pp. 2, 3, 4, and 5). The stated intent for lift replacement is to replace outdated equipment and

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upgrade facilities. However, one of the two offered reasons was for skier comfort, identified as a “more important” factor than capacity. Increased comfort will likely draw skiers and hence increased visitation is a likely effect of the change. To imply that it was not intended to increase, so any increase need not be considered in detail, is selectively circular. It was the closure of East Baldy Traverse that led to poor skier experience and the need for the Flora Lift construction. (EA, ¶2.4.4.1). Instead, this change will completely change the “skier experience,” by reflecting other ski areas where aerial lift lines criss-cross and congestion is common as skiers try to navigate a run while others simultaneously make their way to a queue. Further, it does not appear EBT will be decommissioned, as the EA cites Flora as providing a “redundancy,” to that traverse. (EA ¶3.5.3.3)

The EA evaluates “skier density,” by recognizing ASL “manages [density] by reducing the number of slopes when terrain is limited,” essentially operating the lifts at lower than their design standard. (EA ¶3.5.3.2). The EA goes further and salutes ASL’s drawing card; “Alta’s hallmark is uncrowded skiing on minimally developed terrain.” (EA, ¶3.5.3.2) Potential increase in skier density will be mitigated by ASL continuing to operate lift speeds, not based on design capacity, but on “conditional capacity of the terrain.” (EA ¶3.5.3.3)

Secondly, the proposed Mt. Baldy lift would provide capacity for 150 persons/hour. That number is likely greater than all of ski patrollers employed by Alta. If the lift were as stated, primarily for avalanche control work, a better option would be a 4-7 person jig back lift. Therefore, again, 150 people per hour suggests an intent for increased skiers on the lift. Such a lift will likely be a draw for people unwilling to hike to ski Mt. Baldy’s terrain in the past. This in turn will likely result in increased congestion at Germania Pass as skiers exit Collins lift and then queue for the Baldy tram or try to ski down towards Main Street. We have seen just this phenomena as lines form at the top of Sugarloaf lift, as skiers await the opening of Devil’s Castle, during control work by patrol, often stretch to Sugarloaf Pass and near the Snowbird entry.

The authorized changes are characterized as being mandated by the intent to meet the needs and expectations of today’s skier market and changing patterns of use at the ASL managed area. The DN concludes overall ski area capacity would not

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change appreciably and there would remain in effect a cap on new parking. (DN p. 3) Parking in winter is challenging now with residents, resort skiers, back-country skiers, snowboarders, hikers, snowshoers, x-country skiers and photographers. The referenced changes, to meet skier needs and expectations, will also likely drive more people away from the resort amenities. As lift prices continue to climb, there are more non-resort users of the Albion Basin and environs. Where is the analysis of this natural and direct consequence of increases infrastructure and expansion of ASL?

Similarly, the failure to evaluate changes to summer usage and visitation contemplated by the replacement of Sunnyside with a chondola type lift is particularly significant. Leaving Albion lift, a double, fixed-grip, likely as old as Wildcat, suggests it is skier capacity that is driving the changes. The “desirable skier experience,” at Wildcat, and the redundancy there with the Collins detachable-quad yet leaving Albion suggests it is not lift reliability controlling the purple and need. Albion is a redundant lift, as is Wildcat, to the predominant detachable lift, Sunnyside and Collins, respectively. Both old lifts are fixed-grip, double chairs. Each serves much the same terrain as the detachable, its neighbor. If Wildcat is being replaced for reliability and comfort, (EA ¶2.4.3) a “desirable skier experience,” the same rationale would apply to Albion. But, Albion is not part of this plan suggesting there may be another rationale.

The decision notice concludes “[h]igher capacity lifts will not result in crowding on trails because the lift operating speed is managed ... to maintain the uncrowded conditions sought by [ASL] visitors.” (DN p. 4). Skier circulation is a challenging issue; similar to traffic on roadways. Despite design criteria that suggests a flow will occur on paper, sometimes these flow patterns do not manifest on the ground. This year, the newly operating, newly aligned and extended Supreme Lift, caused significant congestion in and around Alf’s restaurant. Efforts to manage crowding on trails by loading alternating chairs resulted in long queues which further contributed to circulation problems. The result was long lines at the base, skiers stopping and waiting before joining the queue, people stopping to go inside Alf’s, people coming out of Alf’s, skiers traversing to Sugarloaf on the West side of Alf’s, and skiers coming down from Sunnyside lift on the East side of Alf’s all contributed to congestion and “merging” traffic from all directions. That combined

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with ever expanding ski racks for skiers to store their equipment while inside Alf's led to confusion and a congestion of skiers and standers.

The authority to expand Alf's 2000ft<sup>2</sup> to the southeast will only exacerbate the already unworkable congestion. A 500ft<sup>2</sup> addition to the south of Alf's is precisely the wrong direction for any expansion. Rather, expansions ought to be to add a second floor. The structure sits in a depression, is already visible and would not likely lead to any negative visual impacts. While changing the footprint to be straighter to allow better snowcat operations is worthwhile, the contemplated acreage is not necessary to accomplish that aim. In addition, the Town of Alta is currently updating its zoning ordinances, and considering changing stream setbacks of 100 feet, not the 50 feet "buffer from drainage" identified in the EA. (EA ¶2.4.6.1).

These documents fail to consider the impact from the now approved summer visitation access efforts of ASL in concluding "overall impact of increasing visitation and use of LCC... is neither intended nor expected to notably increase canyon visitation." (DN p. 5). Sustaining the health, diversity and productivity of the forest to meet present and future generation needs, requires using visitor use management tools to assure quality recreation while preventing degradation to the very resource drawing that recreation. Increased visitation and uses in national park and recreation areas, reserves, preserves, and national forests, has led many responsible agencies to implement limitations, despite no legal mandate to do so.

"Managers must analyze not only the number of visitors but where and when they go, what they do, and the impacts they leave behind. Managers should acknowledge the dynamic nature of visitor use, the vulnerabilities of natural and cultural resources, and the need to understand changing conditions and evolving visitor expectations."

And, "Federal managers need to address visitor capacity in many situations when required by law or when visitor use levels threaten the desired conditions of an area."

Visitor Capacity on Federally Managed Lands and Waters: A POSITION PAPER TO GUIDE POLICY, June 2016.

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The forest managers have not identified and as a result, likely not understood, current levels of visitor use and baseline conditions for resources and visitor experiences. Yet, this information is vital to evaluating current infrastructure development plans, and to managing the sustainability of the forest resource for current and future generations.

Construction of an onsite equipment storage facility makes sense and locating it in the base area is best. However, it does not appear to manage parking well. Will its location prohibit parking winter and summer in front of the entrance? If so, any added parking gained by the re-work anticipated to Albion and Snowpine lots will be diminished. Additionally, with expanded equipment storage and expansion of on-mountain restaurants, there will likely be more ASL employees commuting in their private vehicles, all needing a place to park, also occupying parking for visitors. Was any consideration given to burying-the structure into the hillside to allow for parking inside as well as storage?

In addition, Albion Basin should more properly be categorized as “semi-primitive,” than either “rural” or “roaded natural.” The “main attraction” for people to Albion Basin, December - April, is likely the recreation amenities of lifts and restaurants (DN p. 6), but May through November does not have that same “attraction” characteristic. During those seasons, visitors come for the opportunity to be isolated from human sights, and sounds, to have a high degree of interaction with the natural environment, to have moderate challenges and risks, and to use their outdoor skills. In areas, concentrations of visitors is low, but evidence of other users is present. Onsite managerial controls are subtle rather than predominating, consisting of trails and signs outside the base area. Sanitation facilities are provided for resource protection and the safety of users. Two forest service seasonal, recreation travel management plans permit motorized use.

Authorizing changes to the character of Albion Basin in the summer months, from an area focused on “nature,” to an area focused instead on “infrastructure,” is a change not in degree but kind. People choose to go to Snowbird, Park City, Deer Valley, or other resorts in the Wasatch, when they are looking for a bit of nature, but predominantly for infrastructure and amenities. People come to Alta in summer

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to photograph, hike, be quiet, seek solitude, or to climb and challenge their abilities; not be pampered or “entertained.”

Did this EA consider a change in usage envisioned by authorizing operation of the Sunnyside lift in summer? This authorization came after the public scoping on the plan from 2016, and, after the draft EA and draft DN were published. Does the operation of a lift July and August, and the resulting concentration of visitors create any adverse environmental impacts? Will there be any change in visitation levels as a result of the intended summer lift operation? Will there be any degradation to natural resources

Finally, the entire area is part of a watershed. While this is acknowledged in several places in the analysis and decision documents, prescriptions have not been followed. “New recreation facility development” is not allowed, according to the Forest Plan. (Section 3.1W). Despite Albion Basin being recognized as an important watershed, and this prohibition, a new lift, Flora, has been authorized with the base sited in a recognized wetland area. The foreseen destruction of that wetland area in the construction and operation of Flora, are projected to be mitigated. The example is offered of the approved and constructed Supreme lift from 2017.

Hydrology was not evaluated. (EA, p. 44). The headwaters of Little Cottonwood Creek is acknowledged to be an “antidegradation [sp] segment ... [, a] classification indicating existing water quality is higher than state standards, and that the state is mandated ... to maintain that condition.” (EA, p. 41.) Despite the recognized importance of the water, the watershed and the wetlands, a lift terminal is being sited precisely in such an area.

The DN categorizes the Supreme lift replacement as involving “unforeseen wetland impacts.” (DN, p. 5) However, the CE granted ASL to NEPA analysis for that lift replacement, specifically stated it was because wetlands (the Albion Fen) would be avoided in lift tower placement. To suggest it was unforeseen that wetland would be impacted is fallacious. The Supreme lift replacement is a prime example of the USFS responsibility to not only evaluate projects at their initial conception, but to continue to offer oversight and inspection during design and

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construction phases. If such oversight is outside the area of USFS expertise or budget, such effort must be delegated to other agencies which have that expertise such as Salt Lake City Public Utilities, Salt Lake County Health Department, and/or the Town of Alta building and inspection officials.

Please remove my name and contact information in any distribution of these comments.

Sincerely,