



Friends of Little Cottonwood Canyon
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LCCfriends.org

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Wasatch Front Regional Council (WFRC)

RE: Regional Transportation Plan (RTP) Friends of Little Cottonwood Canyon Public Comments

Friends of Little Cottonwood Canyon (FoLCC) is a coalition of Utah residents, outdoor enthusiasts, and conservationists bound by our love for the extraordinary and unique landscape of Little Cottonwood Canyon. We are wholly committed to protecting its stunning beauty and access to it—not just for skiing, climbing, and hiking, but for the canyon itself and its inhabitants. More than a recreation spot, the canyon is a sanctuary of wild spaces, pristine watersheds, and untouched alpine backcountry.

We champion common-sense, affordable, sustainable solutions to managing canyon recreation and visitation that enable meaningful human connection with these lands while fiercely protecting their ecological integrity. We are a collection of business-minded individuals who support fiscally responsible government and the appropriate separation of public funding and private enterprise.

As with so many others in the region, we remain opposed to the Little Cottonwood Canyon gondola because it is an extremely costly public project that primarily benefits private ski resorts while failing to reliably solve canyon transportation problems. We have argued it would permanently alter the canyon's natural character, threaten watershed and environmental resources, and encourage even greater visitation and congestion over time. We also believe less expensive transit alternatives were not fully explored and remain troubled by perceived political favoritism, lack of transparency, and growing commercialization of the canyon. All these reasons as well as others identified three years ago still are valid.

While we were disappointed with the initial decision of the WFRC to include Phase 3 in the Regional Transportation Plan (RTP) three years ago, we appreciated the Council's vote to prioritize Phase 1 & 2 and implement evaluation of Phase 1 and 2 before advancing to Phase 3 of the EIS. We also appreciated a comment by Mayor Ramsey: *"one thing that I want to make really clear is that this (RTP) plan is updated every four years. This is a living plan, a living document. Every four years it's updated and I can assure you the plan from 25 years ago does*

not look the same as the plan we approved today because Utah is changing and growing. It is evaluated ongoing. There are amendments that can be made. This is a living process and with that I'm confident that the right things can happen to help us function smoothly and provide solutions to Little Cottonwood Canyon that are appropriate and environmentally sound and will help all parties involved and help alleviate some concerns about the future of the Canyon as we all want to protect the beauty of what we have here in Utah." This statement is a clear recognition that the WFRC embraces change when change is required.

So what has changed? What new information might impact how future elements of UDOT's 3 Phased proposal for LCC fit in the RTP? Is there information that is available now but was not in 2023 that should be considered as the RTP is reviewed?

1. UDOT consistently said the gondola was superior to enhanced bus service primarily because of **travel reliability** — meaning the ability to maintain predictable travel times during storms, crashes, avalanche control, and congestion in Little Cottonwood Canyon. Yet that would not have always played out that way the last of couple years. In 2022-23 LCC received approximately 900 inches of snow. Avalanche closures were common and the resorts were under lock down during most of April 2-8. During that time the road was open briefly in the mornings and afternoons. The gondola would not have operated during 80% of this time as the resorts were subject to interlodge restrictions and UDOT stated that it would not operate under these restrictions

Further, regardless what UDOT has said, the gondola is not impervious to weather. It cannot operate in winds gusting to 65mph (LCC is subject to occasional sustained hurricane force winds of 88 mph and more), has to stop for 20 minutes with each incidence of lightning, and is impacted by icing on cables and sensors. Snowbird's tram has been down with these issues on numerous occasions while the highway was open.

Ask any LCC skier and they will tell you about mechanical lift breakdowns. It happens. The drive mechanism of a ski lift and a gondola are similar except this gondola will be more complex: 4 systems tied together: base to parking in mouth of LCC, mouth to Tanner's Flat, Tanner's to Snowbird, Snowbird to Alta. When there is a break in one system the whole thing stops. In reality, UDOT will probably make the Bird to Alta a separate, no-linked lift, but they couldn't put that in the EIS because it would have increased the gondola travel time for Alta skiers and made it even worse than buses. Real conditions say the gondola is not nearly as reliable as has been marketed.

2. At a recent Sandy City Council meeting (March 31, 2026) Devin Weder from UDOT reviewed plans for the Canyon with the Council. He made several statements that raise concerns for us:
 - a) Stated the gondola was more reliable because it could continue to operate during and after an avalanche, despite the FEIS clearly stating the opposite. However, according to UDOT's own documents, the gondola must halt for avalanches and stay halted while it is inspected post-avalanche (see e.g., Final EIS p 2-89)

- b) Claimed the gondola will be needed regardless of how well bus service works because bus service will not be able to meet the 2050 demand, only the gondola will. This directly contradicts UDOT's published findings in the EIS and ROD that state that at least two bus alternatives can carry the exact same capacity as the gondola in 2050.
 - c) Acknowledged that the gondola will have no connection to regional public transport whatsoever unless UTA happens to provide some in the future. This is a breach of a core mass transit principle.
 - d) Stated the gondola was preferable because of its lower operating costs, despite stating that UDOT expected the *resorts to pay for most of the bus operating costs as they do now* (is UDOT playing fast and loose with numbers used to justify their conclusion?).
 - e) Stated that in an EIS addendum that UDOT had abandoned one site as a gondola base and mobility hub because it was located on the Wasatch fault. Earthquake risk was too great from a safety perspective. Yet, UDOT has selected a mobility hub location at BCC that it believes may be sitting on that same Wasatch main fault and the LCC gondola base is only a few hundred meters away from the main fault.
 - f) Acknowledged they have not considered climate change because it is too unpredictable. (Long term forecasting of climate pattern's impact on the ski industry actually has been viewed as pretty accurate.)
 - g) Stated that its \$350M investment in improved bus service in Phase 1 will not be wasted once the gondola starts, even though all improvements from the \$350M investment will be abandoned once the gondola starts, with the exception of the BCC mobility hub and BCC resort bus stops.
 - h) Stated categorically that there will be no bus traffic to the gondola base or in the canyons once the gondola starts operation. Neither UDOT nor the Council seemed to realize that halting all bus service will create a 30% increase in car traffic on 9400 to reach the gondola base—the gondola will make ski traffic in Sandy 30% worse. By UDOT's own numbers 40% of canyon visitation comes up 9400. Weder just stated what opponents have said all along: The gondola just moves congestion down the hill.
3. Separate from the Sandy meeting, we know the LCC gondola loading station and parking garage are located on top of a known EPA Super Fund site, the Davenport and Flagstaff Smelters. The soil at the site was known to contain harmful levels of lead and arsenic and was only *partially* remediated. UDOT is aware of this but did not include or project remediation costs in comparing the Gondola B option to the Enhanced Bus option. UDOT stated they know there is contamination but stated they will determine what needs to be done once they start PHASE 3 construction. Super fund site remediation may require millions of additional tax dollars not included in cost projections and comparisons.
 4. During the original WFRC meeting, there was a request from Mayor Wilson that the process take a one week delay to consider additional information on the appropriateness of excluding Phase 3 from the RTP. The Council was operating with information presented in a legal opinion previously obtained by the Council from the

firm Stoel Rives (SR) that all 3 Phases needed to be included in the RTP. The Mayor had an opposing opinion from another legal source but needed time to have it transcribed and presented to the Council. That request was voted down. That was then. Now there is no urgency to submit the RTP. The Council can and should consider the veracity of all conflicting claims. Additionally, the use of SR may have been a flawed choice. In a previous action, SR represented Snowbird, a founding member of Gondola Works, a gondola advocacy group, and a clear beneficiary of a taxpayer-funded gondola. As such SR had an undisclosed conflict of interest. WFRC needs to clear the air with a second opinion on the matter of excluding Phase 3 from the RTP.

Furthermore, we question the validity of the opinion issued by SR that the WFRC had to include the LCC Gondola in the RTP at least for the following reasons:

- a) SR failed to mention Appendix A of 23 Code of Federal Regulations (CFR) §450, which details that “for 40 years” it has been the intent of Congress that transportation planning processes (such as the RTPs created by the WFRC) should be the foundation for “environmental analyses produced to meet the requirements of the NEPA” process. While Appendix A is “non-binding”, how can it be true that it is the intent of Congress for NEPA processes to originate from transportation planning processes, but also that a “preferred alternative” from a Final EIS document must be incorporated into an MPO’s RTP?
- b) According to the Federal Highway Administration’s (FHWA’s) “Transportation Planning Requirements and Their Relationship to NEPA Process Completion” document, in order for a Record of Decision (ROD) to be signed, the project in the ROD must be consistent with the MTP. This suggests that if the WFRC had not included the gondola in the previous RTP, UDOT and/or the FHWA would not have been able to complete the NEPA process, and alludes to the WFRC having a greater degree of authority than SR determined in their memorandum. Given the timing of the previous RTP and UDOT issuing the ROD, this raises the question of if UDOT knew of this requirement and brings into question the role of UDOT in the SR memorandum that told the WFRC of their complete lack of decision-making power in excluding the gondola from the previous RTP.

At least, for the reasons mentioned above, we urge the WFRC to pursue a separate legal opinion from counsel who has had no representation of a pro-gondola entity to determine the authority of the WFRC in excluding Phase 3 from the present RTP.

5. Other factors have changed since the gondola’s Purpose and Need was written in 2019:
 - a) The world market for building materials (steel, copper) necessary to build the world’s longest and most complex gondola has drastically changed since UDOT projected costs. Costs have been driven up in light of unpredictable trade tariffs. At present, steel, copper, and aluminum are all tariffed at 50%. Cost projections need to be updated for the original options.

- b) The results of warming and weather pattern changes are being felt. The numbers from the National Ski Areas Association are in, and the 2025-'26 season saw 33 percent less snowfall thanks to a significant drought in the West. As a result, the ski industry recorded nine million fewer skier visits, leading to our worst season in years. (Ski Magazine, May 12, '26). Long-term forecasts do predict shortened ski seasons with precipitation moving toward wetter/heavier snow, rain, and less dry powder. Whether or not these predictions hold they should give pause if we are basing the need for a gondola on a continuation of the "greatest snow on earth". Those days may be numbered.
 - c) It is no secret that UTA would like to be out of the Canyon ski bus business. We understand and respect that. This type of service does not fit their business model. It is recognized that Enhanced Busing has to operate at a higher level than previous bus service in the Canyon.
 - d) Over the past five years, public sentiment surrounding major transportation and development initiatives in Utah has shifted noticeably toward skepticism and distrust. Many residents increasingly perceive that large projects involving substantial public funding and politically connected interests move forward despite unresolved questions about cost, environmental impacts, long-term effectiveness, and meaningful public support. In the case of the Little Cottonwood Canyon Phase 3 gondola, the persistence of the project despite changing conditions, evolving transportation patterns, unresolved operational concerns, and sustained public opposition has contributed to a growing sense of public powerlessness and declining confidence in the planning process itself. The public wants a process that is transparent, with outcomes that demonstrate that their comments were valued at par with those from special interests.
 - e) It is encouraging to see that the WFRC has introduced a new category for projects: "Exploratory Concepts". These include projects that may require additional study, technology development, political support or funding. Such a category allows space for a concept to receive focused analysis, scenario modeling, and stay on the view scape without promising implementation, guaranteeing funding and not necessarily prioritized for construction. A novel (unproven) gondola system falls into this category.
6. We are concerned about UDOT's commitment to make Enhanced Busing successful. UTA/UDOT's past efforts to deliver bus service that meets the need and builds/maintains trust in the bus service has been troublesome. UTA never returned to 15 minute interval service that was in place in 2022 that had been terminated when driver shortages became an issue. Are driver shortages still an issue? Previously, buses operated on 15 minute intervals morning and afternoon and provided good service even on busy days. The 30 minute schedule on weekends and powder days often left riders standing at stops as full buses drove by. Unsurprisingly, this lack of reliability drove riders to give up on buses and turn to private cars clogging the Canyon. In response, what was put in place, and promised these last 2 years, was 30 minute schedules with a surge bus standing by to cycle behind the scheduled UTA bus and pick up the overflow. Reports

this effort was hit and miss the previous year. Same commitment was made for this recent year. But on February 21, a weekend preceding a large storm, 4 UTA buses arrived at Snowbird between 8:30a and 10:30a with the marque reading “Bus Full, Sorry”. When asked if the surge buses were operating, the driver said there were surge buses but they had been directed to operate in BCC that day. Unreliable bus service drives riders to their cars increasing private vehicle use in the canyon.

And here’s one more miss on providing good bus service: Our friends with Canyon Guard have been monitoring challenges riding the current Canyon bus system and they report that a lack of parking at scheduled stops makes it challenging for riders to consistently make use of the bus. If we are going to get drivers out of cars bus reliability has to drastically improve.

That was this last season. Here is what we learned from UDOT at the Sandy City Council meeting for what riders can expect in future bus service for Phases 1 & 2:

- a) UDOT is planning a 2-step bus system for 9400 S. UTA will pick up riders starting in historic Sandy and service stops up 9400 terminating at the Walgreen Park n Ride on 9400 and Highland. Riders will disembark and join the line for a UDOT bus to take them the rest of the way to the resorts. There was no indication if UDOT will service the current stops traveling east on 9400 up to the Church.
- b) The UDOT representative defended this 2-bus approach saying “ we think riders prefer 2 short bus rides over one long one.” By this logic UDOT is suggesting that, when planning a trip to Boston, flyers would choose to change planes in Des Moines with a layover rather than taking a nonstop. Not likely. It also seems UDOT is ignoring what riders have long since asked for: a combination of express and local buses.
- c) The Walgreen Park n Ride location will become the sole pick up point for LCC riders originating from the south and southwest. The parking lot has approximately 345 parking spaces. The lot currently functions primarily as the major southern staging area for the 994 ski bus system. Half a dozen 12-passenger UTA Ride Share vans use the lot as their primary starting point. A loaded 12-passenger van can equate up to 12 personal parked cars. The lot also functions as a bus stop for service connecting the park-and-ride to Historic Sandy TRAX Station and nearby Sandy destinations. At the same time it is used as a carpooling location for people heading north into the City. Public discussions and rider reports indicate the lot has become heavily utilized on peak ski days. With all this activity, this lot may not be capable of handling the increased parking demand, especially when that parking lot becomes the only place where skiers may board a LCC bus.
- d) UDOT acknowledges that it has no plan at present on how to get skiers down the ridge from a proposed Alta bus terminal along the highway within Alta proper overlooking the ski area to those ski lifts below or back up the hill from the lifts at the end of the day. With no transport from the bus terminal up and down the ridge to the ski lifts, no one will take the ski bus to Alta.

The point here is that UDOT and UTA are falling short in creating bus service that builds trust and the support of riders. Trust and reliability are important if we want people out of their cars and on the buses. And from what we can see of UDOT's plan for providing "Enhanced Busing" in Phase 1 & 2 it will not provide a service that will motivate riders. In fact, it appears it will do the opposite. Therefore, the effort ensures a bad outcome with results paving the way for a Phase 3 Gondola. Utahns deserve better. And if we are to trust in the WFRC process that includes an evaluation between Phases before proceeding to a next Phase we look to the WFRC to ensure that Phase 1 & 2 with Enhanced Busing is given the full support needed to be successful. If we are going to get drivers out of their cars bus reliability *and* mobility has to improve.

7. Recently there has been some conversation regarding the legitimacy of the conclusions UDOT drew, as recorded in their EIS, that were based on work product of the Mountain Accord (MA). Going back to a March 15, 2019 article in *The Park Record*, there was a lawsuit that raised the question: Was the MA subject to the Utah Open and Public Meetings Act (OPMA), a statutory mechanism by which citizens exercise their constitutional right to participate in the governmental decisions that affect their lives? And if so, did they violate that Act?

As reported in *The Record*, plaintiff Norm Henderson asserted that the MA process was illegitimate as it did not give proper notice of meetings and neglected to record audio or minutes from those meetings. And, as such, that ideas or work product that came out of that process should be questioned. Further, he stated that recommendations that come out of it (MA) should not be relied upon. UDOT cites the MA numerous times throughout the EIS as the basis for some of its rationale leading to their selection of the Gondola B option. The Judge in this case ruled that MA was indeed subject to OPMA but withheld judgement on the question of whether they broke the law. A key question for the WFRC: If, through some subsequent process, it is determined that MA did break the law and was an illegitimate organization what risks does the WFRC take in keeping UDOT's Phase 3, the gondola implementation, in the RTP?

Suggested Actions

Given WFRC's stated commitment to adaptive planning and periodic reevaluation as conditions change, now is an appropriate time for change. We ask the WFRC to place Phase 3 on hold and reassess whether its original assumptions, benefits, costs, and public support remain valid in 2026 and beyond. It is also appropriate to assess the risks of leaving it in the RTP as is.

We urge the WFRC to remove the Phase 3 gondola from the RTP for reasons identified above along with the fact that it is not needed, if ever for another 20 years. If the WFRC feels that it cannot remove Phase 3 from the RTP, we request that the Council formally amend the Regional Transportation Plan to require re-evaluating the need for the next phase of the Little Cottonwood Project after each phase is completed and operational for a defined period, before proceeding with the next phase. We recognize and appreciate that such action is listed in a one-page summary sheet of the 2023-2050 RTP and LCC EIS. But our understanding is that this

resolution was a nonbinding vote. We also remember one of the Council members expressing the observation and concern that once a project hits the RTP it sometimes takes on a life of its own. Forces outside the WFRC find ways to get special interest projects funded and implemented around the WFRC process. Removing the gondola or officially spelling out the prioritization of Phase 1 & 2, and implementation and evaluation of these Phases before advancing to Phase 3 of the EIS within the RTP ensures the plan does not advance without WFRC approval and that the issues identified here are not ignored.

Another acceptable action could be moving the gondola Phase 3 activities into an Exploratory Concept category. This would allow for more scenario modeling and additional analysis of claims and concerns.

As mentioned earlier, the evaluation of Phases 1 & 2 is critical. Without attributing motive, we have pointed out how UTA and UDOT's actions have not always resulted in rider trust of the bus service and a willingness for them to use it consistently. And, if a true and valid evaluation of Enhanced Busing is to take place, that must mean "best in class" busing logistics and practices need to be in place and practiced. If the public is to trust the evaluation process the implementation and evaluation activity needs to be seen as objective and unbiased. We ask the WFRC to play a lead role in defining the measurement criteria and assessing results. We ask that you involve outside community members in this process. We certainly need your assistance in assuring that Enhanced Busing is truly enhanced and best practices to build busing commitment and ridership are employed (ridership incentives and private car use disincentives).

Friends of Little Cottonwood Canyon values the work the WFRC does and its contribution to the Region. On a broader plane, like other citizens in the state, we do have concerns for observed trends questioning the efficacy of public involvement. We look to the WFRC to help restore faith in this process and appreciate your efforts to reach out to the public in this regard. We are available as a resource to provide additional information or clarifications on our concerns and suggestions.

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FoLCC is a 501c4 nonprofit coalition of Utahns advocating for common sense transportation solutions in Little Cottonwood Canyon