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Comments: This is a protest for the Mill Creek Canyon road improvement project, funded via FLAP grant funds. I have commented in every round. My comments below will generally echo those that I have already made.

Roadway width:
The first point of the Purpose and Need was "The narrow and variable road width makes it difficult and dangerous for vehicles to pass each other." Though I have mentioned it in every comment period, there has been no acknowledgment of my comment that recent studies show that narrow lanes are in many cases actually safer than wider lanes. According to a Johns Hopkins report: "All else being equal, they found 9-foot lanes are just as safe as 10- and 11-foot lanes, and they are safer than 12-foot lanes. At speeds below 30 mph, there is no significant difference among lane widths, but at speeds between 30 and 35 mph, 9-foot lanes are the safest" due to increased driver caution. There has never been any data presented in this project that supports the increased safety of wider lanes.

There has also never been an acknowledgement in this project of the fact that Federal Highway standards do not preclude 9-foot lanes, which are common on more rural and mountain roads, which clearly is the case with the MCC road. In fact, the project does allow for 9-foot lanes at a couple of different points, indicating that indeed 9' lanes are "okay", but apparently for just those short sections.

There have also been studies that show that a lack of striping also increases driver acuity and results in lower speeds and more safety on smaller mountain roads; this concept was brought up as an early option but was inexplicably dismissed. Nine foot lanes and no striping could have been implemented and provided the increased safety and desired road widening while also providing a width to accommodate a bicycle lane to the top of the canyon, but again were dismissed.

Auto accidents: while there was reference in the to anecdotal information that there had been many auto accidents in the upper canyon, no actual statistics were ever shown. A request in to Unified Police indicated that there was approximately 1-2 reportable accidents per year in the upper canyon, with the location identified by an address (eg "8400 E Millcreek Canyon Road" - the winter gate is around 7000 E). Ironically, there were many, many more accidents and incidents on the lower canyon road, which of course is open year round but also has much wider lanes and longer sight lines, which were purported to be the key safety components being built into the upper canyon. The lower canyon speed limit is 30mph, which is most-often ignored due to aforementioned long sight lines, wider lanes, and virtually no enforcement.

Wider lanes enabling emergency vehicle access: According to the EA: "These same conditions inhibit the ability of emergency vehicles to efficiently travel through the canyon." Unified Fire has been going up and down Mill Creek Canyon for decades and have rarely, if ever had problems. Yes, the very top of the canyon just below Big Water is very narrow and can only accommodate one big truck, but as a UFA representative told me: "We have really big, bright trucks with loud sirens and people get out of our way everywhere, including MCC." According to the UFA representative, though they are indeed okay with road widening, it clearly is not necessary nor were contacted by the FS, FHWA, or any consultants regarding their vehicle safety needs, and they have never had their own accident in the canyon.

Cyclist safety
The second point of the Purpose and Need was "The lack of road shoulders, lack of bicycle lanes, limited sight distances (Figure 4), informal parking, and lack of crosswalks and signs create unsafe conditions for cyclists and pedestrians using and crossing the roadway. Improvements are needed to better accommodate pedestrians and

bicyclists." Because of the lack of vision on the total road width pointed out above, there was only room to put in an uphill bike lane to Elbow Fork, only one-third of the way up the canyon. Despite the salience of this point, the reason for NOT doing these bike lanes was a) environmental concerns (so environmental concerns trump cyclist safety concerns, despite the fact that cyclist safety was the number 2 point in the purpose and need?), b) physical constraints (though the road will be narrowed to nine feet in places, and the "physical constraints" allowed for 2x10 foot lanes and middle striping?, and c) economic concerns (despite the fact that this is a $20M project with large excavations for significantly new parking areas and rebuilding bridges, there was not enough money to build in width to create a bike lane to the top?).

Though not documented, project leaders stated in public meetings that only "some" of cyclists riding up the canyon carry on to the top of the canyon past Elbow Fork. I have provided information from the cycling/fitness app Strava that shows that 90% of cyclists who ride to Elbow Fork continue on up to the top; indeed, Elbow Fork is the top of the steepest hill in the upper canyon and past that the gradient lessens to a more manageable pitch, road cyclists are most often interested in riding to "the top," and mountain bikers are now using the road climb to access the new upper Pipeline trail for an easier, more efficient climb and to avoid conflicts with downhill trail riders. Yet no data was ever presented by any of the project leaders to indicate any use patterns by cyclists that was used in the design of the project.

But regardless of use, it appears that your second most important point- cyclist safety - was only incorporated for one third of the project. Which is clearly a rejection/dereliction of an important aspect of the Purpose and Need.

Forest Plan Consistency: There has long been talk of a need to address traffic in Mill Creek Canyon. Multiple studies, including the SLCo's contracted Fehr and Peers study of 2012, and FS documents emphasize the need of a shuttle or other transit plan. The FS and FHWA contend that there was never any consideration of this with the MCC FLAP project; however, the 2003 Uinta-Wasatch-Cache Forest Plan specifically states: "The Forest Service will work actively with other parties to explore options for reducing private vehicular use within these Canyons." Enabling more efficient auto use of the canyon without addressing the inherent problem of too many cars in the canyon is a direct dereliction of duty to fulfill this stated obligation. Additionally, prioritizing vehicle access and not making the aforementioned narrower lanes and accommodating bicycles via a bicycle lane above Elbow Fork is against the 2003 Forest Plan's stated goal to prioritize recreation over vehicle access. Neither aspect was addressed at all in the Forest Plan Consistency Review Document (April 20214) for this project.

FONSI: The document presented by the National Forest Service was a "Finding Of No Significant Impact." According to the Forest Supervisor there was a relatively high number of public comments submitted during the open periods, and only a quick skim of the comments clearly shows that the majority of the comments were against the widening and straightening of the road and the lack of a bicycle lane to the top. Though I have been chastened several times that these comment periods are not votes nor popularity contests, it is clear that a "Significant Impact" is being anticipated by the commenters. Therefore, it is difficult for me to understand how there can be "no significant impact" if indeed the FS and other agencies expend the resources to generate and evaluate comments and expect the community to supply the comments and then those comments are consistently opposed to project developments.

In the case of the MCC road improvement project, each phase of the project reiterated that despite assertions that the public comments from the previous comment period were read and considered, the project consistently moved ahead with what the agencies felt compelled to do by regulations and that the project was a fait accompli by conveniently ignoring the majority of the comments, other statistics, and recent research that may have refuted some of the agencies' key assumptions.