

To Whom It May Concern, September 6, 2022

Thank you for engaging with the public on this important matter. Our public lands are a shared trust that benefit not only citizens of this country but people who visit from around the globe. Save Our Canyons comments on the Recreation Enhancement Act Fee Program (REA) are focused primarily on the Central Wasatch because of the variety of proposals that this region is confronted with. Though we are citing geographically specific examples, our comments are applicable to the entire Uinta-Wasatch-Cache National Forest (UWCNF) to include the areas under this recreational fee program proposal. Other canyons and recreational areas throughout the forest have similar but different nuanced challenges. We appreciate the opportunity to have our comments regarding the Recreation Enhancement Act considered.

Save Our Canyons, founded in 1972 is dedicated to protecting the wildness and beauty of the Wasatch Range and has long been a partner with the Forest Service. As a member driven organization, we represent a growing and passionate group of people that have a diverse relationship with the Wasatch Mountains. As the UWCNF continues to face abundant external pressures and budget cuts from Congress, the best strategy of how to maintain these areas we frequently use - picnic areas, campgrounds, trailhead bathrooms, dispersed camping areas, trails, trail signage, parking lots, and so on is a real challenge. It is our goal to provide perspective and hear response, so we are best able to relay guidance and updates to our membership.

The objectives cited in the REA proposal are important to our communities' future; not only for recreation, but also for access to nature that supports public health. We find it concerning to have areas treated one by one rather than as the connected habitat and ecosystem that they are. The health of the ecosystem and our watersheds must come as the top priority. The Wasatch, a forest attracting millions and millions of visitors annually, is distinctive in having a watershed that is open to access and recreational use.

Save Our Canyons recognizes funding is an obvious need, however are we causing unintended consequences with the approach of some sites under a fee and others reduced, removed, or without? Treating the whole forest, which is in dire need of funding for restoration and management may be the comprehensive approach we need. This raises the question, is there a more streamlined approach like a national park, a state park or Millcreek canyon model where visitors are assessed an entrance (or exit) fee regardless of the destination of their visit. Even those wanting to go for a scenic drive, perhaps even a bike ride, or visiting a resort, should have to join in contributing, not just to the scattered selection of sites in the REA proposal. However, with tolls, paid parking at resorts, gondolas, fee booths, and existing programs merely visiting the forest becomes a real financial burden, exacerbated by the potential for complication of who or where to pay and why.

It is clear, upon visiting the UWCNF during a busy time that management of these areas under cut from a lack of the resources needed to manage visitation to the Wasatch, but we are concerned about where and how those fees are being assessed and how they will impact the Wasatch, visitors, and underrepresented communities. As we grapple with capacity, transportation, and visitation, as we work with a host of local and regional governments who want to see improved year round transit access, we wonder if the REA as proposed may become a barrier for collaboration. For example, the Utah Department of Transportation (UDOT) EIS study for Little Cottonwood Canyon has identified a preferred alternative decision. How will the Forest Service and the state agency work together on the details of how the REA and other transportation fees would be implemented? How would a UDOT alternative, whether gondola or bussing factor into the 12 sites proposed for a fee in the Central Wasatch Canyons? Additionally, the Forest Service states that 95% of collected fees will go back into the forest. The proposal is likely to increase use at non-fee sites including user created trails or pedestrian access along roadways. How will this REA and master and forest wide planning address the induced impacts of increased visitation to non-fee sites? There are areas beyond the Salt Lake Ranger District where amenities, signage, or adequate parking or public transportation access that may be lacking currently or falter under increased pressure. Does the objective cited of “providing quality recreation opportunities, protect the environment from user-created damage, promote safe visitor experiences, and achieve financial sustainability in the short and long term” acknowledge areas which are not resilient or able to handle this increase in visitation?

Save Our Canyons strives to be active in the planning and management, maintenance, and overall conservation efforts across the public lands of the Wasatch Range. In addition to acting as a resource to public land managers, we provide our large volunteer base to assist the Salt Lake Ranger District in eliminating backlogged projects through our Wilderness Stewardship Project. Over the last five seasons, we have had great success hosting a handful of workdays across the Tri-Canyon area each summer and fall. On the other hand, we have had difficulty securing more than 3-5 workdays a season when in reality we could host 10 or more each year. A myriad of complications or inefficiencies have caused this blip in our ability to help alleviate the massive workload the UWCNF faces. If the district offices across the UWCNF prioritized volunteer efforts from Save Our Canyons and numerous other organizations, would this help with the overall maintenance issues and long term goals of preserving heavily used areas across the UWCNF? If volunteering is not in the true bandwidth of the districts, what alternatives are being presented that do not require fee areas?

There are dollars on the table we could forge partnerships to pursue. Save Our Canyons has joined efforts with the Salt Lake Ranger District for more than just on the ground maintenance. We have worked collaboratively to create shared stewardship projects such as the Wasatch Legacy Project, Mountain Accord, and many others. We have secured funding from third party organizations and foundations to further our ability to fund trail projects that have benefited the forest. These funding sources have the potential to be a major contributor that alleviate much of the financial burden without requiring fees to be assessed. We support collaborative action that harnesses our collective efforts to be proactive in a regional forest approach

Not only does volunteerism and collaboration add value to our communities and the health of the forest, but it is also a way for people who haven’t experienced the Wasatch Range to have a unique opportunity to learn about, learn from, and explore in the mountains. Research shows that fees create an acute barrier to minority and poor populations. As we've begun outreach to some of these populations as part of our “Barriers to Nature” initiative, we are hearing the same theme. What is more, is that these populations, particularly those who aren't what we would call habitual recreationists, tend to visit sites that have picnic tables and bathrooms, meaning that these casual users of our shared public lands (who generally have less time/opportunity to recreate) will be paying a greater share than those who may visit 20 plus times a year.

In conclusion, we wish to recap and highlight the areas of concern that Save Our Canyons would like addressed and where we would offer partnership in finding solutions.

* Should the Recreation Enhancement Act be a tool that comes as part of recreation planning and resource management, for example the Salt Lake Ranger Districts Tri-Canyon Trails Master Plan update
* Forest District wide scope modeling a National Park or State Park rather than just 12 (of 119 new, increased, decreased, eliminated) sites in the Salt Lake Ranger District or the
* Provide transparency to how this will affect or overlap with other existing or proposed projects existing or proposed that will also fee based
* The financial cost creates a barrier for infrequent users that is higher than habitual users and this must be addressed
* Opportunity for collaboration to secure funds from grants and other programs that exist
* Impacts to non-fee sites will increase so assuming 95% of funding goes back into forest how is this divvied or allocated

Thank you for your time and attention on this important issue. Please contact Save Our Canyons with any questions you may have related to our comments.

Sincerely,

Alex Schmidt

Campaigns Coordinator

Save Our Canyons