

SAVE OUR CANYONS

BCC Environmental Study
c/o HDR
2825 E Cottonwood Parkway #200
Cottonwood Heights, UT 84121

December 13, 2024

To Whom It May Concern,

1. Introduction and Overview

Thank you for the opportunity to provide scoping comments on the Big Cottonwood Canyon (BCC) Environmental Review process. As a 52-year-old organization dedicated to the preservation of the wildness and beauty of the Wasatch Mountains, Save Our Canyons (SOC) views Big Cottonwood Canyon as an area of unsurpassed importance to our mission, and we therefore see it as critical that any development occurring in it be guided by careful planning designed to minimize environmental harm. Save Our Canyons is dedicated to protecting the beauty and wildness of the Wasatch Mountains. We hope the comments we provide here will help in the development of such planning.

In general, Save Our Canyons is supportive of efforts to alleviate congestion in BCC using low-impact solutions, such as providing enhanced bus service and peak-period tolling, identified in the stated purpose and need on the project's website. SOC supports continued compliance with the Uinta Wasatch Cache National Forest (UWCNF) Master Plan that disallows expansion of parking on UWCNF lands. In this review, SOC encourages UDOT to include an analysis of a regional, multi-canyon transportation system which originates at multiple nodes throughout the Salt Lake Valley, and recognize the need for comprehensive regional planning to reduce canyon congestion across the Central Wasatch Canyons.

Detailed in our comments, we request additional considerations and study be conducted, an expansion of the project's purpose and need be considered to include additional environmental considerations, with a goal of maintaining or improving the integrity of the current viewshed, airshed, watershed and ecosystem functions within BCC. In addition, UDOT should expand the project's purpose and need to include an evaluation of year-round, sustainable and equitable public transportation needs and a larger project area to better address the causes leading to additional congestion within the canyon.

Request for Clarification on NEPA review, Additional Environmental Review

UDOT clearly states "This environmental study will be prepared in accordance with the National Environmental Policy Act (NEPA)" on its project page. The phrase "environmental study" is ambiguous and has no meaning in the application of NEPA. Before proceeding, UDOT should clearly identify which category of study it intends to proceed with. At subsequent stages of UDOT's review, determination of the level of environmental analysis should be clearly stated by UDOT, as well as justification as to the decision making process for why this review would be conducted as an Environmental Impact Statement (EIS), Environmental Assessment (EA), or Categorical Exclusion (CE).

A CE/EA is inadequate for evaluating the transportation needs in UDOT's environmental review in BCC because it fails to account for the complexity and scale of the potential environmental, social, and

economic impacts involved. A CE/EA is typically reserved for projects that are expected to have minimal or no significant effect on the environment. However, addressing transportation needs in BCC entails much more than minor adjustments; it involves large-scale interventions in a sensitive, heavily-visited natural area and protected watershed, with reasonably foreseeable direct, indirect and cumulative impacts on surrounding ecosystems, air and water quality, and the recreational experience of canyon visitors. A study of year-round, sustainable canyon transportation is best suited to evaluate reasonably foreseeable direct, indirect and cumulative impacts to the environment as a result of UDOT's proposed alternatives.

The scope of potential environmental impacts in BCC warrants a more comprehensive review. Expanding transportation infrastructure, such as increased bus service, tolling systems, or mobility hubs carries an undeniable risk of disrupting wildlife habitats, increasing the amount of impervious services in the canyon, and altering the natural landscape. The canyon is home to diverse flora and fauna and is frequented by various user groups who depend on its accessibility for recreational purposes. A CE/EA does not provide the level of scrutiny necessary to understand how these infrastructure changes could affect species that are sensitive to noise and human activity, nor does it evaluate the impacts of increased visitation and runoff on the canyon's water quality and ecosystem health.

Additionally, the social and economic impacts of proposed transportation improvements are significant and extend beyond what a CE/EA can address. For instance, implementing a tolling system could change visitor demographics, potentially excluding lower-income visitors who rely on the canyon for affordable winter recreation. Moreover, by altering transportation and accessibility, UDOT's project could shift traffic patterns and congestion to surrounding canyons and other popular recreation areas nearby, impacting local communities in unforeseen ways. The impact on public access to public lands requires careful analysis to ensure that changes do not disproportionately affect specific groups or limit equitable access to the canyon's resources.

Finally, a CE/EA lacks the public engagement opportunities that an EIS would provide. Public involvement is crucial for identifying and addressing concerns from local stakeholders, conservation groups, recreational users, and residents. BCC's transportation challenges are highly visible and involve a broad range of interests, from skiers and snowboarders, to climbers, bikers, conservationists, homeowners and community members. A more thorough review, such as an EIS, would not only provide a detailed analysis of environmental and social impacts but would also allow for public input to help refine and improve proposed solutions, ensuring a transparent and inclusive decision-making process.

Specifically, an Environmental Assessment must take a hard look at the proposed action such that a determination that the impacts are significant impacts, or the study will determine that the hard look of the proposed actions finds no significant impact (FONSI). A FONSI for UDOT's proposed project would be inadequate to fulfill NEPA's hard look standard for projects of this magnitude.

Provide Several Opportunities for Public Comment at Each Stage of Environmental Review

Public comment at multiple stages of an environmental review process is mandated in NEPA review to ensure a comprehensive, transparent, and democratic approach to decision-making for federally-involved projects. Engaging the public at several stages provides diverse perspectives, offers insights from those most familiar with the affected environment, and helps ensure that a wide range of potential impacts and concerns are considered. Public feedback also ensures that potential social impacts, such as changes to community accessibility, recreational use, and economic impacts, are factored into the decision-making process.

Additionally, providing for public comment throughout several stages of environmental review enhances transparency and accountability. When the public can participate at multiple stages, stakeholders can see how their concerns are being addressed and can follow the project's progression. NEPA's phased approach, which includes an initial scoping phase, a Draft Environmental Impact Statement (EIS), and a Final EIS, each with opportunities for public input, ensures that community concerns are taken seriously at every stage. This iterative process prevents agencies from making decisions in isolation and allows for course corrections based on public feedback before a final decision is reached. In sum, several stages of public comment are essential to fulfilling NEPA's requirement of informed, responsible decision-making that takes a "hard look" on cumulative impacts of this project to the environment, the community, and future generations.

2. Expand Purpose and Need to Include Year-Round Transportation Improvements, Expand Study Area

For a robust and effective environmental review, the project's purpose should clearly state evaluating and maintaining environmental conditions, as well as outline transportation objectives met by specific alternatives, focusing on public transit improvements and implementing a toll beneath the ski resorts, as well as specifically mentioning maintenance and improvement of environmental conditions in the project area. In addition, project planners should expand the scope of the need of the study to include year-round transportation improvements. UDOT's study should evaluate developing year-round transit solutions, including 2050+ projections. Senate Bill 2 (2023) does not specify a particular season for utilizing funds for this project, and to better understand the evolving needs of transportation issues in BCC into the future, UDOT's study should include analysis beyond winter months to anticipate these evolving needs.

The purpose of the BCC project should be to provide a year-round, equitable, integrated transportation system that improves the convenience of multiple transportation modes, and substantially improves the reliability, mobility, and safety for residents, visitors, and commuters who use S.R. 190. Through transportation and/or transit improvements, the project should strive to mitigate congestion on S.R. 190, reduce the number of single-occupancy vehicles entering the canyon and improve recreation and tourism experiences for all users of BCC without compromising the natural character of the canyon. The transportation alternatives UDOT has identified should maintain or improve the watershed health, water supply, water quality and other natural resources. They should also consider the character, diverse uses of the canyons natural resources, and importance of the existing contiguous natural landscape of BCC and adjacent canyon ecosystems upon which much of the Salt Lake Valley residents' livelihood depends.

In addition, it is well-documented that traffic and congestion issues facing BCC begin beyond the identified project area (S.R. 190), and affect surrounding neighborhoods and communities at the base of the canyon. The project's purpose and need should be expanded to include impacts to Wasatch Boulevard and Fort Union Boulevard, as well as surrounding communities, to better evaluate the impacts to existing transportation infrastructure and surrounding communities. Traffic congestion issues should be evaluated at

Although there is a clear consensus, reflected in conclusions of multiple planning processes occurring over decades, that the transportation problems in the Central Wasatch canyons are similar and interrelated, and that they therefore need to be addressed with comprehensive and integrated planning, UDOT is pursuing transportation improvements in BCC as a one-off project, with no analysis of how transportation decisions in BCC will integrate with the comprehensive, multi-canyon transportation system, including Millcreek Canyon, BCC and Little Cottonwood Canyon, that earlier planning documents

have concluded are needed. Integration with such a comprehensive transportation system should also be a clearly stated purpose of the project.

I. Include Environmental Considerations in Project Purpose, Expand Scope

The stated purpose of the BCC environmental study is to:

“evaluate tolling and enhanced bus service to address wintertime traffic congestion management on State Route (SR) 190 in BCC as directed by the Utah State Legislature in Senate Bill 2 (SB 2) (2023).”

An appropriate and representative purpose statement for the environmental review should prioritize protection of the environment, including natural and scenic resources, with the highest priority given to water quality, supply, and watershed health is foundational to the project. Considering this, the purpose of this project should be to protect the environment and improve the canyon experience for residents, visitors, and businesses through improvements to our transportation and/or transit systems approaching or within the SR 190 corridor. The lack of such language would result in a flawed strategy that we encourage you to correct. We are providing edits to the draft purpose and need statement provided on the project's website that we believe will help accomplish this goal. Our suggestions are underlined for easy identification.

“The purpose of the BCC environmental study is to evaluate tolling and enhanced bus service to address year-round traffic congestion management on State Route (SR) 190 in BCC, as directed by the Utah State Legislature in Senate Bill 2 (SB 2) (2023), as well as impacts to connected roadways, such as Wasatch Boulevard and Fort Union Boulevard. Transportation improvements should maintain or improve the integrity of the current viewshed, airshed, watershed and ecosystem functions. Transportation improvements will also consider the character, diverse uses of the canyon's natural resources, and importance of the existing contiguous natural landscape of BCC and adjacent canyon ecosystems upon which much of the Salt Lake Valley residents' livelihood depends.”

II. Identification of Specific Transportation Metrics to Address Purpose and Need

Including detailed metrics for planned transportation improvements at the outset of UDOT's review will aid in clarifying the need of the review process and ensure that each proposal's impacts and benefits are fully considered.

We recommend that any additional alternatives not identified at this stage of review be identified proactively by UDOT and provided to the public in each subsequent phase of environmental review, or excluded from this study. With defined alternatives, the environmental review can thoroughly analyze each one's capacity to meet the stated goals, allowing for a more focused examination of benefits and trade-offs. By concentrating on specific improvements, UDOT can provide clarity on the effectiveness of public transit options and tolling, ultimately ensuring that the review accurately reflects the community's and ecosystem's needs in BCC. Leaving the alternatives too open-ended, or allowing additional alternatives to be considered at later phases of the study, may increase the risk of solutions that do not address the actual congestion issues or that disproportionately impact the environment, or specific user groups.

In terms of the project's need, we encourage UDOT to consider existing and anticipated conditions on SR-190, particularly the pressures on transportation infrastructure from increased visitation to BCC. Enhanced bus service and tolling policies should target a measurable reduction in congestion and travel times on SR-190, improving both the efficiency of winter transportation and the visitor experience. One approach to evaluating these improvements could involve setting specific goals, such as a 30% reduction in congestion or travel times, measured against baseline uphill and downhill travel times. Establishing clear benchmarks for these metrics would enable UDOT to identify the action alternatives most likely to yield effective results.

As stakeholders in the protection of this canyon, Save Our Canyons advocates for a purposeful, outcome-driven approach to ensure that any improvements respect the natural landscape while meeting the transportation needs of the canyon and broader community.

3. Specific areas for study

I. Mobility Hub Placement Within Study Area

While a mobility hub could reduce the number of cars entering BCC via S.R. 190, placing a mobility hub at the base of the canyon in the location indicated on UDOT's project page (see figure 1) would put the mobility hub squarely out of the project study area and in an area which experiences significant congestion where visitors would be expected to enter and leave the mobility hub. At a minimum, if UDOT is evaluating placement of the mobility hub at the site listed in figure 1, it must extend the study area to include the gravel pit at the base of BCC. To effectively evaluate ingress and egress to and from the proposed mobility hub, UDOT should also extend the study area to include Fort Union Boulevard and Wasatch Boulevard.

STUDY AREA



Figure 1 (Source: [UDOT Project Website](#))

If the proposed gravel pit mobility hub is not included in the study area, an entirely separate NEPA review of the reasonably foreseeable impacts of construction of the mobility hub on the surrounding environment would be required. UDOT should make available to the public its study of traffic flow in and out of the proposed mobility hub. Project planners throughout UDOT's LCC EIS process alluded to the study of traffic flow in and out of the mobility hub. In this review, UDOT should publish its findings related to traffic flow, and analyze the total travel time from various points of origin, estimated time it would take for users

of the mobility hub to board and ride transit across a representative set of peak period days/hours, and any estimated queuing times for users of the mobility hub to access public transit.

The proposed mobility hub will significantly impact residents in the canyon, residents of Holladay and Cottonwood Heights, and the millions of visitors to both Cottonwood canyons since transportation changes would affect multiple canyons, Holladay, and Cottonwood Heights. The impacts of bus stops throughout the canyon may significantly benefit everyone by reducing congestion in the canyon through enhanced transit. Reasonably foreseeable impacts to residents of connected communities and roadways should be included in UDOT's analysis of the expanded study area and proposed mobility hub.

II. Protection of Streams, Wetlands and Water Resources

Although enhanced bus stops are included as an alternative for review by UDOT on its project page, sites of new bus stops are not included in UDOT's study area. If UDOT does not plan to evaluate impacts to water resources that will clearly be affected by users of transportation as soon as they leave the right of way UDOT intends to evaluate, UDOT should engage the necessary state and federal agencies tasked with evaluating impacts to surrounding water features.

To protect these sensitive environments, all construction should maintain at least a 100-foot setback from Big Cottonwood Creek, Days Fork, and Mill D North Fork, consistent with the Development Standards in the Foothill Canyon Overlay Zone (FCOZ). Where design or landscape limitations make a 100-foot setback unfeasible, we request that all structures, parking areas, and other developments be kept at least 50 feet from ephemeral streams and their high-water marks. Any improvement of existing bus stops at Cardiff Fork, Spruces, and Silver Fork should be undertaken with the utmost care for nearby streams and wetlands, in compliance with FCOZ setback requirements.

Concerning wetlands, buildings, accessory structures, and parking lots should be set back a minimum of 50 feet, with on-site wastewater disposal systems set back at least 100 feet horizontally from the delineated edge of any wetland.

III. Design Standards for New Infrastructure Consistent with Foothill Canyons Overlay Zone (FCOZ) Zoning Requirements, 2008 Cottonwood Canyons Scenic Byways Corridor Management Plan

Standards and regulations of the Foothills and Canyons Overlay Zone apply to all development that occurs within the mapped Foothills and Canyons Overlay Zone. Development includes all land disturbance activities such as grading, clearing, and excavation.

The purpose of the design standards within FCOZ are to:

1. Preserve and enhance the beauty of the landscape by encouraging the retention of natural topographic features, such as drainage swales, streams, slopes, ridge lines, rock outcroppings, vistas, natural plant formations, trees, and similar features.
2. Encourage planning and design of development and building sites that balances safety, recreational opportunity, economic development, and enjoyment of property rights, while adapting development to, and preserving natural terrain.
3. Establish a foundation for development in sensitive lands to insure a more harmonious relationship between man-made structures and the natural setting.

4. Direct new development in the canyons and foothills toward areas meeting suitability criteria, as outlined in the Wasatch Canyons General Plan and other applicable general or community plans.
5. Preserve the aesthetic qualities of the foothills and canyons, including ridge lines.
6. Encourage design that will reduce the risk of natural hazards and maximize residents' safety.
7. Provide adequate vehicle and pedestrian circulation.
8. Minimize construction impacts on sensitive lands.
9. Prohibit activities that would degrade fragile soils, steep slopes, and water quality.
10. Preserve environmentally sensitive areas through clustering.
11. Protect streams, drainage channels, absorption areas, and floodplains.

FCOZ also requires that buildings and structures shall be sited to keep removal of significant trees and vegetation to a minimum. In line with FCOZ standards, we further request that all construction in the canyon be planned to preserve visual and aesthetic qualities, employ site design techniques that enhance the natural environment, and rigorously control erosion, slippage, and sediment runoff to prevent harmful impacts to nearby streams and waterways. These practices will help protect the beauty and ecological health of BCC. UDOT's review should include an evaluation of net additions to impervious surfaces in the canyon, including any roadway widening associated with construction of new or expanded bus stops within BCC. Any ski resort bus stop expansions evaluated by UDOT should also be sited and built subject to the same setback standards detailed within FCOZ.

In addition, any new infrastructure or signage should be evaluated consistent with the goals and recommendations for scenic byways, detailed in the Cottonwood Canyons Scenic Byways Corridor Management Plan (2008), without reducing or degrading the function of proposed safety infrastructure or signage. We recommend that UDOT work directly with the United States Forest Service as a cooperating agency to develop designs that meet necessary safety requirements, while accommodating the desired aesthetic requirements of the Cottonwood Canyons Scenic Byways Corridor Management Plan.

IV. No Additional Parking, Roadside Parking, Consultation with USFS

Some of the actions discussed in meetings have considered creating new parking and bus stops within the National Forest. It is unclear if these are to be located on or off public land. Limiting parking at the base of the canyon, at popular trailheads and at ski resorts has been a controlling factor in visitation. The USFS plan currently states, "Protection of watershed conditions will be a primary factor in managing roads, trails and access. In the Tri-canyon area (Big and Little Cottonwood Canyons and Mill Creek) parking capacities of canyon parking lots (ski areas, summer use homes, developed and dispersed recreation sites) will not exceed 2000 levels unless modification is needed for watershed protection or to facilitate mass transit. Mass transit will be commonly used during winter, reducing crowding and increasing safety for users of the canyons. The Forest Service will work actively with other parties to explore options for reducing private vehicular use within these Canyons" (USFS Revised Plan, pg. 4-160). We believe this is an important land management factor, and are concerned that upending this policy will lead to undesirable conditions and negative environmental consequences.

Where roadside parking is allowed within the project area, roadside signage should be evaluated for installation, consistent with the Cottonwood Canyons Scenic Byways Corridor Management Plan, instructing how to park roadside (over the white line and not on vegetation).

There should be no additional parking lots, parking structures or parking infrastructure evaluated or approved within BCC as a result of UDOT's Environmental Assessment. While additional parking could accompany the construction of a mobility hub at the base of BCC, no additional parking shall be

considered as an aspect of UDOT's review within the canyon itself. Any additional parking structures in the canyon would only serve to increase the congestion problems the canyon faces during peak periods of travel.

V. Expand Study Area

The scope of the analysis to look at improvements on S.R. 190 is perhaps the greatest missed opportunity. Peak demand is being fed by residents and visitors coming from outside the study area. Currently, the vast majority of visitors utilize personal vehicles to access the area. It is unreasonable to think that the current number of cars can be accommodated within or immediately adjacent (within ¼ mile of the corridor) because of the unavailability of land and the requirements to maintain a high visual aesthetic of the mountainous areas (ie. building vertical parking structures are incongruent with local ordinances and plans governing the entrances of the canyons). This dilemma suggests that the greatest benefit to the canyon environment, experience, not to mention our airshed, would be getting people to SR-190 (at the intersection of Fort Union Blvd and Wasatch Blvd), without use of their automobiles.

VI. Need for Comprehensive Regional Planning

Although there is a clear consensus, reflected in conclusions of multiple planning processes occurring over decades, that the transportation problems in the Central Wasatch canyons are similar and interrelated, and that they therefore need to be addressed with comprehensive and integrated planning, UDOT is pursuing transportation improvements in BCC as a one-off project, with no analysis of how transportation decisions in BCC will integrate with the comprehensive, multi-canyon transportation system that earlier planning documents have concluded are needed. Integration with such a comprehensive transportation system should be a clearly stated purpose of the project.

Anyone who has traveled to a number of large cities recognizes that one thing shared by those that people most enjoy visiting and living in is an appealing, efficient, and integrated transportation system. The process UDOT is conducting for BCC is not part of the planning of such a system. It is a fragment, disconnected from existing policies, strategies, and broader plans. It is another example of a haphazard pattern of one-off, shortsighted, narrowly focused transportation fixes to recurring localized urgencies—urgencies that occur largely because of the lack of a broader plan, or worse, failure to act upon plans that have been tirelessly worked upon by local communities and governments (Mountain Accord, Salt Lake County Canyons Transportation Plan, Salt Lake City Watershed Plan, USFS 2003 revised plan, Salt Lake County Canyons General Plan, 1989 Wasatch Canyons Master Plan, etc). The problems with Wasatch Front transportation, especially for the canyons, are interrelated; any plan that is not a comprehensive response to the needs identified through a thorough understanding of these interrelationships is doomed to be largely wasteful and ineffective.

VII. Reduce Private Vehicular Traffic in the Canyon

UDOT's review should include reducing the number of private vehicles which enter BCC as a transportation metric. To accomplish this, UDOT should identify how many cars enter the canyon at different times on representative days throughout the year as a baseline, and identify a target to reduce the number of cars which would enter the canyon if various alternatives were employed. Without specifically identifying a target for the reduction of personal vehicle traffic in the canyon, UDOT's proposed alternatives could serve to bring more vehicles into the canyon without making a meaningful impact on congestion or the method of transportation visitors use to access the canyon.

VIII. Capacity Study, Analysis of Increased Visitation Due to Increased Transit Options

Preserving the character of these canyons to maintain quality of life is another necessary dimension of comprehensive transportation planning. The goal of such planning should not be to efficiently pack as many people as possible into the canyons; it must also recognize that, at the same time people need access to the canyons for quality of life, it is an overabundance of people, and the development they bring and attract, that, left unchecked, will degrade the experience of being in these canyons. Transportation planning therefore must include a determination of the scope and intensity of human uses that can occur in the canyons without substantially harming their character and diminishing their contribution to a high quality of life, affordable pure drinking quality water, or other economically oriented ecosystem services. ... Understanding what level of human use BCC can bear (call it carrying capacity, visitor analysis, or other) should be a starting point for this project.

IX. Study Cumulative, Direct, Indirect Impacts of Alternatives Proposed by UDOT

Under the National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq., the BCC review must identify and analyze the direct, indirect, and cumulative effects of a proposed action.¹ Direct effects of an action are those “which are caused by the action and occur in the same time and place.” Indirect effects are those “which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.”

Cumulative impacts are those environmental impacts “which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions.”

Obviously, the purpose of the BCC project is to reduce the existing traffic bottlenecks and allow an increased flow of people into the mountains. The presence of more people in the mountains is therefore not just a foreseeable impact, but an intended one. It is also a kind of impact that the CEQ regulation defining indirect effects clearly contemplated: “Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”²

In performing an analysis of the impacts of significantly increased visitation of the Wasatch, there are many types of direct, indirect, and cumulative impacts a NEPA review must consider. These include (recognizing that some may be subsumed under others in analysis):

- Ecosystem impacts
- Impacts on plant life and animal wildlife, including endangered, threatened, and sensitive species
- Watershed impacts
- Impacts from future construction and development inevitably resulting from increased demand for housing, lodging, services, etc.
- Impacts on visitor experience at and outside of ski resorts
- Impacts on backcountry use, including user conflicts from and among other backcountry users, including those making such use under present and foreseeable Forest Service use authorizations, such as helicopter skiing

¹ 42 U.S.C. § 4331 (c)(i); 40 C.F.R. §1508.7, §1508.8.

² 40 C.F.R. §1508.7, §1508.8.

- Impacts of increased backcountry visitation together with present and future Forest Service use authorizations, including helicopter skiing, on plant and animal life, including endangered, threatened, and sensitive species
- Impacts on visitor safety
- Impacts attributable to enlarged parking areas, including at trailheads
- Impacts of improved canyon access together with new road construction on National Forest lands, which may result from the expected amendment of the Forest Service's Roadless Rule.

In terms of the direct impacts of the proposed projects, there are several types of impacts that the improvements and/or their construction may cause that the EIS must consider, including:

- Impacts on riparian areas
- Ecosystem impacts
- Impacts on plant life and animal wildlife, including endangered, threatened, and sensitive species
- Watershed impacts
- Impacts on visitor safety

There also is a potential for a variety of indirect and cumulative impacts attributable to the improvements and/or their construction that the EIS must identify and analyze, apart from those associated with increased visitation. These may include:

- Impacts from the BCC project in conjunction with the construction and use of other transportation projects, including elements of a broader transportation plan for the Wasatch canyons and mountains.
- Indirect impacts stemming from the direct impacts; for example impacts on wildlife population health, number, and behavior indirectly attributable to more direct effects of the improvements and/or their construction on migration, access and passage to/from habitat areas
- Impacts of the proposed improvements together with new road construction on National Forest lands, which may result from the expected amendment of the Forest Service's Roadless Rule.

X. Impacts to Non-Resort Users, Backcountry Users, Hunters & Anglers, Residents

In its review, UDOT should include detailed explanations of how proposed peak period tolling will be implemented, how the cost of a toll will be set, and the intended effect of peak period tolling. UDOT should answer whether a toll will be set to reduce the number of private vehicles entering the canyon at peak periods, and include analysis of alternative costs of a toll, along with social and economic impacts of each alternative.

BCC is heavily trafficked by many user groups throughout the year, and in winter months, while ski resort visitors are likely the primary drivers of congestion in the canyon, other user groups and canyon residents should, to the greatest extent possible, not be impacted by peak period tolling. A system should be explored to exempt residents and certain user groups from being required to pay a toll.

UDOT's review process for transportation in BCC must thoroughly analyze the impacts of proposed transportation solutions on key user groups, including backcountry skiers and snowboarders, as well as hunters and anglers. These groups have deep-rooted cultural, recreational, and economic ties to the canyon, and their experiences are directly affected by changes in access, parking, and traffic flow. Backcountry skiers and snowboarders rely on safe, predictable access points and parking availability to reach trailheads, while hunters and anglers require unimpeded access to seasonal hunting grounds and water bodies.

Proposed infrastructure changes, such as bus stops, a mobility hub and proposed tolling risk displacing access points critical to these activities. UDOT must engage with these user groups to understand their unique needs and ensure that their voices are heard. Incorporating this analysis will lead to more informed decision-making and uphold the public's ability to enjoy Big Cottonwood Canyon's diverse recreational opportunities.

UDOT should prioritize affordability over profitability of transit services, and incorporate low or no-cost toll days in its analysis to avoid "pricing out" user groups of upper BCC.

Thank you for the opportunity to comment on the purpose and need of UDOT's BCC study. We remain open to and encourage consultation with us at any time during preparation of UDOT's study.

Sincerely,

Save Our Canyons
Wasatch Mountain Club