12 January 2026

**Via Email**

Devin Weder, Project Manager for the BCC EA

Utah Department of Transportation

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**Subject:**  Big Cottonwood Canyon Environmental Assessment

Salt Lake County, Utah

UDOT Project Number S-R299(489) / UDOT PIN 21400

Published Environmental Assessment

Dear Big Cottonwood Canyon Environmental Study team,

Please accept the following document as comments from the Central Wasatch Commission (CWC) regarding the published Big Cottonwood Canyon Environmental Assessment. The CWC appreciates the opportunity to provide this comment.

The CWC and its stakeholders have been engaged partners in the Utah Department of Transportation’s transportation process at each opportunity, since its inception, first with the Cottonwood Canyon Transportation Action Plan (CCTAP) that aimed to conduct additional planning and decision-making assessments by studying transit, tolling, congestion, pedestrian and bike facilities, and parking facilities across both Cottonwood Canyons. The intended outcome of the CC TAP was to develop a prioritized list of actions and improvements to the Canyons, and to integrate short- and long-term solutions for both canyons. After the CC TAP was discontinued, the Central Wasatch Commission embarked upon its Mountain Transportation System Project in 2020 that culminated in the Central Wasatch Commission releasing a public statement in support of six “pillars” that would comprise a safe, effective, and equitable regional mountain transportation system for the Central Wasatch.

Those pillars are:

1. A **visitor-use capacity** study that corresponds to transportation and transit study and decision-making is necessary.
2. Any transportation solution should minimize and **mitigate negative environmental impacts, including irreversible damage to the watersheds** that provide precious drinking water to more than 450,000 people in the Salt Lake Valley.
3. **Traffic demand management** strategies should address both traffic congestion on the roads accessing the Cottonwood Canyons, as well as S.R. 190 itself. Canyon traffic management options should include variable tolling, limited access for single occupancy vehicles, carpool programs, or the reduction of on-road parking.
4. Transportation solutions should have the capacity for **integration into the broader regional transportation network**. The CWC supports the exploration of transit micro-hubs in areas throughout the valley as gathering places for visitors and residents to board transit to Big Cottonwood Canyon.
5. The CWC considers **year-round transit service** a priority, including dispersed recreational opportunities, and other dispersed recreational opportunities in the surrounding areas (such as areas along the foothills).
6. Transportation improvements should be coupled with improved land and natural resource protection. **Transportation solutions for Big and Little Cottonwood Canyon should be conditioned upon the passage of federal legislation -- the Central Wasatch National Conservation and Recreation Area Act.** This coupling of federal legislation to transportation is necessary given the delicate balance that was foundational to the Mountain Accord agreement, based on four interdependent systems of the Central Wasatch: transportation, economy, recreation, and environment.

Building on the MTS project, the CWC released the Big Cottonwood Canyon Mobility Action Plan (BCC MAP) in 2023, which was designed to identify and develop strategies to guide multi-modal transportation investments for Big Cottonwood Canyon—expanding sustainable transportation choices that support positive environmental, social, and economic outcomes. The Central Wasatch Commission was invited to submit an agency comment on the scope of UDOT’s environmental study in Big Cottonwood Canyon and did so in December 2024. In that scoping comment, we asked that UDOT include exploration into all of the BCC MAP recommendations for transit and roadway improvements for Big Cottonwood Canyon.

The proposed actions in UDOT’s EA are largely consistent with the recommendations from the CWC’s BCC EA, however, there are notable impacts to the land and natural resources that the proposed actions would cause. Over 34 acres of land would be converted to transportation use -- for the gravel-pit mobility hub, the grade-separated interchange on Wasatch Boulevard, the bus transitway at the base of Big Cottonwood Canyon, the resort bus stops, the mid-canyon bus stops, and the bus priority lane around Brighton Loop Road. The proposed actions would require land acquisitions and amendments to the US Forest Service Plan. The Proposed Action would also have impacts to the Columbia Spotted Frog and the Bonneville Cutthroat Trout found within riparian areas in Big Cottonwood Canyon.

The impacts of these needed transit and transportation improvements could be offset by future drafts of the Central Wasatch National Conservation and Recreation Area Act, which would place protections on the land, water, flora, fauna, and wildlife found within these canyons while further stewarding recreational access and providing pathways for development around clustered nodes in the Canyons. Every function of these canyons rely on the health of the natural resources found within them. In a message to the world, made in 2019, David Attenborough is quoted saying, “our economies and political systems are unconsciously predicated on the belief that nature will continue to be a benign and regular provider of the conditions we need to thrive; regular seasons, dependable freshwater, endless fish, pollinators, minerals, soil.” This sentiment is evidenced in the irregularly warm and dry ski season we are currently experiencing. Any impact to the natural resources found in Big Cottonwood Canyon and in neighboring mountain landscapes, even if determined to be *de minimus* should be offset by protective action, to ensure that we *do* continue to enjoy all that the Central Wasatch offers to us for years to come.

The Cottonwoods are home to four world-renowned ski resorts, which underpin the State’s economy. The Cottonwoods provide drinking water for nearly 500,000 people along the Wasatch Front, and provide habitat to wildlife like elk, moose, rabbit, and snakes. The Cottonwoods are the literal home to two municipalities – the Towns of Brighton and Alta. These mountains are the main placemaker for major metropolitan areas -- Salt Lake City in the Wasatch Front, and Pak City in the Wasatch Back, and are situated only an hour away from a major international airport. These mountains see millions of visitors annually and showcase some of the best recreation of any place in the world, evidenced by the Olympic Winter Games naming Salt Lake City and Utah as host two times in the span of 32 years – 2002 and 2034.

The varied nature of the issues in the Central Wasatch Mountains, and specifically in Big Cottonwood Canyon, should be reflected back through a holistic approach to addressing the transportation needs in Big Cottonwood Canyon, if the intent is for these approaches to be effective. Transportation improvements should be coupled with improved land and natural resource protection. **Transportation solutions for Big and Little Cottonwood Canyon should be conditioned upon the passage of federal legislation -- the Central Wasatch National Conservation and Recreation Area Act.** This coupling of federal legislation to transportation is necessary given the delicate balance that was foundational to the Mountain Accord agreement, based on four interdependent systems of the Central Wasatch: transportation, economy, recreation, and environment. We thank the State for directing resources to address the transportation issues that are reaching a fever pitch in Big Cottonwood Canyon and we urge the State to act similarly to support the land and water protections the Central Wasatch National Conservation and Recreation Area Act would ensure.

Thank you for your consideration of the Central Wasatch Commission’s comments on the BCC Environmental Assessment. Accounting for the populations of the jurisdictions that comprise the Central Wasatch Commission Board, the CWC collectively represents over 1.5 million people. We hope our comments serve to support UDOT. Individual member entities of CWC may provide additional feedback to UDOT on behalf of their organizations. CWC comments may not be inclusive of concerns or comments of individual CWC member entities and reflect the mission of CWC in implementing the intent of Mountain Accord.

Respectfully submitted,

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Erin Mendenhall, Salt Lake City Mayor, Central Wasatch Commission Chair

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Roger Bourke, Town of Alta Mayor, Central Wasatch Commission Co-Chair

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Christopher F. Robinson, Summit County Council Member

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Monica Zoltanski, Sandy City Mayor

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Bill Ciraco, Park City Council Member

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Dan Knopp, Town of Brighton Mayor



Ellen Birrell, Cottonwood Heights Council Member



Emily Gray, Holladay City Council Member

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*The Central Wasatch Commission (CWC) was created in 2017 by interlocal agreement and has since served as a convener for the jurisdictions, stakeholders, and public with interest and authority in the Central Wasatch Mountains. The CWC’s mission is to preserve the Central Wasatch through providing canyon transportation solutions, pathways for concentrated development, environmental protections, and recreational stewardship.*

*The Board of Commissioners is currently composed of elected leaders from Summit County, Park City, Salt Lake City, Millcreek, Cottonwood Heights, Sandy City, the City of Holladay, the Town of Brighton and the Town of Alta with the Utah Transit Authority, High Valley Transit, and Metropolitan Water District of Salt Lake and Sandy serving as ex-officio members, and with Solitude Mountain Resort and Save Our Canyons serving as Special Advisors to the Board, representing the economy system and the environment system of the Central Wasatch, respectively. The CWC’s 35-member Stakeholders Council is composed of representatives from the Cottonwood Canyon ski resorts, the environmental and recreational communities, private property owners, transportation advocates, and representatives from the educational and cultural communities of the Wasatch Front and Back. The varied composition of the Central Wasatch Commission reflects the varied nature of the issues in the Central Wasatch Mountains, and no other entity like the CWC that provides a forum of ideas exists elsewhere.*

*More information at* [*cwc.utah.gov*](https://d.docs.live.net/92035bd6e96ee99e/Desktop/Admin/Transportation/cwc.utah.gov)