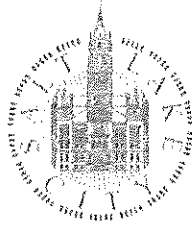


JACQUELINE M. BISKUPSKI
Mayor



DEPARTMENT OF
PUBLIC UTILITIES

ELECTRONIC DELIVERY

March 8, 2019

Central Wasatch Commission Board
c/o Chris McCandless, Chair
2277 East Bengal Boulevard
Cottonwood Heights, Utah

Re: Watershed Benefits of the Central Wasatch National Conservation and Recreation Act

Dear Central Wasatch Commission Board:

It has come to the attention of Salt Lake City, Sandy City, and the Metropolitan Water District of Salt Lake & Sandy (Metro) that some Central Wasatch Commission stakeholders' desire clarification about the watershed benefits of the Central Wasatch National Conservation and Recreation Area Act (CWNCRA). We would like to take the opportunity to provide some insight about the benefits to the culinary watershed that our agencies have identified in the designation.

The Central Wasatch Mountains capture snow systems tracking through northern Utah in the winter, resulting in bountiful snow. The runoff from this snow is used to provide drinking water for half a million people in the Salt Lake Valley. As such, these watersheds are critical for the Salt Lake Valley communities, and they are carefully managed to protect this important resource. Degradation of these watersheds must be avoided to prevent disruptions to water supply, to prevent significant increases in treatment costs, and to ensure quality drinking water into the future. These water sources will become more critical, and more in need of protection, as demands increase in response to population growth, development pressures, recreation use, and climate change.

Our intention is to preserve and protect the long-term health of the watershed in light of continuing pressures. About 80 percent of the watershed area is federal land managed by the Uinta-Wasatch-Cache National Forest. The CWNCRA will designate approximately 80,000 acres of this land as a National Conservation and Recreation Area. Creation of the CWNCRA will significantly limit both the pressures and resulting impacts of human development within our watershed areas. We believe this designation will (1) avoid watershed degradation from additional development and recreation overuse; (2) provide more opportunities for the ecosystems within our watershed areas to adapt to climate change impacts; and (3) help Salt Lake City, Sandy City, and Metro focus resources on other watershed stewardship and resilience programs as we face growing populations, water demand, and climate change impacts.

Below is a brief description of some of the threats and vulnerabilities confronting watershed lands in the Central Wasatch mountains:

1. Development: Population growth and changing recreation demographics stress the watershed through additional demand for resources and additional impacts from development and traffic. Increases in development pressures present incremental and cumulative impacts to watershed health and set a negative precedent for watershed protection. Research and studies have shown the linkages between the development activities occurring in watersheds and resulting degradation of water supply and water quality. Development leads to contamination, sediment loading, and further degrades water quality. Furthermore, development increases impermeable and semi-impermeable areas, which affects soil absorption, increases runoff rates, and elevates the risk of flooding. Increased development and use leads to habitat fragmentation, sanitation issues, invasive species, and other concerns that negatively impact overall watershed functions. These stressors can also make it more difficult for environment systems to adapt to climate change impacts over time. Small, incremental development and use increases over time can create large cumulative impacts that are difficult, if not impossible, to reverse.
2. Recreation Overuse and Changing Demographics: Even with the intensive watershed stewardship programs and policies currently in place, we are experiencing more pressure for additional types and amounts of recreation use in this watershed area. Without question, as the population of Utah continues to grow, the demand for these recreational uses will also grow in this ecologically sensitive and limited geographical area. Currently, land managers deal with increasing and often intense user conflicts as well as issues regarding recreation management and facility development in the watershed. Mountain development and overuse can make ecosystem management more difficult. The result has been a loss of historical access to public lands and increased urban encroachment.
3. Climate Change Impacts: Climate change and drought will exacerbate existing stressors on ecosystem health and function. Our agencies are also deeply concerned that climate change impacts will disrupt the hydrologic cycle in this area, and in turn, place even more pressure on the health of the watershed areas. Furthermore, increased development and fragmentation of terrestrial and aquatic areas could impair climate resilience in the Wasatch Mountains.

When considered cumulatively, these additional pressures threaten to degrade the Central Wasatch watershed areas. This expanding pressure also diverts scarce resources from Salt Lake City, Sandy City, and Metro, since each agency must constantly evaluate and respond to these pressures.

Several components of the legislation directly address threats from development, recreation overuse, and climate change. Specifically, the legislation provides for:

1. Watershed Protection: The enumerated purposes of the CWNCRRA include “conserve[ing] and protect[ing] the ecological, natural, scenic, wilderness (within wilderness areas), cultural, historical, geological, and wildlife values within the Conservation and Recreation Area;” and “protect[ing], enhance[ing], and restor[ing] the

water quality and watershed resources in the Conservation and Recreation Area.” Furthermore, the Act mandates that the subsequent land management plan for the CWNCR “protect . . . water quality and watershed resources.” By codifying a water resource protection mandate, the CWNCR helps ensure that watershed protection is a priority for U.S. Forest Service lands now and in the future.

2. Wilderness: The CWNCR will add approximately 8,000 acres of wilderness to the more than 56,000 acres of wilderness that currently exist above the Salt Lake Valley. The Uinta-Wasatch-Cache National Forest is one of the most heavily visited national forests in the nation. The pressure to develop sensitive areas in this forest with roads, structures, off-road vehicle trails, and other development are significant and growing. Given the continuing and expanding pressures to increase development and uses of the federal lands within the Uinta-Wasatch-Cache National Forest, this scale of preservation is necessary to ensure the continuation of our high-quality water supply to a growing population. This protection will provide better opportunities for the watersheds to adapt to challenges such as climate change, wildfire, invasive species, and drought.
3. Land Exchanges: This legislation facilitates land exchanges that will place land within the Central Wasatch watershed owned by the four Cottonwood Canyon ski areas into public ownership for permanent year-round watershed, and environmental protection. Lands expected to be included are properties in the Superior, Flagstaff, White Pine, upper Big Cottonwood Canyon, Cardiff, and other areas. In exchange, the resorts will receive land in their respective base areas. These land exchanges will clean up landownership in the Central Wasatch and end decades of conflict.
4. Fixed Ski Resort Boundaries: Ski resort boundaries on U.S. Forest Service lands will be fixed permanently within the CWNCR, so the public receives certainty that threatened backcountry and dispersed recreation areas adjacent to the resort boundaries are preserved in perpetuity for backcountry use and environmental protection.
5. Transportation Solutions: This bill was drafted to allow for numerous transportation solutions to continue to be explored allowing a variety of options from the basic, like expanding bus service, to the innovative, like Transportation System Management. The objective of this bill is to develop transportation and transit choices that facilitate access to the mountain regions and support and improve environmental conditions. Importantly, the CWNCR provides that no new roads for automobiles would be permitted on U.S. Forest Service lands. Transportation choices should not degrade environmental conditions, and should support environmental goals, while concentrating use at appropriate locations where use can be managed.

The additional protection afforded by this proposed legislation will ensure future generations of Salt Lake Valley residents continue to have access to a high-quality water supply. Protection of our watersheds is critical for our future health and security, particularly as we face combined challenges due to population growth, increased water demand, climate change, and drought.

Salt Lake City, Sandy City, and Metro hope this insight is useful and constructive, and we appreciate the opportunity to discuss the watershed benefits afforded by the CWNCRA. We look forward to working with the Commission and other CWC stakeholders as the process unfolds. Please do not hesitate to reach out to us with any questions or additional discussion.

Sincerely,



Laura Briefer
Director, Salt Lake City Department of Public Utilities



Michael DeVries
General Manager, Metropolitan Water District of Salt Lake & Sandy



Scott Ellis
Assistant Director, Sandy City Public Utilities

cc: Ralph Becker
Jesse Dean
Carly Castle