



WEST DAVIS  
CORRIDOR

# Comments and Responses for the Final EIS

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in support of the  
Environmental Impact Statement

## West Davis Corridor Project

Federal Highway Administration  
Utah Department of Transportation

in cooperation with

U.S. Army Corps of Engineers  
U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service  
Utah Reclamation, Mitigation, and Conservation Commission



Project No. F-0067(14)0

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## 1.0 Response to Comments

This document contains the responses to comments that were received on the West Davis Corridor (WDC) Final Environmental Impact Statement (EIS) from members of the public, government agencies, and nongovernmental organizations during the 57-day comment period from July 6 to August 31, 2017.

This document responds to all comments provided during the Final EIS comment period. If a comment was the same as a comment provided on the Draft EIS, the response was taken from Chapter 32, Response to Comments, of the Final EIS unless changed circumstances, new information, or other considerations warranted a different or modified response.

The subsections of Section 1.0 present the responses to comments that were received on the Final EIS. The section numbers in Section 1.0 of this document correspond to the chapters and sections of the Final EIS (for example, Section 1.12 of this document corresponds to Chapter 12 of the Final EIS).

Individuals and agencies who commented on the Final EIS are listed alphabetically in Section 2.0, Commenter and Response Matrix, along with their associated comment number. To find the responses to your comment, first find your name in Section 2.0, then find the associated response section numbers, which indicate the sections of this document that address your comment.

Section 3.0, Reproductions of Comments on the Final EIS, presents reproductions of written comments that were submitted. Each comment document is identified in Section 3.0 by its comment number, and each statement or question regarding a separate environmental issue is labeled with an associated response section in this document.

### Summary of Comments

A total of 335 comment submissions were received on the Final EIS from individuals, organizations, and government agencies. The comment submissions took the form of letters, e-mails, phone messages, and website submissions.

During the comment period, comments were received from the following agencies or organizations: U.S. Environmental Protection Agency; Utah Department of Agriculture and Food; Utah Reclamation, Mitigation, and Conservation Commission; Utah Division of Environmental Response and Remediation; Utah Division of Water Quality, Utah Transit Authority; Wasatch Front Regional Council; Davis County; Weber County; Centerville City; Farmington City; Fruit Heights City; Kaysville City; Layton City; Sunset City; Syracuse City; West Point City; Central Davis Sewer District; Weber Basin Water Conservancy District; Audubon Society; SunQuest Development; The Nature Conservancy; Utahns for Better Transportation; Wasatch Aero Modelers; and Western Resource Advocates (on behalf of FRIENDS of Great Salt Lake, HEAL Utah, Utah Physicians for a Healthy Environment, Breathe Utah, League of Women Voters of Utah, Great Salt Lake Audubon, Western Wildlife Conservancy, Utah Native Plant Society, South Shore Wetlands and Wildlife Management, Inc., Utah Waterfowl Association, and Utahns for Better Transportation).

Frequent topics of comments received on the Final EIS included but were not limited to the following:

- Support for or opposition to the project
- Agreement or disagreement with the need for the project
- Requests for changes to the Preferred Alternative's alignment or features, specifically:
  - Move the alignment to avoid or reduce impacts to homes or wetlands or the Central Davis Sewer District property
  - Add or remove proposed interchange locations
  - Modify the cross-street underpasses or overpasses of the WDC
  - Modify which cross-streets would have a grade-separated crossing
  - Modify the proposed WDC trail location or modify the proposed crossing locations of existing trails
  - Modify the locations of park-and-ride lots or detention basins
  - Design the WDC to have features similar to Legacy Parkway (lower speed limit, quiet pavement, billboard restrictions, truck restrictions, dark-sky lighting, and aesthetics)
- Requests for the WDC to continue farther north into Weber County or to have additional lanes north of Antelope Drive
- Concerns about community impacts, safety, schools, and UDOT's right-of-way acquisition process
- Concerns about property values
- Concerns about air quality impacts
- Concerns about noise impacts and the noise analysis, and requests for additional noise walls
- Comments and questions about the proposed mitigation plan
- Concerns about the WDC's impact on other state and local roads
- Concerns about impacts to wetlands, water quality, groundwater, surface water, the Great Salt Lake ecosystem, the Great Salt Lake Shorelands Preserve, and the Farmington Bay Waterfowl Management Area
- Concerns about the visual impacts of the WDC

## 1.1 Chapter 1 – Purpose of and Need for Action

### 1.1.1 Section 1.2 – Description of the Needs Assessment Study Area

- A.** *Commenters stated that the WDC should have gone farther north than 4000 South in Weber County and should have connected to Interstate 15 (I-15) or Interstate 84 (I-84) or extended north to Brigham City or Tremonton. Other commenters stated that the Utah Department of Transportation (UDOT) should have used a date beyond 2040 or considered traffic demand beyond 2040 when developing the need for the project.*

Section 1.2, Description of the Needs Assessment Study Area, of the Final EIS explains why the WDC study area was selected. For the WDC Project, the WDC team used the projected travel demand out to the year 2040, taking into account the other proposed planned transportation projects included in the Wasatch Front Regional Transportation Plan 2015–2040, to determine the need for the WDC. Based on travel demand model maintained by the Wasatch Front Regional Council, there was no need in 2040 for the WDC to extend north of 4000 South in Weber County.

#### What is travel demand?

*Travel demand* refers to the forecasted amount of travel on existing and future roads.

Planning for 2040 is consistent with Federal Highway Administration (FHWA) transportation planning guidelines. Year 2040 is considered the reasonably foreseeable planning year for the WDC Project since the most recent demographic projections, transportation plans, and land-use plans use this date as their planning horizon.

- B.** *Commenters stated that UDOT should have different goals (for example, reducing air pollution, encouraging better use of FrontRunner, reducing the use of personal vehicles, protecting open lands, encouraging different land-use patterns, or preserving farmland) or that the WDC Project is not consistent with UDOT's mandate (to preserve infrastructure, optimize mobility, improve safety, and strengthen the economy). Other commenters stated that the WDC Project was not consistent with the FHWA Livability Initiative. Other commenters stated that there is a requirement for highway projects to have intermodal components.*

The WDC Project was initiated to look at regional congestion in western Davis and Weber Counties. The WDC team performed an extensive evaluation as described in Chapter 1, Purpose of and Need for Action, to determine whether the project is needed. Based on the need, a project purpose of improving regional mobility was developed. The purpose does not describe modes that must be used to meet the purpose. The alternatives considered to meet the project purpose did include a transit alternative, which included increased use of FrontRunner and making transit more accessible by reducing walk-to-transit distance, reducing transit transfer times, and increasing transit ridership by looking at various options

including locating stops near higher-household-density locations. Thus the transit analysis did include options to reduce vehicle use.

Additionally, UDOT evaluated a Shared Solution Alternative that included combining all of these elements plus innovative intersections, complete streets, and changes to land use. There are no requirements that projects must have intermodal connections or transit components. The Wasatch Front Regional Transportation Plan 2015–2040 identifies different modal projects (including road, transit, bicycle, and pedestrian projects) that are needed in the WDC study area.

The purpose of and need for the WDC are consistent with UDOT’s mandate to optimize mobility. As stated in UDOT’s 2013 Strategic Direction, optimizing mobility includes the need to add capacity to the roadway network. The WDC will help UDOT meet its mandate.

The FHWA Livability Initiative ([www.fhwa.dot.gov/livability](http://www.fhwa.dot.gov/livability)) does not prescribe or mandate particular projects, outcomes, modes, or solutions. The FHWA Livability Initiative is intended to direct FHWA to support sustainable communities in conjunction with other efforts undertaken by the U.S. Department of Housing and Urban Development and the U.S. Environmental Protection Agency.

Other goals such as reducing air quality, protecting open lands, preserving farmland, and improving education are not goals that will help solve the transportation need. These goals were considered in alternatives development and analyzed as part of the impacts of the WDC. For example, as part of the alternatives-development process, the WDC team tried to avoid impacts to farmland.



## 1.1.2 Section 1.4 – Summary of Purpose and Need

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### A. Commenters questioned why the WDC is needed or stated that the WDC is not needed.

Section 1.4.2, Need for the Project, of the Final EIS explains why the WDC is being proposed. The major transportation needs are a result of the rapidly growing population and employment projected for the needs assessment study area. The existing road network in the study area and the transportation network to the west of I-15 consist primarily of arterial streets that are not intended to accommodate a high volume of long-distance trips, freight movements, or efficient transit (bus) use. These conditions in the absence of the WDC (No-Action conditions) will result in the following deficiencies in the needs assessment study area in 2040:

- Decreased mobility and increased traffic congestion in the AM and PM peak-period travel period (inadequate roadway capacity).
- Lack of adequate north-south transportation capacity to serve the main travel direction (north to south) in the AM and PM peak-period travel period. This will lead to increased east-west congestion.
- Increased user delay and lost productivity.
- Inadequate interconnection of transportation modes.
- Lack of continuous pedestrian/bicycle facilities.

As shown in Section 1.4.2, Need for the Project, of the Final EIS, without the WDC, the user delay by 2040 is expected to increase by 62% (from 11,320 hours in 2015 to 18,310 in 2040), and the total miles traveled in congestion are expected to increase by 50% (from 429,200 miles in 2015 to 642,000 in 2040), demonstrating a strong need for a transportation improvement.

#### What are peak periods?

Peak periods are the periods of the day with the greatest amounts of traffic. The AM (morning) peak period is from 6 AM to 9 AM, and the PM (afternoon) peak period is from 3 PM to 6 PM. Peak periods are looked at by transportation officials when examining the need for a project.

### B. Commenters agreed with need for the WDC.

Comments noted.

### C. Commenters asked what the source was for the 35% traffic reduction with the WDC. Commenters also asked how long the WDC would reduce traffic congestion by 35%. Commenter stated that building more roads leads to more traffic, not less traffic.

As described in Chapter 2, Alternatives, and *Technical Memorandum 15: Alternatives Screening Report* and the *Final EIS Addendum to Technical Memorandum 15: Alternatives*

*Screening Report*, the WDC alternatives were screened against delay and congestion criteria using the Wasatch Front Regional Council (WFRC) travel demand model to forecast future traffic for roadway alternatives and future transit ridership for transit alternatives. The WDC screening analysis used version 8.1 of the WFRC travel demand model. The WFRC is the local government agency responsible for traffic forecasting along the Wasatch Front. The WFRC's travel demand model is a state-of-the-practice model that predicts travel demand and is used by the WFRC, UDOT, the Utah Transit Authority (UTA), FHWA, and the Federal Transit Administration (FTA) to determine the need for transportation projects. The model is calibrated to actual, observed traffic conditions and meets an advanced practice guideline by FHWA and FTA for similarly sized areas. Further, FHWA traffic experts and other independent consultant traffic experts reviewed the traffic analysis memoranda prepared for the WDC Project (technical memoranda 4, 6, and 7). The WFRC's modeling was used to predict all related traffic congestion and VMT for the WDC No-Action and action alternatives.

The 35% reduction in traffic congestion is for the year 2040, which is the design year for the WDC Project. Planning for 2040 is consistent with Federal Highway Administration (FHWA) transportation planning guidelines. Year 2040 is considered the reasonably foreseeable planning year for the WDC Project since the most recent demographic projections, transportation plans, and land-use plans use this date as their planning horizon.

***Induced Growth.*** The commenter assumes that the WDC new highway alternatives will partially induce growth in the WDC study area and accordingly lead to increased traffic. However, the timing and types of development that would occur in any area are based on many variables, not just the presence or absence of a new highway. One must consider other factors such as projected population growth, available land, and the cost of housing compared to other areas of the region. Additionally, induced-growth effects from a new road would be most pronounced in an area that does not otherwise have any roadway access. In areas that already have transportation access, such as the WDC study area, the presence of a new highway or access to a new highway might contribute little if any to induced-growth effects.

In the case of western Davis and Weber Counties, an area that already has road access, a recently completed real estate market analysis (RCLCO 2015) concluded that the growth in single-family residences in these areas will occur independent of a new highway. The market analysis confirms what local planning officials expressed to UDOT during the initial EIS preparation process: that population, employment growth, and future land use in the WDC study area will generally be the same with or without the WDC. This conclusion has been validated in recent discussions (in 2015) with representatives from Kaysville City, Layton City, and Syracuse City, who stated that their cities continue to grow rapidly with single-family homes without the WDC and are expected to continue such growth in the future, even without the WDC.

Overall, with the expected growth and development by 2040 that will occur with both the No-Action Alternative and the Selected Alternative, the WDC will still result in a 32% reduction in total daily delay in the WDC study area, even with a 3% increase in vehicle-miles traveled with the Selected Alternative. The reduction in travel delay will substantially reduce travel time for commuters. The WDC team reviewed travel times during the evening commute from

Salt Lake City to Syracuse, West Point, and West Haven and found that, overall, the WDC would improve a person's travel time by 19% to 23%.

A detailed discussion of induced growth and its effects is included in Chapter 23, Indirect Effects, of the Final EIS.

## 1.2 Chapter 2 – Alternatives

### 1.2.1 Section 2.1 – Background of the Alternatives-Development Process

No comments were received on this section during the Final EIS public comment period.

### 1.2.2 Section 2.2 – Alternatives-Development Process for the Final EIS

- A.** *A commenter suggested that the WDC should connect farther south at Interstate 215 (I-215) and Redwood Road.*

The Legacy Parkway and I-15 already provide a connection to I-215 near Redwood Road in Salt Lake County. Extending the WDC to I-215 would create a redundant highway that is not necessary, and there is no need for the additional capacity beyond the WDC connection at Legacy Parkway and I-15. The WDC team used the Wasatch Front Regional Council's travel demand model to determine the WDC study area

boundary, and the analysis showed that there was no need for the WDC south of Farmington. In addition, extending the WDC farther south would have extensive wetland impacts since the WDC would need to cross the Farmington Bay Waterfowl Management Area and the Legacy Nature Preserve. An alignment between Legacy Parkway and I-15 would cause substantial business and home impacts without providing any additional benefits.

#### What is the WDC study area?

The WDC study area, also called the needs assessment study area, is the area described in Section 1.2, Description of the Needs Assessment Study Area, of the Final EIS.

- B.** *Commenters stated that an alternative farther west along the shore of the Great Salt Lake should have been considered or an alignment across the Great Salt Lake. This request was made for various locations, including the Glovers Lane Option (requested to move the Glovers Lane Option west of the power lines or to move the Glovers Lane Option even farther west and south to connect in Centerville or Bountiful to Legacy Parkway), the Kaysville Equestrian Estates area (move the WDC west of the power lines by the Equestrian Estates), the Kaysville View Crest area (move the WDC farther west of the power lines), the Layton and Syracuse area south of Gentile Street (move the WDC farther west into the Great Salt Lake Shorelands Preserve), and further west in Syracuse and West Point. The comments stated that an alignment farther west would avoid community impacts.*

An alternative farther west along the shore of the Great Salt Lake would not be possible. The alternative could not be permitted by the U.S. Army Corps of Engineers because it would have a much higher number of wetland impacts than other reasonable alternatives, it would affect both the Farmington Bay Waterfowl Management Area [a Section 4(f) property] and a greater number of acres of the Great Salt Lake Shorelands Preserve, and it would be placed in an area with frequent flooding from the Great Salt Lake.

UDOT evaluated an alternative farther west during the alternatives-screening process based on population projections for 2040. UDOT found that alternatives farther west did not meet the purpose of reducing regional congestion because they would require out-of-direction travel toward the west when travelers wanted to head east, resulting in little use of the WDC (see *Technical Memorandum 15: Alternatives Screening Report*).

#### What is Section 4(f)?

Section 4(f) is part of an FHWA regulation that requires a project to avoid the use of eligible or potentially eligible historic properties and recreation and wildlife areas unless there is no feasible and prudent alternative to such use. Even then, all measures must be taken to minimize harm to these properties.

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- C.** *Commenters stated that the southern terminus of the WDC should connect to I-15 north of Farmington.*

Connections of the WDC to I-15 north of Farmington were evaluated, including 200 North (Schick Lane) in Kaysville, Angel Street in Kaysville, and Layton Parkway in Layton. As described in Chapter 2, Alternatives, of the Final EIS, all of the connections to I-15 north of Farmington either failed to meet the project's purpose and need or were determined to not meet UDOT and FHWA regulations for signing and operations.

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- D.** *Commenters asked whether the WDC should have similar design features as Legacy Parkway (speed limit restrictions, truck restrictions, lower height of the road, access on the west side, billboard restrictions) or stated that the WDC should have these features. Commenters stated that truck restrictions would be safer for the areas around the WDC. Commenters requested that the quiet pavement be specified to be 4 dBA (decibels on the A-weighted scale) quieter at 110 kilometers per hour (about 68 miles per hour), similar to Legacy Parkway's specifications, and that the dark-sky lighting be specified in the Record of Decision. Commenters requested that UDOT restrict use of the WDC to peak times (7:30 to 9:30 AM and 4:30 to 6:30 PM) or times when there are accidents on other roads. Commenters requested that the WDC flyover ramps have lower speed limits.*

***Freeway vs. Parkway (Speed Limit and Truck Restrictions).*** The WDC divided highway will likely have a posted speed limit of 65 miles per hour (mph). As part of the alternatives-evaluation process, UDOT evaluated using a 55-mph speed limit on the WDC. However, with the reduced speed limits, the travel demand model showed that fewer drivers would use the WDC, instead opting for the higher-speed I-15 and causing additional east-west congestion. As a result, the WDC with a 55-mph speed limit would not meet the project

purpose and thus was eliminated from detailed study. The analysis conducted for the Final EIS assumes that the WDC will be posted at 65 mph. At this time, there are no plans for speeds higher than 65 mph.

For the Final EIS, the WDC team anticipated that about 92% of the WDC vehicles would be automobiles and 8% would be trucks. As a comparison, I-15 has about 85% automobiles and 15% trucks. The percentages and total number of trucks on the WDC will be much less than the percentages and number of trucks on I-15. The truck traffic on the WDC will likely be primarily servicing the local community and farmers in the WDC study area. By comparison, I-15 has a high percentage of interstate truck traffic. The main reason for this is that the WDC will not be a bypass to I-15 for interstate trucks since it will not connect back to I-15 on the north. Therefore, UDOT will not prohibit trucks on the WDC.

In addition, if local trucks were prohibited on the WDC, to access the study area they would use the arterial and local street network, which has a higher accident rate than highways and would place the trucks adjacent to residents and pedestrians. Trucks using the WDC would create less risk to the public than trucks using the local road network.

***Lower Height of Road.*** During the final design of the Selected Alternative, UDOT will consider lowering the grade of the road in areas where the WDC can still meet roadway design and drainage requirements.

***Access on West Side.*** Some interchanges will require access on both sides of the WDC. During the final design of the Selected Alternative, UDOT will consider interchange designs based on the amount of expected traffic at each interchange. The 200 North interchange in Kaysville and the proposed Layton interchange without the wetland avoidance option in Layton, both of which are along the Great Salt Lake Shorelands Preserve, would not provide access west of the WDC. However, because the wetland avoidance option was selected in Layton, there will be available land to develop west of the WDC. Layton City could propose zoning to develop this area between the WDC and the Great Salt Lake Shorelands Preserve.

***Billboard Restrictions.*** UDOT does not currently allow any billboards in the UDOT-owned right-of-way. A billboard restriction on properties owned by private landowners adjacent to the WDC would need to be enacted by county or city land-use regulations, or through a Scenic Byway designation by the State Scenic Byway Committee. UDOT has relayed the interest in a billboard restriction to the municipalities in the WDC study area for their consideration. Many of the Cities have provided feedback to UDOT stating that they support the billboard restrictions and will consider enacting local ordinances or Scenic Byway designations.

***Berms and Landscaping.*** UDOT evaluated berms for noise reduction and landscaping. Berms tall enough for noise mitigation would require a much wider roadway footprint increasing impacts to nearby resources. To minimize impacts while mitigating for noise, noise walls were determined to be the most effective noise mitigation for this project. In regards to landscaping (trees and other vegetation), during the final design of the Selected Alternative, UDOT will work in accordance with the UDOT Aesthetics Policy and with the local governments to develop a landscaping plan for the WDC. The WDC Project would

qualify for the maximum amount of funding (0.75% of total project budget) under the current UDOT Aesthetics Guidelines.

***Truck Engine Brake Restrictions.*** There are no current plans to restrict truck engine braking on the WDC. Engine brake restrictions are enacted by local governments, not UDOT, and these decisions, if they were to occur, would not happen until after the Selected Alternative is constructed. Since the WDC is planned to be a freeway and the roadway profile does not have any big hills, UDOT does not anticipate that there will be any truck engine braking on the WDC.

***Quiet Pavement Specifications.*** There are various types of quiet pavements, but there is no standard specification for quiet pavement. During the design phase of the project, UDOT will evaluate various quiet pavement options to determine the pavement type and design that is cost-effective, meets maintenance requirements, and achieves the intended service life.

UDOT plans to use quiet pavement on the main WDC highway and will evaluate the potential use of such pavement on the highway ramps based on safety and cost considerations. UDOT does not plan to repave I-15 with noise-reducing pavement as part of the WDC Project.

***Dark-Sky Lighting Specifications.*** The exact specifications for lighting will be determined during the final design of the Selected Alternative. As stated in the Final EIS, lights will be provided only at intersections, and the lights will be shielded to focus the light downward.

***WDC Open Only during Certain Periods.*** There are no plans to restrict the times of day when the public can use the WDC. The WDC is a publicly funded project, and it is intended to be open to the public 24 hours a day.

***Ramp Speed Limits.*** The WDC flyover ramps are currently designed at 45 mph. For more information, see *Technical Memorandum 28: Interstate Access Change Request*.

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- E.** *Commenters asked why the alternatives ended at 1800 North in Davis County instead of 5500 South or 4000 South in Weber County. Commenters stated that the northern terminus of the WDC should be farther north instead of 1800 North. Other commenters stated that the northern terminus should be farther south in Syracuse.*

After release of the Draft EIS, the Wasatch Front Regional Council released a new Regional Transportation Plan (RTP) and travel demand model which included the latest growth projections. The WDC team used this information to determine how far north the WDC Project needed to extend and how many lanes were required to meet the 2040 transportation need. Modeling with the new travel demand model showed that the northern termini for the A and B Alternatives would be between 1.5 and 4 miles farther south, depending on the alternative. In addition, fewer miles of four-lane highway were needed, and the five-lane arterial was narrowed to a two-lane highway. The main reason for these changes to the alternatives between the release of the Draft EIS and Final EIS was that less population growth is now expected in West Point, Hooper, and West Haven in the 2015–2040 RTP compared to the 2011–2040 RTP that was used for the Draft EIS. For more information, see Section 2.3.8, Changes to Alternatives after the Release of the Draft EIS, of the Final EIS.

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- F.** *Commenters asked whether there are still plans to continue the WDC farther north into Weber County and stated that the cumulative impacts of such a proposal should be considered in the EIS.*

The Selected Alternative will meet the currently anticipated transportation demand until 2040, which is the planning period for the EIS.

The Wasatch Front Regional Council's Regional Transportation Plan 2015–2040 still identifies a transportation corridor in Weber County for corridor preservation. Any project proposing to construct a new facility north of the northern terminus of the WDC would be considered a separate project and would require a new environmental study prior to construction.

However, the section *Potential Indirect Effects from a Future Transportation Corridor in Weber County* on page 23-24 of Chapter 23, Indirect Effects, of the Final EIS states that, if the WDC is built, this would increase the probability that a future road north would be constructed, assuming that a need for the road is identified beyond 2040. Note that indirect effects are caused by the proposed action and are later in time or farther removed in distance than direct effects, but are still reasonably foreseeable. Because the North Legacy Highway is not identified in any long-range plans for construction until after the WDC 2040 planning horizon, it is not possible to reasonably foresee what alternatives might be developed for this project in order to conduct a cumulative impacts analysis.

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- G.** *Commenters stated that the EIS should have considered the following alternatives: expanding I-15 by one or more lanes in each direction (up to six lanes in each direction), expanding east-west roads, expanding I-15 and east-west roads, increasing and improving transit facilities, and eliminating the high-occupancy vehicle lanes on I-15, as well as an alternative farther west in Hooper near 5900 West.*

All of the alternatives suggested in the comment were considered in the Draft and Final EISs (in Section 2.1, Alternatives-Development Process, in the Draft EIS and in Section 2.2, Alternatives-Development Process for the Final EIS, in the Final EIS). Expanding I-15 along with east-west arterials was considered as part of the EIS process (Alternative 05) as stated in Section 2.1.3, Level 1 Screening, in the Draft EIS and Section 2.2.4.1, Level 1 Screening, in the Final EIS. Alternative 05 passed Level 1 screening but was eliminated from detailed consideration as part of Level 2 screening because the alternative would have substantial impacts to existing residential and business properties (see the section *Level 2 Screening Results* in Chapter 2, Alternatives, of the Final EIS). Because of the substantial impacts, the alternative was considered not reasonable under the National Environmental Policy Act and not practicable under the Clean Water Act.

WDC traffic modeling showed that widening I-15 by one general-purpose lane in each direction along with widening east-west arterials would meet the purpose of the project. Widening I-15 by more than one general-purpose lane would not meet the purpose of the project without the addition of east-west arterial-widening projects. Therefore, an alternative

that only widened I-15 by two or more general-purpose lanes in each direction would not meet the purpose of the project.

The Alternative 05 that was considered in the WDC alternatives-screening process would be the least costly and least impactful alternative for the WDC Project that would widen I-15 and existing roads. Because of the substantial impacts, the alternative was considered not reasonable under the National Environmental Policy Act and not practicable under the Clean Water Act. Notably, Alternative 05 was also very expensive, with an estimated cost that was 91%–108% more than the alternatives advanced for study in the Final EIS.

Alternatives located farther west (Alternatives 12A, 12B, and 12C) were also evaluated during the WDC alternatives-development and screening process and either did not meet the purpose of the project or had substantially more wetland impacts than alternatives that provided better transportation performance in western Davis and Weber Counties (alternatives such as Alternative 13A).

Eliminating the high-occupancy vehicle lanes on I-15 would not reduce the congestion on east-west arterial roads in the needs assessment study area and thus would not meet the purpose of the project.

The WDC team also evaluated several transit options as stand-alone alternatives (Alternatives 01 and 02; see Table 2-2, Preliminary Alternatives, in Chapter 2, Alternatives, of the Final EIS) and in combination with other roadway alternatives. Commenters suggested that higher-density land uses support transit use and cited many studies that support the idea that higher densities reduce vehicle-miles traveled and increase transit ridership. As part of the transit evaluation for the WDC (see Section 3.3.5, Transit-Only Alternatives, in *Technical Memorandum 15: Alternatives Screening Report*), the WDC team looked at a transit alternative that included developments located within a half mile of proposed light-rail stations on 4000 South (Weber County) and Antelope Drive in order to reduce walk-to-transit trips. The developments assumed 15 household units per acre and 1.3 people per household consistent with recommendations provided by Envision Utah in the *Wasatch Front Transit-Oriented Development Guidelines* (2002) and by the Transportation Research Board in *Transit Cooperative Research Program Report 128: Effects of TOD [Transit-Oriented Development] on Housing, Parking, and Travel* (2008).

As stand-alone alternatives, none of the transit alternatives met the purpose of the project, and therefore they were eliminated from detailed study. The transit alternatives were also considered with roadway alternatives. However, when the transit alternatives were added to the roadway alternatives, none of the roadway alternatives eliminated under Level 1 screening (due to not meeting the project’s purpose) would have met the screening criteria.

The transit alternatives were developed in coordination with the UTA and looked at several types of transit facilities (including commuter rail, light rail, and bus). However, none of the transit alternatives considered met UTA’s criteria for implementing transit service. For more information, see *Technical Memorandum 26: West Davis Corridor Transit Study*.

#### **What is the needs assessment study area?**

The needs assessment study area, also called the WDC study area, is the area described in Section 1.2, Description of the Needs Assessment Study Area, of the Final EIS.



Finally, UDOT has been working with UTA and the Wasatch Front Regional Council, and an enhanced bus system is planned in Phase 3 (2035–2040) of the Wasatch Front Regional Transportation Plan 2015–2040 from 2000 West/Antelope Drive to Hill Field Road in Layton independent of the WDC Project.

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- H. *Commenters asked why there was not an interchange at State Route (SR) 193 on the WDC alternatives or stated that there should be an interchange at SR 193 extension on the WDC alternatives. West Point City and other commenters requested that Phase 1 of the WDC have a northern terminus at the future SR 193 connection in West Point. West Point City requested that the SR 193 extension and the WDC construction be completed simultaneously.*

An extension of SR 193 from 3000 West to the WDC is in Phase 2 (2025–2034) of the Wasatch Front Regional Transportation Plan 2015–2040. Until the study on the extension of SR 193 to the WDC is completed, the location of the SR 193 interchange on the WDC will not be known. The impacts of this interchange and this new extension would be evaluated in a separate study.

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- I. *Commenters asked why there was not an interchange or access point at Glovers Lane for Farmington residents to access the WDC. Commenters stated that there is not a convenient way for residents of southwest Farmington to access the WDC or I-15. Commenters stated that the new high school on Glovers Lane would increase the need for access on to WDC, I-15, and Legacy Parkway in this area. Other commenters provided comments suggesting that there should be a partial interchange on Glovers Lane or 1100 West. Other commenters stated that they did not want an interchange at 1100 West. Another commenter did not want 1100 West realigned and asked why UDOT did not look at other options such as bridging over 1100 West, moving Glovers Lane to the south, or routing 1100 West to the west. The commenter asked why the realignment was not evaluated in the Draft EIS.*

The WDC action alternatives do not propose a local interchange at Glovers Lane or 1100 West.

The WDC team considered several guidelines to evaluate the locations of interchanges along the alternatives. One of these guidelines included providing 1.5 to 2 miles between interchanges to meet design and safety standards for accommodating vehicle merging and weaving. Without this distance, cars would make abrupt merges with high speed traffic, leading to accidents. For this reason, interchanges should be spaced 1.5 to 2 miles apart so that the entering and exiting traffic has time to accelerate and merge safely without conflicting with cars that are trying to exit the freeway at the next interchange.

A WDC local interchange, whether a partial or full interchange, located at Glovers Lane would be less than 1 mile from the WDC system interchange with Legacy Parkway and I-15. Because an interchange at this location would not meet design and safety standards, it was not proposed.

Residents of southwest Farmington could access northbound WDC at the 950 North interchange. Residents of southwest Farmington will continue to access southbound I-15 at either the Park Lane or 200 West interchanges on I-15.

UDOT has met several times with the Davis School District, and the District has not identified any concerns about access or requested an additional access on the WDC to the new high school or Canyon Creek Elementary School.

The 1100 West connection to Glovers Lane, Canyon Creek Elementary School, the Farmington 1100 West Park, and the adjacent subdivision did not exist at the time the Draft EIS was released, so a realignment of 1100 West was not evaluated in the Draft EIS. When updating the WDC's design for the Final EIS, UDOT looked at several options for 1100 West and concluded that the proposed realignment would have the least overall impacts to the community and the environment. Glovers Lane cannot be relocated to the south to avoid 1100 West because such a relocation would have about an acre of wetland impact and would push the WDC next to the Farmington Bay Waterfowl Management Area, resulting in more impacts to wildlife.

UDOT did look at spanning both Glovers Lane and 1100 West but decided to span only Glovers Lane in order to reduce the height of the WDC through the community. Bridging over 1100 West would create a large structure adjacent to many homes. Rerouting 1100 West to the west would still involve bridging over the road, which would cause additional community impacts from the high structure. In working with Farmington City, UDOT determined that the best solution was to realign 1100 West to the east because this will avoid home impacts and will not require an additional structure through the community.

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- J.** *A commenter asked why the WDC alternatives did not include adding a lane to I-15 in Kaysville and stated that this is a transportation bottleneck.*

The WDC action alternatives evaluated in the Final EIS did not propose any widening of I-15 except in the segment between the WDC interchange with I-15 and the Parrish Lane exit in Centerville. In this area, the Selected Alternative will involve constructing northbound and southbound auxiliary lanes to accommodate traffic from the WDC on and off ramps.

The WDC will meet the 2040 transportation need without widening I-15 through Kaysville. Because the WDC connects to I-15 south of Kaysville, the WDC will actually take some traffic off of I-15 in this area.

There are currently no projects in the Wasatch Front Regional Transportation Plan 2015–2040 that would provide additional capacity on I-15 in Kaysville. A project proposing new capacity improvements on I-15 in Kaysville would need to be added to the Regional Transportation Plan, and the impacts of this project would need to be evaluated in a separate study.

During the alternatives-screening and development process, UDOT evaluated alternatives that proposed widening on I-15 and other arterial roads instead of constructing a new roadway facility. All of these alternatives were eliminated in the screening process. For more

information about the alternatives-development and screening process, see response 1.2.2G and *Technical Memorandum 15: Alternatives Screening Report*.

In response to Farmington City's comments on the Draft EIS, the WDC team also reconsidered the three previously evaluated southern options north of Farmington to include widening I-15 between the I-15/Legacy Parkway/Park Lane system-to-system interchange and the location where the southern option would diverge from I-15. Specifically, the WDC team reconsidered the following southern options:

- Kaysville Rest Area Option with I-15 Widening
- Kaysville 200 North Option with I-15 Widening
- Layton Parkway Option with I-15 Widening

The information included below is also summarized in Section 2.2.4.3, Alternatives Eliminated after the Level 2 Screening Process, of the Final EIS.

In summary, the analysis of these three options showed that the Kaysville Rest Area Option with I-15 Widening would meet the purpose of and need for the WDC Project, and that the Kaysville 200 North Option with I-15 Widening and the Layton Parkway Option with I-15 Widening would not meet the purpose of and need for the WDC Project.

Although the Kaysville Rest Area Option with I-15 Widening would meet the purpose of and need for the WDC Project, the WDC team determined that it was not a reasonable option because the option failed to meet UDOT and FHWA signing regulations, similar to the Shepard Lane Option, which was eliminated between the release of the Draft EIS and the Final EIS for not meeting UDOT and FHWA *Manual on Uniform Traffic Control Devices* regulations. Therefore, the Kaysville Rest Area Option with I-15 Widening was eliminated from detailed study.

After reconsidering the other southern options with I-15 widening, the WDC team determined that the Glovers Lane Option was still the southern option with the fewest impacts and greatest transportation benefit and was the only reasonable option that should be considered in the Final EIS. UDOT also evaluated an alternative that just widened I-15, but the alternative did not meet the project's purpose and need.

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- K.** *Commenters wanted to know about the specific location of an alternative route, the termini of alternatives, where interchanges would be included, whether cross streets are underpasses or overpasses, the cost of alternatives, and where more-detailed information or maps can be found. Other commenters questioned whether there would be a stoplight at certain intersections, the types and locations of lights, and the locations of signs.*

Maps of each alternative and profiles for each system interchange can be found on the WDC Project website ([www.udot.utah.gov/westdavis/documentation#conceptual\\_drawings](http://www.udot.utah.gov/westdavis/documentation#conceptual_drawings)) and in the Final EIS. The website also includes an online map that provides a specific location of each alternative relative to community features, where interchanges are located, cross street underpasses or overpasses, proposed detention ponds, and park-and-ride lots. Chapter 2, Alternatives, of the Final EIS also provides the costs for each alternative and specific details

of proposed interchanges and cross street underpasses or overpasses for each alternative that was considered. Finally, detailed engineering drawings are included in Volume IV, Figures and Roadway Plans, of the Final EIS. The EIS cost estimate is included in Chapter 2, Alternatives, of the Final EIS.

Some details, such as stoplights for intersections, signing, and striping, will not be determined until the final design of the Selected Alternative. Stoplight evaluations are based on local traffic volumes and turning movements expected at the intersections.

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- L.** *Commenters asked why there was an overpass at 3200 West in Layton. The commenter was concerned about impacts to the quality of life for the residents who live on 3200 West and wondered if 3200 West could go over WDC instead of WDC going over 3200 West.*

Visitors to the Great Salt Lake Shorelands Preserve currently use 3200 West in Layton to access the visitors' center. The proposed WDC overpass at 3200 West in Layton will maintain this connection. No widening or improvements to 3200 West are proposed as part of the WDC Project. The WDC does not propose making 3200 West go over WDC because elevating 3200 West would cut off access to and require the relocation of homes on 3200 West.

Because the WDC will not provide an interchange at 3200 West, the WDC team does not anticipate that the WDC will change any traffic volumes on 3200 West.

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- M.** *Commenters stated that the Shared Solution Alternative should have been considered; asked why the initial modeling with version 7 of the Wasatch Front Regional Council's (WFRC) travel demand model showed the alternative passing screening but version 8 showed that the alternative failed to pass screening; and questioned why there was such a large variance in the model results between version 7 and version 8.*

***Summary of Development of the Shared Solution Alternative.*** After the release of the Draft EIS, the WDC team began working with the Shared Solution Coalition to develop the Shared Solution Alternative in enough detail that it could be formally evaluated as part of the EIS process. UDOT worked collaboratively with the Coalition to determine whether the Shared Solution Alternative would meet the transportation needs in the needs assessment study area. The Coalition requested that UDOT formalize the process of developing and evaluating the Shared Solution Alternative in a Memorandum of Agreement, which was signed in May 2014. This agreement included several workshops and meetings that would be held with the Cities, Counties, and agencies. In all, 30 technical coordination meetings, 6 stakeholder workshops, and 15 city land-use meetings were held to develop and evaluate this alternative. The workshops were held to receive and evaluate stakeholder feedback on roadway, transit, and land-use concepts.

In May 2016, UDOT and the Coalition finalized the Shared Solution Alternative's assumptions based on all the information gathered throughout the alternative-refinement process. The Shared Solution Alternative was then evaluated with 50 other alternatives using

WFRC's most recent travel demand model. This evaluation was conducted to determine whether the Shared Solution Alternative would meet the transportation need. This evaluation showed that the Shared Solution Alternative would not meet the transportation need. The alternative would not improve regional mobility to a level that warranted additional study in the EIS process. Thus, UDOT did conduct a detailed evaluation of the Shared Solution Alternative in the Final EIS.

Elements of the Shared Solution Alternative, such as protected bikeways, preventative ramp metering, and strategically placed overpasses along I-15, have been incorporated into the WDC EIS alternatives or local and regional transportation plans. UDOT is also including in the WDC design some parkway features based on comments on the Draft EIS and during the process of developing and evaluating the Shared Solution Alternative, features such as noise-reducing pavement, dark-sky lighting, additional trail connections, and other landscaping and aesthetic features. For more information regarding this process, see *Development and Evaluation of the Shared Solution Alternative*, May 19, 2016.

***Travel Demand Modeling Using Version 7.*** In December 2014, an initial Shared Solution Alternative was developed and was presented at a stakeholder workshop. A map of the alternative was posted on the WDC public website. None of the land-use or transportation assumptions of the alternative had been validated; nonetheless, UDOT conducted the initial evaluation of the Shared Solution Alternative with version 7 of WFRC's travel demand model to determine whether the alternative would pass screening before making further efforts to validate the assumptions, as agreed to with the Shared Solution Coalition. Based on the assumptions, the initial alternative met the WDC Level 1 screening criteria.

After the initial Shared Solution Alternative was developed in December 2014, the alternative went through a refinement process to verify the assumptions made to land use, transit, and other transportation factors. The alternative-refinement process included a review of the Shared Solution Alternative's transportation investments and land uses by the Cities and Counties in the WDC study area, a review of the land uses by the Cities to determine whether the proposed Shared Solution Alternative land uses were reasonable, a market analysis of the alternative land uses, a review of the transit investments by UTA, and additional refinement of the alternative by the Coalition. During this time, 12 technical meetings and 15 individual city meetings were held.

During the refinement process, the WDC team presented the Shared Solution Alternative's land-use assumptions to the Cities. Of the 11 Cities in the WDC study area, only two found the Shared Solution Alternative's proposed land uses to be reasonable. Therefore, as agreed to with the Coalition in a Memorandum of Agreement signed in May 2014, the WDC team removed the proposed land-use assumptions made for the Shared Solution Alternative from the travel demand model where the Cities did not find the land-use changes reasonable.

Based on stakeholder input during the refinement process, the Coalition updated the December 2014 Shared Solution Alternative's transportation projects, land-use assumptions, transit assumptions, and modeling assumptions. UDOT then performed traffic modeling of the Shared Solution Alternative with the updated assumptions, and it did not meet the Level 1 screening criteria.

**Travel Demand Modeling Using Versions 8 and 8.1.** In May 2015, WFRC released the Wasatch Front Regional Transportation Plan (RTP) 2015–2040 and associated travel demand model (version 8). Prior to the release of the 2015–2040 RTP, the WDC team had been using the 2011–2040 RTP and version 7 of the travel demand model. Version 8 included important updates to version 7 including a 2012 household survey and more-accurate modeling of transit, pedestrians, and bicyclists.

Additionally, during the Draft EIS comment period, UDOT received comments on version 7 of the travel demand model stating that the model should have used a 2012 household survey instead of an outdated 1992 survey, did not account for younger and older drivers (life cycle variable), and did not account for younger and older populations shifting away from single-family homes.

In early 2016, WFRC released version 8.1 of the travel demand model, which includes the I-15 Managed Motorways project. Version 8.1 of the WFRC model included the following refinements (Table 1), which addressed many of the comments about the model that were submitted during the Draft EIS comment period.

**Table 1. WFRC Travel Demand Model Version 8.1 Updates from Version 7.0**

Model Update	Description
Recalibration using the 2012 Utah household and travel survey	The model was recalibrated using the 2012 Utah household and travel survey, trip distance by trip type, and mode choice preference.
Addition of a life cycle variable	Households in the model are now categorized into three groups: (1) working with no children, (2) working with children, and (3) retired, with or without children.
New freight module	The freight module now allows more-detailed and robust forecasting of commercial trips, including the ability to forecast long-haul, short-haul, and light-duty commercial trips.
K–12 school trips now explicitly modeled	Trips to and from K–12 (kindergarten through 12th grade) schools were previously included in the “home-based other” category. These trips are now explicitly included in the model, with sensitivity to elementary versus secondary schools.
Expansion of employment categories from 3 to 11	The model previously had only retail, industrial, and other categories. It now has retail, food, manufacturing, wholesale, office, government/education, healthcare, other, mining, agriculture, and construction. This expansion allows the model to be more sensitive to the different trip-generation characteristics of these differing employment centers.
Updating of freeway capacities	Freeway capacities were lowered by 10–20% in order to reflect the operational capacity of these facilities. WFRC found that the “true” capacity is sustained for only a short period before conditions break down and the throughput drops by 10–20%. Switching to the operational capacity is an attempt to replicate real-world traffic conditions over the course of the entire peak period.
Upgrading of transit module	Version 8.1 of the model was one of the first in the United States to incorporate an updated transit submodule. This submodule allows more-robust analysis of transit scenarios, such as providing the ability to test distance-based fare scenarios.
Integration with the Utah Statewide Travel Model	The model is now set up to take advantage of UDOT’s Statewide Travel Model. This allows for improved forecasts of trips entering, leaving, or passing through the WFRC model area.

To ensure that the latest data and tools were being used to evaluate alternatives, the WDC team used version 8.1 for evaluating all alternatives described in the Draft EIS, along with the Shared Solution Alternative. Based on the analysis from Level 1 screening, the Shared

Solution Alternative would not substantially reduce delay and congestion in the WDC study area and therefore was not advanced to Level 2 screening. In addition, at the request of the Coalition, UDOT screened the refined Shared Solution Alternative using version 7 of the model, and it also did not pass Level 1 screening.

Therefore, under both versions 7 and 8.1 of the travel demand model, the Shared Solution Alternative did not pass Level 1 screening. UDOT has prepared a detailed technical memorandum documenting the development and evaluation of the Shared Solution Alternative (*Development and Evaluation of the Shared Solution Alternative*, May 19, 2016) that is available on the project website.

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- N.** *Farmington City requested that the following text be added to the proposed crossing of 1525 West in Farmington for any of the WDC alternatives: “Farmington City supports the recommended cross-over street at 1525 West but sees the need for a future interchange at this location which is not warranted at this time. The City will be taking all steps needed to preserve abutting right-of-way for a future interchange in its planning and development processes as opportunities present themselves. The City wants UDOT to include the future right-of-way design footprint of this interchange site as more favorable than the 1100 West site as shown on our current transportation master plan. The primary reason for this change is that the configuration of the 1100 West site as affected by the WDC makes a future interchange very challenging at this location and more viable at 1525 West.”*

Comments noted. The WDC team is not proposing an interchange at either 1100 West or 1525 West but notes Farmington City’s current preferences. The effects of this interchange and this new extension would be evaluated in a separate study.

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- O.** *A commenter stated that the Glovers Lane Option would have substantial direct and indirect impacts and that the Shepard Lane Option should have been considered. The commenter stated that little information was provided regarding why this and other alternatives were eliminated.*

*Technical Memorandum 19: Traffic Performance and Engineering Design of Shepard Lane and Glovers Lane Area Alternatives, Technical Memorandum 23: Glovers Interchange Design Selection, and Technical Memorandum 24: Shepard Lane Interchange Design Selection* describe and summarize the development, evaluation, selection, and traffic analysis of the Shepard Lane and Glovers Lane interchanges in detail. A summary of the conclusions of these memoranda is included in the Final EIS. All technical memoranda are and have been available on the project website.

In addition, between the release of the Draft EIS and the Final EIS, UDOT prepared an Interstate Access Change Request for FHWA’s review. This request provides a detailed analysis of the Shepard Lane and Glovers Lane Options. The request is posted on the project website ([www.udot.utah.gov/westdavis/documentation](http://www.udot.utah.gov/westdavis/documentation)) as *Technical Memorandum 28: Interstate Access Change Request*. In its review, FHWA determined that the Shepard Lane

Option would not meet federal design and safety standards, while the Glovers Lane Option would.

During the EIS process, UDOT evaluated all of the interchange options provided by the public, including several that were suggested during the Draft EIS public comment period. In addition, UDOT evaluated 10 other potential alternatives for connection to I-15 and Legacy Parkway as summarized in Chapter 2, Alternatives, of the Final EIS. Based on this evaluation, UDOT determined that the eliminated alternatives either did not meet design standards or would have substantially higher impacts to the environment. The details of this evaluation are documented in *Technical Memorandum 30: Southern Connection to I-15 and Legacy Parkway Section 404(b)(1) Practicability Analysis*, which is posted on the project website.

### 1.2.3 Section 2.3 – WDC Roadway Design Elements

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- A. *UTA commented that the WDC alternatives have a southbound–WDC–to–southbound–I-15 ramp that appears to occupy space needed for a future double-tracking of FrontRunner. UTA needs to maintain this space for the future double-tracking.*

The Selected Alternative’s ramps will not affect any UTA right-of-way. If UTA decides to construct a future double-track for FrontRunner, UDOT will work with UTA to identify options for acquiring the additional right-of-way.

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- B. *UTA requested that the Glovers Lane alternatives include a clear-span structure over the Denver & Rio Grande Western (D&RGW) trail/corridor that would maintain the full horizontal width and 21 feet of vertical clearance above the top of the rail to accommodate the future rail and the existing trail.*

During the final design of the Selected Alternative, UDOT will coordinate with UTA regarding the final structure size, taking into account the timing of the future use of the D&RGW corridor as a transit facility.

### 1.2.4 Section 2.4 – Description of Alternatives Carried Forward for Detailed Study

#### Section 2.4.1 – No-Action Alternative

No comments were received on this section during the Final EIS public comment period.

#### Section 2.4.2 – Alternative A1

No comments were received on this section during the Final EIS public comment period.

#### Section 2.4.3 – Alternative A2

No comments were received on this section during the Final EIS public comment period.



## Section 2.4.4 – Alternative B1 (Preferred Alternative)

- A. Commenters requested that the Preferred Alternative be moved farther west in Farmington. Commenters stated there is no reason why the alignment should cut so deeply east toward the homes in Farmington and that there is significant space available for the road to continue straight or move farther west. The alignment must be benefiting someone economically at the expense of 50 home values.

As stated in Section 2.4.6, Wetland Avoidance Options, of the Final EIS, the wetland avoidance option in Farmington was moved east to avoid impacts to wetlands. Throughout the EIS process, the WDC team has been coordinating with the U.S. Army Corps of Engineers (USACE) regarding wetland avoidance options. After the release of the Draft EIS, USACE asked whether any other wetland avoidance options were available. The WDC team stated that two options could meet design standards while still avoiding wetlands:

### What is a relocation?

A relocation occurs when constructing an alternative would require purchasing an occupied structure, such as a home or business. The residents or business would need to relocate.

- **Farmington Eastern Option.** At the corner of Prairie View Drive and West Ranches Road in Farmington, shift the A and B Alternatives about 100 feet east from the alignment of the Draft EIS Glovers Lane Option to the corner of Prairie View Drive and West Ranches Road. The Farmington Eastern Option would reduce impacts to medium-quality wetlands by 1.1 acres. The Farmington Eastern Option would also reduce the number of wetlands within 300 feet by 1.3 acres. The Farmington Eastern Option would result in two more home relocations.
- **Layton Eastern Option.** At the corner of 2200 West and 1000 South in Layton, shift the A and B Alternatives about 300 feet east from the alignment of the Draft EIS design. The Layton Eastern Option avoids all wetland impacts in this area and would reduce impacts to high-quality wetlands by about 5.7 acres compared to the Draft EIS alternatives. The Layton Eastern Option also minimizes impacts to the Great Salt Lake Shorelands Preserve by 12 acres and avoids 5.5 acres of the Utah Reclamation, Mitigation, and Conservation Commission land, which is a Department of Transportation Section 4(f) resource. However, the Layton Eastern Option would have six residential relocations, including three National Historic Preservation Act Section 106 historic properties, one of which is listed on the National Register of Historic Places [also a Department of Transportation Section 4(f) resource]. The other two historic properties are eligible for listing on the National Register of Historic Places.

After reviewing the impacts of the wetland avoidance options, USACE requested that the Farmington eastern and Layton eastern wetland avoidance options be evaluated in the Final EIS so that an informed decision could be made regarding whether to select the options as part of the A and B Alternatives. Therefore, the two wetland avoidance options were evaluated in detail in the Final EIS and could be used by Alternative A1, A2, B1, or B2.

UDOT and FHWA selected the eastern wetland avoidance options as part of the Preferred Alternative at the request of USACE to ensure compliance with Section 404 of the Clean Water Act.

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- B.** *A commenter is disappointed that UDOT is not purchasing their home, which will have an elevated off ramp next to their house. The commenter asked why the ramp is so compressed next to their home.*

The commenter did not provide the location of their house, but we assume that the commenter's house is near the proposed WDC interchange at Antelope Drive. The ramps at this interchange are compressed to avoid home acquisitions, avoid impacts to the Syracuse Arts Academy, and minimize impacts to Fremont Park and the Old Emigration Trail.

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- C.** *A commenter asked whether the ramp for exit 322 on I-15 in Farmington will be modified and whether it is possible to do away with exit 322 since there will now be two other exits in Farmington.*

The northbound exit ramps from I-15 exit 322 will be shifted slightly to the west, but the overall ramp location will not change. There are no plans to remove exit 322 since it provides access to southern Farmington.

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- D.** *A commenter stated that there were not enough access points to the WDC and that all major cross streets should have access points. It does not make sense to have access points to the WDC every 5 to 10 miles. Commenters also asked how the interchange locations were selected. Other commenters stated that there were too many interchange locations and suggested that the 2000 West interchange or Antelope Drive interchange in Syracuse be removed.*

The WDC team considered several guidelines to evaluate the locations of interchanges along the alternatives. These guidelines included considering the nature of the cross street where the interchange would connect, determining whether the interchange was compatible with local plans and community future land-use plans, and calculating the distances between interchanges.

The cross street at each proposed interchange location was evaluated to determine whether the cross street could support the increase in the volume of traffic associated with the interchange. Arterials that handle larger volumes of traffic were considered acceptable (such as 200 North in Kaysville and Antelope Drive), whereas smaller local roads that handle small volumes of traffic were considered unacceptable because the traffic from the interchange would cause high levels of congestion. In addition, before selecting the interchange locations, the WDC team reviewed community plans and met with representatives of the local municipalities to ensure that the interchange location was compatible with current and future land-use plans.

Finally, to improve the level of service and maintain safety, the WDC team evaluated the interchange spacing in order to provide enough distance between interchanges to meet the requirements of the American Association of State Highway and Transportation Officials (AASHTO) and to minimize conflicts between vehicles entering and exiting the roadway. In order to accommodate vehicle merging and weaving and improve safety, the team attempted to keep interchanges spaced at least every 1.5 to 2 miles.

However, the spacing between the Kaysville 200 North interchange and the interchange at 950 North in Farmington is about 3.5 miles, and the spacing between the 950 North interchange and I-15 is about 4 miles. In these segments of the WDC there are no major cross streets to connect with, and any interchange would have a low volume of traffic and would provide minor benefits.

Two interchanges are planned in Syracuse: one at Antelope Drive and a second interchange at 2000 West. One of the factors considered in locating an interchange was the predicted traffic volumes on the planned roads at the WDC interchanges. The predicted traffic volumes for the existing roadway interchanges ranged from 5,590 to 11,510 vehicles per day. Therefore, if the planned road was predicted to have 5,590 vehicles per day or more, the interchange was included in the design for the WDC alternatives.

The interchange at Antelope Drive will have about 15,100 vehicles per day and the interchange at 2000 West will have about 8,500 vehicles per day, which shows a need for both interchanges. The WDC interchange on Antelope Drive is required in order to meet the project purpose of improving regional mobility, since Antelope Drive is a major east-west arterial that has access to I-15. If an interchange is provided at this location, traffic would use the WDC instead of traveling east to I-15.

The second interchange in Syracuse at 2000 West is required in order to reduce future congestion in this growing area of Syracuse. If this interchange is provided, residents in southern Syracuse would access the WDC to go south instead of using east-west arterials such as Gentile Street to access I-15 to go south.

#### What is level of service?

Level of service is a measure of the operating conditions on a road or at an intersection. Level of service is represented by a letter “grade” ranging from A (free-flowing traffic and little delay) to F (extremely congested, stop-and-go traffic and excessive delay). LOS B through LOS E represent progressively worse operating conditions.

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- E.** *A commenter asked why the WDC was two lanes north of Antelope Drive and stated that the two-lane WDC will result in heavy congestion on the WDC, undue pressure on Antelope Drive and 3000 West, and result in two rounds of construction when the WDC is expanded in the future. Commenters stated that, with SR 193 and many new homes and subdivisions being constructed north of Antelope Drive, there would be additional transportation demand between SR 193 and Antelope Drive and that this should require a four-lane WDC in this area. Commenters asked whether it would be possible to widen the WDC north of Antelope Drive to four lanes in the future to accommodate additional traffic.*

The number of general travel lanes required for both the WDC highway and arterials was based on a level of service in 2040 of LOS D as modeled in the regional travel demand model. Typically, in urban areas, LOS C and better are considered acceptable (free-flow conditions), LOS E and LOS F are considered unacceptable (heavy congestion), and LOS D is considered acceptable where funding constraints make it unreasonable to reach LOS C. In summary, the design objective for the WDC roadway elements is LOS D for general-purpose lanes on highways.

The traffic modeling conducted as part of the alternatives-screening process showed that a four-lane divided highway south of Antelope Drive, and a two-lane road north of Antelope Drive, would operate at LOS D or better in 2040, so additional widening to four lanes north of Antelope Drive was not required during the 2040 planning period. In addition, the modeling showed that widening beyond four lanes is not necessary south of Antelope Drive.

As stated in the previous paragraph, only a two-lane road is needed north of Antelope Drive through the 2040 planning horizon evaluated in the Final EIS. The WFRC Regional Transportation Plan identifies a four-lane corridor north of Antelope Drive for corridor preservation purposes.

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- F.** *Commenters asked where the 950 North interchange connector road would be located and which local roads would connect to the planned 950 North. Commenters suggested that the speed limit on the local roads should be 25 miles per hour.*

Kaysville and Farmington Cities will be responsible for the 950 North connector road, setting the speed limit on 950 North or other local roads, installing and maintaining any lighting on 950 North, and determining which local roads would connect to 950 North. Currently, a preserved corridor follows 950 North and will connect to the proposed Shepard Lane interchange in Farmington. The WDC team does not anticipate that the 950 North connector road will go through subdivisions south of the interchange.

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- G.** *A commenter stated that the I-15/WDC interchange should be redesigned. The commenter stated that the current design of the I-15 northbound off ramp appears to require relocating the frontage road, sidewalks, and drainage basins along with taking some private property. The commenter stated that Centerville City plans to widen the frontage road in 2018 including the addition of dedicated bicycle lanes. The commenter stated that UDOT,*

*Centerville City, and Farmington City should work together on an improved design. Other commenters asked whether the WDC northbound off ramp divergence point could be moved farther north by a block or two to reduce the effect on the new homes in the neighborhoods in Centerville and Farmington. A commenter asked whether the frontage road could be moved farther east and/or curved more to provide more room for the WDC off ramp in this area. Commenters asked if the northbound off ramp location could be moved further north to lessen the impact to the subdivisions and the frontage road and provide more room for a noise wall. Commenters requested that the WDC flyover ramps have lower speed limits.*

UDOT will work with Centerville City to seek to accommodate the planned frontage road widening and dedicated bicycle lanes on the frontage road, if possible, with the I-15/WDC interchange design. UDOT will work with Centerville City to try to minimize impacts to the frontage road and the neighborhoods in the final design of the Selected Alternative. The location of the WDC northbound off ramp will accommodate any changes to the frontage road in this area, if applicable. The WDC off ramp location will still need to be in the same area to meet engineering design standards and spacing requirements.

The WDC flyover ramps are currently designed at 45 mph. For more information, see *Technical Memorandum 28: Interstate Access Change Request*.

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- H.** *Farmington and Centerville Cities commented that access to the Davis County “Sheep Road” is blocked by the Glovers Lane Option. Although access is provided farther south via a proposed local road, it appears that the Glovers Lane Option will forever preclude the county road as a viable north-south corridor in the future. Blocking the road will be detrimental to the growth of Farmington. Farmington and Centerville Cities also commented that overpasses at both Sheep Road and Tippetts Lane would accommodate the potential Bear River Pipeline. Other commenters had similar comments, asking whether the Tippetts Lane overpass in Farmington could be moved to Sheep Road to accommodate both the Denver & Rio Grand Western (D&RGW) Trail and the local traffic going south. A commenter stated that the overpass in this location would require a smaller structure because it is west of the system-to-system interchange ramps. Centerville City commented that it might not be possible to connect Tippetts Lane to Sheep Road because UTA prohibits new at-grade crossings of the D&RGW corridor.*

Although the Selected Alternative will block direct access to Sheep Road (also known as 750 West or 725 West), UDOT will provide access to Sheep Road south of the WDC via Tippetts Lane. Sheep Road is currently a dirt road and does not provide any direct access to the businesses on Tippetts Lane. With the existing businesses south of the WDC being located on Tippetts Lane, and since there are no home or business accesses on Sheep Road south of the WDC, UDOT believes that it makes more sense for Tippetts Lane to be the through road with access under the WDC. Also, blocking access to Tippetts Lane at the WDC could require residential and commercial relocations. During the final design of the Selected Alternative, UDOT will continue to work with Farmington and Centerville Cities to provide a better connection with Sheep Road and Tippetts Lane.

UDOT plans to construct a culvert at Sheep Lane to maintain the connection of the D&RGW Trail and will provide a connector road at about 1350 South to connect Tippetts Lane to Sheep Road.

UDOT will work with UTA during the final design of the Selected Alternative to accommodate the crossing of the D&RGW Trail by the WDC and the connector road between Tippetts Lane and Sheep Road.

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- I. *A commenter questioned the location of Alternative B1 at 4100 West and 1800 North and stated that this alignment would affect a pond and wetlands in this location.*

During the alternatives-development and screening process, UDOT evaluated an alignment for the B Alternatives that was farther west, closer to the Layton Canal, but determined that the large increase in wetland impacts with this alignment would make it not permissible under the Clean Water Act. This process and evaluation are described on pages 77 to 81 of *Technical Memorandum 15: Alternatives Screening Report*. The wetlands east of the Layton Canal are protected by the Clean Water Act, which requires avoiding impacts before mitigating impacts.

Shifting Alternative B1 farther east in this location would cause more home impacts between 1300 North and 1800 North.

The WDC analysis of alternatives in this area considered impacts to all resources as well as NEPA, Clean Water Act, and Section 4(f) regulatory requirements. As summarized in *Technical Memorandum 15: Alternatives Screening Report*, the options of Alternative B that were advanced to the EIS would have the lowest levels of impacts to residences, businesses, utilities, and community facilities; no impacts to areas with high densities of historic properties; no impacts to low-income or minority populations; moderate levels of impacts to farmland; and the lowest costs of any of the alternatives evaluated in Level 2 screening. The options of Alternative B that were advanced to the EIS would also be the most consistent with city, county, and regional transportation and land-use plans.

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- J. *Commenters questioned the location of the WDC alternatives at 1100 West in Farmington and asked why the WDC alternatives could not be moved south to avoid impacts to the 1100 West Park.*

UDOT and FHWA evaluated an alternative that would move the WDC alternatives south to avoid the 1100 West Park in Farmington. This evaluation had the following conclusion:

Compared to the existing WDC Glovers Lane Option that impacts the 1100 West Park, the avoidance alternative would have more direct impacts to jurisdictional wetlands (1.73 acres compared to 0.97 acre), impact more high-quality wetlands (0.48 acre compared to 0.03 acre), move the WDC roadway closer to the Farmington Bay Waterfowl Management Area (FBWMA) increasing the potential for indirect wetland and wildlife impacts (230 feet compared to 725 feet), reduce the upland buffer between the roadway and the FBWMA (16 acres compared to 42 acres), have

a potential home relocation, and have higher costs compared to the existing WDC Glovers Lane Option (about \$5 million more). FHWA determined that there is no prudent and feasible avoidance alternative to use of the Farmington City 1100 West Park Section 4(f) resource because the avoidance alternative would have: (1) overall higher wetland impacts including more high-quality wetland impacts; (2) potential for greater indirect impacts to wildlife at the FBWMA as a result of increased noise and reduced upland buffer; (3) a potential home relocation; and (4) greater cost.

As described in Chapter 5, Community Impacts, and Chapter 27, Section 4(f)/6(f) Evaluation, of the Final EIS, UDOT will mitigate for impacts to the Farmington 1100 West Park by purchasing new park property adjacent to the Farmington Regional Sports Complex. UDOT will work with Farmington City to determine the final mitigation proposal for impacts to the 1100 West Park and will ensure that the 1100 West Park's functions and amenities are adequately mitigated at the new location.

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**K.** *Commenters asked whether the WDC alignment could be moved north at the Stillwater development in Syracuse.*

UDOT worked with the developer of the Stillwater development to place the WDC in its currently preferred alignment (Alternative B1). Initially, the WDC would have affected more of the development. Alternative B1 cannot be moved farther north because it would affect Jensen Nature Park and because the curve radius of a more-northern alignment would not meet roadway design criteria.

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**L.** *Commenters stated that the area east of I-15 near Glovers Lane was not evaluated, including moving the frontage road, noise impacts, and safety issues with the interchange.*

The Final EIS includes an evaluation of impacts from the Glovers Lane Option east of I-15. The proposed Glovers Lane Option will realign a short segment of the frontage road east of I-15 but will maintain the current traffic flow. The realigned frontage road will use about 0.08 acre of South Park (which will affect the park sign, which will be replaced) of this Section 4(f) resource.

Noise impacts were evaluated in Chapter 12, Noise, of the Final EIS. A noise evaluation was conducted in this area, and the WDC team determined that a noise wall did not meet UDOT's criteria. UDOT will re-evaluate this area for a noise wall during the final design of the Selected Alternative once more-detailed information about the Selected Alternative's proposed vertical and horizontal alignments is known and UDOT can determine whether a noise wall in this area is feasible. For more information about the noise evaluation in this location, see response 1.12E. Though some commenters thought noise walls would provide a safety barrier, noise walls are built only as mitigation for noise and not as a safety measure.

The current design for the realigned frontage road does not require acquiring any homes east of I-15. The ramps between I-15/Legacy Parkway and the WDC will be designed to meet safety standards.

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- M.** *Commenters asked whether Weaver Lane would still connect to 1750 West on the west side of the WDC and whether UDOT has coordinated with the Davis School District regarding traffic at the proposed junior high school.*

Weaver Lane is proposed to terminate in a cul-de-sac at the WDC, so there will be no connection to 1750 West. UDOT coordinated with Layton and Kaysville Cities regarding the connection and tried to minimize visual and noise impacts by keeping the highway low to the ground instead of having an elevated structure at this location. Throughout the EIS process, UDOT has coordinated with the Davis School District about current and future schools.

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- N.** *Layton City asked that the park-and-ride lot at 2700 West be moved to the west side of the WDC instead of the east side. Layton City stated that this location would allow the park-and-ride lot to serve commuters, buses, and trail users; would be more compatible with Layton's planned business park; and would be a better land use in the area. Layton City stated that placing the park-and-ride lot on the west side of the WDC would be consistent with the design of the Kaysville 200 North park-and-ride lot.*

UDOT will coordinate with Layton City and the surrounding property owners during the final design of the Selected Alternative to determine the final location of the 2700 West park-and-ride lot.

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- O.** *Commenters wanted to know why the B Alternatives could not be shifted a little farther west to be closer to 3000 West in Syracuse between Antelope Drive and Gentile Street or switch back to the previous version (fall 2011 version) of the B Alternatives that had gone through the Cook property. Another commenter requested that the Antelope Drive interchange be moved to 4000 West.*

An alternative farther west (Alternative B, fall 2011 version) was evaluated as part of the alternatives-development process. As described in Chapter 2, Alternatives, and shown in Figure 2-14, Alternative B Syracuse Options January 2012, in Volume IV of the Draft EIS, the west alternative had similar wetland impacts and home relocations but would affect two additional Agriculture Protection Areas and 36.7 additional acres of farmland. Because of these additional farmland impacts, the fall 2011 version was eliminated from detailed consideration.

The Final EIS evaluated two alternatives (Alternatives A1 and A2) that included the Antelope Drive interchange at 4000 West. UDOT and FHWA evaluated the A and B Alternatives including impacts to the natural and human environment. Based on that review, UDOT and FHWA selected Alternative B1 because it would have lower overall environmental impacts and would provide the best transportation benefit. In making this decision, UDOT considered all engineering constraints, cost, future road widening, and existing and future development plans.



**P.** *Syracuse City provided a list of comments and suggestions for the Preferred Alternative in Syracuse. These comments are itemized below with responses.*

- 1. The City is planning a roundabout on Gentile Street and Bluff Road. Please verify that enough room has been provided to accommodate it.*

A roundabout at Gentile Street and Bluff Road would be a city project. There is approximately 100 feet between the edge of the WDC right-of-way and the existing Bluff Road/Gentile Street intersection. It is unclear what size of roundabout Syracuse City is proposing and the proposed location of the roundabout. UDOT will work with Syracuse City during the final design of the Selected Alternative to accommodate a roundabout if possible.

- 2. The City is planning on extending Bluff Road south to Bluff Ridge Boulevard in Layton so it can connect to Layton Parkway. Please verify that enough room has been provided to accommodate the 66-foot right-of-way connection.*

An extension of Bluff Road south of Gentile Street would be a city project. Due to the required curvature of the WDC north of Gentile Street, there is approximately 50 to 70 feet between the east edge of the WDC right-of-way and the next property line to the east between Gentile Street and the Syracuse–Layton city boundary. The City would be responsible for purchasing any right-of-way needed for the city road.

- 3. All overpasses need to be able to accommodate a 66-foot right-of-way which includes sidewalks on both sides of the street.*

UDOT will work with Syracuse City during the final design of the Selected Alternative to determine the appropriate sizes for the structures over the local roads in Syracuse.

- 4. Consider extending trail at 1000 West to continue southeast along the west side of Bluff Road and then west on Gentile Street under the underpass as an alternative or in addition to the proposed pedestrian overpass.*

A trail on Bluff Road in this location would have additional wetland impacts and impacts to property owned by the U.S. Bureau of Reclamation. Because of these impacts, UDOT is not proposing a trail in this location and is instead proposing the trail crossing at 1000 West that aligns with the existing Old Emigration Trail.

- 5. The City is willing to consider trading the “Out West” parkland for the remainder UDOT parcels south of Jensen Park and east of the freeway. Not sure if this would interfere with Section 4(f).*

UDOT is not proposing any changes to the Section 4(f) analysis at this time. Since the proposed Out West Park would not have a Section 4(f) use, exchanging the property for the parcel south of Jensen Park would not change the analysis. UDOT will work with Syracuse City during the final design of the Selected Alternative to determine the right-of-way needed for the roadway and drainage facilities. Compensation for impacts to properties owned by Syracuse City will be determined as part of the right-of-way acquisition process.

- 6. Please work with the City to ensure that all utility crossings are properly sized and located.*

UDOT will work with Syracuse City during the final design of the Selected Alternative to ensure that all utility crossings are properly sized and located.

- 7. Land area south of RC Willey and south of Bluff Road might need a sewer line crossing the WDC in order to accommodate future development. Please work with the City on determining if this is necessary and the location of this crossing.*

UDOT will work with Syracuse City during the final design of the Selected Alternative to ensure that all utility crossings are properly sized and located.

- 8. The driveway for the house at 3053 South 2000 West is possibly too close to the on/off ramp.*

Relocations of residents and businesses will be determined during the right-of-way acquisition process, which will occur shortly before construction. For more information, see response 1.5G.

- 9. Consider incorporating the 2000 West park-and-ride into potential future commercial development or possibly move it across the street to facilitate commercial development.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 10. Would like to open up direct access from 2000 West to the land west of the 2000 West interchange.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 11. Consider a single-point urban interchange (SPUI) on 2000 West to make room for an access road into the acreage mentioned in the previous comment, as well as neighboring driveways and park-and-ride lot.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 12. Please maintain all pedestrian access points to the trail—especially adjacent to Bluff Road.*

The proposed relocation of the Old Emigration Trail will be to the east, so all existing accesses to the Old Emigration Trail from the Bluff Road neighborhoods will be maintained after the construction of the WDC. UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 13. The realigned west entrance to the Syracuse Arts Academy should line up to the current driveway locations.*

UDOT will coordinate on this issue with the Syracuse Arts Academy and Syracuse City during the final design of the Selected Alternative.

- 14. Utilities located in the portion of 3000 West that will become abandoned at Antelope Drive need to be relocated into the new 3000 West right-of-way alignment.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 15. The remaining home on 2641 W. Antelope Drive has a driveway that appears to be very close to the intersection.*

Relocations of residents and businesses will be determined during the right-of-way acquisition process, which will occur shortly before construction. For more information, see response 1.5G.

- 16. The City would like to understand how traffic signal spacing will occur along Antelope Drive at the interchange as well as the potential of future signaling along Antelope Drive between 2000 West and 4500 West.*

Details regarding the traffic signals will be determined during the final design of the Selected Alternative. UDOT will coordinate on this issue with Syracuse City during the final design.

- 17. The City would like to work with UDOT to explore possible alternate ways to route traffic from Bluff Road north to Antelope Drive bringing traffic to a connection point at 2500 W. Antelope Drive.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 18. Antelope Drive will need to be widened between 2000 West and 3000 West.*

The widening of Antelope Drive from 2000 West to the WDC is in Phase 1 (2015–2024) of the Wasatch Front Regional Transportation Plan 2015–2040. This is an independent project from the WDC and will require separate environmental documentation.

- 19. There is concern that parents might use the park-and-ride lot on Antelope Drive for a drop-off and pick-up location for the Syracuse Arts Academy, forcing more children to cross Antelope Drive, which could increase auto/pedestrian conflicts.*

No crosswalks will be provided across Antelope Drive to the park-and-ride lot. All access and traffic going to or from the Syracuse Arts Academy will be directed to 3000 West.

- 20. Maintain good pedestrian and bicycle connections on all sides of the Antelope Drive interchange with particular attention to safe and convenient school routing.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

- 21. When it comes time, the City is requesting to be involved with the architectural aesthetics of the overpasses to ensure coordination with architectural themes desired by the City.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

22. *There is an existing trailhead located at the intersection of 3000 West and Bluff Road that must be relocated.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative. UDOT owns property on the east side of the WDC and west of 3000 West that could be used to relocate this trailhead.

23. *3000 West between Bluff Road and Antelope Drive should meet standards for a 66-foot right-of-way.*

UDOT will replace 3000 West with the same right-of-way to match the current width unless the WDC requires an increased right-of-way width or a larger typical section. Any increases in right-of-way width that are desired by the City would be considered a betterment that the City would need to pay for. UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

24. *Ensure that the relocation of the Weber Basin Canal along 3000 West is outside the right-of-way as much as possible.*

UDOT will coordinate on this issue with the Weber Basin Water Conservancy District, the U.S. Bureau of Reclamation, and Syracuse City during the final design of the Selected Alternative.

25. *Recommend that the location of the future connection of SR 193 be identified in the design.*

An extension of SR 193 from 3000 West to the WDC is in Phase 2 (2025–2034) of the Wasatch Front Regional Transportation Plan 2015–2040. Until the study on the extension of SR 193 to the WDC is completed, the location of the SR 193 interchange on the WDC will not be known. The impacts of this interchange and this new extension would be evaluated in a separate study.

26. *Please review the trail design to minimize the removal of mature trees.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

27. *The intersection of Bluff Road and 3000 West should be squared out to be perpendicular.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative. The current design does not propose a perpendicular intersection at this location because doing so would affect adjacent residences at this location.

28. *All at-grade trail crossings should also cross the road at a 90-degree angle and have a street luminaire for safety.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative.

29. *The driveways for two homes on the north side of Antelope Drive (1686 South 2625 West and 2622 W. Antelope Drive) appear to be in conflict with the 2625 West and Antelope Drive intersection.*

Relocations of residents and businesses will be determined during the right-of-way acquisition process, which will occur shortly before construction. For more information, see response 1.5G.

30. *The City has received input from a few residents who do not want 1770 South to connect to the new 2625 West south of Antelope Drive. Please review the feasibility of this connection.*

UDOT will coordinate on this issue with Syracuse City during the final design of the Selected Alternative. Currently, the west end of 1770 South dead-ends with no local connection. The new 2625 West would be immediately west of the dead end, and a connection with 1770 South would improve circulation within Syracuse.

#### **Section 2.4.5 – Alternative B2**

No comments were received on this section during the Final EIS public comment period.

#### **Section 2.4.6 – Wetland Avoidance Options**

No comments were received on this section during the Final EIS public comment period.

### **1.2.5 Section 2.5 – Summary Comparison of Alternatives**

No comments were received on this section during the Final EIS public comment period.

### **1.2.6 Section 2.6 – Identification of the Preferred Alternative**

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- A.** *Commenters stated that they did not like the Preferred Alternative or disagreed with the selection of the Preferred Alternative.*

Comments noted. The rationale for FHWA and UDOT's decision is presented in Section 3.3, Rationale for the Selected Alternative, of the Record of Decision and in Section 2.6, Identification of the Preferred Alternative, of the Final EIS.

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- B.** *Commenters stated that they support or approve of the selection of the Preferred Alternative.*

Comments noted.

- C. *Commenters stated that homes and people should have been given greater weight in the decision than wetlands or wildlife. Other commenters stated that wetlands or wildlife should have been given greater weight in the decision than homes, farmland, or people. Other commenters stated that impacts to schools or residents should have been considered in the decision more than impacts to wildlife, wetlands, or farmland.*

Comments noted. The rationale for FHWA and UDOT's decision is presented in Section 3.3, Rationale for the Selected Alternative, of the Record of Decision and in Section 2.6, Identification of the Preferred Alternative, of the Final EIS. The decision regarding the Preferred Alternative included considering many different resources and impacts. As stated in Section 2.6, no single alternative had the best transportation performance, the lowest cost, and the fewest impacts to all resources. All of the action alternatives would affect Section 4(f) resources, wetlands, and farmland and would require residential and business acquisitions.

FHWA and UDOT identified the Preferred Alternative based on the WDC alternatives' transportation performance, cost, and impacts to the natural and human environment. Public and agency input during scoping and the alternatives-development, screening, and refinement process was reviewed as part of identifying the Preferred Alternative. There are strengths and weaknesses for each alternative. No single alternative had the best transportation performance, had the lowest cost, and would avoid impacts to Section 4(f) resources, wetlands, farmland, and residential and business properties.

#### What is scoping?

*Scoping* is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.

During the resource-identification process, FHWA and UDOT gave specific consideration to the resources with avoidance and minimization requirements under federal or state laws: Section 4(f) resources, wetlands and waters regulated by Section 404 of the Clean Water Act, wetlands regulated by Executive Order 11990, farmlands regulated by the Utah Agricultural Protection Act, and floodplains regulated by Executive Order 11988. All of these laws require that efforts be made to avoid impacts or uses of specific resources, except under specified conditions.

In making their decision, FHWA and UDOT considered all factors including the context and intensity of the impacts. However, certain regulations, such as those regarding wetlands, impose substantive requirements in order to select an alternative that can be constructed.

- D.** *Commenters disagreed with the selection of the B Alternatives in Syracuse. Commenters stated that Alternative B1 would cause impacts to traffic at the Syracuse Arts Academy, would cause the Syracuse Arts Academy to close, would cause air quality impacts to students and residents, would impact the homes on Bluff Road, would destroy Syracuse City, would destroy Bluff Road, would impact planned soccer fields at Fremont Park, and would impact the Layton Canal and other utilities in the Bluff Road corridor.*

***Access to Syracuse Arts Academy.*** The site for the Syracuse Arts Academy was selected taking into account the proposed WDC and thus was moved slightly farther to the west. However, the school is still near the proposed corridor. As part of the EIS process, the WDC team extensively evaluated traffic to and from the Syracuse Arts Academy, including traffic counts and pedestrian counts during the morning and afternoon student drop-off and pick-up periods. The information is presented in *Technical Memorandum 22: Syracuse Arts Academy Traffic Study* (see [www.udot.utah.gov/westdavis/documentation#technical\\_memos](http://www.udot.utah.gov/westdavis/documentation#technical_memos)). As part of the design process, the WDC team worked with staff at the school and developed a traffic-flow pattern that will reduce congestion compared to the current conditions. In addition, the design of the highway and connecting roads to the school will meet safety standards and will ensure that safe walking access to the school is provided from all directions, including a trail connection under the WDC connecting to the Old Emigration Trail on the east side of the highway.

***Syracuse Arts Academy Closure.*** Commenters stated that they thought having Alternative B1 close to the Syracuse Arts Academy would cause the academy to close due to a lack of demand from students. As stated in Section 5.5.3.1, Alternative B1 – Glovers Lane and 4100 West/1800 North, of the Final EIS, “... the WDC team could not find anecdotal evidence to support the assertion that perceived nuisance effects from the WDC would cause parents to transfer their students to other schools.” Since the Syracuse Arts Academy is a charter school that does not operate school buses, a better transportation network could potentially make the school more attractive for prospective students.

***Air Quality and Health Impacts to Syracuse Arts Academy and Residents.*** Chapter 11, Air Quality, of the Final EIS provides an evaluation of air quality impacts from the WDC. As part of the evaluation, the WDC team modeled air quality at the Antelope Drive/WDC interchange adjacent to the Syracuse Arts Academy. The modeling showed that no U.S. Environmental Protection Agency air quality standards will be exceeded. For more information about health-related impacts due to air quality, see response 1.11.2A.

***Property Impacts.*** The B Alternatives would require 7 to 11 fewer residential relocations and potential relocations than the A Alternatives. See response 1.5G regarding compensation for property impacts as a result of the WDC.

***Community Impacts (Rural Lifestyle and Community Division).*** Chapter 5, Community Impacts, of the Final EIS states that Alternative B1 will change the rural nature of the area to more of an urban environment. However, the WDC will not affect the existing golf course in Syracuse and will allow the parks and trails in the area to continue to be used by the public.

See Chapter 5, Community Impacts, and Chapter 27, Section 4(f)/6(f) Evaluation, of the Final EIS for more information about the impacts to and use of these resources.

***Syracuse Impacts.*** It is not clear what the commenter meant by stating that Alternative B1 would destroy Syracuse. Syracuse City officials have supported the Alternative B1. UDOT acknowledges that there will be impacts to Syracuse from Alternative B1, but this alternative is consistent with Syracuse City's land-use and transportation plans and will provide benefits to the traveling public in Syracuse.

***Bluff Road Impacts.*** The changes to Bluff Road with the B Alternatives in Syracuse would be a realignment to 2650 West of the section of Bluff Road between 1800 South and Antelope Drive and a cul-de-sac on Bluff Road on the north side of Antelope Drive. The realignment south of Antelope Drive and the cul-de-sac north of Antelope Drive are needed to provide spacing between the WDC northbound on and off ramps and Bluff Road. All properties on Bluff Road would maintain access. There would be fewer vehicles traveling on Bluff Road with the B Alternatives because of these changes.

***Congestion on 3000 West and Bluff Road.*** A commenter was concerned that the WDC would end at 3000 West and Bluff Road and stated that Antelope Drive would provide a better termination point for Phase 1 of construction. The final termination point for the WDC will be based on funding. The initial Phase 1 plan is to end construction at Antelope Drive, but, if additional funding is provided, UDOT will extend the highway north. It is not likely that UDOT would end the WDC at 3000 West, since this would not provide adequate capacity. The next termination point after Antelope Drive would be 700 South.

***Antelope Drive over the WDC.*** UDOT evaluated taking Antelope Drive over the WDC. This would cause at least seven more residential impacts to properties on Antelope Drive and would also restrict access to Antelope Drive west of the WDC near 3000 West, the Syracuse Arts Academy, and Glen Eagle Golf Course. UDOT will continue to propose that the Selected Alternative goes over Antelope Drive but will continue to look for ways to lower the elevation of the WDC through Syracuse during the final design of this alternative.

***Impacts to the Fremont Park Soccer Fields.*** UDOT has coordinated with Syracuse City and has designed the access road and detention basins to accommodate the planned soccer fields at Fremont Park.

***Impacts to the Layton Canal and Utilities.*** UDOT has coordinated with the Weber Basin Water Conservancy District and the U.S. Bureau of Reclamation about impacts to the Layton Canal and will work closely with them during the final design of the Selected Alternative to mitigate impacts to the Layton Canal. Similarly, UDOT will coordinate closely with Syracuse City and utility companies to accommodate crossings or relocations of all utilities during final design.



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- E.** *Commenters stated that the WDC in general or the Preferred Alternative in particular would not address transportation needs in the WDC study area.*

Section 2.5.1, Purpose and Need Comparison, of the Final EIS discusses the transportation performance of the WDC alternatives evaluated in the Final EIS. The Final EIS shows that the WDC action alternatives would substantially reduce daily delay, lanes-miles in congestion, vehicle-miles traveled in congestion, and vehicle-hours traveled in congestion in the WDC study area compared to the No-Action Alternative. The Final EIS also shows that the Preferred Alternative, Alternative B1, would provide the greatest reduction in daily delay and vehicle-hours traveled in congestion and would carry the most traffic of any of the WDC action alternatives. Therefore, Alternative B1 would provide the best overall traffic performance and would meet the project purpose and transportation need in the study area.

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- F.** *Commenters stated that they disagree with the selection of the Glovers Lane Option and preferred the Shepard Lane Option.*

The Draft EIS includes a detailed comparison of the Shepard Lane and Glovers Lane Options. Between the release of the Draft EIS and the Final EIS, the Shepard Lane Option was eliminated as a reasonable and practicable alternative and was not carried forward for detailed analysis in the Final EIS. Therefore, comments related to the Shepard Lane Option are no longer applicable to the alternatives being considered in the Final EIS.

## 1.3 Chapter 3 – Land Use

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- A.** *A commenter stated that there should be no development west of the WDC and that the areas west of the WDC should remain unincorporated.*

UDOT and FHWA do not control regional or local planning; this is the responsibility of the Cities and Counties according to Utah state constitution law. Between Gentile Street and I-15, it is likely that there will not be any future commercial or residential development or annexation west of the WDC because the WDC mitigation plan proposes to purchase all of the remaining privately owned properties west of the WDC between Gentile Street and I-15. All other properties in this area are already owned by the State of Utah or by conservation agencies (the Utah Reclamation, Mitigation, and Conservation Commission or The Nature Conservancy). North of Gentile Street, there is already development on both sides of the WDC, and UDOT and FHWA anticipate that future development will occur on both sides of the WDC in this area consistent with the local zoning and general plans.

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- B.** *A commenter questioned what will be developed on the south end of 650 West and questioned what the zoning is in this area.*

The land adjacent to 650 West is subject to either Farmington City or Centerville City zoning. Farmington City zoning information can be found at [www.farmington.utah.gov/departments/community-development/maps-and-gis](http://www.farmington.utah.gov/departments/community-development/maps-and-gis). Centerville City zoning information can be found at [centervilleut.net/maps](http://centervilleut.net/maps).

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- C.** *Farmington City commented that the Farmington Bay Waterfowl Management Area Visitor Center referenced in Section 3.3.5.2 of the Final EIS is under construction and should open within the year.*

Comment noted. The Final EIS language was accurate when the Final EIS was released. UDOT is aware that the new Visitor Center is planned and construction is in progress.

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- D.** *Farmington City commented that the impact tables in Chapter 3 show that Farmington would experience the greatest impacts to land use of any city affected by the WDC alternatives as a percentage of its total land area.*

Comment noted. The Final EIS data accurately reflect the impacts to each city.

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- E.** *Farmington City commented that the impacts to the conservation easements discussed in Section 3.4.3.1 of the Final EIS are misleading because they account for the direct impacts only and not the entire acreage of the conservation easements. Farmington City stated that it considers the entire conservation easements to be impacted by the WDC alternatives. Farmington City also stated that it considers UDOT's early purchase of the conservation easement property in Farmington a violation of the easement conditions and that it constitutes an illegal subdivision under city code and a possible violation of state code. Farmington City also commented that it believes the property acquisition guidelines will require UDOT to compensate Farmington City for the total acreage of the conservation easements, not just the directly impacted portions.*

The impacts to the conservation easements discussed in Section 3.4.3.1, Alternative A1 – Glovers Lane and 4100 West/1800 North, of the Final EIS are the direct impacts from Alternative A1. A similar discussion for Alternative B1 is in Section 3.4.4.1, Alternative B1 – Glovers Lane and 4100 West/1800 North, of the Final EIS. The discussion for the Farmington conservation easements in these sections does discuss the entire acreage for each parcel and notes Farmington City's position about the impacts of the WDC action alternatives to the conservation easements.

Chapter 14, Ecosystem Resources, of the Final EIS discusses potential indirect impacts to wildlife that might use the easements, and Chapter 23, Indirect Effects, notes that, since the WDC would not provide access to the unused portions of the easements, it is unlikely that the remaining easement property would be developed. In addition, UDOT is looking into using the remaining easement land as potential wetland mitigation sites.

As described in Section 3.4.6, Mitigation Measures, of the Final EIS, UDOT will provide compensation in accordance with state and federal property acquisition laws for right-of-way impacts to land that is included in the Farmington Ranches, Farmington Meadows, and Hunters Creek conservation easements. UDOT will allow the right-of-way process to determine the appropriate acreage amount and valuation for impacts to the conservation easements.

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- F.** *Farmington City commented that Table 3-5 does not tell the whole story in regard to consistency with Farmington City's Master Plan and Transportation Plan. Farmington City stated that, "while the narrative in the table is factually accurate, we have stated to UDOT on numerous occasions and in writing that the only reason the City changed its Transportation Master Plan regarding the Glovers Lane alternative in the first place, is the City was told repeatedly by UDOT officials the Shepard Lane alternative was not a viable option. The Shepard Lane resolution mentioned in the table narrative was passed by the City after an initial independent engineering study showed it to be viable. UDOT eventually acknowledged the Shepard Lane alternative was being further considered after it passed through the initial screening review. When that option came back into the EIS process for further study, the City elected not to change its Transportation Master Plan back to Shepard Lane so as not to further confuse the public while the EIS process was being completed. The*

*City intentionally withheld amending its Transportation Master Plan as we felt the resolution adequately explained the history regarding the options.”*

Comment noted.

## 1.4 Chapter 4 – Farmland

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- A.** *Commenters stated concerns about farmland impacts and asked whether the WDC alternatives would result in a loss of local food production.*

Chapter 4, Farmland, of the Final EIS describes the farmland impacts of the WDC alternatives. None of the WDC alternatives are anticipated to remove all farmland or substantially reduce local food production.

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- B.** *Commenters asked whether a greenbelt designation determined the Agricultural Protection Area layer of the online WDC map. Commenters stated that their property is identified as Agricultural Protection Area, and they were not sure why this designation was made or what it means.*

One of the purposes of Utah’s zoning laws is to support the state’s agriculture. Zoning is established by a commission for each County or City that adopts a plan for zoning all land within the county or city. Utah law also allows the formation of Agriculture Protection Areas (APAs), which are geographic areas where agricultural activities are given special protections. State codes require that any property being placed under agricultural protection must be a minimum of 5 contiguous acres, and the landowner making the request must be using the property as farmland.

APAs are not federally regulated, but they are protected from state and local laws that would restrict farm practices, unless the laws are required for public safety or are required by federal law. The municipal government of the county or city in which the APA is located cannot change the zoning designation of the land within the APA unless the landowner gives written approval for the change.

The property owned by the commenters was either placed in APA status with Weber County by a previous owner or the County mistakenly placed the property in APA status. UDOT obtained the APA information from the Weber County Planning Department. The APA status does not affect the current property owner, since the property can be removed from APA status by the owner at any time. Once the APA status is removed, a different zoning designation can be applied to the property.

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- C.** *The Utah Department of Agriculture and Food requested that the new WDC infrastructure be sized so that agricultural operators can continue to move their farm equipment on and across the WDC.*

UDOT will work with the Utah Department of Agriculture and Food and farm operators during the final design of the Selected Alternative to identify the local roads that agricultural operators will need to use to transport equipment and the geometric requirements of the farm equipment to ensure that these WDC local road crossings can accommodate farm equipment.

## 1.5 Chapter 5 – Community Impacts

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- A.** *Commenters stated that the WDC would divide neighborhoods or have impacts to neighborhoods and communities and quality of life.*

Chapter 5, Community Impacts, of the Final EIS describes the community cohesion and neighborhood impacts from the WDC alternatives, including changes to quality of life. Chapter 5 acknowledges that there would be some impacts to the quality of life in neighborhoods and impacts to community cohesion from the WDC alternatives.

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- B.** *Commenters stated that there would be utility impacts in West Point, Syracuse, and Clinton; that canals and other utilities would need to be piped or rerouted; and that these impacts and costs should be considered.*

All major utility crossings (power lines, canals, sewers, gas lines, etc.) have been identified for all of the WDC action alternatives evaluated in the Final EIS. The impacts to utilities are listed in Section 5.5, Environmental Consequences, of the Final EIS, for each of the WDC action alternatives. The costs of utility relocations have been included as part of the estimates for all of the WDC action alternatives evaluated in the EIS. *Technical Memorandum 31: Cost Estimates for WDC Alternatives in the Final EIS* describes and lists all items included in the cost estimates.

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- C.** *Commenters stated that placing the WDC close to schools or houses could increase the risk to students or residents if a driver loses control and the vehicle leaves the freeway and enters the school grounds or private property. Commenters had similar safety concerns about the WDC's interchange on and off ramps and the WDC/I-15 system-to-system interchange. Other commenters wanted to know whether the highway would be fenced or safety barriers provided.*

The Selected Alternative will be designed to meet safety standards. There will be appropriate safety distances between the travel lanes and the end of the right-of-way to minimize the risk of errant vehicles leaving the freeway clear zone. This zone is typically 30 feet for a highway such as the WDC. In addition, the WDC right-of-way will be fenced to keep pedestrians from entering the roadway.

Similarly, the WDC's interchange ramps (both the I-15 system-to-system interchange and the local interchanges) will also be designed to meet safety standards to minimize the risk of vehicles leaving the roadway right-of-way and impacting adjacent roads or private properties.

UDOT does not introduce barriers along the roadway to stop errant vehicles if appropriate clear zones are provided (as is the case with the WDC). Introducing a barrier provides greater risk for injury to the driver of an errant vehicle.

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- D.** *A commenter asked that the WDC's location around an unspecified elementary school be reconsidered. The commenter requested that the on and off ramps be moved to a new location away from the school.*

It is not clear which school, WDC alternative, or WDC interchange the comment is referring to. UDOT has coordinated with the Davis School District about the design of the WDC action alternatives and has not received any requests for different access or alignment for any schools in proximity to the WDC action alternatives.

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- E.** *A commenter stated that the WDC would affect the Central Davis Sewer District facility in Kaysville and would block access to the outfall and discharge pipes of the facility. The commenter requested a meeting with the WDC team to discuss the issues. The Central Davis Sewer District (CDS) submitted comments to UDOT stating that they preferred that the WDC avoid their property completely or use a northern and eastern alternative on their property. The CDS stated that the WDC Preferred Alternative would prohibit the CDS's biosolids application and composting operations and that UDOT would need to mitigate for these impacts if the WDC stayed in its current location and that these impacts could require the CDS to increase rates for users. Other commenters in Kaysville and Farmington stated that they did not want their sewer fees or property taxes to go up because of the impacts to the CDS from the WDC Project. Commenters stated that the WDC should go west of the CDS lands.*

All of the WDC action alternatives would provide the Central Davis Sewer District's facility in Kaysville with roadway access to the outfall underneath the WDC. These accesses would allow CDS to sample the effluents and perform all maintenance activities on the outfall and discharge pipes.

The WDC team met with CDS representatives multiple times during the EIS process and will continue to meet with them throughout the final design of the Selected Alternative. During previous meetings with CDS in 2011, UDOT representatives were made aware that the WDC would affect the CDS properties and operations, but were told by CDS representatives that CDS would prefer that the alignment be located on the south and west sides of the CDS properties instead of on the north and east sides.

Based on this input, UDOT moved the location of the WDC action alternatives to the south and west sides of the CDS D properties. UDOT also considered alternatives that would be farther west and completely avoid the CDS D properties. These more westerly alternatives would be located in Great Salt Lake Shorelands Preserve wetland complexes, would be located in the Great Salt Lake floodplain (below 4,219 feet in elevation), and would affect sensitive wetland and wildlife areas. UDOT determined that any alternative west of the CDS D properties would not be permissible under Section 404 of the Clean Water Act due to the large amount of wetland impacts.

Similarly, the elevations of the areas that would be affected with a western alternative would be between 4,200 and 4,212 feet, which would result in additional floodplain impacts and reviews by the Federal Emergency Management Agency and would require that the WDC have a much more expensive roadway cross-section with either more fill or structures to keep the WDC above the Great Salt Lake floodplain elevation of 4,219 feet.

UDOT understands that the WDC will affect CDS D land currently used for biosolids application and that the location of the WDC could also affect the CDS D's composting operation if the WDC is within the buffer zones of the composting operation. UDOT will continue to work with CDS D during the final design of the Selected Alternative to understand the impacts to CDS D caused by the WDC and to identify a mutually beneficial option so that CDS D remains operational and minimizes the costs to the users.

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- F.** *Commenters stated that their property would be affected by a WDC alternative or the Preferred Alternative, stated that they needed to sell their house, and asked UDOT to purchase their property.*

UDOT has a hardship acquisition program that can be used to purchase properties for future transportation projects if they meet certain eligibility requirements. Information about UDOT's hardship acquisition program is available at [www.udot.utah.gov/main/f?p=100:pg:0:::1:T,V:451](http://www.udot.utah.gov/main/f?p=100:pg:0:::1:T,V:451).

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- G.** *Commenters wanted information about whether their property would be affected, what methodology was used in the EIS to determine impacts, and how property would be acquired—specifically, does UDOT pay for only minor impacts to property, when will property be acquired, how much time would residents have to move out, can irrigation water be maintained for property, and does UDOT compensate for a decrease in property value for homes that are left remaining near an alternative? Other commenters asked whether they would have access to their property, whether the WDC alternatives would restrict access to their property, or whether their irrigation water would be relocated. Some commenters also asked UDOT to buy their properties if the properties are not directly affected but are located close to the road. Some commenters requested that UDOT buy only the amount of property needed for the highway and not the remaining pieces of their property.*

Information about property impacts is included in Chapter 5, Community Impacts, of the Final EIS, and the actual properties affected are listed in Appendix 5A, Relocations and Potential Relocations in the Community Impact Analysis Area. In addition, an online map on the project website ([www.udot.utah.gov/westdavis/maps](http://www.udot.utah.gov/westdavis/maps)) shows the locations of the alternatives in relation to properties. Relocations of residents and businesses will be determined during the right-of-way acquisition process, which will occur shortly before construction. The WDC team made reasonable efforts to avoid affecting residential and business properties, but in some areas this was not possible because of design and environmental constraints.

There is no specific distance for determining full relocations, and each case is unique. Issues such as access to the property and the ability to maintain access and irrigation water for agricultural properties are also considered when determining whether a property is a full relocation. Since final design has not been completed for the Selected Alternative, it is too early to look at each specific circumstance; therefore, UDOT uses a standard distance to ensure an equal comparison of alternatives. For the EIS process, a *relocation* is considered only when a structure would be directly affected by the WDC (that is, the WDC right-of-way would overlap the structure). If a structure would be within 15 feet of the WDC right-of-way, or if the current access could be cut off, this was identified in the Final EIS as a *potential relocation*.

When property acquisitions are necessary, UDOT must comply with the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 United States Code 4601 and subsequent sections, amended 1989) and the State of Utah Relocation Program (part of the Utah Relocation Assistance Act, Section 57-12 of the Utah Administrative Code). To ensure just compensation for any property acquisition, these laws provide for uniform and equitable treatment of all persons displaced from their homes, businesses, and farms without discrimination on any basis.

UDOT will provide just compensation for the acquisition of any private property, including strip take impacts to the property when no structures are taken. A UDOT property acquisition specialist will work with each property owner and consider items such as existing mortgage rates, relocation fees, and any property disputes. UDOT does not compensate for any decrease in property values as a result of a project if no property is acquired.

Per the UDOT right-of-way process, UDOT can generally acquire only property that it needs for a project. Therefore, UDOT generally does not purchase properties not directly affected by a project unless the project causes the property to have no value or not be usable (for example, the project eliminates access to the property).

#### What is a relocation?

A relocation occurs when constructing an alternative would require purchasing an occupied structure, such as a home or business. The residents or business would need to relocate.

#### What is a strip take?

A strip take is the acquisition of a strip of land on the edge of a parcel.



The location and timing of construction will be based on available funding. Currently, there is not enough funding to construct the entire WDC. If funding is made available, the earliest that construction could occur is 2019, with property acquisition starting in 2018. At a minimum, residents will have 90 days to relocate once a property is purchased by UDOT. If the property is not immediately needed for construction, that period could be extended.

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- H.** *A commenter wanted to know whether there are any regulations regarding the proximity of highways to schools and whether the safety of schools has been considered.*

There are no regulations that restrict how close a highway can be placed near a school. The Selected Alternative will be designed to meet safety standards. There will be appropriate safety distances between the travel lanes and the end of the right-of-way to minimize the risk of errant vehicles leaving the freeway clear zone. This zone is typically 30 feet for a highway such as the WDC. In addition, the WDC right-of-way will be fenced to keep pedestrians from entering the roadway.

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- I.** *A commenter stated concerns about their property being identified as a mitigation property for the WDC Project and asked UDOT to reconsider the mitigation plan to remove their property. The commenter stated that the Final EIS was the first notification that their property could be affected by the WDC Project. Other commenters suggested that UDOT should have identified more mitigation properties than what was needed so that property owners who did not want to sell their properties could remain and UDOT could still meet their mitigation needs with willing property sellers.*

The proposed mitigation sites were identified between the release of the Draft EIS and the Final EIS based on comments on the Draft EIS and in consultation and coordination with federal and state resource agencies and The Nature Conservancy. The identification and selection of mitigation properties were based primarily on the properties' proximity to the Great Salt Lake Shorelands Preserve and the Farmington Bay Waterfowl Management Area. The purpose of the mitigation properties is to provide mitigation for wetland and ecosystem impacts in areas that are part of larger areas that are managed for wetland and wildlife habitats.

Prior to the release of the Draft EIS, there was not enough specific information to provide a more-detailed list of properties being considered for mitigation.

Section 14.4.7, Mitigation Measures, of the Draft EIS lists the areas that UDOT and FHWA were considering for wetland and wildlife mitigation. These areas included private land adjacent to the Farmington Bay Waterfowl Management Area, private land within or adjacent to the Great Salt Lake Shorelands Preserve, private land adjacent to existing wetlands along the "Bluff" in Syracuse and West Point, and private land along the Great Salt Lake's east shoreline between Antelope Drive in Davis County and 4000 South in Weber County.

Additional information regarding the location of the proposed mitigation sites was included in the Final EIS and the specific location of each parcel was posted on the project website

when the Final EIS was released. Additionally, UDOT contacted property owners when the Final EIS was released to ensure they were notified and given an opportunity to comment on the mitigation proposal during the formal comment period.

Finally, UDOT and FHWA have been working with the U.S. Army Corps of Engineers to finalize the mitigation required for the Clean Water Act Section 404 permit.

For information about the UDOT right-of-way acquisition process, please refer to response 1.5G.

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- J.** *Commenters in Centerville stated concerns about safety and lights from I-15 and the WDC off ramp from I-15. Commenters stated that the lights from I-15 made it difficult to turn onto the frontage road from 1600 South and 1700 South/Lund Lane and stated that a noise wall or other barrier would keep headlights from traffic on I-15 from mixing with headlights from traffic on the frontage road. Some commenters stated that a traffic light was needed at Lund Lane and the frontage road. Commenters stated that the frontage road is dangerous for pedestrians and bicyclists because of the noise and lights from I-15.*

See response 1.12E regarding noise impacts and questions about noise walls. Currently UDOT does not plan to change the locations or alignments of the cross streets that intersect the frontage road as part of the WDC Project. The safety concerns about left turns have been relayed to the UDOT Traffic and Safety Division for consideration.

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- K.** *The Wasatch Aero Modelers commented that their model-aircraft flying field should not be acquired for wetland mitigation since it is the only area in western Davis County that provides safe flying conditions. The club has invested in the infrastructure of the field, and there are no other areas nearby that can be used to safely fly model aircraft.*

UDOT will continue to coordinate with Wasatch Aero Modelers regarding the acquisition of its property. If UDOT determines that acquisition is required for the WDC, UDOT must comply with the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 United States Code 4601 and subsequent sections, amended 1989) and the State of Utah Relocation Program (part of the Utah Relocation Assistance Act, Section 57-12 of the Utah Administrative Code). To ensure just compensation for any property acquisition, these laws provide for uniform and equitable treatment of all persons displaced from their homes, businesses, and farms without discrimination on any basis.

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- L.** *Commenters asked whether UDOT's construction plans would maintain access to existing businesses or residential areas during construction.*

UDOT requires the selected construction contractor to develop plans to minimize impacts to existing business and residential accesses. During construction, access will be maintained to the extent practicable to all businesses and residences along the WDC.

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**M.** *Commenters stated that they opposed the impacts to the Farmington 1100 West Park.*

The Farmington 1100 West Park would be affected by any of the WDC action alternatives. As described in Chapter 5, Community Impacts, and Chapter 27, Section 4(f)/6(f) Evaluation, of the Final EIS, UDOT will mitigate for impacts to the Farmington 1100 West Park by purchasing new park property adjacent to the Farmington Regional Sports Complex. The WDC team attempted to avoid Section 4(f) properties, but it was not feasible or prudent to do so.

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**N.** *Farmington City and the Weber Basin Water Conservancy District asked whether the WDC right-of-way would be an option for locating the Bear River pipeline in Farmington.*

UDOT will coordinate and consider requests from the Utah Division of Water Resources and local water agencies about potential alignments for the potential future Bear River pipeline to determine whether the pipeline could be co-located in the WDC right-of-way.

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**O.** *Farmington City stated its support for the proposed mitigation for the 1100 West Park, which will need to be relocated because of the WDC Project.*

Comment noted.

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**P.** *The Weber Basin Water Conservancy District (WBWCD) and the U.S. Bureau of Reclamation provided comments identifying impacts to their pressurized irrigation system, which would need to be re-established to maintain services. WBWCD and Reclamation stated that these impacts would have seasonal restrictions (work would need to be completed between April 15 and October 15) and that re-establishments will need to meet WBWCD's specifications and details. Similarly, Reclamation commented that impacts to Reclamation facilities and easements will need to be addressed with a license agreement that will restrict permanent structures and deep-rooted trees. Reclamation stated that any impacts to Reclamation land will need a license agreement, must include an exchange that facilitates the operation and maintenance of the affected facilities, must replace any affected federal land with equal or greater acreage, and must not reduce the hydraulic capacity of the system. Reclamation stated that these processes take time to complete, require additional approvals, and might require funding from UDOT for reviews, and requested that UDOT begin this work as soon as possible.*

Comments noted. UDOT will work closely with WBWCD and Reclamation during the final design of the Selected Alternative to address all affected WBWCD and Reclamation facilities and obtain the necessary approvals, license agreements, and exchanges.

## 1.6 Chapter 6 – Environmental Justice

No comments were received on this chapter during the Final EIS public comment period.

## 1.7 Chapter 7 – Transportation

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- A.** *A commenter stated that the WDC will bypass the main Farmington intersection area and make Farmington a drive-through city instead of a place to stop. The commenter stated that having the WDC farther from the main interchange will make it more confusing. The commenter stated concerns about the existing roadway infrastructure in Farmington.*

The WDC will divert traffic from I-15 and Legacy Parkway south of the I-15/ U.S. Highway 89 (US 89)/Park Lane interchange area, which we assume the commenter is referring to. However, the WDC will not change or restrict access to the I-15/US 89/Park Lane interchange area, the Station Park commercial area, the Lagoon amusement park, or downtown Farmington. Any traffic on the WDC would likely be going to areas farther north. The WDC will reduce traffic on I-15 and the I-15/US 89/Park Lane interchange area, and this reduction in traffic will improve operations at the Park Lane interchange.

After the Draft EIS was released, and based on the projected increase in traffic generated by proposed developments in Farmington, UDOT added a WDC interchange at 950 North in Farmington, which will provide access to the interchange mentioned in the comment. The 950 North interchange will also provide access into the Farmington Station Park development.

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- B.** *A commenter stated that there would be traffic impacts to existing roads during the construction of the WDC because the existing roads would need to be closed.*

The WDC will be a new road, and the WDC team expects that any traffic impacts during construction will be minor and limited to areas where the WDC will connect to existing roads. UDOT requires its construction contractors to develop maintenance-of-traffic plans to minimize impacts to the traveling public and communicate any temporary road closures to the traveling public.

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- C.** *A commenter stated that there would be traffic impacts to I-15 south of the I-15/WDC interchange.*

The WDC team's review of the traffic data shows that both I-15 and Legacy Parkway south of the system-to-system interchange with the WDC would have heavy congestion and poor operating conditions with the No-Action Alternative and the WDC action alternatives. The WDC will not change the level of service on I-15 or Legacy Parkway in 2040 compared to the No-Action Alternative.

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- D.** *A commenter asked why the WDC interchange design did not accommodate a traffic movement from southbound I-15 to the WDC. The commenter stated that the WDC interchange should be a full interchange and should accommodate all traffic movements.*

The WDC design does allow these movements but requires that southbound I-15 traffic use southbound Legacy Parkway to access northbound WDC and traffic from southbound WDC to use northbound Legacy Parkway to access northbound I-15. WDC traffic modeling indicated that there is relatively little travel demand for these movements and that this demand would not require nor justify additional ramps to connect directly to I-15.

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- E.** *Farmington City and other commenters asked why the WDC interchange design accommodates traffic movements from southbound Legacy to northbound WDC and from southbound WDC to northbound Legacy. Farmington City and other commenters stated that these traffic movements would not be made and that the ramps that accommodate them should be eliminated to save the costs of constructing them and to minimize the impacts from the higher flyover ramps.*

WDC traffic modeling indicated that there is relatively little demand for these traffic movements. However, Policy Point 4 of FHWA's Interstate Access Policy Statement requires accesses on the interstates to accommodate all traffic movements. The Glovers Lane interchange will provide continuous system-to-system connections via directional ramps to and from Legacy Parkway and I-15 for all traffic movements, thereby providing a full-access interchange. The Glovers Lane interchange requires southbound WDC to northbound I-15 and southbound I-15 to northbound WDC movements to use Legacy Parkway between the WDC and the I-15/Legacy Parkway/US 89 system-to-system interchange. For more information about the interchange design and requirements, see *Technical Memorandum 28: Interstate Access Change Request*.

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- F.** *A commenter asked whether the WDC would change the traffic movements between US 89 and Legacy Parkway.*

The WDC interchange at Glovers Lane will not change the current access between US 89 and Legacy Parkway. Legacy Parkway will still connect to US 89 and I-15, and all existing traffic movements will be maintained.

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- G.** *A commenter asked whether the average reduction in delay or travel time during rush hour would be 1.8 minutes. Other commenters stated that WDC would provide only a few minutes of benefit. Commenters asked how much reduction in travel time there would be with the WDC alternatives.*

The commenter refers to an *average* time savings of less than 2 minutes per vehicle which, while technically correct, fails to recognize the actual time savings that will occur for many motorists. For example, the actual time savings for a driver traveling from downtown Salt

Lake City to Syracuse (the intersection of Bluff Road and Antelope Drive) during the PM peak period will be 15.8 minutes. Looking at all of the travelers who will make the daily trip from Salt Lake City to the WDC study area during the 3-hour PM peak period, the total travel time benefit will be 2,260 hours per day. This is a substantial time savings for the evening commute. Even a 2-minute trip reduction, when multiplied by thousands of drivers for an extended period, adds up to a significant overall time savings and an increase in economic efficiency.

The WDC is not intended to provide a benefit to one driver but rather to improve overall regional mobility for all users of the transportation system in the WDC study area. If every road project were based on the improvement to one driver, very few projects would be built, since there would not be a large enough benefit. However, when considering projects, UDOT looks at all the users of the transportation system to determine whether the overall benefit is worth the transportation investment. In the case of the WDC, UDOT believes that a 32% reduction in overall user delay in the WDC study area from this one project is worth the transportation investment.

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- H.** *A commenter asked whether 200 North in Kaysville would have increased congestion as a result of the proposed interchange on this street and whether other interchange options that would spread traffic to different streets were evaluated. Other commenters stated that they disagreed with 200 North being the WDC interchange location in Kaysville and stated that they thought 200 North would not be the WDC interchange location. Other commenters requested that the 200 North interchange be relocated on Layton Parkway.*

UDOT has identified 200 North as a WDC interchange location since 2011. WDC traffic modeling predicts that 200 North will operate at an acceptable level of service in 2040 with only minor congestion. The Wasatch Front Regional Transportation Plan 2015–2040 shows 200 North being widened from two to four lanes by 2024 between I-15 and WDC. UDOT is proposing that the WDC will have a diamond or similar interchange at 200 North. Other interchange options that would connect to different streets would affect more homes and would increase congestion on local residential streets not suited for high traffic volumes. Because 200 North is planned to be a major arterial, it will be designed to handle the traffic volumes from the interchange with the WDC.

In addition to the 200 North interchange, an interchange is also planned on Layton Parkway.

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- I.** *A commenter stated that Pages Lane needs a street light at the intersection with the I-15 frontage road. A commenter stated that Pages Lane needs to be reconstructed due to deteriorated pavement.*

Pages Lane is not part of the WDC study area and is not a state road. Pages Lane is maintained by Centerville City or Bountiful City, and these comments should be addressed to these Cities.

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- J.** *A commenter asked how much traffic would be on 650 West in Farmington and Centerville and asked when 650 West would connect to Centerville.*

650 West (also known as Tippetts Lane), a local road owned and operated by Farmington City, currently terminates 1.3 miles south of Glovers Lane. The existing Sheep Road (also known as 750 West or 725 West), a gravel road that is owned and operated by Farmington City, Centerville City, and Davis County, goes from Glovers Lane to Centerville. UDOT's 2040 traffic modeling predicts that there will be about 2,400 vehicles per day on Sheep Road south of Glovers Lane.

UDOT is proposing that the WDC will have an overpass at 650 West (in other words, the WDC will go over 650 West) and will have no road connection at Sheep Road. UDOT will provide a connection south of the WDC between 650 West and Sheep Road. UDOT does not have any plans to improve either 650 West or Sheep Road, and any improvements or extensions of 650 West would be city projects.

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- K.** *A commenter stated that they were against having a connector road from the 950 North interchange to Shepard Lane/Sunset Drive in Kaysville. The commenter stated that this connector road between 950 North and Shepard Lane/Sunset Drive would cause Kaysville City to raise taxes, cause the Central Davis Sewer District to raise its rates, and require Kaysville City to spend money upgrading Shepard Lane and Sunset Drive to accommodate the additional traffic and spend money putting in sidewalks and cross walks. The commenter stated that the additional traffic that this connector road would put on Sunset Drive and Shepard Lane would result in a safety hazard for pedestrians and bicyclists on these roads.*

UDOT is not currently proposing to construct either 950 North or a connector road between 950 North and Shepard Lane/Sunset Drive as part of the WDC Project. Response 1.2.4.4F addresses the comments and questions about the 950 North connector road. Response 1.5E addresses the comments about impacts from the WDC to the Central Davis Sewer District. Response 1.7M addresses comments from Farmington City, Kaysville City, and other commenters about the timing, size, and jurisdiction of the 950 North connector road (also called the Shepard Lane arterial) and a potential connector road to Kaysville.

The impacts of a connector road between 950 North and Shepard Lane/Sunset Drive would be considered a separate project and would require a new environmental study prior to construction.

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- L.** *A commenter stated that Antelope Drive should be widened to four lanes between 2000 West and 3200 West.*

The widening of Antelope Drive from 2000 West to the WDC is in Phase 1 (2015–2024) of the Wasatch Front Regional Transportation Plan 2015–2040. This is an independent project from the WDC and will require separate environmental documentation.

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- M.** *Farmington City stated that it supports the I-15 Shepard Lane interchange project being a Phase 1 (2015–2024) project in the Wasatch Front Regional Council’s Regional Transportation Plan (RTP) 2015–2040. Farmington City disagrees with the Shepard Lane Arterial project between the WDC and I-15 being a Phase 2 (2025–2034) project in the 2015–2040 RTP and believes it should be a Phase 1 project. Farmington City commented that the Shepard Lane arterial (alternately called 950 North) should be four lanes instead of two. Farmington City commented that the traffic data presented in Table 7-9 showing the increased congestion on Park Lane with the WDC alternatives supports the need for the Shepard Lane arterial project to be a Phase 1 project and for the Shepard Lane arterial project to be a state road. Farmington City also believes that, if the Shepard Lane arterial were not built simultaneously with the WDC, the lack of an interchange at 950 North would affect emergency access in Farmington. Farmington City also supports a frontage road connection to Kaysville as part of the Shepard Lane/950 North arterial project and stated that this should be considered a state road. Kaysville City provided similar comments stating that the connector road between the WDC and I-15 should either be included as part of the WDC Project or be considered a state road project. Kaysville City also commented that it wants a connection to the Kaysville road network so that the 950 North interchange and connector road would benefit Kaysville residents.*

Comments noted.

UDOT is not currently proposing to construct the I-15 Shepard Lane interchange, the Shepard Lane arterial, or a connector road between the WDC/950 North interchange and Shepard Lane/Sunset Drive as part of the WDC Project. The impacts of the I-15 Shepard Lane interchange, the Shepard Lane arterial project, and any connector road between 950 North and Shepard Lane/Sunset Drive would be considered separate projects and would require new environmental studies prior to construction.

UDOT is assuming that the Shepard Lane arterial connection between I-15 and the WDC (also referred to as the 950 North connector road) will be a local road and that Kaysville and Farmington Cities will be responsible for constructing the Shepard Lane arterial, setting the speed limit on the Shepard Lane arterial or other local roads, installing and maintaining any lighting on the Shepard Lane arterial, and determining which local roads would connect to the Shepard Lane arterial.

UDOT will work with Farmington City, Kaysville City, and the Wasatch Front Regional Council (WFRC) during the development of the 2019–2050 RTP to determine whether the Shepard Lane arterial project between the WDC and I-15 can be identified as a Phase 1 project (completed by 2024). Farmington and Kaysville Cities could also request that WFRC amend the 2015–2040 RTP to change the Shepard Lane arterial project between the WDC and I-15 to a Phase 1 (2015–2024) project.

Farmington and Kaysville Cities can also work with WFRC to update the request for the Shepard Lane arterial to be designated as a four-lane arterial instead of a two-lane arterial, and can coordinate with WFRC and UDOT to propose that the Shepard Lane arterial be considered a state road instead of a local road.



## 1.8 Chapter 8 – Economics

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- A. *Commenters stated that property values will decrease in areas near the WDC action alternatives. Commenters stated that this could cause reduced property taxes due to lower property values.*

Chapter 8, Economics, of the Final EIS provides an overview of literature on the effects of a new highway on adjacent residential areas. To summarize, there are no formulas that can quantify the effects of a new transportation facility on property values, because each situation is different and property values are dependent on many variables. In general, an improved transportation network increases all property values in an area. However, as suggested by previous studies, residential properties adjacent to the WDC action alternatives could have lower property values or have a lower rate of appreciation than similar properties located farther from the WDC, if all other variables are similar.

If some areas have lower property values, the local taxing entities would receive less in property taxes. However, if other areas have increased property values, local taxing entities would also receive more in property taxes for these properties.

## 1.9 Chapter 9 – Joint Development

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- A. *Farmington City asked why the grade-separated crossings for the Denver & Rio Grande Western (D&RGW) Trail are mentioned in the EIS if these crossings would be constructed only if there is local support and funding. Farmington City stated that, if UDOT is proposing these improvements as mitigation for impacts from the WDC, UDOT should pay for the improvements. Farmington City stated that it supports the trail improvements but is not committing funding.*

These D&RGW Trail improvements described in Section 2.4.2, Alternative A1, and Chapter 9, Joint Development, of the Final EIS are not proposed as mitigation for impacts from the WDC.

Section 9.3.2.2, Trail Improvements Constructed if There is Local Government Support and Funding, of the Final EIS describes the impacts of the additional trail network improvements that would be implemented if the local governments provide funding, construction, and long-term maintenance. UDOT would consider implementing the trail improvements listed in this section only if there is coordination and support from the local governments.

## 1.10 Chapter 10 – Considerations Related to Pedestrians and Bicyclists

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- A.** *A commenter asked that a sidewalk be built along 4500 West in West Point now because they do not want to wait for the WDC trail to be built. The commenter stated that the current conditions with no sidewalks are unsafe for pedestrians.*

Though UDOT does not currently plan to construct an interim sidewalk and the ability to do so would depend on funding, the comment is noted and UDOT will consider this suggestion during the implementation of the project.

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- B.** *Commenters expressed support for the planned trail improvements included with the WDC alternatives.*

Comment noted.

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- C.** *A commenter asked whether the trail crossings could be underpasses instead of bridges. A commenter stated that they prefer a trail underpass to a bridge.*

Based on comments and feedback received during the EIS process, UDOT is proposing to place many of the trail crossings on bridges in order to keep the roadway profile of the WDC lower. A lower roadway profile reduces noise and visual impacts to surrounding residents.

If the trail is kept at grade, then the WDC roadway would need to be raised and placed on a structure to go over the trail, which would increase noise and visual impacts. If the trail is placed in a tunnel below the ground, various challenges would be present including groundwater, lighting, maintenance, and safety of the public. Due to these concerns, the trail crossings have been proposed to go over the WDC on bridges.

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- D.** *A commenter stated concerns about the impacts of Alternative B1 on the Old Emigration Trail in Syracuse. Commenters asked whether the Old Emigration Trail would still exist with Alternative B1 or B2. Another commenter asked whether the trail would affect a bench at the border of Syracuse and West Point.*

As described in Chapter 10, Considerations Related to Pedestrians and Bicyclists, of the Final EIS, the Old Emigration Trail would be moved to the east side of Alternative B1 or B2 in Syracuse between about 700 South and 2100 South. All existing connectivity would be maintained, and a new trail overpass (trail over the WDC) would be provided at about 1900 South to provide access to Fremont Park and the Syracuse Arts Academy. The existing trail underpass (trail under Antelope Drive) would be replaced at Antelope Drive.

Based on the current design of the Selected Alternative, the bench at the border of Syracuse and West Point will need to be relocated adjacent to the realigned trail.

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- E.** *A commenter asked whether the WDC would relocate the Great Salt Lake Shoreline and Buffalo Ranches equestrian trails and whether these trails would still be designed for equestrians. Other commenters stated that the WDC would destroy or remove these trails.*

As described in Chapter 10, Considerations Related to Pedestrians and Bicyclists, of the Final EIS, the WDC Project would provide a crossing or relocate all trails affected by any of the WDC action alternatives. Equestrian trail crossings or relocations would be designed to maintain equestrian use and would be designed to equestrian trail design standards. The Great Salt Lake Shoreline and Buffalo Ranches Trails would have a grade-separated crossing over any of the WDC action alternatives and would be designed for equestrian use.

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- F.** *Farmington City and other commenters stated that they support the trail crossing of I-15 on Park Lane and that they would support having the proposed Park Lane trail also connect over US 89 to the Lagoon amusement park and the hotel. Farmington City stated that the utility for pedestrians and bicyclists would be much greater if the trail also crossed over US 89. Farmington City requested that the design be wide enough to safely accommodate both pedestrians and bicyclists at the same time. Farmington City also requested that UDOT consider a free-standing pedestrian and bicyclist structure instead of widening the Park Lane structure.*

Comments noted. Currently, UDOT does not have the funding to continue the Park Lane trail across US 89, and this would be outside the study area of the WDC Project. However, the comment is noted, and UDOT will consider this suggestion during the implementation of nearby projects.

UDOT will also coordinate with Farmington City during the final design of the Selected Alternative regarding the trail design to make sure it can accommodate pedestrians and bicyclists safely.

Currently, UDOT estimates that it will be more cost-effective to widen the existing Park Lane structure over I-15 than to build a separate trail structure. Widening the Park Lane structure can also provide the benefits of improving traffic operations on the I-15 Park Lane interchange.

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- G.** *Commenters asked whether the sidewalk along the frontage road in Centerville would be replaced where it would be affected by the WDC off ramp. Farmington City and other commenters asked whether this sidewalk would be extended to connect with the existing trail/sidewalk in Farmington by South Park.*

UDOT will relocate any sidewalks affected by the WDC Selected Alternative. In areas where there is not currently a sidewalk or trail, UDOT is not proposing to construct new sidewalks or trails as part of the WDC Project.

Centerville City is planning a project to reconstruct the frontage road in 2018. UDOT will work with Centerville City to seek to accommodate the planned frontage road widening and

dedicated bicycle lanes on the frontage road, if possible, with the I-15/WDC interchange design.

UDOT will work with Farmington City to accommodate the planned sidewalk/trail connection in the frontage road corridor, if possible, with the I-15/WDC interchange design. UDOT will also work with Farmington City to consider joint development opportunities for constructing this section of sidewalk/trail with the WDC Project.

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- H.** *The Nature Conservancy and the Utah Reclamation, Mitigation, and Conservation Commission asked to be consulted during the final design phase of the project regarding the location of the proposed WDC trail in areas where it borders the Great Salt Lake Shorelands Preserve. The Nature Conservancy also asked whether the acreage for the trail is included in the WDC impact acreages. The Nature Conservancy requested that maintenance, funding, and responsibilities be documented and understood by all parties to avoid having noxious weeds in the areas around the trail.*

UDOT will work with The Nature Conservancy and the Utah Reclamation, Mitigation, and Conservation Commission in addition to the local governments regarding the location of the trail. The right-of-way for the trail is included in the impact analysis in the EIS. The trail is included in the WDC right-of-way/impact lines that were used for the impact analysis. The trail right-of-way and impacts are included in the impacts that were used to develop mitigation for the project. UDOT will fund and construct the trail as part of the WDC Project; however, trail maintenance will be the responsibility of the local municipalities, and they have been informed of this requirement.

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- I.** *A commenter stated that the WDC will affect 2000 West in Kaysville near Galbraith Lane, which is currently used by residents as a pedestrian path. The commenter requested either that the WDC trail be moved to the east side of the WDC in Kaysville, or that UDOT construct a trail crossing in this area, so that Kaysville residents could use the WDC trail. Kaysville City also requested that UDOT relocate the Utah Division of Wildlife Resources' Sportsman's Access to Angel Street and move the Roueche Lane overpass to Angel Street. Kaysville City prefers that Angel Street cross over the WDC and stated that having the crossing at Angel Street instead of Roueche Lane would be beneficial to trail users and would minimize impacts to residential areas around Roueche Lane.*

The commenter is correct that the WDC will affect 2000 West near Galbraith Lane. Although 2000 West is not an official trail, this section of local road will be affected by the WDC.

The WDC trail is proposed on the west side of the WDC in Kaysville based on meetings and feedback provided by Kaysville City. The main reason why Kaysville City recommended constructing the trail on the west side is that a west-side trail would give trail users a more aesthetic experience; a trail on the east side would be between the WDC and the power lines. With the current WDC trail plan, trail users in Kaysville will need to use either Roueche Lane or 200 North/Schick Lane to access the WDC trail. UDOT will continue to work with

Kaysville City and The Nature Conservancy regarding the location of the WDC trail and the trail connections in Kaysville.

Kaysville City's request to move the Roueche Lane crossing to Angel Street and move the Sportsman's Access to Angel Street will be evaluated during the final design of the Selected Alternative. It might not be possible to relocate the Sportsman's Access, and any move of this facility would require approval from the Utah Division of Wildlife Resources and could require additional reviews.

If it is not possible to move the Sportsman's Access, the proposed WDC overpass at Roueche Lane would remain, but UDOT would consider adding a new, grade-separated trail crossing at Angel Street to allow trail access to the WDC trail for Kaysville residents in the Angel Street area. UDOT will coordinate with Kaysville City on this issue during the final design of the Selected Alternative.

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- J.** *A commenter requested that the WDC trail be moved to the west side of the highway through Farmington and was concerned that the trail will be elevated, eliminating privacy in their back yard.*

The commenter is correct that Farmington City requested that the trail be on the east side of the WDC. Farmington City requested that the trail be located on the east side to better connect with Farmington's existing trails and provide better access for residents in Farmington. The trail might be elevated a couple feet in certain locations so that drainage can be provided. Overall, the trail should be similar to the Legacy Parkway trail, which is not elevated. Any landscaping to provide privacy along the trail would be the responsibility of Farmington City. UDOT will work with Farmington City during the final design of the Selected Alternative to determine the alignment of the WDC trail in Farmington.

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- K.** *Farmington City stated that the WDC alternatives should have provided a grade-separated crossing for the Farmington Creek Trail. Farmington City requested that grade separation be a box culvert that could accommodate both Farmington Creek and the Farmington Creek Trail.*

In the area where the WDC will cross Farmington Creek, the Farmington Creek Trail does not exist. In the Final EIS, UDOT proposed grade-separated trail crossings for existing trails only. If this section of the Farmington Creek Trail is constructed before the WDC, UDOT will work with Farmington City to accommodate the trail crossing along with the structure over Farmington Creek.

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- L.** *Kaysville City requested that UDOT provide pedestrian and bicyclist access to the WDC through the 200 North interchange and connect these facilities to Bonneville Street. Kaysville City also requested that UDOT build a restroom by the 200 North park-and-ride lot.*

UDOT will work with Kaysville City during the final design of the Selected Alternative to accommodate pedestrian and bicyclist access to and from the WDC trail through the 200

North interchange. UDOT will meet with Kaysville City to discuss its request for a restroom at the park-and-ride lot at 200 North during final design.

## 1.11 Chapter 11 – Air Quality

### 1.11.1 Section 11.4.2 – Effects on Air Quality in the WDC Study Area

- A. *Commenters expressed concerns about the increase in air pollution from the WDC alternatives or stated that the WDC would have impacts to air quality.*

The expected impacts to air quality are analyzed in Chapter 11, Air Quality, of the Final EIS. As stated in Chapter 11, the WDC study area is an attainment area for carbon monoxide and PM<sub>10</sub> (particulate matter 10 microns in diameter or less), and none of the WDC action alternatives would result in any federal or state air quality standard for these pollutants being exceeded.

#### What is an attainment area?

An attainment area is an area that meets (or “attains”) the National Ambient Air Quality Standard for a given air pollutant.

The WDC Project is included in the conforming *Conformity Analysis for the Amended WFRC [Wasatch Front Regional Council] 2015–2040 Regional Transportation Plan* (2017), and the design concept and scope of the project are consistent with the project evaluated as part of the regional emissions analysis for the plan’s conformity determination. This regional emissions analysis found that all of the regionally significant transportation projects included in the Wasatch Front Regional Transportation Plan 2015–2040, including the WDC Project, will conform to the carbon monoxide and PM<sub>10</sub> emission budgets in the State Implementation Plan as well as to the applicable PM<sub>2.5</sub> (particulate matter 2.5 microns in diameter or less) regulatory requirements that were in place at the time of the analysis.

As stated in Section 11.4.3.2, Project-Level Quantitative Analyses for PM<sub>10</sub> and PM<sub>2.5</sub>, of the Final EIS, because the WDC Project is not a project of air quality concern under 40 Code of Federal Regulations (CFR) 93.123(b), no hot-spot analysis is required for PM<sub>2.5</sub>. Since there is no approved State Implementation Plan for PM<sub>2.5</sub>, 40 CFR 93.117 (compliance with PM<sub>2.5</sub> control measures in the State Implementation Plan) does not apply. Thus, the WDC Project complies with all applicable conformity requirements of 40 CFR 93.

As shown in Table 11-8, Emissions Inventory of Criteria Pollutants with Alternatives A1 and B1 in the WDC Study Area, of the Final EIS, UDOT expects that, with the WDC, regional carbon monoxide emissions in 2040 would be about 3% to 4% higher than with the No-Action Alternative, and regional PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be about 2% and 1.3% higher, respectively, than with the No-Action Alternative.

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- B.** *Commenters stated that the WDC will increase greenhouse gases. Other commenters stated that the National Environmental Policy Act requires a discussion of climate change. Some commenters stated that the EIS did not adequately address greenhouse gases. Other commenters stated that the EIS trivializes the contribution of the WDC to planet-wide atmospheric greenhouse gases and, by the logic presented in the EIS, no entity, be it an individual, city, state, or country, should do anything to reduce greenhouse gases.*

Chapter 11, Air Quality, of the Final EIS provides an analysis of greenhouse gases (GHG). To date, no national standards have been established regarding GHG, and the U.S. Environmental Protection Agency has not established criteria or thresholds for assessing the potential impact of GHG emissions. The climate impacts of carbon dioxide (CO<sub>2</sub>) emissions are global in nature, and analyzing how alternatives evaluated in an EIS might vary in their relatively small contribution to a global problem will not better inform decisions regarding the WDC Project.

Further, due to the interactions between elements of the transportation system as a whole, project-level emission analyses would be less informative than ones conducted at regional, state, or national levels. Nonetheless, for informational purposes, CO<sub>2</sub> emissions from the WDC action alternatives have been included in the Draft and Final EISs. The CO<sub>2</sub> emission estimates in the Final EIS are based on results from the U.S. Environmental Protection Agency's MOVES2014a model, which reflects the most recent fuel economy standards. This analysis was updated for the Final EIS.

As shown in Table 11-10, Emissions of Greenhouse Gases with Alternatives A1 and B1 in the WDC Study Area in 2040, of the Final EIS, GHG emissions would decrease in 2040 due to improvements in vehicle emission rates, even with increased vehicle-miles traveled in 2040. There are minor increases in the modeled GHG emissions for the alternatives compared to the No-Action Alternative. When comparing the 2040 No-Action and action alternatives, the GHG emissions would increase by about 1.5% to 2.5% depending on the GHG.

Even though the GHG emissions from individual roads can be very low, as documented for this project, FHWA is actively engaged in many activities with the U.S. Department of Transportation's Center for Climate Change and Environmental Forecasting to develop strategies to reduce the contribution of GHG from transportation projects, especially CO<sub>2</sub> emissions, and to assess the risks to transportation systems and services from climate change. FHWA will continue to pursue these efforts to address this issue. FHWA will review and update its approach to climate change at both the project and policy levels as more information emerges and as policies and legal requirements evolve.

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- C.** *The U.S. Environmental Protection Agency commented that a conformity hot-spot analysis was not required for the WDC Project and that the air quality analysis provided useful project-related air quality information for the NEPA analysis.*

Comment noted.

### 1.11.2 Section 11.4.2.2 – Incomplete and Unavailable Information for Mobile-Source Air Toxics

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- A. *Commenters expressed concerns about the increase in air pollution from the WDC alternatives and the health effects of the pollutants. Specifically, one comment stated that “scientific studies have shown that children living near freeways are at extreme risk for severe health problems. For instance, children living within 250 yards from a freeway are 8 times more likely to develop leukemia and 6 times more likely to develop other cancers. In addition, children living within 500 meters from a freeway are at the highest risk for permanent lung deformities.” Other commenters stated that the WDC would be near schools, that the emissions from vehicles using the highway could affect students, and that UDOT should consider installing air filters and monitors.*

*Others commented that living near major roads is hazardous to one’s health, period, and that lung function is about 10% lower in children who grow up near a freeway, where there are high levels of ultra-fine particles. They also mentioned other severe health-based impacts, and numerous peer-reviewed studies on the health effects of roads on nearby populations were referenced.*

The U.S. Environmental Protection Agency is the lead federal agency for administering the Clean Air Act and has specific responsibilities for determining the health effects of mobile-source air toxics (MSATs). A discussion of health-related impacts from vehicle emissions is included in Chapter 11, Air Quality, of the Final EIS. As stated in the chapter, all of the WDC alternatives meet U.S. Environmental Protection Agency air quality regulations and all regional and project-level air quality conformity requirements. The WDC Project was included in a conforming plan (the Wasatch Front Regional Transportation Plan 2015–2040) and the Transportation Improvement Program, and the carbon monoxide, PM<sub>10</sub> (particulate matter 10 microns in diameter or less), and PM<sub>2.5</sub> (particulate matter 2.5 microns in diameter or less) hot-spot analyses performed for the EIS did not show any exceedance of the National Ambient Air Quality Standard for any of these pollutants. The National Ambient Air Quality Standards are health-based standards. Because air quality standards will not be exceeded, UDOT does not plan to install air filters or conduct air quality monitoring at schools near the WDC.

Section 11.4.2.2, Incomplete and Unavailable Information for Mobile-Source Air Toxics, of the Final EIS summarizes the research FHWA has participated in for near-road health impacts. The MSAT analysis conducted for the WDC Project shows that total MSAT emissions would decline by 65% to 68% between the base year and the design year depending on the alternative chosen; no alternatives would increase emissions in the WDC study area compared to current levels.



## 1.12 Chapter 12 – Noise

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- A.** *Commenters asked whether noise walls were considered and, if so, where they would be located.*

Chapter 12, Noise, of the Final EIS includes an evaluation of potential noise barriers for the WDC action alternatives and includes the locations where noise walls were evaluated. The UDOT noise-abatement criteria are described in Table 12-2, UDOT’s Noise-Abatement Criteria, in Chapter 12. The methodology that was used to determine future noise levels is described in Section 12.4.1, Methodology. The receptors that exceeded the UDOT noise criteria are shown as red dots in Figure 12-1 to Figure 12-36, Noise Receptor Impacts, in Volume IV of the Final EIS. The noise-abatement methodology is described in Section 12.4.5, Mitigation Measures.

Based on the analysis, four potential noise wall locations were identified:

1. From about Millsboro Court to 950 North in Farmington (all alternatives)
2. 2000 West interchange in Syracuse (Alternatives B1 and B2)
3. 2300 South to 1975 South in Syracuse (Alternatives B1 and B2)
4. Bridgeway Island subdivision in Syracuse (Alternatives A1 and A2)

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- B.** *Commenters stated that the WDC would increase the noise at their property or neighborhood or had a question about whether their property would experience a noise impact.*

Chapter 12, Noise, of the Final EIS identifies the properties that would experience noise impacts from the WDC action alternatives evaluated in the Final EIS. The receptors that exceeded the UDOT noise criteria are shown as red dots in Figure 12-1 to Figure 12-36, Noise Receptor Impacts, in Volume IV of the Final EIS. As discussed in Chapter 12, any of the WDC action alternatives would have noise impacts. UDOT evaluated all noise impacts to determine whether they qualified for noise-abatement measures. For more information about noise abatement, see response 1.12A.

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- C.** *Commenters stated that they supported one of the noise walls proposed in the Final EIS or supported following the process described in UDOT’s Noise Abatement Policy.*

Comments noted. Because an action alternative was selected in the Record of Decision, the noise impact analysis will be revised during the final design of the Selected Alternative to more accurately reflect the Selected Alternative’s proposed vertical and horizontal alignment. In addition, any new residential developments that receive a final building permit before the Record of Decision for the project is approved by FHWA will be accounted for in this noise impact analysis. For these reasons, the final recommendations concerning noise-abatement measures will be determined during the final design of the Selected Alternative, and the results discussed in Chapter 12, Noise, of the Final EIS could change based on a revised analysis.

If a noise-abatement measure is both feasible and cost-effective, the viewpoints of property owners and residents (non-owners) must be solicited to determine whether noise abatement is desired. Balloting will be conducted for those noise-abatement measures that both meet the noise-abatement design goal and are cost-effective.

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- D.** *Commenters stated that they thought noise walls should be located in areas that were not identified for noise walls in the Final EIS.*

Chapter 12, Noise, of the Final EIS includes an evaluation of potential noise barriers for the WDC action alternatives, and Figure 12-1 to Figure 12-36 in Volume IV of the Final EIS show the locations where noise walls were evaluated. The UDOT noise-abatement criteria are described in Table 12-2, UDOT's Noise-Abatement Criteria, in Chapter 12.

The noise impact analysis will be revisited during the final design of Selected Alternative to more accurately reflect the Selected Alternative's proposed vertical and horizontal alignment. In addition, any new residential developments that receive a final building permit before the Record of Decision for the project is approved by FHWA will be accounted for in this noise impact analysis. For these reasons, the final recommendations concerning noise-abatement measures will be determined during the final design of the Selected Alternative, and the results discussed in Chapter 12 of the Final EIS could change based on a revised analysis.

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- E.** *Commenters stated that they thought a noise wall or other options such as berms and/or smaller concrete barriers should have been evaluated or considered on the east side of I-15 in Centerville and Farmington. Commenters stated that this evaluation should have been documented in the EIS.*

Although the noise analysis in Chapter 12, Noise, of the Final EIS identifies noise impacts to residences on the east side of I-15 in Centerville between 1600 South and 2150 North, a noise wall was not recommended because the WDC team did not identify a feasible location for a noise wall in this area. A noise wall in this area would need to be placed between the WDC northbound off ramp and the relocated frontage road. The existing noise wall south of this area is 15 feet high, and the WDC team assumed that a wall to the north would need to be this height to be effective.

This area has less than 30 feet of horizontal distance between the WDC northbound off ramp and the relocated frontage road between 1600 South and the end of the existing noise wall near 2150 North in Centerville. In the tightest locations, the width is less than 10 feet between the east side of the WDC northbound on ramp and the west side of the relocated frontage road pavement.

As part of the feasibility evaluation for a potential noise wall, UDOT's engineering considerations include a safety analysis [see UDOT Noise Abatement Policy, Section (C)(1)(b)]. The safety analysis requires that the noise wall height must be no greater than the distance from the back of the curb or the edge of the pavement of both the WDC northbound off ramp and the frontage road to the face of the proposed noise wall. The purpose of this

section of the Noise Abatement Policy is to ensure that, if a noise wall were to collapse, it would not fall onto the roadway and affect vehicles.

In this location, where there is less than 30 feet of width, there would not be enough horizontal distance to accommodate a 15-foot-high noise wall between the WDC northbound off ramp and the frontage road. Therefore, per Sections (C)(1)(a) and (C)(1)(b) of UDOT's Noise Abatement Policy, UDOT determined that a wall would not be feasible because it would not meet the engineering considerations and would not provide adequate safety on an urban non-access-controlled road.

UDOT will re-evaluate this area for a noise wall during the final design of the Selected Alternative once more-detailed information about the Selected Alternative's proposed vertical and horizontal alignments are known and UDOT can determine whether a wall in this area is feasible. In addition, any new residential developments that receive a final building permit before the Record of Decision for the project is approved by FHWA will be accounted for in this noise impact analysis. For these reasons, the final recommendations concerning noise-abatement measures will be determined during final design, and the results discussed in Chapter 12, Noise, of the Final EIS could change based on the revised analysis.

Some commenters suggested that other noise-abatement measures such as berms or smaller concrete barriers be used. In order for a noise wall to be feasible, it must provide the appropriate reduction in noise levels. Smaller features such as berms or concrete barriers would provide only a minor decrease in noise levels (below a 3-dBA decrease). This minor decrease in noise levels would not be detected by the human ear, and noise levels would be similar to current conditions without the abatement measure. UDOT must apply the noise policy consistently across all projects in Utah and therefore implements only walls that meet the noise policy's criteria.

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- F.** *Commenters had questions about the methodology used in the noise analysis and the requirements for noise walls to be approved by 75% of the affected residents. Commenters stated that UDOT should consider future noise growth in the WDC noise analysis and that UDOT should be required to keep noise levels below the noise-abatement criteria levels.*

The methodology used in the WDC noise analysis was consistent with the methodology described in UDOT's Noise Abatement Policy 08A2-01. Chapter 12, Noise, of the Final EIS includes a summary of the methodology that was used to model future noise levels with the WDC. Per UDOT's Noise Abatement Policy, future-year (2040 for the WDC), worst-case noise levels were assumed to occur with traffic operating at a level of service of LOS C, which represents a worst-case noise scenario with a free-flowing high-volume condition. The WDC future-year analysis also included the proposed design of the WDC into the noise model, so the impacts from the WDC are accounted for in the noise analysis.

UDOT's Noise Abatement Policy states that UDOT's goal with noise abatement is to obtain substantial noise reductions, which might or might not result in noise levels below the noise abatement-criteria levels. UDOT's Noise Abatement Policy defines the feasible and reasonable standards that must be met for UDOT to implement the noise-abatement

measures. In some circumstances, noise impacts from UDOT projects do not have reasonable and feasible mitigation options.

UDOT has a 75% approval requirement for ballots to ensure that the benefitted properties and front-row properties near the noise walls would want the noise walls. UDOT has had numerous projects where the property owners have not wanted the noise walls. UDOT has the 75% balloting requirement in the policy because they do not want to invest public funds on noise walls if they are not wanted by 75% or more of the benefitted residents.

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- G.** *Farmington City asked whether a specific noise study had been conducted for the noise impacts created by the flyover ramps in the area north of South Park in Farmington and what, if any, impacts or alterations there would be to the existing noise walls between the frontage road and I-15 north of South Park.*

See response 1.12E for a discussion regarding why noise barriers were not modeled in the areas of Farmington south of South Park.

The flyover ramps proposed as part of the WDC interchange design were included in the WDC noise analysis.

No noise barrier was evaluated on the WDC flyover ramps for the area north of South Park because the flyover ramps are primarily located adjacent to the undeveloped parcels between 1470 South and 1600 South. UDOT typically does not consider noise walls in areas that are undeveloped (Activity Category F or G).

For the 1470 South area and areas north of South Park, the Final EIS noise modeling showed that some residential properties would experience a noise impact, but the closest residential receptor with a noise impact is over 350 feet from the closest point of the WDC northbound off ramp, and all but two of the affected residential receptors in the 1470 South area are over 600 feet from the closest point of the WDC northbound off ramp. UDOT typically considers noise barriers only in areas where there are multiple affected residences close to the proposed roadway improvements, so a noise barrier was not modeled in this location for the Final EIS.

In response to Farmington City's request, UDOT evaluated a noise wall in this area and determined that a noise wall on the WDC northbound ramp would provide a maximum 2-dBA noise reduction to any of the residential receptors in the 1470 South area, with most receptors having a noise reduction between 0 and 1.5 dBA. As defined in UDOT's Noise Abatement Criteria, for a noise barrier to be considered feasible, it must provide a 5-dBA reduction for at least 50% of the front-row receptors. Therefore, UDOT determined that this noise barrier was not feasible.

UDOT does not anticipate that the existing noise walls between I-15 and the frontage road north of South Park will be affected by the WDC interchange or flyover ramps.

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- H. *The Nature Conservancy stated that the Visitor Center at the Great Salt Lake Shorelands Preserve should have been considered a Category A land use, subject to the 56-dBA noise abatement criterion, and evaluated for noise abatement consistent with a Category A land use.*

Noise impacts and evaluation of noise abatement for the WDC were done consistent with UDOT's Noise Abatement Policy. Under UDOT's current Noise Abatement Policy, the areas west of the WDC south of Gentile Street would not have noise impacts and would not qualify for noise abatement. The WDC will be about 0.70 mile from the Visitor Center. At this distance, the noise models do not predict that there would be a meaningful difference in the noise level at the Visitor Center with the WDC. Furthermore, the current and modeled future noise levels at the Visitor Center with the WDC are expected to be below 50 dBA, which is below the 56-dBA noise-abatement criterion for Category A properties. Because the noise levels at the Visitor Center will be less than 56 dBA and will not increase by 10 dBA or more from existing conditions, the Visitor's Center will not have a noise impact as defined by UDOT's Noise Abatement Policy. Because there will not be any noise impacts, no noise-abatement measures were considered for the Visitor Center.

## 1.13 Chapter 13 – Water Quality

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- A. *Commenters stated that the WDC would raise groundwater levels and cause flooding adjacent to the highway, impact wetlands by reducing groundwater flows or groundwater quantity to wetlands, and impact wetlands by reducing surface water flows or quantity to wetlands.*

Chapter 13, Water Quality, of the Final EIS documents the evaluation and analysis of groundwater levels and impacts to adjacent properties and wetlands from the WDC. The analysis included computer modeling to determine the effects of all alternatives considered on shallow groundwater flow that was monitored from 1997 to 2006 as part of the Legacy Parkway Project and a more recent study conducted by Utah Geological Survey in 2009 regarding groundwater effects on wetlands in Farmington Bay.

Similar to Legacy Parkway, the WDC road base for the highway will not be in the water table but will be raised on fill above the current ground elevation and therefore will not impede the groundwater. The computer simulations for the Legacy Parkway predicted a 0.15-to-0.25-foot rise in the water table up-gradient of the roadway embankment and a corresponding 0.15-to-0.25-foot drop in the water table down-gradient of the roadway embankment.

Actual field monitoring results indicate that the shallow groundwater is fed from the deeper aquifers, and that this supply of groundwater, which provides a water supply for the wetlands, would not be affected by Legacy Parkway. The 2009 U.S. Geological Survey study regarding wetlands in Farmington Bay confirmed that wetlands are located primarily in groundwater discharge areas for the principal deeper aquifers versus shallow surface flows from east to west. Therefore, the WDC team does not expect that the WDC will substantially affect

groundwater flows. In addition, appropriate stormwater drainage as part of a stormwater best management practice system will be provided along the WDC to avoid flooding adjacent properties.

Similarly, the Selected Alternative will maintain the hydrology of all surface water flows by using culverts or other structures for all of the streams or other surface water bodies that cross the alternative. The Selected Alternative will not negatively affect the hydrology of any surface water flows or quantity. Additionally, the Selected Alternative will not substantially affect surface water quality. All stormwater runoff will be mitigated by discharging stormwater runoff into stormwater best management practices (detention basins or vegetated filter strips) before it is released into receiving waters.

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- B.** *The U.S. Environmental Protection Agency (EPA) commented that, in areas adjacent to wetlands, a design pollution prevention (DPP) infiltration system should be used because the system provides more-effective treatment and infiltration. EPA also recommended that it might be beneficial to run FHWA's water quality model after the final drainage design is developed to determine whether state water quality goals are being met.*

UDOT is coordinating with the Utah Division of Water Quality as part of the Clean Water Act Section 401 permit process to ensure that state water quality goals are being met. UDOT will comply with its municipal separate storm sewer systems (MS4) permit regarding water quality treatment of highway runoff. As part of the final design of the Selected Alternative, UDOT will consider EPA's recommendation of using a DPP infiltration system. Note that the water quality designs being considered by UDOT have greater pollutant removal efficiencies than those modeled as part of the EIS process, since the EIS analysis considered detention basin systems with low pollutant removal efficiencies as a conservative approach. Therefore, UDOT does not anticipate the need to run FHWA's water quality model on the final drainage design.

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- C.** *The Utah Division of Water Quality submitted its comments to the Clean Water Act Section 401 Certification application through the EIS comment database. The comments were specific to the Section 401 Certification application.*

UDOT will continue to work with the Utah Division of Water Quality on the Section 401 Certification application and will update the Certification application based on the comments provided.

## 1.14 Chapter 14 – Ecosystem Resources

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- A.** *Commenters stated that there would be impacts to wetlands, wildlife habitat, the Farmington Bay Waterfowl Management Area, and/or the Great Salt Lake Shorelands Preserve from the WDC and that these impacts would be substantial or devastating.*

Chapter 14, Ecosystem Resources, of the Final EIS addresses impacts to wetlands and to migratory birds and wildlife that use the Great Salt Lake ecosystem and describes the importance of this ecosystem. UDOT and FHWA acknowledge the importance of the Great Salt Lake ecosystem and the potential for impacts from the WDC. The analysis states that the WDC would have direct and indirect effects on wetlands, migratory birds, and wildlife and their associated habitat. Because of the potential for impacts to wildlife and wetlands, UDOT is proposing 1,111 acres of mitigation that will preserve and improve wetlands and wildlife habitat along the Great Salt Lake Shorelands Preserve and near the Farmington Bay Waterfowl Management Area.

Chapter 24, Cumulative Impacts, of the Final EIS describes the cumulative impacts to wetlands and wildlife habitat from the WDC and other projects and states that the WDC's impacts would affect less than 1% of the existing wetland and wildlife habitat in the Ogden Hydrologic Unit of the Great Salt Lake and the impact analysis area for cumulative impacts to ecosystem resources.

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- B.** *The Nature Conservancy and the Utah Reclamation, Mitigation, and Conservation Commission asked that land between the WDC right-of-way and the boundary of the Great Salt Lake Shorelands Preserve be included with the WDC mitigation package.*

UDOT is committed to purchasing 1,111 acres for mitigation of impacts to wetlands, wildlife, and the Great Salt Lake Shorelands Preserve. If additional mitigation is identified during the Clean Water Act Section 404 permitting process or changes in design, UDOT will consider additional mitigation at that time.

Only a few of these private parcels that will be bisected by the WDC in Layton and Kaysville meet the criteria described by The Nature Conservancy. Depending on the outcome of the right-of-way acquisition process, UDOT might not obtain ownership of these parcels to allow them to be transferred to The Nature Conservancy and/or the Utah Reclamation, Mitigation, and Conservation Commission as part of the WDC mitigation package. UDOT will coordinate with the Conservancy and the Commission during the property acquisition phase to determine the best use of these properties.

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- C.** *The Nature Conservancy and the Audubon Society stated that the Legacy Avian Research Program is a faulty study to use for evaluating noise impacts from the WDC because Legacy Parkway prohibits truck traffic and has a lower speed limit, whereas the WDC would have a 65-mph speed limit and would allow trucks.*

As stated in Section 14.4.1.1, Methodology for Assessing Impacts to Wildlife Habitat, of the Final EIS, UDOT determined that it was appropriate to consider the Legacy Parkway Avian Study because of the similarities in location, design, and traffic volumes between Legacy Parkway and the WDC.

After release of the Draft EIS, UDOT decided to use similar noise-reducing pavement material for the WDC as was used for Legacy Parkway. Chapter 14, Ecosystem Resources, of the Final EIS clarifies the WDC's noise levels and the similarity to Legacy Parkway. Chapter 14 provides more details regarding the noise monitoring and modeling processes.

Based on the results of the additional noise analysis, which included the predicted WDC traffic volumes, 65-mph speed limit, and trucks, the WDC team anticipates that the WDC will have a 24-hour average of 1-hour  $L_{eq}$  (equivalent noise level) noise levels of 47.3 dBA (decibels on the A-weighted scale) at 600 feet from the WDC right-of-way. The FHWA traffic noise model predicted a 50.3-dBA noise level at 300 feet and a 47.3-dBA noise level at 600 feet. These noise levels are similar to those in the *Legacy Avian Noise Research Program Report* (BIO-WEST, Inc., 2011), which reported recorded average noise levels of 43.5 to 48 dBA about 800 feet west of the operational Legacy Parkway and noise levels of 48 to 53.5 dBA about 400 feet from Legacy Parkway.

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- D.** *The Nature Conservancy stated a concern about hazardous or toxic waste spills from trucks using the WDC and the effect this would have on the surrounding wildlife habitat.*

A major spill is unlikely since the WDC will not be a major truck route. UDOT designs highways for safe operations to minimize the potential for accidents. UDOT also maintains an incident monitoring and response team so that it can rapidly respond to any accident on its road system. This is part of UDOT's standard procedures and will not be any different for the WDC. In addition, hazardous materials spills are handled through the local emergency responders such as fire departments.

Though an accident on the WDC involving a spill of hazardous material could affect wildlife habitat or surface water quality, those impacts are difficult to quantify because their location, severity, and conditions are not known in advance. However, immediate action by the party responsible and spill response teams would minimize adverse impacts. If a spill of hazardous waste or other chemicals were to occur in wetland habitats, it could adversely affect wildlife, particularly if water levels are high. The existing UDOT and FHWA/U.S. Environmental Protection Agency requirements for safe transport of these materials and emergency spill containment programs would minimize these effects under most conditions.



Though unavoidable accidents could occur, most spills would be local in nature and would therefore vary in effect, but the effects would be worst in aquatic habitats. This analysis is included in Chapter 13, Water Quality, of the Final EIS.

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- E.** *The Nature Conservancy and the Utah Reclamation, Mitigation, and Conservation Commission stated their requirement for an adequate endowment to manage the proposed mitigation properties to ensure that the mitigation efforts have tangible, lasting results and protect the investment of public dollars into the proposed mitigation package. Other commenters, including the U.S. Environmental Protection Agency, requested that, along with the endowment, sufficient water rights are provided for all mitigation.*

UDOT will continue to work with The Nature Conservancy and the Utah Reclamation, Mitigation, and Conservation Commission to provide an adequate endowment for managing the mitigation properties before any land is transferred to the Conservancy. Additionally, UDOT is acquiring water rights with each property acquisition to provide sufficient water to support wetland and wildlife mitigation. UDOT will continue to work with the U.S. Army Corps of Engineers during the Clean Water Act Section 404 permit process to ensure sufficient water is provided to ensure mitigation success.

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- F.** *The Nature Conservancy stated its support for the mitigation plan presented in the Final EIS, subject to reaching agreement with UDOT on an endowment and a commitment from UDOT that land between the WDC and the Great Salt Lake Shorelands Preserve will not be developed.*

Comment noted. UDOT appreciates The Nature Conservancy's support of the proposed mitigation package. See response 1.14F for the endowment response and response 1.14B for the response to the comment about undeveloped properties between the WDC and the Great Salt Lake Shorelands Preserve.

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- G.** *The Utah Department of Agriculture and Food requested that the WDC Project include a comprehensive weed-management plan. Invasive weeds from construction and operation of the highway could affect agricultural land, wetlands, and all adjacent land without proper weed management. Although a statewide roadside weed-management plan exists, the commenter advocates for a specific weed-management plan for the WDC.*

Chapter 14, Ecosystem Resources, of the Final EIS addresses the management of invasive weeds during construction. Constructing the WDC will remove vegetation and could also introduce invasive species into the surrounding areas. To prevent further, permanent effects, temporary impacts to vegetation will be mitigated once construction is complete and no further disturbance is anticipated. Mitigation will include the following measures:

- All fill materials brought onto the project site will be required to be clean of any chemical contamination as per UDOT's General Standard Specifications, Section 02056, Embankment, Borrow, and Backfill. Topsoil for landscaping must also be free of weed seeds as per UDOT's General Standard Specifications, Section 02912, Topsoil.
- Compacted soils will be ripped, stabilized, and reseeded with native seed mixes.
- The contractor will be required to follow noxious weed mitigation and control measures identified in the most recent version of UDOT Special Provision Section 02924S, Invasive Weed Control.
- Reseeding with native plants, followed by monitoring seedlings and invasive species until the vegetation has re-established, will mitigate direct-disturbance impacts and reduce the potential for weed invasions. UDOT will be responsible for monitoring and determining when vegetation becomes re-established. The selection of native plant species will be coordinated with the U.S. Fish and Wildlife Service, the Utah Division of Wildlife Resources, The Nature Conservancy, and the Utah Reclamation, Mitigation, and Conservation Commission.

UDOT does not believe that a specific weed-management plan for operation of the WDC (after construction) is warranted for the WDC Project. UDOT's Maintenance Division manages roads across the state and will follow the statewide procedures for invasive-weed management. UDOT believes that its procedures for managing invasive species will minimize the potential for weeds to spread to adjacent land.

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- H.** *Commenters asked for additional parcels or other parcels to be added to the proposed wildlife and wetland mitigation plan presented in the Final EIS. Other commenters felt that the mitigation presented did not compensate for all impacts and that additional mitigation should be provided for impacts out to 3,900 feet. Other commenters felt that the plan did not address vegetation needs and fails to specifically identify important native plants.*

As summarized in Chapter 14, Ecosystem Resources, of the Final EIS, to meet Clean Water Act and Section 4(f) requirements and to provide mitigation for direct and indirect impacts to

wetlands and associated habitat, UDOT proposes to purchase and perform mitigation on privately owned properties within and around the Great Salt Lake Shorelands Preserve boundary and properties on the eastern and northern borders of the Farmington Bay Waterfowl Management Area. The plan proposes to mitigate for direct and indirect impacts to wetlands, wildlife habitat, the Great Salt Lake Shorelands Preserve, and the Farmington Bay Waterfowl Management Area in a holistic and comprehensive manner that will provide a long-term benefit to the eastern shore of the Great Salt Lake ecosystem.

The WDC team coordinated with The Nature Conservancy, the Utah Reclamation, Mitigation, and Conservation Commission, and the Utah Division of Wildlife Resources to develop the specific details for wildlife and wetland mitigation described in the Final EIS. In addition, the WDC team conducted field visits to the proposed mitigation parcels with The Nature Conservancy, the Utah Reclamation, Mitigation, and Conservation Commission, the Utah Division of Wildlife Resources, the U.S. Fish and Wildlife Service, and the U.S. Army Corps of Engineers. The WDC team believes that coordinating with the land managers of conservation areas affected by the WDC provides the most-valuable input regarding how to mitigate potential impacts.

UDOT believes that the proposed 1,111 acres for mitigation of impacts to wetlands, wildlife, and the Great Salt Lake Shorelands Preserve adequately mitigate for impacts caused by the WDC including potential impacts out to 3,900 feet as requested by several groups. As UDOT finalizes the wetland mitigation plan developed as part of Clean Water Act Section 404 permit process, it will consider further opportunities to acquire and preserve land for wildlife habitat and/or buffers to development throughout implementation of the project. UDOT will consider the suggested parcels mentioned during the Final EIS comment period.

During the development of the final wetland mitigation plan as part of the Section 404 permit process, UDOT will work with the U.S. Army Corps of Engineers, The Nature Conservancy, and the Utah Division of Wildlife Resources regarding specific plant species that will be included on restored land.

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- I. *The Native Plant Society commented that the Final EIS did not accurately determine impacts to native vegetation and their ecosystems. The EIS failed to disclose plant species identified during surveys, surveys were not conducted during the appropriate time of year, surveyors were not qualified, the survey assumption that *Spiranthes diluvialis* does not occur in Davis County is not correct, and the Final EIS failed to address increased nutrients and pollution levels in what few ponds and marshes that are left around the Great Salt Lake.*

Section 14.3.2.4, Wildlife Habitat, of the Final EIS discloses the various plant species that were identified during field surveys. In addition, the expected impacts to wildlife habitat, including plant species, were disclosed in the Final EIS.

Using qualified plant, wildlife, and wetland biologists, the WDC team performed extensive wildlife habitat and wetland surveys in the WDC study area in 2010, 2011, 2012, 2013, and 2016. Surveys were conducted in during the spring, summer, and fall months. During those surveys, wildlife and plant species were observed and documented. As part of those surveys,

habitat that could support threatened and endangered species within the WDC study area was also documented. During those surveys, no Ute ladies'-tresses (*Spiranthes diluvialis*) were identified, and the species is not known to be present in the WDC study area. The species is not listed by either the U.S. Fish and Wildlife Service or the Utah Division of Wildlife Resources as being present in Davis County. As shown in Appendix 14B, Ecosystems Correspondence, of the Final EIS, the U.S. Fish and Wildlife Service concurred with UDOT's no-effect determination on threatened and endangered species on January 14, 2013 (as indicated in the letter to Larry Crist dated December 13, 2012).

The water quality impacts from all alternatives are documented in Chapter 13, Water Quality, of the Final EIS. The analysis showed that none of the WDC action alternatives would substantially affect surface water quality. All stormwater runoff would be treated by discharging stormwater runoff into stormwater best management practice systems (detention basins or vegetated filter strips) before it is released into receiving waters.

As part of the water quality evaluation, the WDC team conducted water quality modeling, as stated in Chapter 13 of the Final EIS. The results of the modeling showed that stormwater from the WDC will not contribute to a major degradation of adjacent waters. The Final EIS states that the main pollutants of concern for the Great Salt Lake including Farmington Bay are selenium and mercury.

Given that the WDC action alternatives would create up to an additional 262 acres of impervious area within the Great Salt Lake watershed of 21,000 square miles (13,440,000 acres), the impacts of typical roadway pollutants from the WDC to the water quality of the Great Salt Lake would be negligible. In addition, the best management practices proposed as part of the WDC Project (including detention basins or vegetated filter strips) will further reduce the concentrations of any heavy-metal pollutants that do run off the roadway. Similarly, the effects of total dissolved solids from UDOT's winter de-icing activities on the water quality of the Great Salt Lake including Farmington Bay will be negligible.

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- J.** *The Audubon Society requested that UDOT monitor groundwater flows that provide hydrology between wetlands and habitats associated with the Great Salt Lake before and after highway construction. If any additional impacts to wetlands are identified, UDOT should mitigate for those impacts. The U.S. Environmental Protection Agency requested that impacts to hydrology be considered further as part of the Clean Water Act Section 404 permit process. Additionally, the U.S. Environmental Protection Agency requested that UDOT use longer spans to maintain hydrologic connections over wetland and riparian areas and that natural-bottom culverts be used as a manner of standard practice.*

As discussed in Chapter 14, Ecosystem Resources, of the Final EIS, a concern that must be addressed concerning indirect effects on wetlands is the effect that the WDC could have on hydrology. The WDC design will include structures (for example, pipes, culverts, or bridges) that will allow the conveyance and hydrologic connection of all surface waters crossed by the WDC. Culverts will be designed and constructed at channelized drainages to maintain surface flow, thereby maintaining hydrology in open-water areas, areas abutting riparian wetlands, and hydrologically connected adjacent wetlands. During the final design of the Selected

Alternative, UDOT will conduct additional evaluation of the hydrologic connection of wetlands to minimize impacts to hydrologic connection features comparable to the existing hydrologic conditions. UDOT will also conduct pre- and post-construction monitoring of the upper aquifer to better understand how the WDC could change subsurface water flows under the highway and will report the results to the USACE as part of the conditions of the Section 404 permit. Based on post-construction monitoring, UDOT might adjust hydraulic designs to ensure that hydrologic connectivity is maintained.

UDOT has accounted for the potential for indirect impacts to wetlands, including changes to hydrology. As stated in Chapter 14 of the Final EIS, there could be indirect effects on about 90 acres of wetlands (wetlands within 300 feet of the right-of-way where likely hydrologic impacts would occur). For the indirect wetland effects, UDOT's preliminary estimates anticipate about 61 acres of wetland mitigation, which will include about 30 acres of wetland preservation (33.5 acres of impacts mitigated at a ratio of 0.89 to 1) and 31 acres of wetland rehabilitation (56 acres of impacts mitigated at a ratio of 0.56 to 1).

Engineering and/or structural avoidance options, such as additional alignment shifts and/or bridging some of the larger wetland complexes, might be incorporated into the final design of the Selected Alternative in order to satisfy avoidance and minimization requirements during Section 404 permitting.

To mitigate potential impacts to fish and amphibians, when designing crossings of the WDC over water, UDOT will consider using natural-bottom culverts, maintaining existing gradients, and not adding any new points where slope changes could impede the movements of fish or amphibians. Consideration and identification of the locations for these types of crossings will be determined during the Section 404 permitting process.

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- K.** *The U.S. Environmental Protection Agency (EPA) requested that the detailed wetland mitigation plan developed as part of the Clean Water Act Section 404 permit process be made available for public review before final approval and that EPA be included in the process for developing the final wetland mitigation plan.*

UDOT will work closely with EPA and the U.S. Army Corps of Engineers (USACE) to develop the final wetland mitigation plan. UDOT will defer to USACE regarding its process for making the plan available for public and agency review before the plan is approved.

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- L.** *A commenter asked whether anticipated changes in the Clean Water Act could allow for the WDC to be moved farther west and impact more wetlands.*

The WDC Project complies with the applicable laws and regulations that were in place at the time the EIS was prepared, including the Clean Water Act. Because it is impossible to predict the outcome of these discussions and the timing of any changes, UDOT, FHWA, and the U.S. Army Corps of Engineers must follow the laws and policies that are in place at the time of their studies.

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- M.** *The Utah Reclamation, Mitigation, and Conservation Commission stated that it expected UDOT to ensure access and water delivery to the Great Salt Lake Shorelands Preserve.*

UDOT plans to maintain or relocate all access and water delivery to the Great Salt Lake Shorelands Preserve as part of the mitigation plan for the WDC Project.

## **1.15 Chapter 15 – Floodplains**

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- A.** *A commenter stated that the WDC should be a “berm” against flooding in low-lying areas and that the EIS did not address this issue.*

The EIS addresses floodplain issues in Chapter 15, Floodplains. As discussed in Chapter 15, the WDC is not being designed as a dam or levee. The roadway is designed with elevations above adjacent floodplain elevations; therefore, flooding would not interfere with the functional use of a transportation facility needed for emergency vehicles or evacuation. Culverts and bridges in regulatory floodplains will be designed to pass the 100-year flood in accordance with FEMA and local floodplain ordinance criteria.

Furthermore, the impacts to natural and beneficial floodplain values would not be significant, because floodplain connectivity will be maintained to reduce these impacts. Maintaining floodplain connectivity under the WDC will allow both passage of flood waters conveyed by tributary streams to the Great Salt Lake and conveyance from the lake to the adjacent floodplain during periods of high water. This connectivity will allow floodplain inundation, establishment of vegetation and habitat, and groundwater recharge to occur similar to current conditions around the roadway facility, thereby maintaining the natural and beneficial floodplain values.

## **1.16 Chapter 16 – Historic, Archaeological, and Paleontological Resources**

No comments were received on this chapter during the Final EIS public comment period.

## 1.17 Chapter 17 – Hazardous Waste Sites

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- A.** *The Utah Division of Environmental Quality’s Division of Environmental Response and Remediation (DERR) provided comments encouraging UDOT to review the DERR interactive map to ensure UDOT is informed of potential contamination. DERR also stated that it is possible that future construction activities associated with the project will encounter hazardous substances and that if this happens these materials must be disposed of properly. DERR stated that if impacted materials are encountered during construction UDOT should contact DERR.*

UDOT reviewed the DERR interactive map during the preparation of the Draft and Final EISs, and the EIS analysis reflects the information on the DERR interactive map.

UDOT Standard Specification 01355, Environmental Compliance, Section 3.1, Hazardous Waste, includes the requirement to notify the Utah Department of Environmental Quality if hazardous waste is discovered during construction.

## 1.18 Chapter 18 – Visual Resources

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- A.** *Commenters stated that they would experience visual impacts from one of the WDC alternatives, or that the WDC would affect their views.*

Impacts to visual resources are described in Chapter 18, Visual Resources, of the Final EIS. The chapter concludes that all of the proposed WDC action alternatives would produce mostly high visual quality impacts to viewers in the viewshed, with some areas having moderate visual impacts.

### What is a viewshed?

A viewshed is all areas where physical changes associated with the WDC alternatives could be seen.

- B.** *Commenters stated that the WDC alternatives would cause light pollution. Commenters stated that light pollution can cause health concerns such as sleep issues or cancer. Commenters stated that they would need to buy black-out curtains for their house.*

New artificial lighting with the Selected Alternative will include street lamps at on ramps and off ramps, luminaries (lighting for highway signs), and traffic headlights. UDOT will use directional, downward-facing lights on poles higher than 25 feet high to minimize any impacts from lights, if the lights meet operational safety requirements. No other lights are currently planned for the mainline of the Selected Alternative. Since traffic headlights are pointed downward to the road, any traffic headlight impacts to areas outside the footprint of the Selected Alternative are expected to be minor.

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- C.** *A commenter requested that UDOT increase its limitation on funding in the aesthetics policy to allow more funds to be spent on berms and aesthetics. A commenter stated that the areas of the WDC that go through conservation easements and bird refuges should be allowed to have a higher aesthetics budget.*

The WDC Project will qualify for the maximum amount of funding (0.75% of the total project budget) under the current UDOT Aesthetics Guidelines, and UDOT does not anticipate changes to the policy for the WDC Project. All UDOT projects, including WDC, are subject to the UDOT Aesthetics Guidelines and UDOT Project Aesthetics and Landscaping Plan Development and Review Policy (UDOT Policy 08A-03). During the final design of the Selected Alternative, UDOT will work in accordance with the UDOT Aesthetics Guidelines and with the local governments to develop a landscaping plan for the WDC. The UDOT Aesthetics Guidelines and UDOT Project Aesthetics and Landscaping Plan Development and Review Policy do not currently make exceptions for conservation easements or bird refuges.

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- D.** *The Nature Conservancy and the Utah Reclamation, Mitigation, and Conservation Commission requested that UDOT provide mitigation for visual impacts to the Visitor Center at the Great Salt Lake Shorelands Preserve and suggested the use of berms or trees.*

The Visitor Center is about 0.7 mile from the proposed location of the WDC. Given the low profile of the highway, flat terrain (no vista points), and existing vegetation, the WDC will not be visible except potentially any elevated structures. Given the distance, even the structures will barely be visible.

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- E.** *Farmington City and other commenters supported the use of lighting being used only at the WDC interchange locations.*

Thank you for the comment.

## **1.19 Chapter 19 – Energy Impacts**

No comments were received on this chapter during the Final EIS public comment period.



## 1.20 Chapter 20 – Construction Impacts

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**A.** *Commenters wanted to know how the project would be constructed once funding is identified.*

See Section 20.3.2, Construction Phasing, of the Final EIS for information about construction of the WDC. According to the Wasatch Front Regional Transportation Plan 2015–2040, the initial portion of the WDC (I-15/Legacy Parkway to Antelope Drive) would be constructed during Phase 1 of the plan (2015–2024), with all other segments completed by 2034. The actual timing of construction would be based on the availability of funding, the consideration of safety factors, and the need for the roadway improvement.

Because FHWA selected a WDC action alternative, funding for the project has been identified in the Record of Decision. If only partial funding is allocated for construction, UDOT would construct portions of the Selected Alternative based on the amount of the funding while considering safety and operational benefits. Any implemented portion of the Selected Alternative would need to operate in an independent and acceptable manner with appropriate and functional project limits.

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**B.** *Commenters requested nighttime noise restrictions during construction.*

The construction noise restrictions for the WDC have not been determined.

UDOT’s Standard Specifications for Environmental Protection (Section 01355) will be followed, which require contractors to locate haul routes to minimize noise disturbances, minimize nighttime construction noise (from 9 PM to 7AM) to 55 dBA (decibels on the A-weighted scale) within 10 feet of the nearest receptor, and minimize noise disturbances on Saturday and Sunday.

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**C.** *Farmington City requested that all construction access for the WDC use Legacy Highway to minimize impacts to local residents and not create safety problems for the high school which will open in 2018. Farmington City stated that it would not support construction access using 650 West or Glovers Lane.*

The access points and routes for WDC construction have not been determined. During the construction phase of the project, UDOT will work with Farmington City and the construction contractor regarding construction access points and access routes.

## 1.21 Chapter 21 – Short-Term Uses versus Long-Term Productivity

No comments were received on this chapter during the Final EIS public comment period.

## 1.22 Chapter 22 – Irreversible and Irretrievable Commitment of Resources

No comments were received on this chapter during the Final EIS public comment period.

## 1.23 Chapter 23 – Indirect Effects

No comments were received on this chapter during the Final EIS public comment period.

## 1.24 Chapter 24 – Cumulative Impacts

No comments were received on this chapter during the Final EIS public comment period.

## 1.25 Chapter 25 – Permits and Clearances

No comments were received on this chapter during the Final EIS public comment period.

## 1.26 Chapter 26 – Mitigation Summary

No comments were received on this chapter during the Final EIS public comment period.

## 1.27 Chapter 27 – Section 4(f)/6(f) Evaluation

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- A.** *Farmington City asked why Bus Park was considered a Section 4(f) resource even though it would not be affected by the WDC.*

The Section 4(f) impact analysis area is the area adjacent to the WDC action alternatives where resources could be affected. For parks, that area was defined as 0.5 mile from the WDC action alternatives. Bus Park is a publicly owned park that is near (within 0.5 mile of) the WDC action alternatives. Therefore it was identified as a Section 4(f) resource in the WDC Section 4(f) evaluation.

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- B.** *Farmington City commented that it respectfully disagrees with FHWA's Section 4(f) determination regarding the Farmington conservation easements.*

Comments noted. A summary of FHWA's rationale for the Section 4(f) determination is included in the Chapter 27, Section 4(f)/6(f) Evaluation, of the Final EIS.

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- C.** *Farmington City stated that it supports the proposed location for the mitigation for the 1100 West Park and appreciates UDOT's commitment to buy as much of the parcel as needed to adequately replace the recreational amenities and functions that would be lost at the 1100 West Park. Farmington City stated that the replacement parcel might need additional*

*acreage or improvements to compensate for the parking, access, and maintenance requirements of the new park location.*

Comments noted. The mitigation for the use of the 1100 West Park is a property adjacent to the Farmington Gymnasium and Regional Sports Complex at 294 South 650 West. The proposed replacement property is Davis County parcel 080760010. This parcel is 22.37 acres and is located adjacent to and south of the Farmington Gymnasium and Regional Sports Complex. UDOT will work with Farmington City to identify which parts of this parcel are needed to replace the park amenities and function of the 1100 West Park affected by the Selected Alternative.

- 
- D.** *The Utah Reclamation, Mitigation, and Conservation Commission stated that its interpretation and understanding relative to the Section 4(f) finding of de minimis impact to the Utah Reclamation, Mitigation, and Conservation Commission properties within the Great Salt Lake Shorelands Preserve, which the Commission concurred with, is that UDOT will acquire all of the identified mitigation parcels within the boundary of the Great Salt Lake Shorelands Preserve. The Commission did not agree with the statement in on page 14-102 that stated that “If UDOT is unable to acquire a private inholding within the Great Salt Lake Shorelands Preserve, UDOT will appraise the property and put an amount of funding equal to the appraised value of the property in a trust fund that can be used for future acquisition of these properties.”*

UDOT intends to purchase all identified mitigation properties to meet the requirements of the Clean Water Act Section 404 permit and the requirements of Section 4(f). The statement referenced above was included to cover a situation in which a proposed mitigation property could not be legally acquired.

## **1.28 Chapter 28 – List of Preparers**

No comments were received on this chapter during the Final EIS public comment period.

## **1.29 Chapter 29 – Distribution**

No comments were received on this chapter during the Final EIS public comment period.

## **1.30 Chapter 30 – Public and Agency Consultation and Coordination**

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- A.** *Commenters stated that UDOT and the WDC team had done a good job of soliciting public comments and feedback and incorporating this information into the WDC EIS.*

Thank you for the comment.

## 1.31 Other Comments

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- A.** *Commenters wanted to know where copies of the Final EIS could be reviewed and/or requested copies of maps. Commenters requested information or status updates about the project. Commenters requested information about the height of the WDC alternatives at different locations. Commenters requested information about other UDOT projects or other projects in the area. Commenters asked to be added to the project email list.*

Flyers, mailers, newspaper ads, and the project website all provided the locations where copies of the Final EIS could be viewed. In addition, the project website provides an interactive, detailed map of the project alternatives. Project team representatives responded to requests for information as these comments were received. Requested information was provided to commenters if it was available.

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- B.** *A commenter asked whether a Layton City map that labels the connector road located east of 3600 West as “3650 West” is incorrectly labeled and asked whether Layton City is changing the road’s name or the Layton City grid coordinates for homes in this area. Commenters also had questions about a plan for a Layton frontage road between 2700 West and Bluff Ridge Road.*

Layton City will make the final naming decisions regarding the Layton city roads. Layton City would also decide whether to change the grid coordinates for any of the roads or houses in this area. UDOT is not aware of any plans by Layton City to do this. The Google Maps layer that UDOT is using on the WDC interactive map labels this road as Bluff Ridge Boulevard.

There are no proposed changes to Bluff Ridge Road or 3600 West as part of the WDC Project. Similarly, the WDC Project does not propose the construction of a frontage road between Bluff Ridge Road and 2700 West. Any changes to the local road network or construction of frontage roads or local arterials along this route would be the responsibility of Layton City.

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- C.** *Commenters stated that UDOT predetermined the outcome of the process, or that the process was driven by politicians, business groups, or developers.*

UDOT did not make a decision on a Preferred Alternative based on direction from politicians, businesses, or real estate developers. The basis for identifying the Preferred Alternative is described in Section 3.3, Rationale for the Selected Alternative, of the Record of Decision and in Section 2.6, Identification of the Preferred Alternative, of the Final EIS.

- 
- D.** *Commenters stated a fact about their situation, expressed an opinion about the project (for example, I like it, I don't like it, etc.), expressed a comment about the EIS process, directed the comment to another agency (for example, the Davis County Commission, Syracuse City, Farmington City, Kaysville City, or UTA), or made a comment that was not clear.*

Thank you for the comment.

- 
- E.** *Commenters stated that the online interactive map did not have the correct label for the Canyon Creek Elementary School or Farmington High School. Commenters stated that the mailing address on the website was not an existing address.*

The WDC team revised the online map to correct the label for Canyon Creek Elementary School. Since the Farmington High School is not yet completed, no label has been added. Nevertheless, UDOT has been aware of the new high school location and has coordinated with the Davis School District throughout the study.

The WDC team reviewed the address on the website and confirmed that the address was correct. 900 West is an alternate name for Kays Drive in Kaysville.

- 
- F.** *Commenters stated that there were technical issues with the website.*

The WDC team reviewed the website and verified the website functions were working correctly.

- 
- G.** *Commenters requested information about attributes of the WDC such the height of the roadway or ramps in specific locations.*

Requested information was provided to commenters if it was available.

- 
- H.** *Commenters stated that lighting on the WDC would increase the mosquito population by attracting them to the lights.*

Research suggests that mosquitos can be attracted to some lights, though it is not conclusive which lights are attractive to mosquitos and which are not. It is possible that the lighting at the WDC interchanges could attract mosquitos. However, the WDC interchange street lights will be located on the UDOT right-of-way and will not be close to any residences.

- 
- I.** *Commenters stated that they did not like raised taxes or that they thought the WDC would raise their taxes.*

No tax increase is proposed as part of or as a result of the WDC Project. The WDC would be funded from state transportation funds.

- 
- J.** *Commenters asked whether the WDC would be federally funded or whether half of the funding would be federal funding.*

All of the funding for the WDC to date has been state funding. No federal funds are currently identified for any parts of the WDC Project.

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- K.** *Commenters stated that they should have been informed about the WDC prior to buying their properties. Commenters stated that UDOT, the Cities, or developers should have been legally required to disclose that the WDC would impact or be close to their properties. Commenters stated that no new development in the areas around the WDC alternatives should have been allowed until a decision was made.*

Prior to the start of the Draft EIS, several planning studies had been conducted identifying several potential alignments for the WDC in western Davis and Weber Counties. However, a final alignment is not approved for construction until the completion of the EIS process. Therefore, there are no specific alignments until this EIS process is complete and appropriate permits are in place. Thus it might not be possible for property owners selling their homes to disclose to potential buyers whether the alternative near their home will be selected, and it is not the responsibility of UDOT to ensure that sellers inform buyers. Finally, most of the Cities in the WDC study area have identified a proposed route for the WDC in their respective city transportation plans prior to the start of the EIS process. The transportation plans were available for review by potential homeowners. The alignment of the UDOT Preferred Alternative in the Draft EIS was available on UDOT's interactive map beginning in May 2013.

UDOT and FHWA cannot give legal advice to homeowners. Individuals should contact an attorney or real estate agent with any questions regarding the responsibility to disclose information about the WDC EIS.

UDOT cannot stop private land from being platted or developed without purchasing the property. Cities can try to work with developers during the platting process to preserve private land for future transportation needs.

## 2.0 Commenter and Response Matrix

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Anonymous			12	1.2.2A, 1.1.1A, 1.2.2B
Anonymous			30	1.2.6B, 1.20A
Anonymous			103	1.31A
	Brian		64	1.2.4.4I
	Daren		47	1.2.2E, 1.2.2F
	James		45	1.2.2E, 1.2.2F
	Kathryn		228	1.1.2C
	Mark		1	1.2.4.4A
	Rob		59	1.2.2B
	Sharon		277	1.5E, 1.5A
	Steve		142	1.2.2D
	Tamara		66	1.2.6D, 1.11.1A, 1.11.2A, 1.12B
	Travis		53	1.31D, 1.1.2A, 1.2.6E, 1.5A
Alfonsi	Shawn		40	1.4B
Allen	MaLynn		83	1.2.2B, 1.12B, 1.5C, 1.2.2B
Allen	Michelle		68	1.2.2B, 1.8A, 1.11A
Allen	Michelle		246	1.5E
Allen	Sheryl		97	1.2.2D, 1.10B
Allred	Nathan		159	1.2.2L, 1.31A
Allred	Paul		95	1.2.4.4F
Allred	Paul		155	1.2.6B, 1.2.4.4F, 1.2.2D, 1.20A, 1.31D
Allred	Paul		172	1.31D
Allred	Paul		299	1.2.6B, 1.31D
Ames	Tiffany		5	1.2.4.4C
Anderson	Colby		153	1.2.4.4M
Archibeque	Mikel		20	1.2.6B
Arnold	Bruce		170	1.2.6B
Ashcraft	Cindy		27	1.31D, 1.18A, 1.12B
Austin	David and Karen		106	1.2.6B, 1.31D
Bailey	Brad		42	1.2.2D
Bankhead	Brian		143	1.8A, 1.2.4.4J
Bankhead	Heidi		89	1.5C, 1.5D, 1.2.6C

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Bankhead	Heidi		249	1.2.4.4J, 1.2.6C
Barnes	Chad		225	1.5I, 1.5G
Barney	David		55	1.12A, 1.12D, 1.2.2D
Barns	Chad		120	1.31A
Barrus	Nancy and Roger		132	1.2.6A, 1.2.4.4J, 1.2.6C
Bateman	Alicen		65	1.2.6D, 1.11.1A, 1.11.2A
Bauco	Chris		167	1.31D, 1.2.6B
Beck	Susan		91	1.2.2G, 1.2.2D
Bird	David	Utah Division of Env. Response and Remediation	205	1.17A
Black	Alan		52	1.2.6B
Blanchard	Ann		54	1.31D, 1.14A
Bodily	Clint		110	1.31A
Bone	Don		150	1.31A
Borgenicht	Roger	Utahns for Better Transportation	281	1.7G, 1.2.2M, 1.4A, 1.5A, 1.5C, 1.5G, 1.14C, 1.5H, 1.11.2A, 1.2.2D
Boswell	Russell		201	1.12D, 1.12E, 1.8A
Bowen	Matt		190	1.12D, 1.12E, 1.5J, 1.8A
Brenchley	Julie, Eric, and Tayler		80	1.2.6B
Brierley	Jeanie		169	1.5A, 1.5C, 1.31H, 1.18B, 1.5F, 1.5G, 1.8A, 1.13A, 1.1.2B
Brierley	Ryan		2	1.2.4.4B
Brinton	Robert		182	1.12D, 1.12E
Brough	Brooke		112	1.31A
Brough	Brooke		305	1.2.6C, 1.1.2B, 1.2.2B, 1.2.2D, 1.12B, 1.18A, 1.8A
Brough	Mike		145	1.14A
Budge	Amy		32	1.5C, 1.2.6D
Burns	David		81	1.2.6B
Burns	David		259	1.2.6B
Butterfield	Jared		293	1.2.2D, 1.10I
Butterfield	Jared		294	1.2.2D, 1.10I
Butterfield	Jared		295	1.2.2D, 1.10I



Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Calmes	Ariel	Western Resource Advocates	318	1.14H, 1.2.2D, 1.14I, 1.14G, 1.11.2A, 1.7G, 1.2.2M, 1.4A, 1.5A, 1.5C, 1.5G, 1.14C, 1.5H
Carlson	Angela		207	1.14A, 1.1.1B
Casey	Nicole		3	1.31A
Caygle	Tom		19	1.2.6A, 1.1.2A, 1.31C, 1.4A, 1.11.2A
Christensen	Carly		284	1.12E
Christensen	Elliott		144	1.2.2E
Christensen	Jerry W.		48	1.1.2B
Clark	Heather		29	1.31E
Clayton	Amber		16	1.5B, 1.5C, 1.8A
Colombel	Tena		76	1.2.6B
Colombel	Tena		77	1.2.6B
Combe	Dustin		38	1.12D
Comcast			105	1.2.2D
Conacher	Cameron		248	1.31J, 1.15A
Cook	Jeff		118	1.31A
Cooksey	Nicole		216	1.2.2K
Cool	Kristi		36	1.2.4.4E, 1.1.2B, 1.12B, 1.31D
Coombs	Chad		162	1.2.2I
Cox	Dennis		271	1.5G, 1.2.2B, 1.2.4.4A
Crawford	Bryce		309	1.18A, 1.2.2D
Craythorne	Erik	West Point City	300	1.2.6B, 1.31D, 1.2.2H, 1.2.4E
Cutler	Paul		22	1.2.4.4G
Cutler	Paul		262	1.2.2D, 1.2.4.4H
Damery	Bill	Utah Department of Environmental Quality	334	1.13C
Davenport	Anne		319	1.31D, 1.2.6B
Denison	Adam		57	1.14A
Denos	Holly		7	1.2.6B
Dobson	Tara		147	1.12A, 1.12D
Dodson	Chris		288	1.2.2D, 1.12E, 1.5C, 1.31K
Douglass	Josie		117	1.5G, 1.31A
Douglass	Josie		316	1.12A, 1.12B, 1.12E, 1.2.2D, 1.2.4.4G

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Dove	Heather		111	1.2.2D, 1.7G
Dunn	Jessica		198	1.12D, 1.12E, 1.5J
Eastman	Rob		124	1.31A
Einfeldt	Sherri		15	1.2.4.4D
Einfeldt	Sherri		220	1.7H
Elwood	Sydney		330	1.2.2D, 1.12E, 1.7B, 1.2.4.4G, 1.10G, 1.5C
Erickson	Robert		33	1.31F
Erickson	Robert		34	1.7A, 1.14A, 1.2.2G, 1.7B, 1.2.2G, 1.31C
Erickson	Robert		94	1.2.2J
Evans	Ann		322	1.2.2D, 1.12E, 1.5C, 1.7B, 1.10G
Faerber	Seth		238	1.5E
Feeney	Michael		255	1.2.2D, 1.12C, 1.2.2B, 1.5C, 1.12F, 1.10J, 1.2.2D
Fink	Megan		237	1.7K, 1.12D, 1.8A
Floor	Ann	Utahns for Better Transportation	282	1.7G, 1.2.2M, 1.4A, 1.5A, 1.5C, 1.5G, 1.14C, 1.5H, 1.11.2A, 1.2.2D
Foote	Nathan		60	1.2.6B, 1.1.2B
Fortesven	Dave		8	1.2.6B
Frew	Chad		108	1.2.6B, 1.1.2B, 1.10B
Fulton	Bill		327	2.4.4A, 1.5G, 1.18C, 1.2.2D
Galbraith	Jeni		292	1.2.2I
Gerrard	Christy		326	1.2.6A, 1.2.2D, 1.12E, 1.5C, 1.18C
Gibson	Roy M.		197	1.12D, 1.12E, 1.7I, 1.5J
Gore	Matt		96	1.31D
Green	Brandon	Fruit Heights City	264	1.5E
Green	Brian		126	1.2.2G, 1.2.6A
Greenhalgh	Chadwick		72	1.2.2I, 1.7E
Gridley	Nancy		114	1.31A
Griffin	Chris		160	1.31D, 1.2.6B, 1.1.2B
Groves	Leslianne		146	1.2.4.4J
Groves	Leslianne		243	1.2.2I, 1.12A, 1.12D
Groves	Leslianne		331	1.14L
Haacke	Cindy		157	1.31A

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Haacke	Cindy		272	1.20A, 1.2.2E, 1.2.4.4E, 1.2.6D
Hacking	Tom		49	1.2.4.4H
Hammond	M. Darin		258	1.2.6B
Hammond	Nathan		274	1.2.6B, 1.31D, 1.2.6B
Hansen	Carlee		13	1.31B
Hansen	Cole		61	1.2.2E
Hansen	Vicky B.		109	1.31A, 1.5F
Harmon	Kyle and Tiffany		218	1.1.2B
Harvey	Stanley		123	1.31A
Haslam	Scott		101	1.2.4.4J, 1.5C
Hatch	David		233	1.5E
Headley	Carrie		11	1.2.4.4A, 1.12A, 1.2.4.4F
Hebert	Brenda		286	1.2.4.4D, 1.2.2I
Hellewell	Carl		70	1.2.2H
Helms	Alan		62	1.2.2F
Higginson	Mark		18	1.2.2D, 1.2.6A
Higginson	Mark		104	1.31D, 1.2.6A
Hill	Casey		71	1.31D, 1.2.2D
Hill	Matt		235	1.2.6B
Hincks	Bacall		128	1.11.1A, 1.2.2G
Hoffman	Annalaurie		227	1.10I, 1.5E
Hoffman	Jeremiah		268	1.7H
Hogan	Wade		296	1.18E, 1.2.4.4D, 1.2.2D
Holdeman	Scott		247	1.5C, 1.12E, 1.2.4.4G
Holden	Mark	Utah Reclamation, Mitigation, and Conservation Commission	335	1.31D, 1.30A, 1.14B, 1.27D, 1.14E, 1.14J, 1.14M, 1.10H, 1.18D
Hooper	Dennis		75	1.31D, 1.1.2B
Howell	Rob		86	1.31A
Hunt	Ken		46	1.2.2D
Inouye	Ron		175	1.2.2F
Isaacson	Bryce		56	1.1.2A, 1.14A, 1.18A
Isaacson	Thelma		51	1.2.6B, 1.2.2E, 1.2.2F
Ivie	Marcia		310	1.5C, 1.2.2D, 1.20B, 1.7B, 1.12E

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
J.	Taylor		31	1.2.2B
Jacobs	Briant H.		129	1.2.4.4E
Jacobsen	Mitchell		152	1.2.2D
Jensen	Emily		320	1.5C, 1.2.2D, 1.12E, 1.2.4.4G, 1.10G
Jensen	Eric		78	1.2.6B, 1.10B
Jensen	Jeff		116	1.2.2K, 1.5A, 1.2.4.4J, 1.2.2B
Johns	Mal		266	1.5L
Johns	Matt		58	1.7B
Johns	Matt		99	1.7B
Johns	Matt		102	1.7B
Johns	Matt		265	1.5L
Johnsen	Cameron	Weber County	179	1.31A
Johnson	Adam		200	1.12B, 1.31D, 1.12D, 1.12E
Johnson	Anne		127	1.31A
Johnson	Camille		137	1.2.2I
Johnson	Jeff		212	1.12E, 1.12F
Johnson	Jeff		213	1.12E, 1.12F
Johnson	Jeff		214	1.12E, 1.12F, 1.10G
Johnson	Jeff		215	1.31F, 1.12E, 1.12F
Johnson	Jenny		136	1.12A, 1.12D, 1.8A, 1.5A
Johnson	Jenny		210	1.12E, 1.5C, 1.12F, 1.8A
Johnson	Jenny		211	1.12E, 1.5C, 1.12F, 1.8A
Johnson	Jenny		229	1.12E, 1.31K, 1.31A
Johnson	Jenny		239	1.12F, 1.5C, 1.12E, 1.31K, 1.10G
Johnson	Jenny		240	1.12E, 1.31K, 1.18A
Johnson	Jenny		252	1.12E
Johnson	Jenny		313	1.5C, 1.2.2D, 1.20B, 1.12E, 1.18C, 1.10G
Johnson	Kay		139	1.12A, 1.12D, 1.5A, 1.8A, 1.2.4.4G
Johnson	Kay		141	1.12A, 1.12D, 1.2.4.4L
Johnson	Summer		278	1.2.2F
Jones	Brent		113	1.31A
Jones	Jill	Central Davis Sewer District	100	1.5E

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Jones	Jill	Central Davis Sewer District	263	1.5E
Jorgensen	Michael		44	1.2.6B, 1.1.2B
Judkins	Karl and Colenda		82	1.31D
Kartchner	Val		79	1.10B, 1.10C, 1.2.2I, 1.2.2F
Kemeny	Deanne		151	1.5H
Kezerian	Stephanie		232	1.2.2B, 1.2.4.4A, 1.2.4.4J, 1.2.6F, 1.2.6C, 1.2.2I
Kimball	Ben		134	1.1.2A, 1.14A, 1.5G, 1.31D, 1.2.6A
Kimball	Ben		273	1.2.2D
Kirk	Adam		180	1.12D, 1.12E
Kitchens	Elizabeth	The Nature Conservancy	221	1.1.1B, 1.1.2A, 1.2.2G, 1.2.2D, 1.2.6B, 1.10H, 1.12H, 1.14A, 1.14B, 1.14C, 1.14D, 1.14E, 1.14F, 1.18D
Knavel	Bruce		135	1.2.2D, 1.12A, 1.12D, 1.2.4.4K, 1.2.2D
Kowallis	Julene		149	1.5G, 1.11A
Kowallis	Julene		301	1.5F, 1.5G
Krantz	Kevin		23	1.31B
Larsen	Luke		90	1.12A
Layton	Jason		87	1.31D, 1.2.6A, 1.1.2A, 1.2.6E, 1.2.2G
Layton	Jason		88	1.31D, 1.2.6A, 1.11.1A, 1.11.2A, 1.11.1B, 1.2.2G, 1.2.2G
Lemon	Wendy		302	1.2.2D, 1.5C, 1.2.4.4G, 1.12E
Lim	Diana		188	1.12D, 1.12E
Long	Ricky and Julie		260	1.2.6B
Love	Sarah		187	1.2.2I
Lueckler	Barry		158	1.2.6B
Macfarlane	Beverly	Sunset City	122	1.31A
Mangelson	Gavin		254	1.2.2I, 1.5M, 1.2.2D
Martinez	Bryce		164	1.5G, 1.31A
Maughan	David		67	1.7C, 1.7D
McBride	Michael	SunQuest Development	171	1.5G
McConkie	Michael		165	1.2.6B, 1.31D
McFadden	Joe		173	1.12A, 1.2.2D
McGuire	Bill		226	1.2.6B, 1.31D

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
McInelly	Kathy and Vern		161	1.5F, 1.5G
Mecham	Cassie		148	1.2.6B
Meyer	Steve	Utah Transit Authority	280	1.2.3A, 1.2.3B
Mikkelsen	Christine		287	1.5C
Miller	Scott		9	1.2.4.4E
Millheim	David	Farmington City	217	1.12E, 1.12F, 1.12G, 1.10G, 1.31D, 1.12A
Millheim	David	Farmington City	283	1.30A, 1.7M, 1.10F, 1.2.2D, 1.7E, 1.2.4.4H, 1.7J, 1.5N, 1.2.2N, 1.9A, 1.3C, 1.3D, 1.3E, 1.3F, 1.5E, 1.5O, 1.10K, 1.18E, 1.12C, 1.20C, 1.2.4.4F, 1.27A, 1.27B, 1.27C
Minchey	Amber		63	1.1.2B, 1.2.6B
Moss	Brent		41	1.31A
Munn	Melissa		290	1.11.1A, 1.11.2A, 1.5A, 1.8A, 1.5G
Munn	Richard		332	1.11.2A, 1.8A, 1.2.2B
Myers	Jennifer A.		178	1.2.2D, 1.1.2B, 1.18A
Nelson	Aaron		28	1.12C
Nelson	Becca		25	1.2.4.4A, 1.2.6C
Nelson	Cristina		308	1.5L, 1.2.4.4H
Nelson	Kim		154	1.5H, 1.7H
Nelson	Trent		270	1.1.2B, 1.12A, 1.11.2A, 1.10I
Newbold	Dale		261	1.31D, 1.2.6B
Niemcziek	Blair		26	1.14A, 1.11.1A, 1.12B, 1.8A, 1.5C, 1.2.6C
Olsen	Jason		140	1.12A, 1.12D, 1.2.2D
Orr	Lance		10	1.10A
Palmer	Alice		303	1.12E, 1.2.4.4G, 1.5C, 1.2.2D, 1.5L
Palmer	Dave		84	1.7F
Parrish	Doug		196	1.12B
Parry	Jonathan	Weber Basin Water Conservancy District	325	1.5P, 1.5N
Perkins	Ron Dee		37	1.31D
Perkins	Ron Dee		166	1.31D
Petersen	Angie		14	1.2.2C, 1.11.1A, 1.18.1A, 1.11.2A, 1.8A, 1.5.1A

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Petersen	Rose		181	1.12D, 1.12E, 1.5J
Peterson	Darhl		21	1.1.2B
Peterson	Darhl		241	1.1.2B, 1.26B
Peterson	Elisha		269	1.8A, 1.11.2A, 1.2.2B, 1.12A
Peterson	Elisha		323	1.11.2A
Phelps	Carrie		125	1.20A, 1.2.2K, 1.12A
Phillips	Bree		195	1.12D, 1.12E, 1.5J
Phillips	Bree		242	1.2.4.4G, 1.5C
Pickard	Dana		275	1.2.6D
Pickard	Dana		297	1.2.2H, 1.2.4.4D, 1.2.4.4E
Pickard	Dana		298	1.7L
Pinson	Randall		267	1.5L
Pitt	Hyrum		307	1.2.2D, 1.5C, 1.2.4.4G, 1.12E
Plaizier	Nate		50	1.31D, 1.18A, 1.14A
Poulton	Donald		306	1.12E, 1.2.2D, 1.2.4.4G
Prince	John		279	1.2.2E, 1.2.2F, 1.2.2H, 1.2.4.4E, 1.8A, 1.2.2G, 1.1.1A, 1.1.2A, 1.2.6D, 1.31C, 1.2.2D
R.	Ryan		6	1.8A, 1.2.4.4D
Raines	Sara		185	1.7E, 1.2.2I
Rathbun	David		289	1.2.2G, 1.18C, 1.2.2D
Rawson	Jessica		285	1.2.2I
Rees	David		206	1.5G
Remley	Nykki		98	1.2.6D, 1.11.1A, 1.11.2A, 1.5C, 1.10D
Rhodehouse	Justin		24	1.12B, 1.8A
Rice	Rick		204	1.12E
Richards	Jason		107	1.10E
Richardson	Melvin		304	1.2.6A, 1.12E
Richardson	Melvin		321	1.5C, 1.2.2D, 1.20B, 1.7B
Rogers	Matthew		4	1.31A
Rothfeder	Cindy		133	1.1.2A, 1.5A, 1.11.1A, 1.14A, 1.1.2A, 1.2.2D
Roundy	Tricia		311	2.4.4O, 1.2.6D, 1.12A, 1.2.2D
Roundy	Tricia		328	1.2.6D, 2.4.4O, 1.12A, 1.2.2D
Roundy	Tricia		329	1.31D

Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Rowley	Paula		208	1.2.2H
Royall	Nathan and Jennifer		183	1.12D, 1.12E, 1.1.2B, 1.2.6B
Rushton	Rhett		202	1.31E, 1.31D
Sartor	Steven	Wasatch Aero Modelers	156	1.5I
Sartor	Steven	Wasatch Aero Modelers	253	1.5K
Saunders	Ammon		236	1.31I
Schow	Greg		219	1.2.2D, 1.18B, 1.18C, 1.12A
Scott	Shayne	Kaysville City	333	1.5E, 1.7M, 1.10L, 1.10I, 1.30A, 1.31D
Seaman	Tyler D.		192	1.12D, 1.12E
Shoop	Marcelle	National Audubon Society	324	1.14A, 1.2.2M, 1.14H, 1.14E, 1.2.2D, 1.14C, 1.2.2F, 1.14J
Shumway	Amy		131	1.10B, 1.10F
Silva	Tracy		231	1.2.6D, 1.14A, 1.31C, 1.1.2A, 1.2.4.4O
Simmons	Ashley		177	1.2.2D, 1.12B, 1.12D
Smith	James E.		224	1.1.2B, 1.2.6B, 1.31D
Smith	Jim		234	1.31D, 1.12E, 1.12F, 1.2.2D
Smith	Sindy	State of Utah, Resource Development Coordinating Committee	230	1.2.6B, 1.14G, 1.4C
Snell	Wendi		251	1.2.6B
Sorsensen	Trent		314	1.2.2O, 1.14A, 1.2.6C
Squire	Devin		244	1.31A
Steed	Jeff		176	1.2.2I, 1.2.4.4F
Steele	Noah	Syracuse City	256	1.2.4.4P
Steele	Noah		257	1.10D
Stephens	Mitch		276	1.5J, 1.10G, 1.2.4.4G, 1.18B, 1.2.2D, 1.12E, 1.20B, 1.5J, 1.2.2D
Stettler	Jonathan		203	1.3A
Stevenson	Matt		43	1.2.2B
Stowell	Kyle		69	1.1.2B, 1.31D, 1.2.6B
Stratton	Geoff		17	1.2.6B
Stringfellow	David		35	1.31D



Last Name	First Name	Affiliation	Comment Number	Response Number(s) in Section 1.0
Strobel	Phil	U.S. Environmental Protection Agency	317	1.14J, 1.14E, 1.14K, 1.13B, 1.11.1C
Strong	Ashlee		223	1.7J, 1.3B, 1.31G, 1.12A
Stuart	Chelsea		193	1.12D, 1.12E, 1.5C
Swallow	Kevin		121	1.31A
Talbot	Chet		74	1.2.6B, 1.1.2B
Tate	David		115	1.2.6A, 1.1.2B, 1.31D
Tate	David		119	1.2.6A, 1.18A, 1.2.6C, 1.12B
Taylor	Elisabeth		315	1.2.6C, 1.31C, 1.7B, 1.12A, 1.12B, 1.18A, 1.11.2A, 1.14A, 1.5A, 1.2.2G, 1.2.2O
Tucker	Ryan		250	1.31A
Walker	Paul		245	1.12E
Warburton	Shane		291	1.2.2I, 1.5E
Webber	Kevin		85	1.31A
Westwood	Kyle		73	1.1.2B
Williams	Clay		163	1.2.2E, 1.2.2F
Williams	Summer		39	1.31A
Willis	Dana		194	1.12D, 1.12E, 1.5J
Willis	Willis		189	1.5A
Wilson	Joey		130	1.12A
Wilson	Joey		174	1.12D, 1.12E
Wilson	Joey		184	1.31A
Wilson	Joey		209	1.2.4.4G
Wright	Brandon		168	1.2.6B
Wright	Mike		93	1.8A, 1.31C, 1.2.2B
Wright	William T.	Layton City	186	1.2.4.4N
Wright	William T.	Layton City	191	1.2.4.4N
Wright	William T.	Layton City	199	1.2.4.4N
Wuthrich	Ben		312	1.31D, 1.30A
Young	Brian		138	1.2.6A, 1.11.2A, 1.2.2D
Young	Mary		92	1.2.6A
Zumwalt	Anna		222	1.2.6A, 1.14A



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