

**FARMINGTON CITY**  
**WEST DAVIS CORRIDOR DEIS**  
**CURRENT TALKING POINTS**

**9/3/13**

Farmington City appreciates the obvious time and effort that has been invested to date in this process, but unfortunately, the DEIS falls short of the mark required by applicable law and does not provide the public with sufficient relevant information to allow meaningful feedback, discussion of whether such a road is needed, whether the trade-offs required are worth it and whether less damaging alternatives have been fairly analyzed.

Farmington City has provided its comments on the West Davis Corridor (“WDC”) in an effort to protect its territory and proprietary interests from direct harm and indirect and cumulative impacts to wildlife, water, city-owned property interests, and conservation easements. The current approach to the Project frustrates the City’s intent to remain a rural community with planned areas of functioning commercial development, will injure the quality of life of its residents, will injure the quality of the environment, will create economic losses and create other environmental injuries.

Based on the information in the DEIS, it is currently unclear whether this Project is needed for the Region at all in 2040 and it is clearly not needed at that time in Farmington City. The problematic road segments under the 2040 model located in the northern portion of the Study Areas are close to I-15 and are located on the East/West roads. Only certain discrete portions of I-15 appear not to meet an acceptable LOS in 2040. With the high local employment increases projected for both Davis and Weber Counties, we question whether the assumptions regarding future North/South travel demand are accurate, especially in view of the noted preferences of the younger workers in the Region to find local employment and not become

commuters. An outdated travel and transportation paradigm may have been applied here and in the modeling, which needs to be corrected.

The need issue is further complicated by the scope and extent of the selected Study Area. To fully understand Regional need and to provide the most effective and efficient Regional solutions, the Study Area needs to include all of the lands East of I-15 and to the North to connect with I-15 above Ogden. Along this line, if a need can be demonstrated for the WDC, we also question whether Farmington City and Kaysville should be part of the Study Area, as so little need appears to exist here. We also believe it is critical to fully explore an alternative interchange located on I-15 north of Farmington City.

There are significant problems with the 4(f) Evaluation. The fundamental problem is that the Farmington City Conservation Easements qualify as properties that must be protected under Section 4(f) (“4(f)”) and they are not included in that analysis. Not only do they perform recreational, park, open space, farmland and wildlife and wetland habitat functions, they are perpetually protected for those purposes by the City. While the trails to, through, and around these conservation easements have been accorded 4(f) status, the properties containing the conservation values protected by the Conservation Easements those trails use as a destination are ignored. This is a serious legal flaw and makes no sense. Farmington City is required by contract to protect these Conservation Easements from encroachment and intends to do so.

The cumulative impacts to and the direct and indirect effects on the Conservation Easement properties are also insufficiently explored in the Chapters of the DEIS designed to array and explore the impacts to and effects on parks, recreation areas, wildlife refuges, area habitat, farmland, wetlands, community cohesion, community facilities and otherwise. This is an issue separate and apart from the incorrect 4(f) legal status of these properties.

The Direct Effects Chapters represents noticeable effort by the Preparers, but generally they do not go far enough, as set forth in our comments on the DEIS. Specific comments regarding the Indirect Effect analysis are set forth in our comments on the DEIS, but that effort fundamentally fails as a result of the failure to provide an alternative-by-alternative analysis of the comparative Indirect Effects and to discern all of the Indirect Effects. The failure to adequately discuss the Indirect Effects on the Farmington City Conservation Easements and the Indirect Effects created by the preferred alignment off of those properties as they relate to the rest of Farmington City is also problematic. Lastly, because of these problems with the Direct and Indirect Effects analysis, the Cumulative Impacts analysis fails as well. The problems with that effort are further discussed in our comments on the DEIS.

The problems with this DEIS are significant and far reaching enough that a new or revised DEIS must be undertaken before a final EIS may be undertaken. The issues concerning the size of the Study Area and Purpose and Need, including the failure to rely on current local plans for Farmington City disable not only those Sections, but the entire DEIS. The 4(f) issue created by the failure to accord the Farmington City Conservation Easements 4(f) status disables the Alternatives Analysis and forecloses the use of the Glover's Lane Alternatives. There are issues with the Shepard Lane Alternatives, but they are far less than Glover's Lane. Further effort must be invested in the Alternatives Analysis to include the roads located in the entire corrected Study Area, perhaps allowing an alternative that doesn't require the WDC. If it is concluded that a portion of the currently contemplated WDC is required, then interchanges North of Farmington City and Kaysville must be studied.