Document Title		Layton Interchange EIS			Preparer	Date	5/30/08
Document Date					Organization		
Commenter		Environmental Protection Agency					
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1				The document only presents the impacts on environmental resources for the Preferred Alternative. In the described screening process, only two alternatives were analyzed for potential impacts to critical environmental resources. The only critical environmental resource identified was cultural resources protected by Section 4(f) of the Department of Transportation Act. No analysis was conducted to compare impacts to wetlands. Comparison of wetland impacts is needed in order to identify the Least Environmentally Damaging Preferred Alternative (LEDPA) under Section 404(b)(1) of the Clean Water Act. Although the wetland impacts of this project are minimal and your agencies have consulted with the United States Army Corps of Engineers, EPA recommends inclusion of this information in the final EIS. Recommendation: Include wetland impact comparison of Alternatives 2G and 4B.	A quick analysis of potential impacts from Alternative 4 was performed. It focused on the area around I-15 where Kay's Creek crosses under I-15, since the remainder of the area that would be impacted by Alternative 4 would run along Gentile Street, which is mostly developed residential. Alternative 4 would require a northbound on-ramp off of westbound Gentile Street, which would have an approximate footprint of 4/10 of an acre along the eastern side of I-15. The footprint would impact Kay's Creek where it enters Layton Park and would also impact the Bamberger Trail near Gentile Street, as well as the 100-year floodplain. The Section 4(f) impacts in Chapters 2, 3 and 4 were updated to include this impact as well. The wetland analysis was confined to the Wetlands section of Chapter 3 since it was not initially a factor in the Alternatives Screening analysis. Added the following text (page 3-84): Alternative 4, which was the only other alternative to meet the Purpose and Need for the project but was eliminated for its impacts to Section 4(f) properties, would have had impacts to Kay's Creek from the footprint of the northbound on-ramp. See the Wetland Impact Comparison memo in Appendix B. No specific delineation was performed for Alternative 4 due to its prior elimination from further consideration. Added the Wetland Impact Comparison memo to Appendix B.	3-85 and App. B	

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2	3-66			Page 3-66, Carbon Monoxide – Please correct the following formula (CO8 = PF x (CO1 – BG1) = BG8) to agree with the formula in Appendix B [= should be +]. Also, please explain how the 8-hour ambient background CO concentration was determined.	Corrected the formula. Also, the 8-hour ambient background CO concentrations were obtained from the most current UDOT Air Quality Hotspot Manual. A footnote was added to the table for clarification.	3-66	
3	3-70			Page 3-70 – For the purposes of public disclosure, EPA recommends the addition of a table to show which schools, hospitals, and residential areas are within ¼ mile of the new interchange and which would be of highest risk of exposure to Mobile Source Air Toxics.	Added the following text: This would mostly affect the residential areas within a quarter of a mile of the new interchange and roadway; namely the Larsen Lane neighborhood to the north, the Willow Creek neighborhood on the west side of Flint Street adjacent to the proposed new intersection of the 750 South Connection, the Heritage Fields neighborhood to the south. There are no hospitals currently in this area and the nearest schools are Layton Elementary and Layton High School, which are both approximately half a mile away from the proposed new roadway, Even if the MSAT increases do occur, they would be substantially reduced in the future due to implementation of EPA's vehicle and fuel regulations.	3-71	
4	3-72			Page 3-72 – "What mitigation measures would be required . . ." The statement "The Preferred Alternative would likely result in a minimal increase in air pollutant emissions" contradicts the decrease in emissions shown in Table 3-21 and Appendix B. Also, the first paragraph on page 3-92 states "With improvements to vehicle emissions and more stringent air quality controls, it is anticipated that air quality will continue to improve in Davis County through the 2030 planning period. EPA recommends that the above statement be revised to agree with the decrease in emissions shown in Table 3-21 and the statement on page 3-92.	Changed the paragraph to the following text: The Preferred Alternative would not result in new violations of the NAAQS, increases in the frequency or severity of existing violations of the NAAQS, or delays in attaining the NAAQS. Therefore, no harmful health effects are expected as a result of this project. No mitigation is required.	3-72	

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5	3-92			Page 3-92 , Ozone – Please discuss both the new ozone National Air Quality Standard (now 75 ppb vs. 80 ppb, previously) and the possible increase in ozone due to increased non-road sources resulting from new residential development and growth occurring in this city and county. Non-road sources related to residences would be lawn mowers, paints, and consumer products which emit pollutants such as nitrogen oxides (NOx) and/or volatile organic compounds (VOCs).	Added the following text: <u>"Ozone</u> On March 12, 2008, the EPA announced that the new primary 8-hour ozone standard is 0.075 parts per million (ppm) and the new secondary standard is set at a form and level identical to the primary standard. The previous primary and secondary standards were identical 8-hour standards, set at 0.08 ppm. The ozone compliance deadline for the revised 8-hour standard is as follows: • States must make recommendations to EPA no later than March 2009 for areas to be designated attainment, nonattainment, and unclassifiable. • EPA will issue final designations of attainment, nonattainment and unclassifiable areas no later than March 2010 unless there is insufficient information to make these designation decisions. In that case, EPA will issue designations no later than March 2011. • States must submit State Implementation Plans (SIPs) outlining how they will reduce pollution to meet the standards by a date that EPA will establish in a separate rule, which will be no later than three years after EPA's final designations. • States are required to meet the standards by deadlines that may vary based on the severity of the problem in the area. • EPA will issue a separate rule to address monitoring requirements necessary to implement the new standards in June 2008 and issue a final rule by March 2009.	3-94	

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					Future residential growth could also affect future ozone levels. Based upon the residential and commercial growth anticipated in western Layton, there would be an increase in non-road sources like lawn mowers, paints, and consumer products which emit pollutants such as nitrogen oxides (NOx) and/or volatile organic compounds (VOCs) and from locomotives due to the increase in train traffic in the area. Non-road sources produce about 36% of NOx and 37% of VOC emissions.[1] From 1994 to 2004, the EPA has issued regulations for the control of pollutants from non-road sources, with the first 14 regulations going in to effect in 1996 and the last scheduled to take effect in 2008. In 2004, EPA developed the *Control of Emissions of Air Pollution from Non-Road Diesel Engine and Fuel* (Tier 4 Standards) to reduce emissions from non-road diesel engines through combining engine and fuel controls. The full benefit of these and other methods to reduce emissions from non-road sources is not expected to be realized until 2020-2030 when the standards are expected to be fully implemented."		
6	3-92			Page 3-92, first paragraph – The last sentence "Air pollutant emissions as a result of the Preferred Alternative would increase slightly due to the increase in vehicle miles traveled because of improved mobility" appears to contradict the first sentence in the same paragraph: ". . . it is anticipated that air quality will continue to improve in Davis County. . . ." Please clarify the apparent contradiction in these statements.	The last sentence was deleted and replaced with the following highlighted text: "Overall, the growth in the area by 2030 would likely be the same with or without the Preferred Alternative <u>and would result in an increase in vehicle miles traveled (VMT), with the Preferred Alternative having a slightly higher increase in VMT over the No-action Alternative</u>. However, the project would help reduce regional traffic congestion and improve travel times, which could	3-93	

[1] See the Progress Report on EPA's Nonroad Mobile Source Emissions Reduction Strategies, Report No. 2006-P- 00039 from the Office of the Inspector General.

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					help maintain compliance with air quality standards. Improved travel times throughout the region would reduce idling emissions of CO and volatile organic compounds, <u>even with the increase in vehicle miles traveled</u>. “		
7	3-99			Page 3-99, Air Quality paragraph – Possibly “disturbed surface areas” would be more meaningful than “disrupted surface areas.”	Changed, as requested.	3-101	