

## CHAPTER FOUR

# COMMENTS & COORDINATION

### 4.1 INTRODUCTION

This chapter describes the program and activities for public involvement and agency coordination undertaken for the I-15, Payson Main Street Interchange EIS project. These efforts were conducted between February 2015 and July 2017. Coordination and outreach activities included an agency and public scoping period; a public open house meeting; specialized meetings with agencies, a stakeholder working group, interested stakeholders, and city leaders; and distribution of various outreach materials. The public, agency, and stakeholder involvement effort for the project was designed to be inclusive, comprehensive, transparent, and continuous throughout the course of the project.

### 4.2 SCOPING

The purpose of the scoping period was to provide an early and open opportunity for both environmental resource agencies and the public to comment on the purpose and need of the proposed project, the alternatives to be considered, and the resources to be evaluated.

Scoping was accomplished through a public scoping meeting, an agency scoping meeting, and through email and hard copy correspondence with interested individuals, organizations, federal, state, and local agencies, and Native American tribes.

The scoping phase and comment period began with the publication of the Notice of Intent (NOI) in the *Federal Register* on February 3, 2015. The NOI is a requirement of the CEQ regulations (40 CFR 1501.7). The NOI initiates the mandated scoping process for all EIS documents and provides a short description of the project, the proposed action, and any preliminary alternatives. The NOI also describes the scoping process, identifies any upcoming formal public meetings that are associated with the project, and includes the name, address, and phone number of a contact person. A copy of the NOI is included in Appendix D.

### 4.2.1 Agency Scoping

The roles and responsibilities for lead, cooperating, and participating agencies during the environmental review process are defined in Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act-A Legacy for Users (SAFETEA-LU) and the CEQ regulations (40 CFR 1501) for implementing the NEPA (Title 42 of the U.S.C Chapter 4321 *et seq.*). In addition, expectations are clearly defined to help all parties involved with the EIS to understand what is expected of them during that process. Agency scoping was conducted through an agency scoping meeting and hard copy correspondence with federal and state agencies.

#### Lead Agencies

Prior to January 17, 2017, the project was carried out by the FHWA with UDOT as the joint lead agency. The FHWA and UDOT, as the lead agencies, were responsible for identifying and inviting participating and cooperating agencies. Throughout the environmental review process, the lead agencies oversaw and involved cooperating and participating agencies in defining the purpose and need for the project, identifying and screening a broad range of alternatives, identifying resources that need to be analyzed in the EIS, and formulating methodologies for qualifying and quantifying potential impacts.

On January 17, 2017, UDOT assumed FHWA's NEPA responsibilities within the State of Utah and became the sole lead agency. Since that date, the environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being or have been carried-out by UDOT pursuant to 23 USC 327 and a Memorandum of Understanding dated January 17, 2017, and executed by FHWA and UDOT.

#### Cooperating and Participating Agencies

The CEQ defines cooperating agencies as federal agencies other than the lead federal agency that have

jurisdiction by law or special expertise with respect to the project. SAFETEA-LU defines a participating agency as any federal, state, regional, local, or tribal government agency that might have an interest in the project. Unlike cooperating agencies, participating agencies typically do not have jurisdiction by law or special expertise.

Responsibilities of participating and cooperating agencies are similar, except that cooperating agencies have a higher degree of authority, responsibility, and involvement in the environmental review process than participating agencies. More specifically, participating agencies are not expected to develop information or prepare environmental analysis to support the EIS. However, based on information provided by the lead agencies, participating agencies are expected to provide, as early as practicable, any environmental issues of concern that could substantially delay or prevent approval of the project.

On March 4, 2015, the lead agencies sent initial scoping letters inviting federal, state, and local agencies to participate as cooperating or participating agencies. The scoping letters gave an overview of the project, defined the role of a cooperating or participating agency, and provided an invitation to the upcoming agency scoping meeting. Follow-up scoping letters were sent to all agencies on May 20, 2015, providing further clarification on the scope of the project, potential project alternatives, and possible environmental resources that could be affected.

Table 4-1 lists the agencies invited to be cooperating or participating agencies and the responses received from each agency. Copies of the agency scoping letters and any responses received are included in Appendix A.

TABLE 4-1

**Cooperating and Participating Agencies**

Agency	Type of Invitation	Response
<b>Federal Agencies</b>		
Advisory Council on Historic Preservation (ACHP)	Cooperating	Accepted
U.S. Army Corps of Engineers (USACE)	Cooperating	Accepted
Bureau of Indian Affairs	Participating	Declined participation
U.S. Environmental Protection Agency (EPA)	Cooperating	Accepted as participating only
U.S. Fish and Wildlife Service (USFWS)	Cooperating	Accepted
Federal Emergency Management Agency (FEMA)	Participating	Declined participation
Natural Resources Conservation Service (NRCS)	Participating	Declined participation
<b>State Agencies</b>		
Governor's Office of Planning & Budget, Resource Development Coordinating Committee	Participating	Declined participation
Department of Environmental Quality (DEQ), Division of Air Quality	Participating	No response
DEQ, Division of Water Quality	Participating	No response
DEQ, Division of Environmental Response & Remediation	Participating	Declined participation
Department of Natural Resources (DNR), Division of Parks & Recreation	Participating	No response
DNR, Division of Wildlife Resources	Participating	Declined participation
DNR, Division of Water Resources	Participating	No response
DNR, Division of Water Rights	Participating	Declined participation
Utah State Historic Preservation Office (SHPO)	Participating	No response
<b>Regional or Local Governments or Agencies</b>		
Mountainland Association of Governments (MAG)	Participating	No response
Utah Transit Authority (UTA)	Participating	Accepted
Payson City	Participating	Accepted

*Note that for those agencies that did not respond, UDOT has as appropriate continued to consult and/or solicit input during the EIS process.*

**Tribal Coordination & Section 106 Consultation**

The study area does not include tribal lands; however, Native American tribes could have an interest in the project due to the potential to discover historic or archaeological resources. FHWA sent scoping letters to Native American tribes on March 2, 2015. These letters

gave an overview of the project and invited the tribe to become a consulting party for the project as required under Section 106 of the NHPA of 1966, as amended. Section 106 consultation letters were sent to the following tribes:

- Ute Indian Tribe of the Uintah and Ouray Reservation
- Eastern Shoshone Tribe of the Wind River Reservation
- Northwestern Band of the Shoshone Nation
- Shoshone-Bannock Tribes of the Fort Hall Reservation
- Paiute Indian Tribe of Utah
- Cedar Band of Paiute
- Shivwits Band of Paiute
- Skull Valley Band of Goshutes

UDOT also sent letters to the following local agencies or groups with an interest in historic resources:

- Payson Certified Local Government
- Peteetneet Museum and Cultural Arts Center
- Daughters of the Utah Pioneers—Utah County Chapter
- Payson Historical Society

Copies of the Section 106 consultation letters and informal local cultural letters are included in Appendix A. No tribes responded to the request to become consulting parties.

### Agency Scoping Meeting

An agency scoping meeting was held on March 17, 2015, in Salt Lake City, Utah. In addition to the initial scoping letter, meeting invitees received an email invitation from FHWA on March 3, 2015, along with a copy of the *I-15, Payson Main Street Interchange EIS Agency Coordination Plan*. All invitees were informed that they were invited to participate in this scoping meeting regardless of if they chose to becoming a cooperating or participating agency.

The purpose of this meeting was to introduce the I-15, Payson Main Street Interchange project and project team to the cooperating and participating agencies and to lay the foundation for coordination with the agencies throughout the EIS process. This meeting focused on informing the agencies of their roles and

expectations on the project, as well as providing and soliciting information on the resources within the study area.

## 4.2.2 Public Scoping

### Public Scoping Meeting

A public scoping meeting was held on March 19, 2015, at the Clarion Events Center in Payson, Utah. The meeting provided an opportunity for interested parties to submit scoping comments and become part of the project at the earliest possible point. The meeting also served as an opportunity for the project team to educate the public on the NEPA process, the schedule, and potential outcomes of the EIS.

The project team used a variety of methods to inform the Payson community and surrounding areas of the public scoping meeting, including the following:

- Advertisement in the March 2015 Payson City Community Newsletter
- Advertisement in *The Payson Chronicle* on March 12, 2015
- Open house notices delivered door to door in the Main Street area, and provided to local school principals and Salem City
- Invitations to Payson City Council members, the local Utah Transportation Commission member, and local government representatives
- Press release distributed to local and regional media outlets on March 18, 2015

The meeting was an open house format, with various informational boards and maps. Instead of formal presentations, project team members throughout the room were available to answer questions. Comments were collected both electronically via the interactive project website and through hard copy comment forms. A total of 89 attendees signed in as they entered the meeting.

A total of 36 hard copy comment forms were completed and submitted at the public scoping

meeting, and one online comment was received during the scoping phase of the EIS. In general, the comments received focused on the following topics:

- Alternative options
  - Improve existing interchange
  - Relocate interchange to the north
  - Combination of improvements to the existing interchange and a new interchange to the north
- Economic concerns
- Safety
- Environmental impacts
- Community impacts
- Active transportation
- Access to businesses and residences

The majority of comments received during the scoping period expressed interest in potential alternatives, especially an alternative that includes a new interchange to the north and improves the existing interchange.

A copy of the outreach materials, the materials presented at the public scoping meeting, and the comments received can be found in Appendix D.

## 4.3 PUBLIC OUTREACH

### 4.3.1 Public Open House

A public open house was held on December 3, 2015, at the Payson City Municipal Building to inform and gather input from the public on the alternatives development and analysis process. The project team developed a strategic outreach plan to invite members of the public, local businesses, and other interested organizations to the open house. Outreach efforts included electronic messages on local LED business signs, an ad in *The Payson Chronicle*, UDOT and Payson City social media posts, a desk-side briefing with *The Daily Herald*, and an invitation flier. The flier was distributed door to door in the study

area; emailed to a broad audience, including surrounding communities and local officials; and posted online through Payson City and UDOT Region Three.

After signing in at the open house, participants were shown a five-minute video that provided background information on the study and interviews with members of the stakeholder working group (see Section 4.3.3, Stakeholder Working Group for more information). After the video, groups of five to ten participants were directed to a story map-based presentation about the study and preliminary alternatives. A project team member guided them through this presentation, which helped to engage participants and encouraged them to ask questions.

After the presentation, participants were able to view poster-sized maps of each of the 17 remaining preliminary alternatives, a map book of the 19 original preliminary alternatives, and participate in an informal polling activity regarding their preference for a specific category of alternative (Improve, Relocate, or Combination), and complete hard copy comment forms. Members of the project team were available throughout the room to answer questions.

Overall, more than 100 people attended the open house and completed the sign-in sheet.

The comment form was also available on the project website through January 3, 2016. A total of 48 comments were submitted: 37 written comments submitted at the public open house and 11 comments submitted online. Stakeholders were asked to rate the importance of widening Main Street, protecting wetlands, and preserving historic resources. The comment form also asked stakeholders to identify their preferred alternative(s). Overall, the C alternatives were the most popular, with Alternative C1 Braided Ramps receiving the most support. Participants of the informal polling activity at the meeting overwhelmingly

supported the Combination category of alternatives more than other categories.

To emphasize support for the C alternatives, a Payson City resident circulated a petition through the community after the public open house. A total of 421 signatures were received.

Copies of the outreach materials, presentations, polling results, comments, and the petition can be found in Appendix D.

### 4.3.2 Ongoing Public Outreach

#### Project Website, Email, and Hotline

A project website ([www.udot.utah.gov/paysoneis](http://www.udot.utah.gov/paysoneis)) was created to provide the public with information on the project. The website was updated regularly throughout the duration of the project, and included project information, details about upcoming meetings, materials from public meetings, an FAQ page, and contact information for the project team.

In addition, a project email and public hotline were available throughout the course of the project. All questions or comments received through this email or hotline received a response from a member of the project team. An email list of stakeholders wishing to receive project updates was maintained throughout the process. Email updates were sent to these stakeholders at key milestones and to inform them of upcoming meetings.

#### Onion Days Informational Booth

An informational booth for the project was hosted at the local Payson Golden Onion Days festival from September 4–7, 2015. The booth was staffed by project team members each day of the festival. A project brochure was available that provided information about the conceptual alternatives, the alternatives screening process and criteria, the project purpose and need, the upcoming public meeting, and the project

website and contact information. A general comment form and map books of the conceptual alternatives were also provided.

An email was sent to the stakeholder email list, members of the Payson City Council, and Payson City representatives to inform them that the project would be participating in the event.

#### City Council Updates

Project team representatives presented updates to the Payson City Council at their regularly scheduled city council meetings at key milestones throughout the process. These city council meetings were also open to the public to attend. A summary of these presentations is provided in Table 4-2.

The project team also provided an update to the Payson City Council and the mayor in mid-December 2016 outside of the regularly scheduled city council meetings. A summary of this update is provided in Table 4-2.

### 4.3.3 Stakeholder Working Group

A stakeholder working group was formed to ensure that the project team received input from a cross-section of the larger community. This group consisted of individuals who represented various interests, such as businesses (both near the interchange and in the broader community), Payson City, and residents.

This group's objective was to assist the project team by listening to ideas and concepts regarding Payson-specific project elements and to provide input representing their interests and fellow community member interests. Group members were encouraged to reach out to others in the community to share the information presented at the working group meetings.

The stakeholder working group met at various key stages of the project, as summarized in Table 4-3.

TABLE 4-2  
**Summary of Payson  
City Council  
Updates**

Date	Summary
December 17, 2014	Provided overview of project objectives, explained the NEPA process, and explained how Payson City and the public would be involved in the EIS process.
July 1, 2015	Reviewed outcomes of the public scoping meeting, provided details of the project need and potential solutions, and described the alternative screening process.
November 18, 2015	Reviewed updates/changes to the alternatives screening efforts, discussed agency input received on preliminary alternatives, and announced the upcoming public open house.
February 3, 2016	Provided an update on the alternatives being considered and results of the public open house and comment period.
April 6, 2016	Reviewed Level 1 and Level 2 screening results and input provided by the public and Payson City, and described the four build alternatives being carried forward for detailed study.
December 9, 2016	Reviewed build alternatives, including the two R alternatives (R1 and R2), and provided updated project timeline.
September 20, 2017	Reviewed build alternatives and selection of the Preferred Alternative, and provided updated project timeline.
April 19, 2018	Reviewed Preferred Alternative design and Nebo Beltway typical section and provided schedule update

TABLE 4-3  
**Summary of Stakeholder Working Group Meetings**

Date	Meeting Summary
March 18, 2015	Discussed the purpose, role, and expectations of the working group; described the EIS process and timeline; carried out a "virtual tour" of the project area (using Google Earth), identifying key areas, concerns, issues, etc.
May 13, 2015	Presented preliminary purpose and need; introduced preliminary alternative concepts.
June 10, 2015	Discussed Payson land use and planned development; introduced potential screening criteria and conceptual alternatives; reviewed the project schedule.
July 8, 2015	Discussed Level 1 and 2 alternative screening process and criteria in detail, as well as alternative refinements; provided an opportunity to discuss any remaining comments on conceptual alternatives presented at June 10, 2015 meeting.
October 21, 2015	Reviewed Level 1 and 2 screening results and discussed two-tier screening approach for Level 2; provided an opportunity to comment on screening results.
March 23, 2016	Presented and discussed the four build alternatives selected for detailed study.
January 25, 2017	Presented and discussed six build alternatives, including R alternatives (R1 and R2), and provided an updated project timeline.



## 4.4 ADDITIONAL AGENCY COORDINATION

### 4.4.1 Agency Coordination Plan

As part of Section 6002 of SAFETEA-LU, the lead agency preparing an EIS is required to prepare an agency coordination plan to manage agency and public participation during the environmental review process. An agency coordination plan was prepared in coordination with this EIS. The coordination plan clearly defined project milestones, roles and responsibilities, and agency expectations. The plan also documented UDOT's process for interacting with and

informing the public, stakeholders, and federal, state, and local agencies.

### 4.4.2 Agency Working Group

An initial agency working group meeting was held on April 30, 2015. The purpose of this meeting was to provide additional details to representatives interested in becoming a cooperating or participating agency, including information about the project scope, the initial purpose and need, potential interchange concepts, and the approach and methodology for identifying and evaluating resources.

The agency working group met at various key stages of the project, as summarized in Table 4-4.

TABLE 4-4  
Summary of Agency Working Group Meetings

Date	Agencies in Attendance	Meeting Summary
April 30, 2015	FHWA, UDOT, EPA, USACE, DWR, USFWS	Purpose and need introduction, cooperating/participating agency roles and status, approach for natural resource identification and analysis
July 13, 2015	FHWA, UDOT, EPA, USACE	Review of draft purpose and need chapter; approach to Ute-ladies' tresses analysis, wetland functional assessment, wetland delineation; alternative screening process and criteria; introduction of conceptual alternatives
October 20, 2015	FHWA, UDOT, EPA, USACE, ACHP, UDWR, USFWS	General project update; Level 1 and 2 alternative screening criteria and results (changes to conceptual alternatives)
February 10, 2016	FHWA, UDOT, EPA, USACE, USFWS, DWR	Conceptual alternatives; Level 1 and 2 alternative screening results; input received from stakeholder working group, public open house, and Payson City Council; summary of resource agency input received; summary of build alternatives moving forward
April 10, 2017	UDOT, EPA, USACE, USFWS, DWR	General project update, including UDOT assuming FHWA NEPA responsibilities; process and rationale for selecting the Preferred Alternative
June 8, 2017	UDOT, EPA, USACE	Follow-up discussion from April 10, 2017 meeting—Nebo Beltway Phase I, indirect and cumulative impact methodology, identification of the Preferred Alternative, Section 404(b)1 Guidelines, and practicability of alternatives
October 26, 2017	EPA	Field visit prior to public hearing to examine wetlands and other sensitive resources in the study area



## 4.5 DRAFT EIS PUBLIC HEARING & COMMENT PERIOD

The official 45-day comment period began with the publication of the Draft EIS on September 29, 2017, and continued through November 13, 2017. A public hearing was held on October 26, 2017, at Payson High School. Outreach efforts to notify the public included legal notices that ran twice in the Salt Lake Tribune, Deseret News, and Payson Chronicle; mailed invitations to approximately 475 property owners; email notifications to approximately 350 people; door-to-door flyers to impacted properties; and two separate advertisements in the Payson Chronicle.

Approximately 133 people attended the open house-style public hearing. Attendees were able to review project boards that included information about the EIS process, details of the alternatives considered, comparison of the alternatives, and details of the Preferred Alternative. Project team members were available to answer questions. The UDOT project manager also gave a short presentation that explained the EIS process and selection of the Preferred Alternative, after which attendees were given the opportunity to publicly provide comments that were recorded by a court reporter.

The project website was updated on September 29, 2017, to include information about the public comment period and hearing, as well as details about the Draft EIS process and selection of the Preferred Alternative.

## 4.6 DRAFT EIS PUBLIC & AGENCY COMMENTS

A total of 35 public and agency comments were received during the official comment period. The project team reviewed and provided a response to each substantive comment. Verbatim comments are included in Table 4-5. Each verbatim comment includes a reference to a generalized comment and response

that follows Table 4-5. Public comments are denoted with "P" prior to the comment number, and federal agency comments are denoted with "F". References to Nebo Beltway in verbatim comments received generally refer to Nebo Beltway Phase I (see Chapter 2 for more information on Nebo Beltway phasing).

The following summarizes substantive changes that were made from the Draft EIS to the Final EIS in response to public and agency comments:

- Corrected wetland impact numerical discrepancies in tables 2-5, 2-11, ES-1, and ES-4
- Included information regarding the purpose of and alignment process for Nebo Beltway Phase I in Section 2.3.5
- Added two new proposed residential developments to Section 3.1 and Figure 3.2-7
- Added Project of Air Quality Concern Determination to Section 3.11
- Changed the PM<sub>2.5</sub> nonattainment status from moderate to severe in Section 3.11
- Added qualitative discussion of greenhouse gas emissions under each alternative in Section 3.11.3
- Added 2017 Ute ladies'-tresses survey results to Section 3.15, including Figure 3.15-2
- Added summary of consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act, which resulted in a Not Likely to Adversely Affect Ute-ladies'-tresses determination for the Preferred Alternative to Section 3.15.3
- Provided further traffic analysis to Section 3.23.3 to show that the Preferred Alternative would be able to handle the substantial increase in traffic assuming the Bamberger Ranch Maximum Development Scenario
- Removed statements from Section 3.23.5 that alternatives R2, C1, and C3 would result in fewer indirect impacts to wetlands because

these alternatives are consistent with the *Bamberger Ranch P-C Zone Plan* Maximum Development Scenario, which includes open space where wetlands are the most concentrated

- Included indirect impacts to wetlands from the roadway under each alternative in Section 3.23.5
- Included indirect impacts under Alternative R1 to individual Ute ladies'-tresses plants identified during the 2017 survey in Section 3.23.5

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
P.2.1	<p><b>Commenter Name:</b> Caren Kirk  <b>Commenter No.:</b> 1  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>The traffic currently existing on is horrendous. I live on 3rd North and Main and cannot cross or enter Main without a long wait. Something needed to be done for this exit without losing homes. Relocating an alternative so 2 exits helps keep historic Main stores and north Main homes.</p> <p>I believe this Alternative C1 is the best way to take care of the traffic on North Main which now bottlenecks at the 198 light. This saves the homes on North Main which many are historic or older well kept homes which were built in the 20's and the businesses can relocate to bigger and better places.</p> <p>The alternative to take out the homes and widen Main leaving the existing exits does not solve the bottleneck at 198 and Main.</p> <p>Appreciate UDOT for thinking of the impact on these North Main home-owners. Also the public notices and mail informing homeowners which may be effected was appreciated. Emails were sent and flyers mailed and newspaper notice was all used to inform citizens also social media facebook.</p>	P.2.2	<p><b>Commenter Name:</b> Duane C Frisby  <b>Commenter No.:</b> 2  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>Please make certain in the design of pedestrian access that their transit under the freeway is not a frightening exposure to traffic - the pedestrian access under the north Santaquin overpass seems to make a pedestrian feel safe through the way pedestrian traffic is separated from vehicular traffic.</p> <p><b>Commenter Name:</b> Anonymous  <b>Commenter No.:</b> 3  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing  <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>You need to have a barrier or space between the cars and the bike path. This design will kill bikers.</p>
		P.2.2	

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
P.2.3	<p><b>Commenter Name:</b> Kathy Adams <b>Commenter No.:</b> 4 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (written) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>The best place to put the new road would be the Canyon Road (600 East) because of all the traveling up Payson Canyon and so Elkridge would be able to go either in town or home. I say the Canyon Road so that in time there could be a small fee to go to the canyon so it would help pay for the new road and campers' won't have to travel through town or out of their way to get to the canyon.</p>	P.3.1	<p><b>Commenter Name:</b> Anonymous <b>Commenter No.:</b> 7 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (written) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>It's really sad that Payson City is willing to give up on Main St and the small business that stood by Payson for all these years. (Shame on you) It's all greed. Fix Main St don't destroy it. Thanks.</p>
	<p><b>Commenter Name:</b> Anonymous <b>Commenter No.:</b> 5 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (written) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>Please listen to the comments of Mr. Lamb in the Public Hearing held Oct. 26, 2017. I agree with everything he said.</p>		<p><b>Commenter Name:</b> Neal Pearson <b>Commenter No.:</b> 8 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (written) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>Look at what Minneapolis/St Paul have done. I lived there for 4 years and would bike everywhere because a lot of bike lanes were protected/separated from the road by a curb and some grass or gravel. The Nebo Beltway layout does not create a protected bike lane. I love road biking and will not ride on roads where bike lanes are right next to car lanes. Most bikers will ride on the sidewalk instead in order to have some protection from cars. If you reduce the width of the road and use the extra space to create a protected bike lane or 10 foot wide bike/walk lanes. I don't ride when the bike trail is snowed in so there shouldn't be an issue with needing to clear it. The emergency sides have too much junk on them to ride on with road tires so getting the bike lane detached from the road is very good as well.</p>
	<p><b>Commenter Name:</b> Anonymous <b>Commenter No.:</b> 6 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (written) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>I am in complete agreement with the comments that Mr. Lamb made. Not really understanding the need for the expense of this project.</p>		

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
	<p><b>Commenter Name:</b> Doug Welton  <b>Commenter No.:</b> 9  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>		<p><b>Commenter Name:</b> Jerry Williams  <b>Commenter No.:</b> 11  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>
P.2.1	<p>C1 is clearly the best option. Relocation in particular will create economic hardship on the business on Main St and create a blighted area. Improvement negatively impacts historic homes in the area and changes the character of Payson.</p>	P.2.4	<p>If you do only part of street you will have a problem with traffic, the traffic now is bad people speed up and down Main St. We can not get out of are drive way the trafic is bad</p>
P.0.1	<p>Ownership of the Nebo Beltway is a concern. Where it connects State road to State road with only one intersection, it should be owned and maintained by UDOT. It also serves multiple communities, which should also be taken into consideration and is another reason to stay in UDOT's control.</p> <p><b>Commenter Name:</b> Anonymous  <b>Commenter No.:</b> 10  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>	P.3.5	<p>Are house is the second one from the freeway exit we have the sewer man hole if you take that you will take out part of yard area is 15 ft from the sidewalk. I had Any Hour put a sewer line from sidewalk to the house 8 ft pipe it is connected that manhole you need to look at that because if you work on that I will be without sewer.</p> <p><b>Commenter Name:</b> Anonymous  <b>Commenter No.:</b> 12  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>
P.2.1	<p>I am in favor of C1 as the preferred alternative.</p>		
P.0.3	<p>Let's get it built as soon as possible.</p>	P.2.1	<p>I like it – move ahead right away</p>

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
	<p><b>Commenter Name:</b> Walt Johnson  <b>Commenter No.:</b> 13  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>		<p><b>Commenter Name:</b> Adam Cowie  <b>Commenter No.:</b> 15  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>
P.2.1	<p>This looks like a good way to alleviate traffic on Main Street and direct it to a more positive flow to Salem, Woodland Hills and Payson. I think it is very much needed for future development. C1: Braided Ramps is the way to go!</p>	P.2.9	<p>Sounds like a lot of work and alternatives were evaluated. Suprising though that the highest/most expensive option is preferred. As a tax payer I hope cost saving alternatives continue to be considered through out project.</p>
	<p>I thank you for reading my comment sent to you by e-mail. This was one of two that I selected for the best route.</p>	P.0.1	<p>Will frontage roads - and specifically proposed Nebo Beltway become UDOT owned and maintained roads - or Payson City roads? Nebo Beltway connecting between Hwy 198 and I-15 should stay a regional UDOT roadway. Building such a large roadway then handing eternal maintenance over to the city feels burdensome to Payson residents. Make sure Payson officials are clearly informed if UDOT plans to have Payson operate/maintain Nebo Beltway. It will be extreme over time.</p>
P.0.3	<p>How soon will it start construction?</p> <p><b>Commenter Name:</b> Anonymous  <b>Commenter No.:</b> 14  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>		<p><b>Commenter Name:</b> Nita Burch  <b>Commenter No.:</b> 16  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>
P.0.3	<p>Build it as soon as possible.</p>	P.0.2	<p>On the 8000 South exit for Benjamin, it would be nice have a sign put there that says "Benjamin Exit," not just "8000 South," simple thing. The sign for Benjamin is about a mile or two before it. It would be just nice to have sign that says "Benjamin Exit"</p>

TABLE 4-5

**Draft EIS Verbatim Comments**

Response No.		Response No.	
	<p><b>Commenter Name:</b> Connie Wilson  <b>Commenter No.:</b> 17  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (written)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>		<p><b>Commenter Name:</b> Coralee Wilson  <b>Commenter No.:</b> 18  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing (verbal)  <b>Location:</b> Payson</p> <p><b>Comment</b></p>
P.2.1	<p>Definitely need immediate attention to traffic back up from 198 to present freeway exit. New exit will relieve that problem</p> <p>This alternative makes more sense to me than widening Main Street and taking out historic homes. The Nebo Beltway should greater help in easing congestion on Main Street and will be good for future commercial development. The long one-way ramp should be good for flow of exiting traffic and alleviate cross traffic and stop signs.</p> <p>It looks like this one has been well-thought out and the EIS team has been open to comments and input from the public. Good job</p>	P.2.1	<p>Hi. I'm Coralee Wilson. I live at 248 North Main in Payson, Utah. My home was one of them that was considered for demolition. I first of all -- and you're probably going to wonder why I'm thanking them, but I do. I want to thank UDOT because -- not for their decision, which I am really happy for, but the way they handled the last two years with me and answered every question. And I encourage anybody that has questions to ask them because they will answer them and they won't hesitate. They answer them straightforward, and I asked hard questions, and they didn't hesitate in answering those questions. So I encourage everybody to -- if you do have anything, please ask it. It's better than having rumors floating all over. I told them when I went to visit them all and we had this meeting that the rumor mill in Payson is great. It does a really good job. We used to play a game in -- I think it was in primary called gossip. I don't know if you guys remember it, but when it started it was one thing and when it ended, it was a totally different thing. And we still have that really well in Payson. So I wanted the truth, and I wanted it, so I had questions. I'm asked them and they would tell me what the real thing was, and it made me feel, not comfortable. I still was frightened, but I was more comfortable in having the right answer. So I want to thank all of you guys. You all put up with me, and I called them in a frantic state sometimes.</p>
P.0.5	<p>Thanks for listening and considering our needs and the impact on the Main Street homes. The one block of commercial Main Street could be turned into a quaint street for entertainment by extending to the park to the south.</p>		



TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
	<p>I was very upset, and they all -- especially Laura. Poor Laura. She'll be so glad to have this over for no other reason than she won't have to talk to me again. But, anyway, I just want to thank you all so much. It was a semi-positive experience for me. The other thing is I know that there's people that have their own ideas where it should have gone. I know I did, and I know that they didn't pick these options out of a hat. They worked on them very hard, and they wanted to do the best thing for us. One time I said, "It's like you're trying to make Payson not exist as Payson," because I felt like taking out Main Street was going to change our look, our feel. There's nothing wrong with being the littlest town in Utah. I'm fine with that. I don't know about the rest of you, but I'm really fine with that.</p> <p>The other thing is I want to have an open house when I get my house done because I started working on it again now that I know it's going to be my house, hopefully.</p> <p>One thing I would like to really ask all of you is to fill out one of those forms with your thoughts because that does go in the books. The books -- how the federal government and UDOT are going to make their decision is out of those books. This book is what's going to make that final decision. Probably next year; right? So that's when it will be a done deal, and I'm putting in a new kitchen. Okay. And so let everybody know when I'm going to have an open house.</p>	P.2.1 P.3.1	<p><b>Commenter Name:</b> Mike Hardy <b>Commenter No.:</b> 19 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (verbal) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>I appreciate, Coralee, what you've been going through because the bank where I work is really close to where Coralee lives, and so you would come in and talk to us and that was a lot of fun talking to you trying to work through some of these issues. I'm glad to see all of you here tonight. I think it's really important that we as a citizenry, citizens of Payson, are giving input on things that are going to impact us because it's extremely important we do the best things we can for Payson and we make sure the representatives in the state and the federal area do the best as well.</p> <p>Of the alternatives that we've been offered, I like the C1 alternative the best. I said in the city council meeting I thought it was a good thing for Payson. That doesn't mean that there's not things that we can improve on that. I see some of the buildings that aren't going to go, and I wish there was a way maybe we could skinny up the road so we could keep some of those businesses there. But I think it's going to be good for Payson from an economic perspective. We have UVU which is in the process of purchasing land out to the north on that interchange. I think with this kind of a realignment and with making sure it's easy to get to that interchange in that area that they will be more likely that we'll get that all finished up and get a campus here. That's going to be a big deal for Payson.</p>

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
	<p>I do have to say that this process really started much earlier than this. I don't know if anybody know this, but they had a meeting – I think it was in 2007 or 2008. It was in the city council chambers in which they talked about realigning that just a single interchange. There was no talk of a new one. I was sitting next to the Flying J representative in that meeting. When they talked about what they were going to which would have taken the Flying J out, he turned to me and said, ""We're history,"" and they were gone about a year later. And that's been a problem in developing business in Payson particularly on the north. Nobody knows what's going to happen. So I'm glad to see where we got the process done to this point where we can now make some decisions about how we're going to utilize that property out there. It's going to not only impact that area of town. It's going to impact a new area of town, impact 800 South. It will impact Main Street. I've been working on Main Street for years since I've been in town, and I think we've seen some improvement down there, but until, again, we solve some of these issues, we solve traffic issues on Main Street, it's going to be difficult for us to revitalize Main Street and make it what it really could be. So I thank you for the time."</p>	<p><b>P.2.15</b></p> <p><b>P.0.6</b></p>	<p><b>Commenter Name:</b> Doug Lamb  <b>Commenter No.:</b> 20  <b>Date:</b> 10/16/2017  <b>Source:</b> Public Hearing(verbal) and Mail  <b>Location:</b> Payson</p> <p><b>Comment (1 of 2)</b></p> <p>I too would like to appreciate and acknowledge all the efforts you guys have done or the engineers or whoever has done all this planning, but in my own opinion, it's a whole bunch of money spent to accomplish the same thing we've already got. The idea is to improve traffic flow in and out of Payson. This arrangement -- this development, is not going to help with that at all because we have a dead end at the stoplight. Traffic comes in until it reaches First North and it either goes right or left. The new interchange out here is going to take a whole bunch of that traffic away, and it's going to come in.</p> <p>More than that, there's going to come a time when they develop the Benjamin exit out there where that new hospital is and come straight through to the 89 and tie into Elk Ridge. That's going to make some more area out there. The beltway out on the other side out by the sewer plant is going to take -- that's where UVU, I believe, in that area somewhere. Students are not going to pay -- people are not going to Payson exit to go there. They are going to get off on that exit up there. We can accomplish the same thing we have by realigning the exit ramps that we have currently. I know there's only two, three cramped roads underneath the overpass there, but they can't go any more than that anyway. Where are they going to go when they get into town? There's going to be alternatives to handle this traffic besides Payson.</p>

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
P.3.1	<p>We cannot lose what little commercial development we've got on that end of town. When this goes through we will have Payson Market and McDonald's. That will be it. Nothing else out there. And the bus girls. Now, we need to keep what we've got there. Straight through with the Main Street as it is, braided thing is supposed to make a continuous flow, it's already there. The freeway goes straight through. Nobody stops on the freeway. It's there. You can solve the exits by realigning them. There's not much room on the other side between there and the railroad tracks, but it can still be straightened out and make some left-hand turns available. They can do what they did over in Santaquin. They made a five-mile or three-mile exit lane, and Santaquin gets by fine. Traffic doesn't back up. We can do that. We can back up an extra lane out there clear to Benjamin if we have to, and handle this traffic so that is taken care of.</p> <p>Now, we're talking about 2040. Fortunately, I won't be around, but I've seen a lot of changes come. I've seen a lot of studies take place. Sometimes these studies know what they are talking about. Sometimes they are daydreams. And I have about as much faith in some of these studies as me speaking Chinese. Now, I'm hopeful that we will reconsider. This braided ramp is going to cost millions of dollars and just buying the property -- I was talking to some people about the hotel out there. They are holding out for at least \$5 million, and that's my money. I don't feel like paying it for it when there's another development. We can make this thing work.</p>	P.1.1	<p>I think there will come a time when we will see development taking off the Benjamin exit going down and around through Benjamin and coming in Main Street from the north to get into some of these places out there. There will be a lot of development. As far as development in town, all the development's going to be out on the west side for now and also on the east side out past the hospital out there. The development south of Provo is -- Payson is done. There's not going to be much development down that way anymore until they give up the orchards, but it just isn't there. Out past the temple there's not going to be anymore development out there or very little compared to what's available elsewhere.</p> <p>Now, we need to -- but this alignment in Payson or this interchange is not going to help the development on the west side of town. That's all going to come out of 8th South, so we need to make some arrangements to get this done. I appreciate the opportunity, express my -- and I've got a big mouth and I like to talk, and I know it all and I'm always right, but think about it anyway. Thank you.</p>
P.2.6			
P.2.8			
P.2.9			

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.	Comment (2 of 2)	Response No.	
P.0.6	<p>Purpose is to prepare Payson Main Street for coming/continuing growth. It is or will be needed to move traffic from the freeway thru main street to outside areas to the east and north. -F. The west is controlled by the county- It's their problem.</p> <p>The proposed alternatives are mostly extravagantly over-engineered. The Nebo Byway is the major solution. 80% or better of main st traffic. The present exit will handle what is left over- But it does need realigning of the approaches to improve turning conditions</p> <p>It requires extensive reconstruction and alignments which will not be needed. There are other approaches – to save our north main commercial district. Attached are three sample solutions suggestions which you could make work.</p> <p>North main Presently has 5 lanes of traffic. 1-frontage 1 northbound access, 3 traffic lanes- under the freeway. With the relief that will come from the north &amp; east with the Nebo Byway, the present lanes will continue to serve north main traffic &amp; save the commercial district.</p> <p>I appreciate the effort, research and surveys you have performed, However I feel you have under estimated the enormous impact of the Nebo Byway. It is sorely needed. Best idea yet.</p> <p>Thank you for your service and the opportunity to comment on your efforts.</p> <p><i>[Note: Attachments follow]</i></p>		
P.2.13			
P.2.7			
P.2.14			
P.2.16			
P.2.6			

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
P.2.1 P.3.4	<p><b>Commenter Name:</b> Walter Johnson <b>Commenter No.:</b> 21 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (verbal) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>Walter Johnson, a gentleman made a comment on Payson Market being affected. I live in that neighborhood, and it's like a community grocery store because you've got Smith's on the other end of town, people go there. So it's really not going to be affected. I believe this alternative C1 is the right way to go. There's room to expand. It takes the traffic to Salem to Woodland Hills and then also Payson traffic, so it splits off three ways, and just as long as people are compensated right for their property, I'm good to go with it. Thank you.</p>		<p><b>Commenter Name:</b> Dorothy Meriwether <b>Commenter No.:</b> 23 <b>Date:</b> 10/10/2017 <b>Source:</b> Email <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>To The Public Involvement Team, DEIS</p> <p>My beloved grandmother was Veda Dixon, the daughter of Christopher Flintoff (Jack) Dixon, Jr. who, with his father, Christopher Flintoff Dixon, Sr., built their home at 248 North Main Street in Payson. That home stands today and is owned by my Cousin, Coralee Wilson, a native of Payson. The home is on the National Historic Registry.</p> <p>I lost my grandmother when I was only ten, but I have loved her every day of my life. My greatest happiness was when Grandma came to visit, and I vividly remember my delight when we would go to Payson to visit her and our aunts, uncles and cousins. My mother, until the day she died, yearned for her return to Utah and her family.</p> <p>I have been blessed to become friends with my second cousin, Coralee, only in the last few years, but it has brought me a lot of joy to be reunited with a family I thought I had lost. Last year, I got to visit Coralee, and return to what I think of as our family home which she has lovingly cared for for many years. Walking into her home, I remembered everything about it, including the beautiful and unique rose window and the elaborate woodwork.</p>
P.2.1	<p><b>Commenter Name:</b> Kirk Beecher <b>Commenter No.:</b> 22 <b>Date:</b> 10/16/2017 <b>Source:</b> Public Hearing (verbal) <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>Kirk Beecher. And my comments are that actually I do feel that it will increase business and opportunities for Payson. This is a good option. Engineering-wise it makes a lots of sense, improves traffic flows, and it provides for what we need do into the future.</p>		

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
P.3.2	<p>I was heartbroken to learn that after nearly losing this important part of my life, it was potentially on the "chopping block" for UDOT to destroy and use the land to build an interstate offramp. After what seems like an eternity, it appears that the DEIS has chosen an preferred alternative route which will not, in fact, affect 248 North Main, nor any of the other homes in the Historic District of Payson.</p> <p>I implore you to please not use any part of Payson's Historic District for the I-15 Payson Interchange. I appreciate the need to improve the existing interchange, having recently been there, I can see how dangerous it is. I also appreciate your consideration of any environmental impact. If I read your study correctly, your preferred alternative is C-1, which would not adversely impact the Historic District and would protect environmentally sensitive areas.</p>	P.2.1	<p><b>Commenter Name:</b> Ann Humpherys <b>Commenter No.:</b> 24 <b>Date:</b> 10/27/2017 <b>Source:</b> Email <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>The preferred alternative is absolutely the best option! It would deal with the increased traffic (current and future) in Payson and Elk Ridge and Salem in the best manner possible with the least impact to current businesses and homes. This is an option that will deal with future growth for decades to come. It cannot be built soon enough! Ann Humpherys</p>
P.2.1	<p>In short, I wish to voice my support of your preferred alternative, C-1.</p> <p>Many thanks for giving me the opportunity to tell my story and for your consideration on my behalf and for all the members of my family who would be heartbroken to lose this treasure.</p> <p>Very sincerely,</p> <p>Dorothy Meriwether</p>	P.2.1	<p><b>Commenter Name:</b> Dennis &amp; Laurie Lisonbee <b>Commenter No.:</b> 25 <b>Date:</b> 10/27/2017 <b>Source:</b> Email <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>When the Payson and Benjamin interchanges were built in the 70's the population was small and the area was rural. In the past seven years Salem, Elk Ridge and Payson development exploded without a plan to update the rural roads and interchanges in a way to handle the urban traffic increases. The new interchange is a great step in the right direction.</p>

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
	<p>I have a close friend and business partner who is a Riverside California County Supervisor. It took over a decade to get an interchange approved and built to handle overnight growth in the Chino California area. I saw the process first hand and know that to get the new Payson interchange built could require years of environmental studies for EPA approval and Federal Department of Transportation approval. As a result it important that UDOT and our legislators immediately move forward with the new interchange plan. If our US Senators and House members work in conjunction with State Legislators and UDOT the process could be fast tracked the same the I-15 project was fast tracked to get ready for the 2002 Olympics. UDOT has my full support to bring this project to a successful conclusion.</p> <p>Sincerely,</p> <p>Dennis &amp; Laurie Lisonbee Woodland Hills, Utah</p>	<p><b>P.2.4</b></p> <p><b>P.2.12</b></p> <p><b>P.2.5</b></p> <p><b>P.3.1</b></p> <p><b>P.2.9</b></p>	<p><b>Commenter Name:</b> Michael Hone <b>Commenter No.:</b> 26 <b>Date:</b> 11/02/2017 <b>Source:</b> Email <b>Location:</b> Payson</p> <p><b>Comment</b></p> <p>UDOT Planners,</p> <p>I have a home at 625 north main street. The first thing I would like say is Thank You for leaving my property intact in your draft seen at the open house. Concepts before left me little hope. I'm a little concerned about the amount of traffic that might end up being on the road. I'm sure you have reviewed that problem along with many others I haven't considered. As I look closely at your map you have the cross walk coming across main street to the center of my driveway. I'm not sure that will work for the people using the crosswalk or me ether backing into the crosswalk or pulling out into it. Being the time I would pullout is when the traffic flow was stopped from the north and south and the traffic turning to proceed up main street is going to be a crap shoot as to weather there is no accidents. I am under the understanding that there will be a traffic light there. Right?</p> <p>A few more thoughts with the new parkway exit coming on line I'm not sure you need to take such a drastic approach with the main street part of your proposal.</p> <p>Your going to spend 10 to 15 million dollars to buy businesses before you start moving dirt. Because Cost was one of your items on the list, I'm not sure we need to do this. Can we at least backup and look at the traffic counts that you took?</p>



TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
P.2.6	<p>On the traffic that turns left off of main at the light onto SR 198 let alone the people that filter left at 600 north off of main and then go south on 600 east. I think we could leave the exchange in the same place adjust the span of the overpass to accommodate 4 lanes and a turn lane, run the lanes north to 600 north and about the same distance north then reduce them back at that point. This could be done after the Park-way exit is complete to reduce congestion at main street.</p> <p>We might lost Rite-aide and Comfort inn. But you could save the animal clinic, Subway, Chevron and the old Block Buster building in front of Payson Market.</p> <p>I know we need some changes to help the flow of traffic, and I know you guys have spent a lot of time on this project. I also know that you want it to be the best it can be.</p> <p>This is my small amount of input I just hope this makes some sense to you.</p> <p>Thanks</p>	P.2.1	<p><b>Commenter Name:</b> Calvin Blohm <b>Commenter No.:</b> 27 <b>Date:</b> 11/3/2017 <b>Source:</b> Email <b>Location:</b> Payson</p> <p><b>Comment</b> This letter is to serve as my personal feedback on the C1 alternative chosen by the EIS team studying this redesign of the interchange area.</p> <p>First, I would like to say that this has been a very long and arduous journey to get to this point. The first notification I received on this redesign occurred back in 2007 via a letter I received from Merrill Jolley, a UDOT employee. I am glad to be at this point. I would also like to thank the EIS members for their work on this project. The Lochner group, the UDOT employees and others on the working group dedicated many, many hours of work toward this project.</p>

TABLE 4-5  
Draft EIS Verbatim Comments

Response No.		Response No.	
	<p>It is my belief that the C-1 proposal as it is currently drawn provides the best compromise for all parties. I think that no one is completely satisfied with the proposal but no one will be harmed irreparably if the project is completed as it is shown. I know that I and my wife would have preferred another alternative if it were up to us, but that may not have been acceptable to other parties. The C-1 interchange is the only option that has the ability to be acceptable for all parties even though it may not be anyone's first choice.</p> <p>If the C-1 option were to be redrawn in any manner and/or completed other than presented at the city council and the public open house, it may cause it to be completely adverse to the interests and ability of the north main businesses to survive and thus my comments at that point may be completely different.</p> <p>Again, my thanks to the Lochner Group, UDOT and others connected to the project for arriving at a solution that allows north main to remain somewhat viable as a business district, allows for increased traffic to be handled by the new access point, allows the downtown main street of Payson to maintain some traffic flow and doesn't create a blighted area in the north main area that would be a very detrimental thing to all the residents of Payson, especially those in the north main area.</p> <p>Sincerely, Calvin Blohm</p>	P.2.10	<p><b>Commenter Name:</b> Sara Courtney <b>Commenter No.:</b> 28 <b>Date:</b> 10/9/2017 <b>Source:</b> Website Comment Form <b>Location:</b> Payson</p> <p><b>Comment</b> I believe this area is in desperate need of a new access point to the freeway. The communities of Salem, Elk Ridge and Woodland Hills are growing so quickly and need better access to the freeway. It takes me longer to get to the freeway on ramp in Spanish Fork than to make it from Spanish Fork to Provo (where I work) park and go in.</p> <p>I do not feel that another Payson exit is the answer. Something closer to Elk Ridge, Woodland Hill and Salem City makes more sense. All of these communities must travel on the two lane highway to another city to access the freeway. A road close to the Elk Ridge road where is intersects with highway 89 would reduce traffic at other access points and relieve the pressure on the main streets of Payson and Spanish Fork. Why does Payson need 3 exits?? What good is traveling on a two lane highway all the way to the proposed 4 lane road to the new exit? Shorten the distance we have to travel on the two lane highway.</p>

TABLE 4-5

**Draft EIS Verbatim Comments**

Response No.		Response No.	
P.3.3	<p><b>Commenter Name:</b> Dave Walters  <b>Commenter No.:</b> 29  <b>Date:</b> 10/26/2017  <b>Source:</b> Website Comment Form  <b>Location:</b> Payson</p> <p><b>Comment</b>  I agree, Payson does need something done with north main street. How ever the wetlands should also be a great concern. There are many animals and birds (eagles, hawks) fox, that call those wetlands home. As small a impact on the wetlands as could be, should be a great consideration.  The no-build. Will just not work for the future.</p> <p><b>Commenter Name:</b> Katherine  <b>Commenter No.:</b> 30  <b>Date:</b> 10/28/2017  <b>Source:</b> Website Comment Form  <b>Location:</b> Payson</p>		<p>The presentation at PHS last Thurs evening was informative, but the ability of those in attendance to really view the over-all map was very poor. Your representatives were all very polite, cheerful and professional. They did not seem to be versed on the UVU extention or the UDOT Front Runner Station either.</p> <p><b>Commenter Name:</b> Lilian Paul, Institute for Policy Integrity  <b>Commenter No.:</b> 31  <b>Date:</b> 11/13/2017  <b>Source:</b> Email  <b>Location:</b> New York</p> <p><b>Comment</b>  The Institute for Policy Integrity at New York University School of Law respectfully submits the attached comments on the I-15, Payson Main Street Interchange Draft Environmental Impact Statement.</p> <p>Please do not hesitate to contact us should you have any questions or require additional information.  Respectfully submitted,  Ilina Paul</p> <p>[Note: Attachments follow]</p>
P.2.1 P.2.11	<p><b>Comment</b>  I trust your engineers have decided on the best plan. UVU Extension and Front Runner Depot should not be Excluded from the discussion</p> <p>It would be very helpful if you would include in the diagrams the possible site for the UVU extension, and also the future site of the Front Runner Depot. These are two very critical locations that would help all Residents of Payson understand your decision.</p>		

TABLE 4-5  
Draft EIS Verbatim Comments

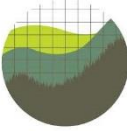
Response No.		Response No.	
P.3.6	 <p>Institute for Policy Integrity NEW YORK UNIVERSITY SCHOOL OF LAW</p> <p>November 13, 2017</p> <p>Via Electronic Mail</p> <p>Attn: Federal Highway Administration</p> <p>Subject: Comments to the Federal Highway Administration on the I-15, Payson Main Street Interchange Draft Environmental Impact Statement</p> <p>The Institute for Policy Integrity at New York University School of Law (Policy Integrity)<sup>1</sup> respectfully submits the following comments on the United States Federal Highway Administration's (FHWA or the Administration) I-15, Payson Main Street Interchange Draft Environmental Impact Statement (Payson DEIS or DEIS).<sup>2</sup> Policy Integrity is a nonpartisan think tank dedicated to improving the quality of government decisionmaking through advocacy and scholarship in the fields of administrative law, economics, and public policy.</p> <p>The FHWA gives two main reasons for not analyzing the climate change effects of the proposed project. Firstly, the FHWA claims that project-level emissions analysis is not useful in decisionmaking.<sup>3</sup> Secondly, the DEIS states that projects typically have little effect on regional—and presumably global—emissions levels and therefore should only be accounted for at the regional planning level.<sup>4</sup> These claims are wrong according to economic principles and the requirements of the National Environmental Policy Act (NEPA). Moreover, the Administration fails to refer to climate change when discussing the impact of greenhouse gas emissions.<sup>5</sup> By not accounting for climate effects as such, the FHWA is further failing to meet the requirements of NEPA.</p> <p>When it finalizes the Payson DEIS, the Administration should clearly articulate the connection between climate change and greenhouse gas emissions and should abandon its inaccurate misleading overgeneralizations regarding the greenhouse gas effects of individual projects. Instead, the FHWA must rationally apply its judgment to the evidence to answer whether this specific project's greenhouse gas emissions are most likely too small to warrant quantification, such that the informational benefit of quantification does not justify the expense of quantification. Only if it is</p> <p><sup>1</sup> No part of this document purports to present New York University School of Law's views, if any.</p> <p><sup>2</sup> Federal Highway Administration, I-15, Payson Main Street Interchange Draft Environmental Impact Statement (Sept. 29, 2017) [hereinafter Payson DEIS].</p> <p><sup>3</sup> Payson DEIS, <i>supra</i> note 2, at 3-120 ("The effects of greenhouse gases are global in nature and a project-level analysis of the effects of negligible increases or decreases of carbon dioxide [the primary greenhouse gas transportation related emission] is not useful in project level decision making.")</p> <p><sup>4</sup> <i>Id.</i> ("Individual projects typically have little effect on regional emission levels of greenhouse gases and reducing energy consumption and the production of greenhouse gases is better addressed at the regional planning level.")</p> <p><sup>5</sup> Payson DEIS, <i>supra</i> note 2.</p> <p>139 MacDougal Street, Third Floor, New York, New York 10012 • (212) 992-8932 • www.policyintegrity.org</p>	P.3.7	<p>not feasible to quantify the greenhouse gas emissions of this particular project should the inquiry end. Otherwise, if this project will likely have significant greenhouse gas effects, the Administration must quantify those effects to the extent feasible, and should further monetize those effects using the social cost of greenhouse gas metrics.</p> <p><b>I. Contrary to the Administration's Statements, It Is Both Possible and Meaningful to Quantify the Climate Effects of Individual Projects</b></p> <p>The FHWA does not quantify the potential greenhouse gas emissions in the Payson DEIS on the ground that project-level emissions in general do not have identifiable effects.<sup>6</sup> The Administration further states that the quantification of project-level emissions would not provide meaningful information for decisionmaking.<sup>7</sup></p> <p>Contrary to the Administration's assumptions, sophisticated metrics known as the Social Costs of Greenhouse Gases are capable of monetizing the marginal climate damages associated with an additional unit of greenhouse gas emissions from a single project.<sup>8</sup> Only if the Administration concludes that this specific project will have so little effect on greenhouse gas emissions that the informational benefit of quantification does not outweigh the expense of doing so should the Administration not move forward with quantification and monetization. And far from being a meaningless exercise, monetizing the climate effects of a small project may be the best way for the public and decisionmakers to put those effects into their proper context.</p> <p><b>The Social Costs of Greenhouse Gases Can Be Applied to Individual Project and to Any Amount of Emissions</b></p> <p>The Administration is wrong to over-generalize that all individual projects produce negligible amounts of emissions. In fact, many resource management decisions have quite significant effects on greenhouse gas emissions; for example, the Bureau of Land Management recently finalized a single environmental impact statement for a coal lease expansion project at mines that produce 20% of the country's coal supply.<sup>9</sup></p> <p>More importantly, a blanket argument that individual projects are too small to monetize misunderstands the tools available for monetizing climate effects. The Social Cost of Carbon and Social Cost of Methane protocols were developed to assess the cost of actions with "marginal" impacts on cumulative global emissions, and the metrics estimate the dollar figure of damages for one extra ton of greenhouse gas emissions.<sup>10</sup> This marginal cost is typically calculated using integrated assessment models. The models translate emissions into changes in atmospheric greenhouse concentrations, atmospheric concentrations into changes in temperature, and changes in temperature into economic damages.<sup>11</sup> A range of plausible socio-economic and emissions trajectories are used.<sup>12</sup> The marginal cost is attained by first running the models using a baseline</p> <p><sup>6</sup> Payson DEIS, <i>supra</i> note 2, at 3-120.</p> <p><sup>7</sup> <i>Id.</i></p> <p><sup>8</sup> See generally Ilana Paul, Jason Schwartz, Peter Howard, THE SOCIAL COST OF GREENHOUSE GASES AND STATE POLICY, INSTITUTE FOR POLICY INTEGRITY REPORT (Oct. 2017) for more information on the social costs of greenhouse gases and their use, available at <a href="http://policyintegrity.org/publications/detail/social-cost-of-ghgs-and-state-policy">http://policyintegrity.org/publications/detail/social-cost-of-ghgs-and-state-policy</a>.</p> <p><sup>9</sup> See Bureau of Land Mgmt., Final Environmental Impact Statement for the Wright Area Coal Lease Applications, ES-60-61, 4-130-50 (July 2010).</p> <p><sup>10</sup> Interagency Working Group on Social Cost of Carbon, Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12,866, at 1 (2010) [hereinafter 2010 TSD].</p> <p><sup>11</sup> 2010 TSD, <i>supra</i> note 10, at 5.</p> <p><sup>12</sup> <i>Id.</i> at 15.</p>

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Quite the opposite, agencies often overlook or completely ignore nonquantified, i.e., purely qualitative, benefits, even if those effects are in fact significant.<sup>14</sup></p> <p>If an analysis only qualitatively discusses the general effects of global climate change—or worse, as this DEIS does and neglect to connect greenhouse gas emissions to climate change full stop—decisionmakers and the public will tend to overly discount that individual action's potential contribution. Greenhouse gas emissions from motor vehicle use undoubtedly have climate effects, which should be discussed in the Payson DEIS. But without context, it is difficult for many decision-makers and the public to assess the magnitude and climate consequences of a proposed action, like the infrastructure improvements discussed in the EIS. Quantification of these emissions and the monetization of their effects is the best way to avoid this tendency.</p> <p>More specifically, agencies and the public might suffer from base-rate bias, which causes the undervaluation of information that is generally applicable across a range of scenarios.<sup>15</sup> Agencies fall into this trap when their NEPA reviews provide generic narrative descriptions of climate change yet conclude that climate change is too global and general a problem to address in a project-specific environmental impact statement, like in the Payson DEIS. This approach inappropriately forecloses the possibility of mitigating the effects of climate change.</p> <p>Monetization provides much-needed context for otherwise abstract consequences of climate change. Monetization allows decision-makers and the public to weigh all costs and benefits of an action—and to compare alternatives—using the common metric of money. Monetizing climate costs, therefore, better informs the public and helps “bring those effects to bear on [the agency’s] decisions.”<sup>16</sup> The tendency to ignore non-monetized effects is the result of common but irrational mental heuristics like probability neglect. For example, the phenomenon of probability neglect causes people to reduce small probabilities entirely down to zero, resulting in these probabilities playing no role in the decision-making process.<sup>17</sup> This heuristic applies even to events with long-term certainty or with lower-probability but catastrophic consequences, so long as their effects are unlikely to manifest in the immediate future. Weighing the real risks that, decades or centuries from now, climate change will fundamentally and irreversibly disrupt the global economy, destabilize earth’s ecosystems, or compromise the planet’s ability to sustain human life is challenging; without a tool to contextualize such risks, it is far easier to ignore them. Monetization tools like the social</p> <p><sup>12</sup> <i>Id.</i> at 1.</p> <p><sup>14</sup> Richard L. Revesz, <i>Quantifying Regulatory Benefits</i>, CALIFORNIA LAW REVIEW (2014), at 1425.</p> <p><sup>15</sup> See Fallacy Files, <i>The Base Rate Fallacy</i>, available at <a href="http://www.fallacyfiles.org/base-rate.html">http://www.fallacyfiles.org/base-rate.html</a>; David B. Graham, Capt. Thomas D. Johns, <i>The Corporate Emergency Response Plan: A Smart Strategy</i>, 27 NAT. RESOURCES &amp; ENV'T 3 (2012) (on normalcy bias).</p> <p><sup>16</sup> See <i>Baltimore Gas &amp; Elec. Co. v. Natural Res. Def. Council</i>, 462 U.S. 87, at 96 (U.S. 1983).</p> <p><sup>17</sup> See R. Sunstein, <i>Probability Neglect: Emotions, Worst Cases, and Low</i> (John M. Olin Law &amp; Economics, Working Paper No. 138, 2001), available at <a href="http://ssrn.com/abstract=292149">http://ssrn.com/abstract=292149</a>.</p>		<p>cost of greenhouse gases are designed to solve this problem: by translating long-term costs into present values, instantiating the harms of climate change, and giving due weight to the potential of lower-probability but catastrophic harms.</p> <p><i>The FHWA Must Assess Whether It Is Feasible to Quantify the Climate Effects of This Particular Project</i></p> <p>An individual project may have such small climate effects that the informational benefit of quantification is not worth the expense. However, the Administration cannot make a blanket assumption about all individual projects. Rather, it needs to assess the evidence of this specific project and decide whether its greenhouse gas emissions are likely to be significant and require monetization, or else so insignificant as to not make monetization feasible.</p> <p><b>II. Legal Requirements and Precedents for Monetizing Climate Effects in EISs</b></p> <p><i>NEPA May Require Quantifying and Monetizing Climate Effects</i></p> <p>NEPA requires “hard look” consideration of beneficial and adverse effects of each alternative option for major federal government actions. The U.S. Supreme Court has called the disclosure of impacts the “key requirement of NEPA,” and held that agencies must “consider and disclose the actual environmental effects” of a proposed project in a way that “brings those effects to bear on [the agency’s] decisions.”<sup>18</sup> Courts have repeatedly concluded that an EIS must disclose relevant climate effects.<sup>19</sup> Though NEPA does not require a formal cost-benefit analysis,<sup>20</sup> agencies’ approaches to assessing costs and benefits must be balanced and reasonable. Courts have warned agencies, for example, that “[e]ven though NEPA does not require a cost-benefit analysis, it was nonetheless arbitrary and capricious to quantify the <i>benefits</i> of [federal action] and then explain that a similar analysis of the <i>costs</i> was impossible when such an analysis was in fact possible.”<sup>21</sup></p> <p>While often eschewing formal cost-benefit analysis in environmental impact statements, agencies typically include in their NEPA reviews of resource management decisions both quantitative and monetized analyses of the economic benefits and distributional effects of the decision, including estimated tons of recoverable resources per acre and the market value thereof; rental rates per acre and annual royalty rates; temporary and permanent job growth, including annual wages and indirect job effects form local expenditures; construction of infrastructure supporting the project; and other related benefits.<sup>22</sup> The Payson DEIS, for example, takes into account direct economic</p> <p><sup>18</sup> <i>Baltimore Gas &amp; Elec. Co.</i>, 462 U.S., <i>supra</i> note 16, at 96.</p> <p><sup>19</sup> As the Ninth Circuit has held: “[T]he fact that climate change is largely a global phenomenon that includes actions that are outside of [the agency’s] control . . . does not release the agency from the duty of assessing the effects of [its actions on global warming within the context of other actions that also affect global warming.” <i>Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin.</i>, 538 F.3d 1172, 1217 (9th Cir. 2008); <i>see also Border Power Plant Working Grp. v. U.S. Dep’t of Energy</i>, 260 F. Supp. 2d 997, 1028-29 (S.D. Cal. 2003) [failure to disclose project’s indirect carbon dioxide emissions violates NEPA].</p> <p><sup>20</sup> 40 C.F.R. § 1502.23 (“[T]he weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis.”).</p> <p><sup>21</sup> <i>High Country Conservation Advocates v. FHWA</i>, 52 F. Supp. 3d 1174, 1191 (D. Colorado, 2014); <i>Western Organization of Resource Councils v. U.S. Bureau of Land Management</i> CV 16-21-GP-HMM, 2017 WL 374705 (D. Mont., Jan. 25, 2017).</p> <p><sup>22</sup> <i>See, e.g., FHWA Federal Coal Lease Modifications COC-1362 &amp; COC-67232</i>, [Aug. 2012], at 190-91; FHWA, <i>Pawnee National Grassland Oil and Gas Leasing Final Environmental Impact Statement</i> 317, (Dec. 2014), at 291-98; Bureau of Land Mgmt., <i>Final Environmental Impact Statement for the Wright Area Coal Lease Applications</i>, ES-60-61, 4-130-50 (July 2010).</p>



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	<p>impacts, like avoided costs that would occur with the alleviation of traffic congestion, as well as indirect economic impacts, such as changes to property values, employment and wages, and retail sales.<sup>23</sup> As the U.S. District Court for the District of Colorado concluded, “[i]t is arbitrary to offer detailed projections of a project’s upside while omitting a feasible projection of the project’s costs.”<sup>24</sup> Thus, to the extent that agencies continue to quantify and monetize many of the economic and distributional effects of resource management decisions, agencies must also treat climate effects with proportional analytical rigor.</p> <p>The recent withdrawal of the Council on Environmental Quality’s guidance on greenhouse gas emissions does not change the fact that using the social cost of greenhouse gases is consistent with—and may be required under—NEPA obligations. As CEQ explained in its withdrawal, the “guidance was not a regulation,” and “[t]he withdrawal of the guidance does not change any law, regulation, or other legally binding requirement.”<sup>25</sup> In other words, when the guidance recommended the appropriate use of the social cost of greenhouse gases in EISs,<sup>26</sup> it was simply explaining that the social cost of greenhouse gases is consistent with longstanding NEPA regulations and case law, all of which are still in effect today.</p> <p>Finally, NEPA does not excuse agencies from analyzing the effects of individual actions that contribute to global phenomena. As the U.S. Court of Appeals for the Ninth Circuit has held in a case involving the National Highway Traffic and Safety Administration, “the fact that climate change is largely a global phenomenon that includes actions that are outside of [the agency’s] control . . . does not release the agency from the duty of assessing the effects of its actions on global warming within the context of other actions that also affect global warming.”<sup>27</sup> The FHWA, in saying that greenhouse gases “have little effect on regional emission levels of greenhouse gases and reducing energy consumption and the production of greenhouse gases is better addressed at the regional planning level”<sup>28</sup> uses the same logic that the Ninth Circuit rejected.</p> <p>Numerous federal agencies have used the social cost of greenhouse gases in EISs. In 2013, EPA called on agencies to include a monetized estimate of anticipated greenhouse gas effects in their environmental impact statements,<sup>29</sup> and multiple agencies have applied the social cost of carbon in</p>		<p>their environmental impact statements, including the Office of Surface Mining Reclamation and Enforcement,<sup>30</sup> the Bureau of Land Management,<sup>31</sup> the National Highway Traffic Safety Administration,<sup>32</sup> and the Forest Service.<sup>33</sup> Clearly there are no legal, conceptual, methodological, or practical barriers to applying the social cost of greenhouse gases in NEPA reviews. Even if under the current administration some of those agencies try to shift away from using these metrics, past precedent confirms not only that it is possible to use the social cost of greenhouse gases in EISs, but that there is much to recommend applying the metric in EISs. In Section III, we further discuss how the most recent guidance from the current administration still requires agencies to monetize greenhouse gas emissions, and why the social cost of greenhouse gases is an appropriate tool for doing so.</p> <p><b>III. The Administration Should Use the Social Cost of Greenhouse Gases to Monetize Climate Effects Whenever Feasible</b></p> <p>A federal government-wide value of the social cost of carbon (SCC) was first developed in response to a Ninth Circuit decision that required the federal government to account for the economic effects of climate change in a regulatory impact analysis of fuel efficiency standards.<sup>34</sup> In 2009, the federal government convened the Interagency Working Group on the Social Cost of Carbon (IWG), which used a set of peer-reviewed models to develop an SCC value for use in federal regulatory analysis; between 2009 and 2016, the IWG convened several times to refine the SCC estimates and also produced estimates for the social costs of methane and nitrous oxide emissions. The IWG’s August 2016 central estimate<sup>35</sup> of \$50 in 2017 dollars per ton of year 2020 carbon dioxide emissions is based on the best available science<sup>36</sup> and is still likely an underestimate because some forms of damage, like catastrophic risks, are omitted from present calculations due to data limitations and scientific uncertainty.<sup>37</sup> Nonetheless, the IWG’s SCC is the best available estimate of climate damages and has been used in approximately one hundred federal regulations and a number of state proceedings,<sup>38</sup> reflecting close collaboration and consistency across agencies.</p>

<sup>23</sup> Payson DEIS, *supra* note 2, Economic Impact Technical Report, at 8.

<sup>24</sup> *Hugh Country*, 52 F. Supp. 3d, at 1195; *W. Org. of Res. Councils*, CV 16-21-GF-BMM.

<sup>25</sup> 82 Fed. Reg. 16,576, 16,576 (Apr. 5, 2017).

<sup>26</sup> See CEQ, *Revised Draft Guidance on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews* at 16 (Dec. 2014), available at [https://obamawhitehouse.archives.gov/sites/default/files/docs/ceqa\\_revised\\_draft\\_ghg\\_guidance\\_searchable.pdf](https://obamawhitehouse.archives.gov/sites/default/files/docs/ceqa_revised_draft_ghg_guidance_searchable.pdf) (“When an agency determines it appropriate to monetize costs and benefits, then, although developed specifically for regulatory impact analyses, the Federal social cost of carbon, which multiple Federal agencies have developed and used to assess the costs and benefits of alternatives in rulemaking, offers a harmonized, interagency metric that can provide decisionmakers and the public with some context for meaningful NEPA review. When using the Federal social cost of carbon, the agency should disclose the fact that these estimates vary over time, are associated with different discount rates and risks, and are intended to be updated as scientific and economic understanding improves.”); see also CEQ, *Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews* at 33 n.86 (Aug. 2016), available at [https://obamawhitehouse.archives.gov/sites/default/files/docs/ceqa\\_final\\_ghg\\_guidance.pdf](https://obamawhitehouse.archives.gov/sites/default/files/docs/ceqa_final_ghg_guidance.pdf).

<sup>27</sup> *Or. for Biological Diversity*, 538 F.3d 1172, 1217, *supra* note 19; see also *Border Power Plant Working Grp. v. U.S. Dep’t of Energy*, 260 F. Supp. 2d 997, 1028-29 (S.D. Cal. 2003) [failure to disclose project’s indirect carbon dioxide emissions violates NEPA].

<sup>28</sup> Payson DEIS, *supra* note 2, at 3-120.

<sup>29</sup> Letter from Cynthia Giles, Assistant Admin’r, U.S. Environmental Protection Agency, to Jose W. Fernandez & Dr. Kerri Anne Jones, U.S. Department of State, at 2 (Apr. 22, 2013).

<sup>30</sup> Available at <http://www.wrcc.osmre.gov/initiatives/fourCorners/documents/FinalEIS/Section%204.2%20-%20Climate%20Change.pdf>; see also <http://www.wrcc.osmre.gov/initiatives/fourCorners/documents/FinalEIS/Appendix%20A%20-%20Ne%20Quality%20and%20Climate%20Change%20Information.pdf>.

<sup>31</sup> Bureau of Land Management, *Environmental Assessment: DOI-BLM-MT-CO20-2014-0091-EA*, at 76 (May 2014).

<sup>32</sup> Available at [http://www.nhtsa.gov/statelikes/rulesmaking/pdf/care/FINAL\\_EIS.pdf](http://www.nhtsa.gov/statelikes/rulesmaking/pdf/care/FINAL_EIS.pdf) at 9-77; see also [http://ntrl.bts.gov/lib/55000/55200/55224/Draft\\_Environmental\\_Impact\\_Statement\\_for\\_Phase\\_2\\_MDHD\\_Fuel\\_Efficiency\\_Standards.pdf](http://ntrl.bts.gov/lib/55000/55200/55224/Draft_Environmental_Impact_Statement_for_Phase_2_MDHD_Fuel_Efficiency_Standards.pdf).

<sup>33</sup> Forest Service, *Rulemaking for Colorado Roadless Areas: Supplemental Final Environmental Impact Statement* (Nov. 2016), available at [https://www.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd525072.pdf](https://www.usda.gov/Internet/FSE_DOCUMENTS/fseprd525072.pdf) (using both the social cost of carbon and the social cost of methane).

<sup>34</sup> *Or. for Biological Diversity*, 538 F.3d 1172, *supra* note 19.

<sup>35</sup> The IWG produced a range of social cost of carbon estimates, reflecting a 5-percent discount rate, a 3-percent discount rate, a 2.5-percent discount rate, and a 95th percentile estimate. This \$50 per ton figure corresponds to the “central” 3-percent discount rate.

<sup>36</sup> INTERAGENCY WORKING GROUP ON SOCIAL COST OF GREENHOUSE GASES, UNITED STATES GOVERNMENT, TECHNICAL SUPPORT DOCUMENT: TECHNICAL UPDATE OF THE SOCIAL COST OF CARBON FOR REGULATORY IMPACT ANALYSIS UNDER EXECUTIVE ORDER 12866 (2016), at 4, (EIS-1) (showing a value of \$42 in 2007 dollars for 2020 emissions, which yields \$50 in 2016 dollars when updated using a Consumer Price Index Inflation Calculator, <http://data.bls.gov/cgi-bin/cpi/calc.pl>).

<sup>37</sup> See Richard L. Revesz et al., *Improve Economic Models of Climate Change*, 508 NATURE 173 (2014) (co-authored with Nobel Laureate Kenneth Arrow, among others); 2010 TSD, *supra* note 11; Peter Howard, COST OF CARBON PROJECT, OMITTED DAMAGES: WHAT’S MISSING FROM THE SOCIAL COST OF CARBON (2014) [hereinafter “OMITTED DAMAGES”]; Peter Howard, COST OF CARBON PROJECT, FLAMMABLE PLANET: WILDFIRES AND THE SOCIAL COST OF CARBON (2014); The Cost of Carbon Pollution, <http://costofcarbon.org/>.

<sup>38</sup> JANE A. LERAY, CONGRESSIONAL RESEARCH SERVICE, FEDERAL CITATIONS TO THE SOCIAL COST OF GREENHOUSE GASES (2016).

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	<p>Executive Order 13,783 withdraws the guidance of both the IWG and the Council on Environmental Quality on greenhouse gas emissions. The Executive Order refers agencies to the Office of Management and Budget's (OMB) Circular A-4 on cost-benefit analysis. The Order assumes that federal agencies will continue to "monetiz[e] the value of changes in greenhouse gas emissions" and instructs agencies to ensure such estimates are "consistent with the guidance contained in OMB Circular A-4."<sup>39</sup> Consequently, while the FIWA and other federal agencies no longer have technical guidance directing them to exclusively rely on the IWG's estimates to monetize climate effects, by no means does the new Executive Order imply that agencies should not monetize important effects in their regulatory analyses or environmental impact statements. In fact, Circular A-4 instructs agencies to monetize costs and benefits whenever feasible.<sup>40</sup> Circular A-4 also directs agencies to consider uncertain consequences or outcomes of actions in a transparent manner,<sup>41</sup> which should not be read to exclude providing the best possible estimates of greenhouse gas emissions that would result as a consequence of a particular action. Moreover, though Executive Order 13,783 withdrew the IWG's technical documents, the estimates developed by the IWG continue to reflect the best available data and methodological choices consistent with Circular A-4, as required by the new Executive Order. For a more detailed discussion of the social costs of greenhouse gases for use in environmental impact statements in light of Executive Order 13,783, please refer to Policy Integrity's recent joint comments to the U.S. Army Corps of Engineers.<sup>42</sup></p> <p>In conclusion, the Administration should assess GHGs and their climate effects, and if feasible should quantify and monetize them, in the final Payson EIS for the reasons discussed above.</p> <p>Respectfully submitted,</p> <p>Jason Schwartz, Legal Director Iliana Paul, Policy Associate</p> <p>Institute for Policy Integrity</p> <p>CC: Utah Department of Transportation</p> <p><small><sup>39</sup> <i>Id.</i> § 5(c). <sup>40</sup> Office of Mgmt. &amp; Budget, Circular A-4, Nat'l Archives (Sept. 17, 2003), available at <a href="https://georgewebush-whitehouse.archives.gov/omb/circulars/a004/a-4.html">https://georgewebush-whitehouse.archives.gov/omb/circulars/a004/a-4.html</a> [Hereinafter Circular A-4] ("You should monetize quantitative estimates whenever possible.") <sup>41</sup> <i>Id.</i> at E.7.b. <sup>42</sup> Environmental Defense Fund, Institute for Policy Integrity at NYU School of Law, National Resources Defense Council, Union of Concerned Scientists, Joint Comments to the U.S. Army Corps of Engineers on the Use of the Social Cost of Greenhouse Gases in the Draft Environmental Impact Statement for the Proposed Missouri River Recovery Management Plan (MRRMP-EIS) (May 2017), available at <a href="http://policyintegrity.org/documents/Joint_Comments_to_Army_Corps_on_SCC_in_EIS.pdf">http://policyintegrity.org/documents/Joint_Comments_to_Army_Corps_on_SCC_in_EIS.pdf</a></small></p>	P.2.22	<p><b>Commenter Name:</b> Laura Evans <b>Commenter No.:</b> 32 <b>Date:</b> 10/25/2017 <b>Source:</b> Email <b>Location:</b> Payson</p> <p><b>Comment</b> As the wife of one of the owners of West Mountain Veterinary Hospital, I am writing to object to the proposed full acquisition and relocation of our business. I feel you have several other easy alternatives that you can consider without needing to devastate our livelihood, most especially the following - Why can't you move the road a small bit more north and take the park and ride and use that empty land as part of the road you wish to expand, instead of going right through our building and our land, forcing us to relocate? You have no mentions or maps affecting that area which is just north of us, yet you want to severely impact a business that has been there for almost 20 years and serves approximately 14,000 clients and their animals. There is also empty land directly south of our building that could easily be integrated into your plan, thereby avoiding taking our business. I see no reason why you can't use either parcels of land instead of one already in use by a thriving business. With just a few minor adjustments to your plan you could save our business. Or if those are not viable options, why can't you use the Benjamin exit? Or the Walmart exit a mile away, which has already been expanded to five lanes? Neither of these exits would force people out of their homes, lands, and business. This is our livelihood, our retirement, as well as that of several employees. We are a fundamental part of the community and are strongly against you taking our land and our business.</p>



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	<p>Even relocating it will severely impact our business, a loss that would more than likely not be recouped and would need to be dealt with through legal means, which we sincerely hope to avoid. You revamped your plan so that you would not have to devastate many owners of homes in this area, we ask that you please see fit to do the same for our business and either consider taking the road through the park and lot north of our building or using Benjamin Exit or the Walmart Exit where you will not have to destroy anyone's homes or businesses. You note that you currently have no funding for this project, I would earnestly ask that you revamp the project in a small way that will leave us our land and our business - our livelihood - before you do gain the funding. Thank you so much.</p> <p>Also — my husband and I request a meeting asap to discuss viable alternatives for your plan before we seek legal counsel. We have already contacted Gephart and they are anxious to do a story on this. We can be reached at <u>801/372-8162</u>. Thank you</p> <p>Laura Evans</p>		<p><b>Commenter Name:</b> Jennifer Schuller, Environmental Protection Agency  <b>Commenter No.:</b> 33  <b>Date:</b> 11/13/2017  <b>Source:</b> Email  <b>Location:</b> Denver</p> <p><b>Comment</b>  Dear Mr. Schellenberg,</p> <p>The EPA appreciates the opportunity to provide comments for the I-15, Payson Main Street Project Draft EIS. An electronic copy of our comment letter is attached to this email. A hard copy has been mailed and should arrive shortly. Please let us know if you have any questions or concerns.</p> <p>Thank you,</p> <p>Jennifer  [Note: Attachments follow]</p>

**I-15, PAYSON MAIN STREET INTERCHANGE  
FINAL ENVIRONMENTAL IMPACT STATEMENT**

**TABLE 4-5  
Draft EIS Verbatim Comments**


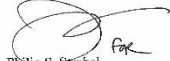
Response No.		Response No.	
	 <p><b>UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8</b> 1565 Wynkoop Street Denver, CO 80202-1129 Phone 800-227-8817 www.epa.gov/region8</p> <p>Ref: 8EPR-N NOV 13 2017</p> <p>Justin Schellenberg, Project Manager Utah Department of Transportation 658 North 1500 West Orem, Utah 84057</p> <p>Dear Mr. Schellenberg:</p> <p>Pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency Region 8 has reviewed Utah Department of Transportation's I-15, Payson Main Street Interchange Draft Environmental Impact Statement (EIS) (CEQ No. 20170141). The project purpose includes improving traffic operations in Payson by reducing expected roadway congestion at the Main Street interchange and on Main Street and addressing design deficiencies to meet current roadway design standards.</p> <p>We appreciate UDOT's efforts to involve EPA and other agencies early in the NEPA process by providing an opportunity for input in 2015 during scoping, and holding agency work group meetings over the last year. In addition, thank you for providing Lisa Lloyd of my staff a project site visit prior to the public meeting on October 26, 2017. She found the visit and following phone conversation informative, and they improved our understanding of the proposed project.</p> <p>The EPA is rating the Preferred Alternative (Alternative C1) as Environmental Concerns – Insufficient Information (EC-2). You may find the description of the EPA's rating system at: <a href="http://www2.epa.gov/ncpa/environmental-impact-statement-rating-system-criteria">http://www2.epa.gov/ncpa/environmental-impact-statement-rating-system-criteria</a>. Our primary concern is that the EIS provide sufficient information to support: (1) the Clean Water Act (CWA) Section 404 permitting decision, and (2) the conclusion that the project will not cause an air quality concern.</p> <p>We offer two recommendations related to the CWA Section 404 concern. First, the Draft EIS does not discuss whether there are available alignment or design alternatives for the eastern portion of Nebo Beltway segment that is part of the Preferred Alternative. We recommend the Final EIS assess the availability of Beltway alignments or designs to avoid additional wetlands, especially higher functioning wetlands, and still meet the purpose and need. Second, the document does not identify secondary impacts to wetlands, as required in the CWA Section 404. There are potential efficiencies to be gained in CWA 404 permitting if the NEPA process considers CWA 404 permitting requirements and presents information to support the permitting decision in the Final EIS. The addition of the information summarized here and detailed in the enclosure will support the CWA Section 404 evaluation. It also aligns with the goals of Executive Order 13807, which is directed at obtaining more efficient and effective federal infrastructure decisions. Thus, we recommend the information described in the enclosed detailed comments be included in the Final EIS.</p>		<p>Additionally, we recommend that the Final EIS include information to support the conclusion that this project will not cause an air quality concern. This can be done by completing and providing in the Final EIS a Project of Air Quality Concern (POAQC) questionnaire, which we understand is in process, as well as providing quantitative motor vehicle emission information. The enclosure provides further explanation and recommendations to address this issue, as well as other recommendations to help enhance the Final EIS.</p> <p>We appreciate the opportunity to participate in the review of this project and are committed to working with you as you prepare the Final EIS. If you would like to discuss our comments, please contact me at (303) 312-6704, or Lisa Lloyd of my staff at (303) 312-6537 or <a href="mailto:lloyd.lisa@epa.gov">lloyd.lisa@epa.gov</a>.</p> <p>Sincerely,</p>  <p>Philip S. Strobel Director, NEPA Compliance and Review Program Office of Ecosystems Protection and Remediation</p> <p>Enclosure</p> <p>cc: Naomi Kisen, UDOT Lochner c/o Payson Main St. EIS</p> <p>2</p>

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Response No.		Response No.	
	<p style="text-align: center;"><b>Enclosure</b> <b>I-15, Payson Main Street Interchange Draft Environmental Impact Statement</b> <b>(CEQ No. 20170141)</b></p>		
<b>F.2.20</b>	<p><u>Nebo Beltway:</u> All of the C and R alternatives, including the Preferred Alternative, rely on the to-be-constructed Nebo Beltway as the predominate travel route that reduces congestion on Main Street and the modified new Main Street interchange. The EIS relies on construction of this portion of the Nebo Beltway for these alternatives to meet the purpose and need for the project. However, the purpose of the Nebo Beltway appears to be broader than alleviating traffic congestion on Main Street. The described "optimal Nebo Beltway" alignment appears to serve as a route for those desiring to travel north on I-15 from the east side of Payson and also supports future planned development. We recommend that the Final EIS provide a complete description of the purpose of the Nebo Beltway and how it helps meet the purpose and need of this project, as well as adding additional description of the beltway in the alternative's chapter.</p>	<b>F.3.15</b>	<p><u>Impacts to Wetlands and other Waters of the U.S., including Secondary Impacts:</u> Section 3.14 evaluates the potential impacts to Waters of the U.S. and identifies wetlands within the 300-foot of the road footprint, however, it does not provide any discussion or analysis of the secondary effects to these wetlands from the roadway alignments. Wetlands adjacent to roadways have the potential to be adversely affected by changes in hydrology and water quality from bisection of wetland complexes, changes in impervious surface and stormwater runoff, changes in vegetation from additional disturbance, and changes to the habitat availability and quality for wetland dependent wildlife. Section 3.14.3 states that C1 (the Preferred Alternative), C3, and R2 create a cluster of "landlocked" wetlands and these alternative alignments would have no direct impact to this cluster. However, because this wetland cluster is isolated by the alternative alignments, there are potential secondary impacts to hydrology or function which are important to identify in the Final EIS.</p>
<b>F.2.17</b>	<p>UDOT has evaluated a wide range of options for the I-15 Main Street interchange and presented those options in the Draft EIS. The Draft EIS also includes discussion of the Nebo Beltway I-15 interchange location. A commensurate analysis of the design, alignment, termini, or capacity that is needed for the rest of the beltway project is important. For instance, the Draft EIS mentions moving the alignment to avoid two wetlands, yet there is no discussion whether other alignments, including those outside of current alignment's 300-foot buffer, were considered to avoid impacts. Additionally, information about the Beltway capacity necessary to meet the project purpose and need, other designs considered, and access points locations would help complete the Nebo Beltway analysis. The Beltway design directly impacts the foot print of the roadway, and thus, may have potential impacts. These factors are important when determining compliance with the CWA Section 404(b)(1) implementing regulations (Guidelines). We recommend that the Final EIS identify Nebo Beltway alternatives and analysis described above.</p>	<b>F.3.16</b>	<p>We recommend the Final EIS include a discussion of the potential secondary impacts to wetlands adjacent to the build alternatives. We suggest also adding a table which provides quantitative information on the acreage of wetlands within the 300-foot buffer affected by each build alternatives. Table 3.14-4, which currently discloses direct impacts to wetlands and other potential Waters of the U.S. by alternative, could be amended to include this information.</p>
<b>F.3.10</b>	<p>We also suggest that the maps provided, such as Figure 3.14-6, be updated to include all the wetland identification numbers. Complete identification of all wetlands would support the text discussion such as in the example provided above. The two wetlands that were avoided along Nebo Beltway do not appear to be labeled so it is difficult to determine the wetland locations.</p>	<b>F.3.17</b>	<p>Additional recommendations for minimization and mitigating impacts are:</p> <ul style="list-style-type: none"><li>• Consider replacing the existing culvert carrying Beer Creek under I-15 with an open bottomed culvert, instead of with a box culvert. Open bottom culverts generally help maintain the hydrologic flow better than a concrete bottom culvert and function more similarly to a natural stream; and</li><li>• Provide a higher compensation ratio for impacts to spring and seeps within the project area. The project proposes to mitigate wetland impacts at a 1:1 ratio, however, springs and seeps are considered difficult to replace resources under the CWA 404 implementing regulations and a higher mitigation ratio is appropriate to compensate the impact.</li></ul>
<b>F.2.18</b>	<p><u>Preferred Alternative:</u> The Draft EIS correctly identifies that the Guidelines prohibit discharges to wetlands where there is a practicable, less damaging alternative, even if the preferred project best meets the applicant's interest. Under the Guidelines, practicable means, "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purpose." We recommend that alternatives that meet the project purpose and impact less wetlands than other alternatives are retained for consideration as the selected alternative, unless it can be demonstrated that they are not-practicable per the Guidelines. Additionally, we recommend providing the results of a wetland functional assessment to help inform the decision by further differentiating the wetland impacts of each alternative.</p>	<b>F.3.11</b>	<p><u>Indirect Impacts Analysis:</u> The EPA appreciates the inclusion of the indirect impacts analysis in the Draft EIS. This section presents a useful analysis of the potential land use changes within the project area, with the goal of anticipating how the various build alternatives could influence the level of development. We have a concern with the indirect impacts conclusions for wetlands. In particular, the Draft EIS notes, "the indirect effects to wetlands would be minimized under Alternatives C1, C3 and R2 because development under these alternatives could closely resemble the Bamberger Ranch Maximum Development Scenario, which includes open space areas where wetlands are currently the most concentrated within the [Area of Influence] AOI," (p. 3-279). The Bamberger Ranch P-C Zone Plan (Plan) appears to be the basis for this conclusion.</p>
<b>F.3.18</b>			<p>When we read the Plan, we found that open space areas where wetlands are located appear to be a component of all of the potential plans, not just the maximum development plan (see Figure 2 of the Plan). If open space and wetland areas will be preserved regardless of the level of development within the area, this assumption should be corrected in the Final EIS. In addition, the less dense development scenario could reduce the potential cumulative impact on wetlands and water quality because of reduced impervious surface and less significant hydrologic changes</p>
	1		2

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F.3.12	<p>from stormwater runoff in the developed area. We recommend the Final EIS indirect impacts analysis be updated to consider the information presented in the Bamberger Ranch P-C Zone Plan.</p> <p><u>Air Quality:</u> Since the proposed project is located in a PM<sub>2.5</sub> 24-hour National Ambient Air Quality Standard (NAAQS) nonattainment area and a PM<sub>10</sub> nonattainment area, we recommend that a UDOT Project of Air Quality Concern (POAQC) questionnaire PM hot-spot analysis be conducted for this project for inclusion with the Final EIS. Per conversations between EPA staff and Naomi Kisen, UDOT Environmental Program Manager, we understand UDOT is currently working on the POAQC. As done with other project POAQCs, we encourage UDOT to provide the draft POAQC document to the EPA and the Federal Highway Administration Resource Center for review.</p>		<p><b>Commenter Name:</b> Michael A. Pectol, U.S. Army Corps of Engineers  <b>Commenter No.:</b> 34  <b>Date:</b> 11/28/2017  <b>Source:</b> Mail  <b>Location:</b> Bountiful</p>
F.3.19	<p>We also recommend that quantitative motor vehicle emissions information be provided to support the Final EIS air quality resource conclusion. The Draft EIS Section 3-11, Air Quality, and the Air Quality Assessment in Appendix B do not contain any quantitative motor vehicle emissions information for criteria pollutants and Mobile Source Air Toxics (MSAT). In our March 3, 2015, scoping letter we recommended that vehicle emissions estimates be calculated with EPA's MOVES2014 motor vehicle emissions model (the current version is MOVES2014a) and those emissions be provided for the baseline, no-build, and Preferred Alternative. Completing a POAQC and quantitative motor vehicle emissions, should provide the necessary information to support the Final EIS air quality conclusion.</p>		<p><b>Comment</b> See following attachments.</p>
F.3.20	<p>Utah County's PM<sub>2.5</sub> nonattainment area classification, which is presented on 3-119, Table 3.11-2, Attainment Status, has been legally changed from "Moderate" to "Serious," (Federal Register, 89 FR 21711, May 10, 2017). We recommend updating this information in the Final EIS.</p>		
F.3.21	<p>In reference to page 3-294, Section 3.24.4, Cumulative Impacts Analysis, Air Quality, we note that the monitoring data provided in figures 3.24-6 and 3.24-7 both refer to the annual PM<sub>2.5</sub> NAAQS. Utah County is in attainment for this NAAQS. We also recommend including data trends for the 2006 24-hour PM<sub>2.5</sub> NAAQS for which Utah County is designated as nonattainment. Including this information in the Final EIS will accurately characterize the project area air quality status.</p>		
F.3.13	<p><u>Environmental Justice:</u> Section 3.5 of the Draft EIS indicates that residents of the Meadows and Shady Oaks mobile home parks would be adversely affected by noise under the Preferred Alternative. The Draft EIS further states that this would not be a disproportionately high impact since other residences in nearby neighborhoods would be affected the same. Although the noise levels may impact everyone in the specified area, those living in the mobile home parks may more impacted since the walls of trailers and mobile homes tend to provide less soundproofing than walls of wood framed houses. According to Draft EIS Table 3.25-2, noise abatement is determined based on if 75% of balloted receptors support the proposed noise abatement. We recommend that the mobile home parks be considered as individual areas for the determination of noise abatement versus incorporated in a poll that includes homes with wood frames.</p>		



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Response No.		Response No.	
F.2.17	 <p>DEPARTMENT OF THE ARMY U.S. ARMY CORPS OF ENGINEERS, SACRAMENTO DISTRICT 1325 J STREET SACRAMENTO CA 95814-2922</p> <p>November 28, 2017</p> <p>Regulatory Division (SPK-2015-00329)</p> <p>Utah Department of Transportation Region 3 Attn: Mr. Rich Allen 658 North 1500 West Orem, Utah 84057</p> <p>Dear Mr. Allen:</p> <p>As a cooperating agency, we appreciate the joint-lead agencies, the Utah Department of Transportation (UDOT) and the Federal Highway Administration (FHWA), affording us the opportunity to provide comments regarding the Draft Environmental Impact Statement (DEIS) for the Payson Main Street Interchange project.</p> <p>We also appreciate the level of participation and discussion that you have provided us throughout the EIS process for this project. Additionally, since this project will likely require a Department of the Army permit for impacts to waters under Section 404 of the Clean Water Act, we look forward to continuing coordination with you to ensure that the EIS will be sufficient for us to incorporate into our permit decision under the 404(b)(1) Guidelines (§40 CFR 230; hereafter Guidelines) and our regulations. We note that since we have not yet received a 404 permit application, we are making these comments outside of our normal process.</p> <p>Based on the information in the DEIS, the Nebo Beltway is an essential component of all but one of the alternatives carried forward for further analysis. The Corps understands the need to relieve pressure in the Main Street area and that one way to accomplish this would be by drawing vehicle traffic to a new arterial road. However, since the Payson Interchange project does not appear to have separate and independent utility from the Nebo Beltway, and because the C and R alternatives would not meet the project purpose and need without also constructing this arterial, the Corps would consider this portion of Nebo Beltway to be part of the overall Payson Interchange project. Therefore, the Corps believes that the portion of Nebo Beltway between Interstate 15 and State Route 198 should be included in the project scope of analysis and that adjustments to the alignment to further avoid and minimize wetland impacts should be evaluated. Also, the planned location of the Nebo Beltway south of SR-198 and its anticipated tie-in point on SR-198 would be considered a separate project and should have no bearing on the alignment north of SR-198. Additional avoidance and minimization may be available by adjusting the Nebo Beltway tie-in point on the north side of SR-198 further to the west.</p>	-2-	<p>The DEIS did not contain justification for the proposed width of the Nebo Beltway right-of-way (ROW). The Corps believes that the need for bike lanes, sidewalks, park strips and fill slope width should be re-evaluated as there may be additional opportunities to reduce impacts to waters of the U.S., by reducing the ROW width.</p> <p>The Clean Water Act Section 404 (b)(1) guidelines prohibit discharges of dredged or fill material into waters of the U.S. where there is a less damaging practicable alternative (LEDPA) that meets the project purpose and need. Factors such as community support, a more optimal Nebo Beltway alignment, having 2 interchanges instead of 1, or how well an alternative performs are not considered legitimate constraints to eliminate an alternative if it otherwise meets the project purpose and need. Based on available information, it appears that the applicant-preferred alternative (C-1 Alternative) does not represent the LEDPA. There are two other alternatives identified with lesser impacts to waters of the U.S., C4 and R1. Further justification would be necessary to demonstrate the Alternative C1 is the LEDPA since there does not appear to be other significant environmental consequences resulting from these two alternatives that are lesser damaging to the aquatic environment.</p> <p>Documentation previously provided by UDOT to the Corps identifies impacts to waters at significantly lower levels. For instance, draft screening documents dated October 20, 2015, show that C1, C3, C4 and R1 are identified as having 1.56, 1.08, 0.40 and 0.33 acres of impact to waters of the U.S. However, in the DEIS these alternatives are identified as having 3.98, 5.39, 2.38 and 1.81 acres of impacts. What led to the increase in the level of impacts?</p> <p>There appears to be a consistency issue with regard to the acres of impacts to waters of the U.S. The numbers differ from section to section and even from table to table within the same section of the DEIS. UDOT should review these numbers and tables for consistency.</p> <p>The DEIS contains useful information on indirect impacts resulting from the proposed project but does not provide an estimate of aquatic resource impact acreage within the 300-foot buffer. These impacts need to be identified for all alternatives and a description of the anticipated secondary impacts resulting from each alternative should be included in the DEIS. The Corps would determine the amount of compensatory mitigation to be required for indirect and/or secondary impacts.</p> <p>Based on the information in the DEIS, alternatives R2, C1 and C3 would have greater direct impacts to the higher concentration of wetlands surrounding I-15. These alternatives would likely also have a greater potential for secondary impacts resulting from induced growth than the alternatives located closer to the existing interchange. To reduce the potential for these increased impacts, we recommend alternatives such as C4 and R1 should be considered for the preferred alternative.</p>

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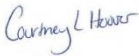
Response No.		Response No.	
F.2.20	<p>-3-</p> <p>It appears as though a heavily weighted consideration regarding the preferred alternative is the compatibility with the proposed future development of the Bamberger Ranches property adjacent to Nebo beltway. We feel this is inappropriate as the purpose and need as stated in Chapter 1 is focused on improving the operation and safety of the I-15, Main Street interchange.</p>		<p><b>Commenter Name:</b> Courtney Hoover, U.S. Department of the Interior  <b>Commenter No.:</b> 35  <b>Date:</b> 11/3/2017  <b>Source:</b> Email  <b>Location:</b> Denver</p>
F.2.21	<p>Lastly, the decision for the preferred alternative appears to run counter to criteria for most previous transportation projects, in that the preferred alternative is the highest cost, highest impact to prime and unique farmland, highest number of impacts to threatened and endangered species, and meets the purpose and need to a lesser extent (i.e. provides for lesser level of service along Main Street) than other alternatives which consequently have lesser impacts to waters. Please provide clarity as to this change.</p> <p>Please refer to identification number SPK-2015-00329 in any correspondence concerning this project. If you have any questions, please contact Michael Pectol at the Bountiful Regulatory Office, 533 West 2600 South, Suite 150, Bountiful, Utah 84010, by email at <a href="mailto:Michael.A.Pectol@usace.army.mil">Michael.A.Pectol@usace.army.mil</a>, or telephone at (801) 295-8380. For more information regarding our program, please visit our website at the following link: <a href="http://www.spk.usace.army.mil/Missions/Regulatory.aspx">www.spk.usace.army.mil/Missions/Regulatory.aspx</a>.</p> <p>Sincerely,</p>  <p>Michael A. Pectol Project Manager Nevada-Utah Regulatory Section</p> <p>cc: Julia McCarthy, EPA Region 8 (<a href="mailto:McCarthy.Julia@epa.gov">McCarthy.Julia@epa.gov</a>)</p>		<p><b>Comment</b> Mr. Schellenberg,</p> <p>Please see attached for the Department of the Interior's comments on the Payson Main Interchange Project. If you have any questions, please let me know.</p> <p>---</p> <p>United States Department of the Interior OFFICE OF THE SECRETARY Office of Environmental Policy and Compliance Denver Federal Center, Building 67, Room 118 Post Office Box 25007 (D-108) Denver, Colorado 80225-0007</p> <p>ER-17/0444</p> <p>Justin Schellenberg Utah Department of Transportation Federal Highway Administration 2520 West 4700 South – STE 9A Salt Lake City, UT 84129</p> <p>[Note: Attachments follow]</p>

TABLE 4-5

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Response No.		Response No.	
F.3.14	 <p>United States Department of the Interior OFFICE OF THE SECRETARY Office of Environmental Policy and Compliance Denver Federal Center, Building 67, Room 118 Post Office Box 25007 (D-108) Denver, Colorado 80225-0007</p> <p>ER-17/0444</p> <p>Justin Schellenberg Utah Department of Transportation Federal Highway Administration 2520 West 4700 South – STE 9A Salt Lake City, UT 84129</p> <p>Dear Mr. Marrero:</p> <p>Thank you for the opportunity to review and comment on the Department of Transportation Draft Environmental Impact Statement and Section 4(f) Evaluation for the Payson Main Interchange Project, Utah County, Utah.</p> <p><b>SECTION 4(f) EVALUATION COMMENTS</b></p> <p>The Department of the Interior (Department) appreciates that you have coordinated with various agencies regarding this project and the development of the Section 4(f) Evaluation. We encourage continued coordination with these agencies throughout the life of this project. The Department acknowledges that this project has identified 11 Section 4(f) properties, for which the Section 4(f) Evaluation has indicated that four properties will be temporary occupied and six additional properties with a <i>de minimis</i> use.</p> <p>We acknowledge that this project will constitute temporary occupancy on four historic properties. Further, we understand that you executed a finding of no adverse effect letter (September 25, 2017) in consultation with the Utah State Historic Preservation Office. Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources.</p> <p>We appreciate the opportunity to review this document. Should you have questions in response to these Section 4(f) comments, please contact David Hurd, Environmental Protection Specialist, National Park Service Inter-Mountain Regional Office at 303-987-6705.</p> <p>Sincerely,              Courtney Hoover            Regional Environmental Officer</p>		



## Draft Environmental Impact Statement Generalized Comments & Responses

### COMMENTS NOT RELATED TO SPECIFIC SECTIONS IN THE FINAL EIS

*P.0.1 Commenter suggested Nebo Beltway should be owned and maintained by UDOT (2 comments)*

Ownership and maintenance responsibilities have not been determined. UDOT will work with Payson City to formalize a corridor agreement that specifies ownership, maintenance, and access limitations.

*P.0.2 Commenter suggested changing I-15 Exit 253 sign to read Benjamin instead of 8000 South (1 comment)*

Changing the Exit 253 sign as suggested is outside the scope of this project.

*P.0.3 Commenter asked when the project will be built or suggested that it be constructed as soon as possible (3 comments)*

There is currently no funding for construction of this project. The project is included in Mountainland Association of Governments (planning organization responsible for long-range transportation planning in the region) regional transportation plan as a Phase 1 project that is planned between 2015 and 2024. It is unlikely construction could begin sooner than three years after a Record of Decision (ROD) is issued. After a ROD is issued, if funding becomes available through state and/or federal sources, final design and property acquisition would still be required prior to construction.

*P.0.4 Commenters stated they are in agreement with Mr. Lamb's verbal comments at the public hearing (see commenter No. 18, comment 1 of 2) (2 comments)*

See corresponding responses P.0.6, P.1.1, P.2.6, P.2.8, P.2.9, P.2.15, and P.3.1.

*P.0.5 Commenter suggested improvements to Main Street south of downtown to Memorial Park (1 comment)*

Improvements to Main Street south of SR-198 as suggested are outside the scope of this project. None of the build alternatives evaluated would require improvements to Main Street south of SR-198.

*P.0.6 Comment is unclear (2 comment)*

An appropriate response could not be provided because the project team could not understand the commenter's point.

*F.0.7 Wetland impacts are reported inconsistently throughout the Draft EIS (USACE)*

Discrepancies were identified in Tables 2-5, 2-11, ES-1, and ES-4. These tables have been updated in the Final EIS.

### COMMENTS SPECIFIC TO SECTIONS IN THE EIS Chapter 1: Purpose and Need

*P.1.1 Commenter questioned the accuracy of planned development and travel demand assumptions in the Draft EIS (1 comment)*

Chapter 1 of the Final EIS details the process UDOT undertook to identify development trends in the study area. UDOT worked with Mountainland Association of Governments (planning organization responsible for long-range transportation planning in the region) and Payson City to improve the accuracy of the

regional travel demand model (see also the traffic report in Appendix B of the Final EIS). As a result, the traffic model more closely matched observed traffic volumes in the study area, which provided a more accurate base to predict future traffic volumes.

## Chapter 2: Alternatives

### P.2.1 *Commenter expressed support for the selection of Alternative C1 as the Preferred Alternative (15 comments)*

Thank you for your comment. Throughout the Preferred Alternative selection process, UDOT sought to identify an alternative that met the future transportation needs of the area, but also balanced regulatory requirements, environmental impacts, and community needs.

### P.2.2 *Commenter expressed concern for pedestrian and bicyclist safety under the Preferred Alternative, and suggested adding space or a barrier that separates pedestrians and bicyclists from traffic. (3 comments)*

The Preferred Alternative would provide a five-foot wide sidewalk and dedicated bike lanes on Nebo Beltway Phase I and on Main Street through the interchange from 600 North to 900 North. The sidewalk and bike lane configurations (shown on Figure 2-15 and Figure 2-25 in the Final EIS) meet current UDOT design standards. Adding a space or barrier between vehicles and bikes or pedestrians is not required to meet standards and would result in greater impacts. Reducing the width of the travel lanes to provide space for a barrier would violate standards. The Preferred Alternative would improve safety on Main Street—there are currently no dedicated bike lanes or sidewalks under the I-15

interchange. See Section 3.10.3 of the Final EIS for more information.

### P.2.3 *Commenter suggested aligning Nebo Beltway Phase I to connect to Canyon Road (600 East) (1 comment)*

UDOT initially considered an alternative—Alternative C6—that would connect the additional interchange to 600 East. Alternative C6 was eliminated from detailed analysis because 600 East is primarily a residential street and it would require more property acquisitions (see Section 2.4.2 of the Final EIS).

### P.2.4 *Commenter suggested widening Main Street to five lanes from the interchange to SR-198 (100 North) to reduce congestion (1 comment)*

The primary purpose of the C Alternatives, including the Preferred Alternative, is to maintain the existing connection to I-15 without needing to widen Main Street all the way to SR-198. Widening to SR-198 would result in demolition of 20 historic buildings and an adverse effect to the Payson Historic District. By adding another interchange to the northeast, the Preferred Alternative would draw enough traffic off Main Street onto Nebo Beltway Phase I that Main Street would not need to be widened to SR-198. The traffic analysis summarized in Table 2-3 of the Final EIS shows that Main Street under the Preferred Alternative would operate at a Level of Service D during peak hours in 2040. Level of Service D is considered acceptable operating conditions for a road of this type (see Section 1.5.1 of the Final EIS for more information).

- P.2.5 Commenter asked if a traffic signal would be installed at the intersection of Main Street and 600 North, and if there would be a crosswalk connecting to his driveway near the intersection (1 comment)*

A traffic signal would be installed at the intersection of Main Street and 600 North under the Preferred Alternative (see Figure 2-38 in the Final EIS). The crosswalks would not tie into any driveways.

- P.2.6 Commenter suggested widening the I-15 bridge over Main Street to accommodate additional travel lanes and maintain the current north-south alignment rather than realigning Main Street to connect to 900 North as shown under the Preferred Alternative (3 comments)*

Main Street would be realigned to connect to 900 North that would improve the skew with the on- and off-ramps (see Section 2.3.3 of the Final EIS for more information). The existing turning radius is substandard, which forces vehicles to cross into opposing travel lanes while turning (see Section 1.5.1 of the Final EIS for more information).

Main Street would also be realigned to accommodate the future predominant traffic movement from West Mountain. The population west of Payson City is projected to grow more than 300 percent by 2040 (see Figure 1-3 in the Final EIS).

- P.2.7 Commenter suggested Nebo Beltway Phase I will take 80 percent or more of projected traffic, which would allow Main Street to remain in its current configuration (1 comment)*

The traffic analysis concluded that Nebo Beltway Phase I would draw approximately 21 percent of trips to and from I-15 under the Preferred Alternative (see Table 2-10 in the

Final EIS). Main Street would be realigned to connect to 900 North under the Preferred Alternative to accommodate the predominant traffic movement and correct geometric deficiencies (see response 2.6 for the rationale to realign Main Street under I-15).

- P.2.8 Commenter suggested extending off-ramps at the Main Street interchange to store traffic before turning onto Main Street to eliminate braided ramps (1 comment)*

The braided ramps are needed to provide free-flow connections between the Main Street and Nebo Beltway Phase I, and eliminate weaving conflicts with vehicles entering and exiting I-15 between the two interchanges (see Section 2.5.5 of the Final EIS for more information). The Federal Highway Administration and the American Association of State Highway and Transportation Officials' guidelines state the minimum spacing between urban interchanges is one mile. If interchanges are within one mile of each other, braided ramps, collector-distributor roads, or frontage roads need to be included to mitigate the effects of the closely spaced interchanges.

The purpose of this project is to improve traffic operations in Payson by reducing expected roadway congestion at the Main Street interchange and on Main Street between approximately 900 North and SR-198 (see Section 1.5.2 of the Final EIS for more information). The bottle neck that currently exists on Main Street is expected to increase delay and congestion on the off-ramps if Main Street is not widened or another route is provided that takes traffic away from Main Street (see Section 1.4.2 of the Final EIS for more information).

Extending the off-ramps as suggested to store more vehicles would exacerbate the bottleneck that currently exists at the Main Street interchange and would not improve traffic operations. To avoid widening Main Street, another route must be constructed. Nebo Beltway Phase I and the interchange configuration under the Preferred Alternative is the solution. In addition, the ramp lengths under all alternatives were designed based on the results of the traffic analysis and UDOT standards.

*P.2.9 Commenter expressed concern over the cost of the Preferred Alternative (3 comments)*

Although the Preferred Alternative would be the most expensive, cost is only one consideration. Section 2.6 of the Final EIS describes the process and reasons the Preferred Alternative was selected. Cost savings will be explored during final design.

*P.2.10 Commenter suggested an interchange closer to Elk Ridge, Woodland Hills, and Salem rather than another interchange in Payson (1 comment)*

UDOT considered an alternative that would add an additional interchange approximately one mile northeast of Main Street. Alternative A1 was developed as a potential solution to improve and maintain the existing interchange in its current location without the need to widen Main Street to five lanes all the way to SR-198. Nebo Beltway Phase I would connect the additional interchange to SR-198. Alternative A1 was eliminated because it did not meet the purpose and need, as it did not provide Level of Service D or better along Main Street without widening. Nebo Beltway Phase I would be too far away from the existing interchange under Alternative A1 to draw

enough traffic from Main Street (see Section 2.3.4 and Section 2.4 in the Final EIS for more information).

Although the Preferred Alternative is within Payson, Nebo Beltway Phase I would connect the interchange to SR-198 towards the east side of Payson. This would provide individuals from Elk Ridge, Woodland Hills, and Salem a faster and more direct route to I-15 by avoiding or bypassing Main Street.

*P.2.11 Commenter suggested the Utah Valley University Extension and Front Runner Depot should not be excluded from the discussion (1 comment)*

UDOT met with the Utah Transit Authority (UTA) to discuss the how the various alternatives would affect a future FrontRunner station near Payson. UTA representatives informed UDOT that the interchange would not influence UTA's decision on a location for the future station. Other factors, such as destinations and high ridership would be more influential (see Section 3.23.3 of the Final EIS for more information).

UDOT also met with Farmland Reserve Inc. (FRI), current owners of Bamberger Ranch, to discuss how this project could affect development on Bamberger Ranch. UDOT learned at this meeting that FRI and Utah Valley University (UVU) were negotiating a deal to locate the university extension on Bamberger Ranch. The agreement between FRI and UVU was not official during development of the Draft EIS.

*P.2.12 Commenter expressed concern over the amount of traffic that might exist on Main Street under the Preferred Alternative (1 comment)*

The traffic study conducted to support the EIS showed an estimated 14,500 vehicles currently use Main Street between I-15 and SR-198 on a daily basis. Under the Preferred Alternative, this volume would increase to 18,000 vehicles per day by 2040. The increase in traffic would result in restricted flow with regular delays. Only the Relocate Alternatives would result in similar traffic volumes in 2040 to what currently exists on Main Street. Alternative R1 would result in 14,700 vehicles per day and Alternative R2 would have 13,800 vehicles per day. Conversely, Alternative I1 would have 24,500 vehicles per day by 2040.

- P.2.13 Commenter suggested Main Street should not be realigned under the Preferred Alternative because land west of the interchange is controlled by Utah County (1 comment)*

The project is intended to improve regional connectivity regardless of jurisdiction. Regional population growth, including unincorporated areas west of Payson, is expected to put increased pressure on the local road network if changes are not made to the interchange. The interchange modifications under the Preferred Alternative are intended to accommodate the predominant traffic movement and improve traffic operations resulting from development west of Payson.

- P.2.14 Commenter suggested connecting the Main Street and Nebo Beltway Phase I interchanges via a frontage road east of and parallel to I-15 instead of braided ramps as currently proposed under the Preferred Alternative.*

UDOT considered a similar alternative known as Alternative C3, which would connect the two interchanges via two frontage roads on both sides of I-15. Alternative C3 was not

selected as the preferred alternative because it would result in greater wetland impacts than the Preferred Alternative (see Section 2.6 of the Final EIS for more information).

- P.2.15 Commenter stated the Preferred Alternative would not address the traffic problems that currently exist at Main Street and SR-198 (1 comment)*

The intent of Nebo Beltway Phase I under the Preferred Alternative is to draw enough traffic away from Main Street to avoid widening Main Street between SR-198 and I-15. The traffic analysis summarized in Chapter 2 of the Final EIS shows that Main Street would operate at Level of Service D in 2040, which meets the purpose and need for this project.

- P.2.16 Commenter suggested exit to Nebo Beltway Phase I pass over the northbound on-ramp from Main Street to I-15, and southbound exit to Main Street pass over southbound on-ramp from Nebo Beltway Phase I to I-15 (1 comment)*

The interchange configurations as described are similar to the braided ramps under the Preferred Alternative. The braided ramps would provide free-flow connections and eliminate weaving conflicts between both interchanges.

- F.2.17 The Draft EIS evaluated a wide range of options for the I-15 Main Street interchange. A corresponding analysis of the design, alignment, termini, and capacity of Nebo Beltway should be included in the Final EIS (EPA). The alignment of Nebo Beltway, including the intersection with SR-198, and need for bike lanes, sidewalks, park strips, and fill slopes should be should be reevaluated to reduce wetland impacts (USACE)*

The following was added to Section 2.3.5 of the Final EIS to include more information about the purpose of Nebo Beltway Phase I and the process for determining the alignment and width.

Various alignments were developed for Nebo Beltway Phase I between I-15 and SR-198 during the alternative development process. Northern termini were based on the proposed I-15 interchange locations for each R, C, and A alternative. Southern termini along SR-198 were considered at Elk Ridge Drive, 2100 West, and 2300 West (see Figure 2-25). 2100 West was ultimately chosen as the southern terminus through coordination with Payson City to be consistent with the *Payson City Street Master Plan*, *TransPlan40*, and *Provo to Nebo Corridor Study*, and connect with future phases of Nebo Beltway.

The *Provo to Nebo Corridor Study*, in particular, examined various alignments between I-15 and SR-198. After considering traffic modeling results, environmental impacts, and public input, the study concluded that the optimum intersection with SR-198 would be at 2100 West (InterPlan 2009).

Elk Ridge Drive was not selected as the southern terminus because *TransPlan40* identifies the extension of Elk Ridge Drive from SR-198 to 8000 South as a separate and independent project (see Figure 2-1).

Nebo Beltway Phase I was analyzed as a five-lane facility to be consistent

with *TransPlan40* and Phase II recommendation described in the *Provo to Nebo Corridor Study* (InterPlan 2009). The proposed five-lane Nebo Beltway Phase I cross-section is shown on Figure 2-26. Bike lanes were included on Nebo Beltway Phase I in accordance with UDOT policy to improve active transportation opportunities on state facilities where feasible (see Section 2.3 for more information). In addition, a goal of the Payson City General Plan is to develop an effective multi-use trail system that connects to regional trails, and *TransPlan40* acknowledges there will be a greater need for nonmotorized transportation facilities, including bike lanes, as the population increases. *Transplan40* includes the Highway 198 Connector Trail, which would connect to the proposed bike lanes on Nebo Beltway Phase I (see Section 3.10 for more information).

Nebo beltway Phase I is intended to be an arterial road for motorized vehicles, so placing curbs, gutters, sidewalks, and park strips are essential to ensure pedestrian safety and access to future developments. Lane and shoulder widths were based on UDOT design standards for arterial roads. Shoulder width, however, could be reduced if it is determined during final design that on-street parking would be prohibited. Park strips provide a buffer between pedestrians and vehicles, and provide snow storage during the winter. This buffer would be more important if the shoulder widths are reduced. The side slopes are



variable and the slope could be increased during final design to reduce impacts.

The following was added to Section 2.6.7 of the Final EIS to include more information about Nebo Beltway Phase I alignment shifts considered by UDOT.

The alignment of Nebo Beltway Phase I under the build alternatives was shifted to the extent feasible to avoid or minimize impacts to wetlands W4a, W4b, W5, W6, W7a, W8, and W9a while maintaining UDOT and AASHTO design standards and a connection to future phases of Nebo Beltway (see Figure 3.14-2). In addition, modifications were considered to shift the location of the Nebo Beltway Phase I interchange under Alternatives C1, C3, and R2 closer to the Main Street Interchange, but north of alternatives C4 and R1, to minimize wetland impacts. To achieve a substantial reduction in wetland impacts, the interchange would need to be shifted farther south, which would require relocating the Utah Associated Municipal Power Systems power plant; UDOT determined relocating the power plant would be too costly—over \$100 million based on the original costs of the power plant in 2003—and not worth the exorbitant expense to minimize impacts to wetlands along I-15 (Deseret News 2003). Shifting the interchange farther north would result in greater impacts to wetlands (see Figure 3.14-2 and Figure 3.14-6).

Figure 3.14-2 was added to Section 3.14.4 of the Final EIS showing all Nebo Beltway Phase I alignments considered during the alternative screening process and wetlands. The following explanation was also added to Section 3.14.4.

The proposed Nebo Beltway Phase I was refined during preliminary design stages. As shown on Figure 3.14-2, early Nebo Beltway Phase I concepts north and east of the build alternatives (Level 1 and Level 2 screening alignments; see Section 2.4) would cross large wetlands identified in NWI data. The Nebo Beltway Phase I alignments considered under the build alternatives were aligned to avoid these wetlands and maintain the optimum intersection location with SR-198 (see Section 2.3.5). Furthermore, Nebo Beltway Phase I under the build alternatives was shifted slightly to the south-southeast in an effort to minimize impacts to wetlands W4 and W5.

For the reasons outlined in Section 2.3.5, Section 2.6.7, and Section 3.14.4 of the Final EIS, UDOT determined that moving the Nebo Beltway Phase I interchange under alternatives C1, C3, and R2, and shifting the southern terminus of Nebo Beltway Phase I at SR-198 is impracticable.

*F.2.18 Further justification would be necessary to demonstrate Alternative C1 is the Least Overall Damaging and Practicable Alternative as required under the Clean Water Act Section 404(b)(1). Alternatives with lesser wetland impacts should be retained for consideration as the Preferred Alternative unless it can be*

*demonstrated that they are not practicable per the Guidelines (USACE, EPA)*

Although the Preferred Alternative (Alternative C1) would have the second most wetland impacts, UDOT selected it by weighing a variety of considerations, including environmental impacts, regulatory requirements, and community needs, and because it avoids the use of properties protected by Section 4(f) of the Department of Transportation Act. Section 4(f) requires UDOT to consider alternatives that do not impact historical properties. The use of a historical property cannot be approved unless a determination has been made that there is no feasible and prudent alternative that avoids the property (other than *de minimis* use). Alternative C1 would not use any historical properties.

Alternative C4 and R1, which had fewer wetland impacts, were not selected as the preferred alternative because they would result in a greater than *de minimis* use of two eligible historical properties.

Alternative I1 would result in the least adverse impacts to wetlands and other Waters of the United States (WOUS), but would bring significant impacts to historical sites protected under Section 4(f). Alternative I1 would result in the removal of 20 historical buildings, 18 of which are contributing within the Payson Historic District.

Alternatives C4 and R1 would result in lesser impacts to wetlands and WOUS. They would, however, use two Section 4(f) historical buildings. Alternative C4 would also result in greater right-of-way impacts. Alternative R2 would result in similar impacts to WOUS

compared to the Preferred Alternative, but it would result in greater traffic congestion in the study area. In addition, Alternative R2 would require closing the existing Main Street interchange and could potentially lead to blight, threaten redevelopment prospects, and diminish the historic character of Main Street.

See also the response to comment F.2.17 for information regarding efforts to minimize wetland impacts during the alternative development process.

For these reasons, UDOT believes Alternative C1 is the Preferred Alternative and Least Environmentally Damaging and Practicable Alternative. Efforts will be taken during the Section 404 permitting process to reduce wetland impacts to the extent practicable through coordination with the U.S. Army Corps of Engineers (see also response P.3.3).

*F.2.19 Wetland impacts previously provided to the U.S. Army Corps of Engineers differ from the impacts disclosed in the Draft EIS (USACE)*

Initial wetland impact estimates were based on high-level conceptual alternatives. These conceptual alternatives were based only on horizontal alignment and were not designed in detail. Vertical alignments were not developed and earthwork (cut and fill) was not estimated at the time of Draft EIS. Wetland impacts were estimated in order to compare conceptual alternatives with higher wetland impacts that performed similarly to other alternatives eliminated during screening.

Following screening, the build alternatives were designed in greater detail. Vertical alignments were developed and alternatives were modeled with required side slopes in

order to approximate the location of cut and fill lines. Other design options for the build alternatives also included realigning the railroad and an access road along I-15, resulting in additional wetland impacts. In 2017, UDOT adopted new design standards, which were used to evaluate impacts for the build alternatives. Certain standards (e.g., for ramp metering) increased the required size of the on-ramps which resulted in greater wetland impacts (see Section 2.4.2, Level 2 Screening)

*F.2.20 The described optimal Nebo Beltway alignment appears to serve as a route for those desiring to travel north on I-15 from the east side of Payson and also supports future planned development. We recommend that the Final EIS provide a complete description of the purpose Nebo Beltway, how it helps meet the purpose and need, and an additional description of the beltway in Chapter 2 (EPA). It appears as though a heavily weighted consideration regarding the Preferred Alternative is the compatibility with the proposed future development of the Bamberger Ranches property adjacent to Nebo Beltway. This is inappropriate as the purpose and need focused on improving the operation and safety of the I-15, Main Street interchange (USACE)*

Section The Federal Highway Administration's Technical Advisory T6640.8A states the EIS should identify the current development trends and the State and/or local government plans and policies on land use and growth in the area which will be impacted by the proposed project. The land use discussion should assess the consistency of the alternatives with the development plans adopted for the area.

The Draft EIS covered all land use plans in the study area, including general plans. These plans are general in nature and cover large areas. For example, the *Bamberger Ranch P-C Zone Plan* outlines specific development scenarios for a relatively large area in the study area. The implementation of the *Bamberger Ranch P-C Zone Plan* has significant implications in the future development of Payson City. In addition, the *Bamberger Ranch P-C Zone Plan* is unique in that it identifies two clear development scenarios that are dependent on the location of the interchange and Nebo Beltway Phase I. As such, Bamberger Ranch was given greater consideration in the selection of the preferred alternative to ensure consistency with adopted plans.

In addition, locating Nebo Beltway Phase I farther away from the Main Street interchange is effective in drawing traffic away from Main Street (see Table 2-10 in the Final EIS). The location of Nebo Beltway Phase I influences the engineering design and the distribution of traffic. If Nebo Beltway Phase I was located farther south 0.2 miles from Main Street, as Alternatives C4 and R1 proposed, it would be an unfavorable route and would draw a lower percentage of traffic. This is likely because people traveling north on I-15 from the east side of Payson would have to travel farther out of their way to reach I-15 and would prefer to use the Benjamin interchange—the next interchange to the north. If the Nebo Beltway Phase I was located farther north 0.7 miles from Main Street, as listed in Alternatives C1, C3, and R2, it would become a favorable route and would result in the highest share of traffic on Nebo Beltway Phase I.

*F.2.21 Rationale for selecting the Preferred Alternative is contrary to the criteria used for other transportation projects (USACE)*

UDOT considered environmental impacts, regulatory requirements, and community needs throughout the entire alternative develop and screening and preferred alternative selection process.

Difference in impacts to threatened and endangered species, and unique farmland were considered negligible. Ute ladies'-tresses individual plants would not be directly or indirectly be impacted by any of the candidate build alternatives, except Alternative R1. The concrete batch plant under Alternative R1, would be removed by realigning Main Street to accommodate the Nebo Beltway Phase I interchange. Realigning Main Street would provide street front visibility near the plant population and, therefore, increase the likelihood of development in this area without the need for additional infrastructure improvements. As a result, the known Ute ladies'-tresses population could be indirectly affected by new development under Alternative R1—assuming the external factors align for development to occur (see Section 3.23.5, Potential Indirect Effects on Environmental Resources).

Furthermore, none of the alternatives had a Farmland Impact Rating Score that exceeded the threshold set by the National Resource Conservation Service requiring further consideration for protection (see Section 3.3.3 and Section 3.15.3 of the Final EIS for more information).

A major differentiator was how each alternative met the legal requirements of Section 4(f). The Preferred Alternative would

not result in any Section 4(f) uses (see also response F.2.18).

All build alternatives would meet the purpose and need—they would reduce expected (2040) roadway congestion at the Main Street interchange and on Main Street, and would address the current design deficiencies. The differences in level of service and average vehicle delay at the interchange and on Main Street were not substantial enough to separate one alternative from another. Because LOS and vehicle delay at the interchange and on Main Street were similar under each build alternative, UDOT examined differences in engineering design components, overall study area traffic operations, and the distribution of I-15 traffic to the surrounding roadway network between the build alternatives to identify the preferred alternative. Section 2.6.2 was revised as follows to provide more information regarding the additional design and operational considerations evaluation by UDOT.

Total vehicle delay was used to measure the overall traffic performance in the study area and was an important metric considered during the preferred alternative selection process. Total study area delay is a commonly used metric due to its ability to represent all traffic performance in any given area as a single number. Beyond just traffic congestion, lower vehicle delay also improves air quality, decreases commuting costs and economic impacts, and enhances quality of life. Table 2-9 shows that Alternative C1 is has the lowest overall study area delay in 2040.

The results of an origin-destination analysis—shown in Table 2-10—provide a general idea of how, for each alternative, traffic from I-15 is distributed to the surrounding roadway network. The circle around I-15 shown on Figure 2-44 represents a screenline that all trips to and from I-15 pass through. Table 2-10 shows that the R and C alternatives do the best job of distributing traffic to Main Street and Nebo Beltway, which are the two arterial roads that pass through the study area and are the most capable of carrying traffic to and from I-15 in 2040. However, the R alternatives also add the most traffic to 600 East, which is a heavily residential street that is sensitive to additional traffic.

The location of Nebo Beltway Phase I influences the engineering design and the distribution of traffic. When located farther south—0.2 miles from Main Street for Alternatives C4 and R1—Nebo Beltway Phase I is a less attractive route and draws a lower percentage of traffic. This is likely because people in vehicles desiring to travel north on I-15 from the east side of Payson would have to travel farther out of direction to reach I-15 and would prefer to use the Benjamin interchange—the next interchange to the north.

When located farther north—0.7 miles from Main Street for Alternatives C1, C3, and R2—Nebo Beltway Phase I becomes a more attractive route and

would result in the highest share of traffic on Nebo Beltway Phase I.

Alternatives C4 and R1 would require vertical realignment of the railroad and reconstruction of mainline I-15—raising the grade for approximately 3,000 feet—because I-15 would need to go over both Nebo Beltway Phase I and Main Street. Reconstructing the mainline would result in maintenance-of-traffic complications during construction.

The C alternatives would provide two interchange connections to I-15. An additional interchange would result in improved regional mobility, improved network connectivity, and better emergency response times. The C alternatives would provide better accessibility to the area west of I-15 because Main Street would be realigned to directly connect to 900 North.

In summary, when considering engineering design and traffic operations, Alternatives C1 and C3 provide the combined benefits of two interchange connections and an optimal Nebo Beltway Phase I alignment. Alternative C1 would result in less overall delay in the study area compared to Alternative C3.

*P.2.22 Commenter suggested moving the realignment of Main Street under I-15 to the north or south to avoid the veterinary clinic. Commenter also suggested improve the Benjamin interchange (1 comment).*

UDOT evaluated several options to resolve the traffic and design deficiencies of the Main Street Interchange. Some of these options did not require the full acquisition of the veterinary clinic; however, they did not address the current and future problems of the interchange as well as the Preferred Alternative. Shifting the alignment south of the veterinary clinic would impact the McDonald's and new and existing homes to the south and west of McDonalds, and a new multifamily development southwest of the veterinary clinic that was approved for construction while the Draft EIS was being prepared. Shifting the alignment north may require the full acquisition of South County Lanes & Family Fun Center and residences to the west.

### **Chapter 3: Affected Environment and Environmental Consequences**

*P.3.1 Commenter expressed concern for the removal of businesses on North Main Street and economic effects under the Preferred Alternative (4 comments)*

UDOT carefully evaluated potential right-of-way impacts and corresponding economic effects for each build alternative (see Section 3.8.3 and Section 3.23.5 of the Final EIS). In summary, Alternative I1 would remove 17 commercial buildings, the C Alternatives would remove six commercial buildings, Alternative R1 would remove two commercial buildings, and Alternative R2 would remove one commercial building.

The R Alternatives would remove the fewest businesses, but relocating the interchange would have detrimental economic effects on the remaining businesses on North Main Street that are reliant on convenient interchange access. Moving the interchange

would put the remaining businesses at a disadvantage because new businesses near the relocated interchange under the R Alternatives would then benefit from convenient interchange access. Overall, the Preferred Alternative would provide the most economic benefit for Payson, including the remaining businesses on North Main Street.

*P.3.2 Commenter expressed concern for the removal of historic homes along Main Street and impacts to the Historic District (1 comment)*

Impacts to historic properties were a major consideration during alternative development and impacts analysis (see Section 2.4.2, Section 3.16, and Section 3.17 of the Final EIS). Section 4(f) of the Department of Transportation Act of 1966 requires UDOT to consider alternatives that do not affect historic sites. The use of historic properties may not be approved unless a determination has been made that there is no feasible and prudent alternative that avoids these historic properties. The Preferred Alternative would not adversely impact historic properties on Main Street.

*P.3.3 Commenter expressed concern over wetland impacts and suggested wetland impacts should be reduced (1 comment)*

Impacts to wetlands were a major consideration during alternative development and impacts analysis (see Section 2.4.2 and Section 3.14). All alternatives would impact wetlands. Efforts to avoid or minimize impacts were applied throughout the alternative development process (see Section 3.14.4). Further efforts to reduce wetland impacts will take place during final design. UDOT will evaluate options such as steeper side slopes, barriers, or walls to reduce the footprint. In addition, this project proposes to mitigate for



wetland impacts through coordination with the U.S. Army Corps of Engineers through the Section 404 permitting process.

- P.3.4 *Commenter expressed concern that property owners should be compensated for property acquisition (1 comment)*

All property acquisitions would be completed according to the Federal Uniform Relocation assistance and Real Property Acquisitions Policy Act of 1970 (as amended July 2008) and the Utah Relocation Assistance Act. These regulations require fair compensation for property owners and qualified renters to offset or eliminate any financial hardship that private individuals or entities may experience as a result of property acquisition for public purposes. No individual or family would be required to relocate until adequate, decent, safe, and sanitary housing is available (see Section 3.7 of the Final EIS).

- P.3.5 *Commenter expressed concern regarding impacts to the sewer line to his house (1 comment)*

The location of all utilities will be identified during final design. UDOT will coordinate with utility providers and property owners to minimize disruption of these services during construction.

- P.3.6 *Commenter suggested the Final EIS should articulate the connection between climate change and greenhouse gases (1 comment)*

Revised section 3.11.1 to read, "Greenhouse gases that contribute to climate change are both naturally occurring and by-products of human activity."

- P.3.7 *Commenter suggested the Final EIS should quantify greenhouse gas emissions and effects*

*on climate change at the project level (1 comment)*

As noted in the EIS, there are no federal laws establishing criteria or thresholds for greenhouse gas emissions for transportation projects. FHWA has not required projects to quantify greenhouse emissions. However, a qualitative discussion of greenhouse gas emissions was added to Section 3.11.3. In summary, Alternative I1 could have the lowest CO<sub>2</sub> emissions among the build alternatives.

It should be considered that under the No-Build Alternative, the average daily vehicle delay within the study area in 2040 would be 3,320 hours. The Preferred Alternative would have the lowest delay of 430 hours. The information contained in the Final EIS projects that any of the build alternatives would result in a lower CO<sub>2</sub> emission compared to the No-Build Alternative.

- P.3.8 *Commenter suggested the Final EIS should monetize the impacts of climate change using the social cost of the greenhouse gas metrics (1 comment)*

To date, the Federal Highway Administration has not required individual projects to monetize the social cost of climate change. However, the Federal Highway Administration is actively engaged with the U.S. Department of Transportation's Center for Climate Change and Environmental Forecasting to develop strategies to reduce the contribution of greenhouse gas from transportation projects, especially carbon dioxide emissions, and to assess the risks to transportation systems and services from climate change. The Federal Highway Administration will continue to pursue these efforts to address this issue. The Federal Highway Administration 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.

**F.3.9** *Recommend the Final EIS include a discussion of the potential secondary (indirect) impacts to wetlands within a 300-foot buffer adjacent to the build alternatives. Secondary impacts to aquatic resources should be quantified within a 300-foot-wide buffer (USACE, EPA)*

Indirect wetland impacts were not quantified within a 300-foot-wide buffer because there is no official guidance or regulation from the U.S. Army Corps of Engineers or U.S. Environmental Protection Agency providing justification or rationale for this request. According to a report prepared by the Association of State Wetland Managers, which was also funded by the U.S. Environmental Protection Agency, "the Clean Water Act does not explicitly allow for protection areas adjacent to aquatic resources" (Association of Wetland Managers 2015). UDOT is also unaware of any requirement for compensatory mitigation for secondary effects.

However, the following analysis was added to Section 3.23.5 of the FEIS.

Indirect effects from the roadway include bisecting existing wetlands, and potentially introducing noxious and invasive plant species and diminishing water quality. All alternatives, except Alternative I1, would bisect existing wetlands. Most of the wetlands bisected by the other alternatives occur along the railroad realignment parallel to I-15 and Nebo Beltway Phase I (see Figures 3.14-5

through 3.14-19). Bisecting these wetlands could alter their hydrology and diminish the size and quality of the remaining wetland areas. Table 3.23-5 identifies the wetlands that would be bisected by each alternative. Overall, the C and R alternatives would bisect relatively few wetlands. Alternatives C1, C3, and R2 would bisect the most wetlands (5 out of 41 wetlands delineated in the study area) followed by alternatives R1 (3) and C4 (2).

**TABLE 3.23-5**  
Bisected Wetlands by Alternative

Alternative	Bisected Wetlands
No-Build	N/A
I1	None
C1	W-2e, W-2f, W-6, W-7b, W-9b
C3	W-2e, W-2f, W-6, W-7b, W-9b
C4	W-7b, W-9b
R1	W-7b, W-9b, W-13
R2	W-2e, W-2f, W-6, W-7b, W-9b

Automobiles are known to carry seeds over long distances and disperse them along roadsides. Non-native or noxious species introduced by vehicles travelling along I-15 and Nebo Beltway Phase I could be dispersed into adjacent wetlands and eventually overtake native wetland vegetation. As a result, wetland

habitat for sensitive plant and wildlife species could be reduced.

Changes in stormwater discharge could alter wetland hydrology and vegetation over time. Impacts would vary depending on the wetland type and size and if the runoff is intercepted before entering the wetland. Similar to noxious weeds, inundating wetlands with stormwater could alter the composition of plant and animal species in addition to diminishing water quality. Stormwater under all alternatives would be captured and conveyed by curb and gutter to detention basins that would filter stormwater before outfalling into adjacent tailwater ditches (see Figure 3.13-4). As a result, stormwater runoff would not inundate adjacent wetlands or have a noticeable indirect effect on wetland water quality.

Design features, such as culverts, would be considered during final design to minimize impacts to bisected wetlands.

- F.3.10 Suggest revising wetland figures in Section 3.14 of the Draft EIS to label wetlands that would not be impacted (EPA)*

Wetland labels were added to the figures as requested.

- F.3.11 The Draft EIS assumed that only the Maximum Development Scenario in the Bamberger Ranch P-C Zone plan included open space to preserve existing wetlands. It appears open space where wetlands occur is component of all scenarios in the plan, not just the Maximum Development Scenario. Suggest revising the Final EIS to*

*correct the assumption that only the Maximum Development Scenario will preserve existing wetlands (EPA)*

Section 3.23.5 to remove statements that only the Maximum Development Scenario would preserve existing wetlands.

- F.3.12 Recommend a Project of Air Quality Concern questionnaire PM hot-spot analysis be conducted and included in the Final EIS (EPA).*

In response to this comment, an Air Quality Assessment was prepared that determined this project is not a Project of Air Quality Concern because it would not result in a substantial increase in diesel traffic in the project area compared to the No-Build Alternative. The project is expected to neither influence the vehicle mix in the project area nor attract a significant number of new diesel vehicles to the area. The project is intended to improve traffic flow and safety through the Main Street Interchange and along Main Street from 900 North to SR-198 in Utah County. This project is not a project of air quality concern; therefore, no project-level (hot-spot) analysis is required for conformity purposes under 40 CFR 93.123(b). The Project of Air Quality Concern can be found in Appendix B.

- F.3.13 Recommended mobile home parks be considered as individual areas for the determination of noise abatement versus incorporated in a poll that includes homes with wood frames (EPA).*

Although the environmental justice analysis considered the effects noise would have on environmental justice and non-environmental justice populations, balloting for each noise barrier would occur individually. In other words, only those who are benefitted by a

particular noise barrier would be balloted. This means benefitted receptors with wood frames would not be balloted for noise barriers that would benefit the mobile home parks.

- F.3.14 Concurred that there is no feasible or prudent alternative to the Preferred Alternative and all measures have been taken to minimize harm to Section 4(f) resources (DOI).*

Thank you for your concurrence on Section 3.17, Section 4(f) in the Draft EIS.

- F.3.15 The Draft EIS did not provide an analysis of the secondary effects to wetlands from the roadway alignment. Wetlands adjacent to roadways have the potential to be adversely affected by changes in hydrology and water quality from bisection of wetland complexes, changes in impervious surface and stormwater runoff, changes in vegetation from additional disturbance, and changes to the habitat availability and quality for wetland dependent life (EPA).*

Although section 3.23.5 in Draft EIS discussed indirect impacts to wetlands resulting from induced growth, it did not describe the indirect impacts from the roadway itself. Section 3.23.5 of the Final EIS was revised to provide an analysis of these effects. See response to comment F.3.9.

- F.3.16 Consider replacing the existing culvert carrying Beer Creek under I-15 with an open bottomed culvert, instead of a box culvert.*

Replacing the existing culvert with an open bottomed culvert will be considered during final design if it is determined the culvert needs to be replaced instead of extended.

- F.3.17 Provide a higher compensation ratio than 1:1 for impacts to springs and seeps within the project area.*

The appropriate mitigation ratio will be determined in the Section 404 permit through coordination with the U.S. Army Corps of Engineers. Section 3.14.4 was revised to state the project proposes to utilize permittee-responsible compensatory mitigation. Wetland mitigation for unavoidable impacts will be determined in consultation with the USACE as part of the Section 404 permitting process.

- F.3.18 Recommend providing the results of a wetland functional assessment to help inform the decision by further differentiating the wetland impacts of each alternative (EPA)*

Based on a meeting with the U.S Army Corps of Engineers and EPA on July 15, 2013, it was determined a wetland functional assessment would not be completed for the Final EIS. A wetland functional assessment may be completed during the permitting stage after the Final EIS and Record of Decision to inform mitigation in accordance with UDOT's approved methodology (Report No. UT-06.12).

- F.3.19 Recommend that quantitative motor vehicle emissions information be provided to support the Final EIS air quality resource conclusion using EPA's MOVES2014a motor vehicle emissions model.*

The Federal Highway Administration's *Updated Interim Guidance on Mobile Source Air toxic Analysis in NEPA Documents* dated October 18, 2016, identifies new interchanges as projects that qualify as *Projects with Low Potential Mobile Source Air Toxics Effects*. A qualitative assessment on mobile source air

toxics based on vehicle miles traveled, vehicle mix, and speed is all that is required because the emission effects of these projects are typically low. There would be no difference in overall mobile source air toxics emissions among the various alternatives. In addition, the guidance acknowledges that although vehicles miles travelled is expected to increase by 45% from 2010 to 2040, mobile source air toxics emissions is expected to decrease by 91 percent as the result of stricter emissions standards.

The Federal Highway Administration's guidance provides example language that can be used in qualitative analyses. This language was adapted to the *Payson; I-15 Main Street Interchange Air Quality Assessment*. In summary, the qualitative analysis concluded that although vehicle miles traveled in the study area are expected to increase, mobile source air toxics emissions for all build alternatives are expected to be lower because of reduced congestion and increased travel speeds.

Based on guidance from the Federal Highway Administration and results from the qualitative analysis, a quantitative assessment mobile source air toxics emissions was not completed for the Final EIS.

*F.3.20 Utah County's PM<sub>2.5</sub> nonattainment area classification was legally changed from Moderate to Serious. Recommend updating Table 3.11-2 in the Final EIS to reflect this change (EPA).*

Table 3.11-2 has been updated to reflect this change in the Final EIS.

*F.3.21 Figures 3.24-6 and 3.24-7 refer to annual PM<sub>2.5</sub>, which Utah County is in attainment.*

*Recommend including data trends for the 2006 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standards for which Utah County is designated as nonattainment (EPA).*

Final EIS was revised by replacing Figure 3.24-6, Statewide Annual Mean Concentration of PM<sub>2.5</sub> from 2000-2015 with PM<sub>2.5</sub> Three-Year Average 98<sup>th</sup> Percentile 24-hour concentration. The paragraph discussing PM<sub>2.5</sub> was revised to clarify that Utah County, as indicated by the Spanish Fork monitoring location, is within the annual standard for PM<sub>2.5</sub>.