



FARMINGTON CITY

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November 20, 2012

To: Randy Jeffries, UDOT Project Manager, West Davis Corridor

Subject: Farmington City Input
West Davis Corridor Environmental Impact Statement

Dear Randy:

Thanks for receiving all the input we have provided thus far. Your cooperation and professionalism is appreciated and respected. As a follow-up to our discussion of November 14, 2012, we wanted to formally express some concerns of Farmington City.

By way of service to our city residents, we remain focused on doing what's best for the long-term well being for our community and residents at large. Therefore we respectfully submit (and in some cases re-submit) the following:

- **Farmington City preference between the Shepard Lane option and the Glovers Lane option, continues to remain the Shepard Lane option – ever since the original 1996 study**¹. The only time Farmington City communicated any other message than this, was during the approximate 3 year period (2009-2011) when UDOT erroneously deleted the Shepard Lane option as a possibility. As soon as UDOT reinstated the Shepard lane option, Farmington City immediately reinstated our previously declared preference of the Shepard Lane option. On our current Farmington City website, the outdated Master Transportation Plan map² shows the period when UDOT prohibited the Shepard Lane option. However, the City Council minutes of Jan 2011 reflect the reinstatement of the Shepard Lane preference. This was communicated via a resolution of the City Council to your office at that time.

¹ Over 15 years the documented plan for Legacy expansion in the Farmington/Kaysville area has been the Shepherd lane option: 1) Wasatch Front Regional Council Map Oct 2, 1996, 2) Farmington City Letter Sep 18, 1996, 3) Farmington City Planning Map 1997-1998, 4) Wasatch Front Regional Council "North Legacy Transportation Corridor Preservation Map (Figure 8-3 Baker Lochner Drawings), and 5) Hunters Creek Plat Map Plan Jan 23, 2003.

² In June 2009 Farmington City posted new transportation plan map showing something similar to the current Glover Lane alignment (reference <http://www.farmington.utah.gov/img/Files/Final%20Farmington%20Master%20Plan%20Addendum%20Part%20A.pdf>)

- **Farmington City Input regarding Glovers Lane Option.** There are several points of input -- IF – the Glovers Lane option is selected:
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 - 1. **Net Loss to Farmington – “Road to nowhere”** The current plan as presented by UDOT provides an overall negative impact to Farmington. Similar to “*taxation without representation*” if UDOT rejects the pre-established arterial route between Kaysville and Farmington (similar to UDOT’s current Shepard Lane option), Farmington City will experience a form of “*taxation without connection*” (or benefit) with an overall significant net loss to Farmington as follows:
 - No benefit of access to residents to compensate for the devaluation of their property
 - Additional loss of land and tax base to Farmington – more than the Shepard Lane option presents. This alignment virtually destroys our LM&R zone in the south part of the City.
 - Devalue of property in all areas in and around the corridor
 - Diverting potential retail revenues from Farmington’s retail revenue corridor (Station Park) to the planned exits in Kaysville and Centerville. We have built our economic development planning around this area and the fact that all the highways come together in this location and the transportation spokes all stem from that guiding principle.
 - 2. **Safety / Emergency Access in Farmington** Having no exits for 10 ¾ miles between exits from Kaysville to Centerville and having 10 miles between exits from Kaysville to Park Lane creates safety hazards for not only rerouting traffic in accident/emergency situations, but also inhibiting emergency vehicles to respond to crisis situations. This is unacceptable in the urban environment we live in. As you know, by sheer geography Farmington is also the host for the intersection of three highways (I-15, US 89 and Legacy). Adding one more large highway without the ability to access will make our jurisdictional responses for emergencies very delayed, not to mention impactful to those needing the assistance.
 - 3. **Regional Interchanges** -- When UDOT without a detailed study informed Farmington the I-15 Alignment (current Shepard Lane option) was not possible a few years ago, Farmington commissioned a traffic study in 2009 to evaluate the viability of various alignments. This traffic analysis, which in no small part eventually led to the full EIS now being completed and showed two interchanges are required to ensure proper traffic standards for flow and safety. This data resulted in defining the Master Transportation Plan (MTP) map that is found on our website. If UDOT selects the Glovers Lane option they must consider this traffic analysis and

properly respond to Farmington City's request for two interchanges:

- **1100 West Access / Interchange** -- As seen in the MTP map, Farmington City is planning for an intersection at 1100 West and Glovers Lane. This presents two issues for UDOT: 1) Designing an interchange to 1100 W, or 2) not designing an interchange and having to build extended structures over both 1100 West and Glovers due to the proximity of the WDC to both 1100 West and Glovers. This must be addressed in the draft Environmental Impact Statement (EIS). We also believe the impacts of the grades are not called out enough in the EIS. While UDOT uses an "at grade" definition when a structure is not used, the revised plans call for fill grade elevation effects ranging from ten to thirty feet in height. We also believe the Bassett home would likely have to be taken once this intersection modification and/or interchange is factored in the mix and the revised data does not reflect that fact.
 - **950 North Access / Interchange** -- Also noted in the MTP map, Farmington requires an interchange out west at 950 North. This will provide the required regional traffic flow and access to our citizens on the west side. If UDOT selects the Glovers Lane option, the Shepard Lane connector road between I-15 and WDC will still be built and an interchange at Legacy is still required.
4. **New Elementary School and High School impacts.** The Davis School District has closed on property for a new elementary school on the Diument property and the City transportation plan calls for a connection road to Glovers which would be impacted by that alignment. This access connection should be factored in because that school will likely be built in the next three years. The School District has also informed the City they are attempting a bond cycle which would have a new Farmington High School built and operational by the fall of 2018 near the current bus barn. This will significantly affect west side transportation patterns for parents, students, teachers and bus routes. We need more connections in this area which the City is planning for but the Glovers alignment will significantly limit and restrict. This will affect residents of Centerville, Farmington and West Kaysville. One of the complaints discussed in great detail from those opposing the Shepard Lane alignment is that it would divide school and church boundaries in that neighborhood. We want to make sure that the EIS addresses that very same principle but on a larger scale for the Glovers alignment as it relates to the school impact for the new elementary school and high school which will impact multiple neighborhoods.
5. **Wasatch Front Regional Council – Shepard Lane Interchange – “Two for one”** -- From the Wasatch Front Regional Council - Regional

Transportation Plan, the Shepard Lane interchange is planned for 2011-2020. If the Glover Lane option is selected, taxpayers will have to pay extra:

- **Additional connector road between I-15 and WDC** (which is where the WDC Glovers Lane option would replace)
- **Separate Project Overhead Costs** for having to design and manage two separate projects (WDC and Shepard Lane interchange in lieu of just one project with the Shepard Lane option of the WDC). We believe a double counting of environmental impacts are being wrongly attributed to the Shepard Lane alternative in the EIS. Our reason for this belief is those impacts to the Shepard Lane interchange are going to be there regardless of which alternative is selected so we think that should be noted as a separate note in the comparison between the two alternatives because it skews the presentation of the data.

With this input submitted months before the DRAFT EIS is scheduled to be released, we strongly request this input be addressed in the DRAFT EIS and not only in the final EIS.

Respectfully submitted

Scott Harbertson
Mayor

Jim Talbot
Councilmember

Cory Ritz
Councilmember

Nelsen Michaelson
Councilmember

Jim Young
Councilmember

John Bilton
Councilmember