
Appendix 4B

Section 4(f) Correspondence

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State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.
Executive Director

LISA J. WILSON, P.E.
Deputy Director of Engineering and Operations

BENJAMIN G. HUOT, P.E.
Deputy Director of Planning and Investment

February 6, 2024

Brian Horrocks
Mayor
City of North Salt Lake
10 E. Center Street
North Salt Lake, Utah 84054

Subject: UDOT Project No. S-I15(369)309, I-15 Farmington to Salt Lake City Environmental Impact Statement, Davis and Salt Lake County, Utah (PIN 18857)
Section 4(f) Temporary Occupancy Concurrence Request

Dear Mr. Horrocks:

The purpose of this letter is to notify you that the Utah Department of Transportation (UDOT) intends to make a temporary occupancy finding regarding one Section 4(f) recreation resource under your jurisdiction and make a temporary nonconforming use finding regarding one Section 6(f) under your jurisdiction. UDOT requests your concurrence that the I-15: Farmington to Salt Lake City Project would not adversely affect the activities, features, or attributes that make this resource eligible for Section 4(f) and Section 6(f) protection.

This temporary occupancy finding is pursuant to Section 4(f) of the Department of Transportation Act of 1966; Section 6009 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); and 23 Code of Federal Regulations Part 774. This temporary nonconforming use finding is pursuant to Section 6(f) of the Land and Water Conservation Fund Act of 1964; and 54 United States Code Chapter 2003. The review, consultation, and other actions required by these laws and rules are being carried out by UDOT pursuant to 23 United States Code Section 327 and a Memorandum of Understanding dated May 26, 2022, and executed by the Federal Highway Administration and UDOT.

UDOT is preparing an Environmental Impact Statement (EIS) for I-15 between Farmington and Salt Lake City which has aging infrastructure and worsening operational characteristics for current and projected (2050) travel demand, both of which contribute to decreased safety, increased congestion, lost productivity, and longer travel times. The purpose of the I-15 project is to improve safety, replace aging infrastructure, provide better mobility for all travel modes, strengthen the state and local economy, and better connect communities along I-15 from Farmington to Salt Lake City.

Action Alternative

One Action Alternative is being evaluated in the EIS. The Action Alternative includes five general-purpose lanes and one high-occupancy/toll lane on I-15, interchange improvements, and improvements to pedestrian and bicyclist facilities throughout the project study area. The Action Alternative also includes the following subarea options:

- Farmington 400 West Option
- Farmington State Street Option
- Salt Lake City 1000 North – Northern Option
- Salt Lake City 1000 North – Southern Option

Detailed information regarding the Action Alternative and subarea options is available in Chapter 2, *Alternatives*, of the Draft EIS. Avoidance, minimization, and mitigation measures have been considered while developing the Action Alternative. The Action Alternative would result in temporary occupancy of a Section 4(f) resource under your jurisdiction as described below. There would not be any difference in impact from any of the subarea options.

Section 4(f)

Section 4(f) Recreation Resources

Section 4(f) applies to significant publicly owned parks and recreation areas that are open to the public. The land must be officially designated as a park or recreation area, and the officials with jurisdiction of the land must determine that its primary purpose is as a park or recreation area.

UDOT has identified one Section 4(f) recreation resource under the City of North Salt Lake’s jurisdiction that would be potentially affected by this project: Hatch Park.

Temporary Occupancy Definition

Temporary occupancy occurs when a recreation property is occupied during construction but the impacts are so minimal that they do not constitute a use within the meaning of Section 4(f). The following conditions must be satisfied:

1. The duration must be temporary, that is, less than the time needed for construction of the project, and there should be no change in ownership of the land;
2. The scope of the work must be minor, that is, both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis;
4. The land being used must be fully restored, that is, the property must be returned to a condition which is at least as good as that which existed prior to the project; and
5. There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

Hatch Park

Hatch Park is a 12.3-acre park located at 50 W. Center Street. The entire 12.3-acre park is considered a Section 4(f) recreation resource. A total of 10.9 acres of the 12.3-acre park received LWCF Act funds and are considered a Section 6(f) resource. The park is owned and maintained by the City of North Salt Lake and includes a baseball field, a soccer field, a tennis court, a volleyball court, a playground, a walking trail, grills, pavilions, and picnic tables.

Section 4(f) Impact to Hatch Park

The Action Alternative would result in temporary construction impacts on the south edge of the park to construct a new sidewalk and bike lane on City-owned park property. Additionally, the existing noise wall would be replaced, and an extension of the noise wall might be constructed on the west edge of the park (subject to meeting the conditions of the balloting process in UDOT’s Noise Abatement Policy). This noise wall would extend the full length of the west side of the park (from 150 North to Center Street) and would be constructed on existing UDOT right-of-way.

Installing the new sidewalk, bike lane, and noise wall would temporarily impact about 0.21 acre of land. No right-of-way would be permanently converted (Figure 1).

UDOT is proposing the following mitigation measures. UDOT would build a new sidewalk and bike lane on City-owned property on the north side of Center Street. All disturbed areas would be revegetated. The extended noise wall would reduce traffic noise from I-15 at Hatch Park.

Figure 1. Section 4(f) Use of Hatch Park with the Action Alternative



Section 6(f)

Section 6(f) Recreation Resources

The Land and Water Conservation Fund (LWCF) Act was established in 1964 to enable the purchase of land, water, and wetlands by federal, state, and local governments for the benefit of all Americans. It has been used to protect wildlife habitat, historic treasures, and clean water sources, as well as to expand recreation opportunities, such as parks and trails. Areas in which these funds were used have special protection under Section 6(f) of the LWCF Act. UDOT has identified one Section 6(f) recreation resource under the City of North Salt Lake's jurisdiction that would be potentially affected by this project: Hatch Park.

Section 6(f) Temporary Nonconforming Use Definition

Temporary nonconforming uses of the Section 6(f) property that last less than 6 months are not considered conversion and do not require replacement property. To be considered a temporary use, the use cannot result in permanent damage to the LWCF-assisted area. In addition, appropriate measures must be taken to ensure that the outdoor recreation area is restored for public recreation use and there are no residual impacts on the site once the temporary use is concluded.

Section 6(f) Impact to Hatch Park

The Action Alternative would temporarily impact 0.19 acre of the 10.9-acre section of Hatch Park that received LWCF Act funds. These temporary impacts would include relocating the sidewalk on the south side of Hatch Park farther north between the west parking lot entrance and I-15, replacing the existing noise wall on the west side of Hatch Park, and extending the existing noise wall farther south (subject to meeting the conditions of the balloting process in UDOT's Noise Abatement Policy). This noise wall would extend the full length of the west side of the park (from 150 North to Center Street) and would be constructed on existing UDOT right-of-way. The installing the new sidewalk, bike lane, and noise wall would likely require temporary non-recreation activities in the park to construct the new sidewalk and the noise wall. No ownership would be converted with these improvements. The total park acreage would remain the same, and the park parcels would continue to be owned by the City of North Salt Lake. The improvements would not impact parking or access (Figure 2).

These activities would likely qualify for a temporary nonconforming use for the following reasons:

- Constructing the sidewalk and the noise wall would take less than 6 months.
- The size of the area affected by the temporary non-recreation use would not significantly affect public outdoor recreation use. The temporary uses would occur in areas that are not actively used for recreation including a storage area and a landscaped berm west of the walking trail and sports fields.
- The temporary use would not permanently damage Hatch Park. The area would be restored for public recreation use, and there would be no residual impacts once construction is complete.
- There are no practical alternatives to the proposed temporary use.

UDOT will submit a request for temporary use to the State LWCF Coordinator. Documentation will include start and completion dates, identification of the affected area and map, an analysis of alternatives to the proposed temporary use, a description of immediate impacts and any residual or long-term impacts, and a description of the actions that will be taken to restore the site for public outdoor recreation use. The LWCF Coordinator will then submit the proposal to the National Park Service for its review.

Figure 2. Section 6(f) Use of Hatch Park with the Action Alternative



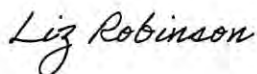
Public Notice and Opportunity for Public Comment

UDOT provided public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of Section 4(f) recreation resources in conjunction with the opportunity for public review of and comments on the Draft EIS. UDOT released the Draft EIS on September 29, 2021, followed by a 45-day public comment period that ended on November 13, 2023.

Request for Concurrence

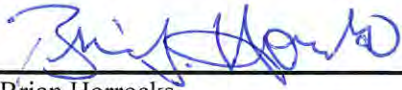
UDOT did not receive any comments concerning the effects on the protected activities, features, or attributes of Hatch Park during the public comment period. We are now requesting your final concurrence that the I-15 project would not adversely affect the activities, features, or attributes that make this property eligible for Section 4(f) protection. If you have any questions, please contact me at (801) 910-2035 or lizrobinson@utah.gov.

Sincerely,



Liz Robinson
Cultural Resources Program Manager
Utah Department of Transportation

Regarding Hatch Park, I concur with the Section 4(f) evaluation described above and with UDOT's intent to make a Section 4(f) temporary occupancy finding.



3/25/24

Brian Horrocks

Date

Mayor

City of North Salt Lake

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State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.
Executive Director

LISA J. WILSON, P.E.
Deputy Director of Engineering and Operations

BENJAMIN G. HUOT, P.E.
Deputy Director of Planning and Investment

February 6, 2024

Kristin Riker
Director
Salt Lake City, Department of Public Lands
451 S. State Street, Suite 306
Salt Lake City, Utah 84111

Subject: UDOT Project No. S-I15(369)309, I-15 Farmington to Salt Lake City Environmental Impact Statement, Davis and Salt Lake Counties, Utah (PIN 18857)
Section 4(f) Temporary Occupancy Concurrence Request

Dear Ms. Riker:

The purpose of this letter is to notify you that the Utah Department of Transportation (UDOT) intends to make temporary occupancy findings regarding two Section 4(f) recreation resources under your jurisdiction and to request your concurrence that the I-15: Farmington to Salt Lake City Project would not adversely affect the activities, features, or attributes that make these resources eligible for Section 4(f) protection.

These temporary occupancy findings are pursuant to Section 4(f) of the Department of Transportation Act of 1966; Section 6009 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); and 23 Code of Federal Regulations Part 774. The review, consultation, and other actions required by these laws and rules are being carried out by UDOT pursuant to 23 United States Code Section 327 and a Memorandum of Understanding dated May 26, 2022, and executed by the Federal Highway Administration and UDOT.

UDOT is preparing an EIS for I-15 between Farmington and Salt Lake City which has aging infrastructure and worsening operational characteristics for current and projected (2050) travel demand, both of which contribute to decreased safety, increased congestion, lost productivity, and longer travel times. The purpose of the I-15 project is to improve safety, replace aging infrastructure, provide better mobility for all travel modes, strengthen the state and local economy, and better connect communities along I-15 from Farmington to Salt Lake City.

Action Alternative

One Action Alternative is being evaluated in the EIS. The Action Alternative includes five general-purpose lanes and one high-occupancy/toll lane on I-15, interchange improvements, and improvements to pedestrian and bicyclist facilities throughout the project study area. The Action Alternative also includes the following subarea options:

- Farmington 400 West Option
- Farmington State Street Option
- Salt Lake City 1000 North – Northern Option
- Salt Lake City 1000 North – Southern Option

Detailed information regarding the Action Alternative and subarea options is available in Chapter 2, *Alternatives*, of the Draft EIS. Avoidance, minimization, and mitigation measures have been considered while developing the Action Alternative. The Action Alternative would result in temporary occupancy of Section 4(f) resources under your jurisdiction as described below. There would not be any difference in impact from any of the subarea options.

Section 4(f) Recreation Resources

Section 4(f) applies to significant publicly owned parks and recreation areas that are open to the public. The land must be officially designated as a park or recreation area, and the officials with jurisdiction of the land must determine that its primary purpose is as a park or recreation area.

UDOT has identified two Section 4(f) recreation resources under Salt Lake City's jurisdiction that would be potentially affected by this project: North Gateway Park and Warm Springs Park.

Temporary Occupancy Definition

Temporary occupancy occurs when a recreation property is occupied during construction but the impacts are so minimal that they do not constitute a use within the meaning of Section 4(f). The following conditions must be satisfied:

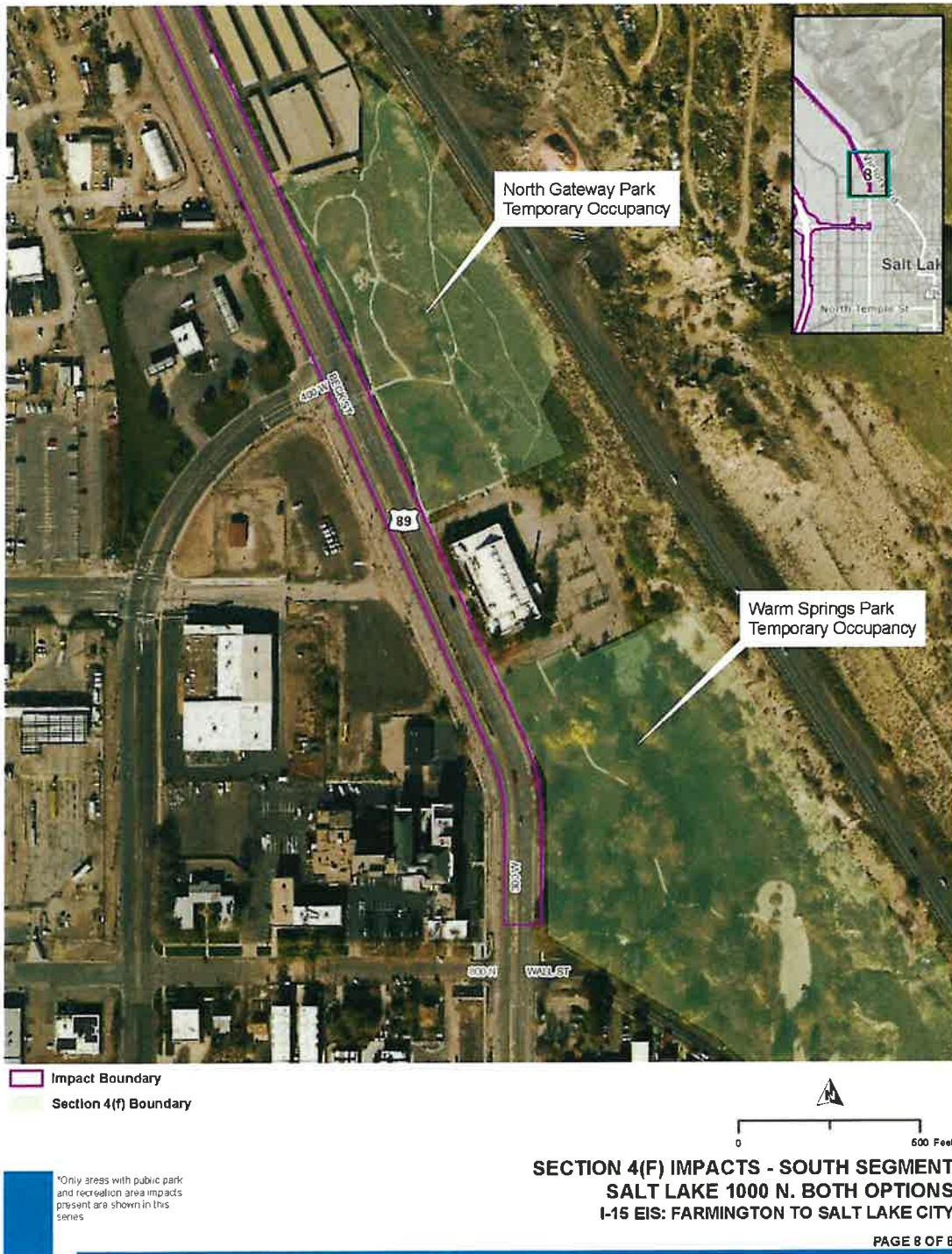
1. The duration must be temporary, that is, less than the time needed for construction of the project, and there should be no change in ownership of the land;
2. The scope of the work must be minor, that is, both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis;
4. The land being used must be fully restored, that is, the property must be returned to a condition which is at least as good as that which existed prior to the project; and
5. There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

North Gateway Park

The Action Alternative would result in temporary occupancy to reconstruct driveway access to North Gateway park. These temporary occupancy impacts are needed due to constructing the Action Alternative's new shared-use path on U.S. 89/Beck Street (Figure 1). No right-of-way would be permanently converted.

UDOT is proposing the following mitigation measures. UDOT would reconstruct the driveway to the parking lot. Any disturbed areas would be revegetated. UDOT would acquire a temporary construction easement and would coordinate with Salt Lake City during construction to minimize any closures of the park.

Figure 1. Use of North Gateway Park and Warm Springs Park with the Action Alternative



Warm Springs Park

The Action Alternative would result in temporary occupancy impacts to reconstruct driveway access to the park. No right-of-way would be permanently converted (Figure 1).

UDOT is proposing the following mitigation measures. UDOT would reconstruct the driveway to the parking lot. Any disturbed areas would be revegetated. UDOT would acquire a temporary construction easement and would coordinate with Salt Lake City during construction to minimize any closures of the park.

Public Notice and Opportunity for Public Comment

UDOT provided public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of Section 4(f) recreation resources in conjunction with the opportunity for public review of and comments on the Draft EIS. UDOT released the Draft EIS on September 29, 2021, followed by a 45-day public comment period that ended on November 13, 2023.

Request for Concurrence

UDOT did not receive any comments concerning the effects on the protected activities, features, or attributes of North Gateway Park or Warm Springs Park the public comment period. We are now requesting your final concurrence that the project will not adversely affect the activities, features, or attributes that make these properties eligible for Section 4(f) protection. If you have any questions, please contact me at (801) 910-2035 or lizrobinson@utah.gov.

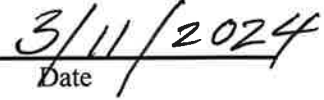
Sincerely,



Liz Robinson
Cultural Resources Program Manager
Utah Department of Transportation

Regarding North Gateway Park and Warm Springs Park, I concur with the Section 4(f) evaluation described above and with UDOT's intent to make Section 4(f) temporary occupancy findings for the impacts to North Gateway Park and Warm Springs Park.


Kristin Riker
Director


Date

Salt Lake City, Department of Public Lands

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State of Utah

SPENCER J. COX
Governor

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Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

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Executive Director

LISA J. WILSON, P.E.

Deputy Director of Engineering and Operations

BENJAMIN G. HUOT, P.E.

Deputy Director of Planning and Investment

February 28, 2024

Craig Carter
Superintendent
Davis School District
45 E. State Street
Farmington, Utah 84025

Subject: UDOT Project No. S-I15(369)309, I-15 Farmington to Salt Lake City Environmental Impact Statement, Davis and Salt Lake Counties, Utah (PIN 18857)
Section 4(f) *De Minimis* Impact and Temporary Occupancy Concurrence Request

Dear Mr. Carter:

The purpose of this letter is to notify you that the Utah Department of Transportation (UDOT) intends to make a *de minimis* impact finding regarding one Section 4(f) recreation resource and temporary occupancy findings for two Section 4(f) recreation resources under your jurisdiction. UDOT also requests your concurrence that the I-15: Farmington to Salt Lake City Project would not adversely affect the activities, features, or attributes that make these resources eligible for Section 4(f) protection.

These *de minimis* impact and temporary occupancy findings are pursuant to Section 4(f) of the Department of Transportation Act of 1966; Section 6009 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); and 23 Code of Federal Regulations Part 774. The review, consultation, and other actions required by these laws and rules are being carried out by UDOT pursuant to 23 United States Code Section 327 and a Memorandum of Understanding dated May 26, 2022, and executed by the Federal Highway Administration and UDOT.

UDOT is preparing an Environmental Impact Statement (EIS) for I-15 between Farmington and Salt Lake City which has aging infrastructure and worsening operational characteristics for current and projected (2050) travel demand, both of which contribute to decreased safety, increased congestion, lost productivity, and longer travel times. The purpose of the I-15 project is to improve safety, replace aging infrastructure, provide better mobility for all travel modes, strengthen the state and local economy, and better connect communities along I-15 from Farmington to Salt Lake City.

Action Alternative

One Action Alternative is being evaluated in the EIS. The Action Alternative includes five general-purpose lanes and one high-occupancy/toll lane on I-15, interchange improvements, and improvements to pedestrian and bicyclist facilities throughout the project study area. The Action Alternative also includes the following subarea options:

- Farmington 400 West Option
- Farmington State Street Option
- Salt Lake City 1000 North – Northern Option
- Salt Lake City 1000 North – Southern Option

Detailed information regarding the Action Alternative and subarea options is available in Chapter 2, *Alternatives*, of the Draft EIS. Avoidance, minimization, and mitigation measures have been considered while developing the Action Alternative. The Action Alternative would result in a *de minimis* impact to or temporary occupancy of Section 4(f) resources under your jurisdiction as described below. There would not be any difference in impact from any of the subarea options.

Section 4(f) Recreation Resources

Section 4(f) applies to significant publicly owned parks and recreation areas that are open to the public. The land must be officially designated as a park or recreation area, and the officials with jurisdiction of the land must determine that its primary purpose is as a park or recreation area.

UDOT has identified three Section 4(f) recreation resources under Davis School District's jurisdiction that would be potentially affected by this project: the Woods Cross High School playing fields, the Farmington Junior High School playing fields, and the Woods Cross Elementary School playing fields and walking path.

***De Minimis* Impact Definition**

For a park or recreation resource, a *de minimis* impact is one that would not adversely affect the features, attributes, or activities of a property that qualify the resource for protection under Section 4(f). *De minimis* impact determinations are based on the degree of impact after including of any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) to address the Section 4(f) use (that is, the net impact).

Temporary Occupancy Definition

Temporary occupancy occurs when a recreation property is occupied during construction, but the impacts are so minimal that they do not constitute a use within the meaning of Section 4(f). The following conditions must be satisfied:

1. The duration must be temporary, that is, less than the time needed for construction of the project, and there should be no change in ownership of the land;
2. The scope of the work must be minor, that is, both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis;
4. The land being used must be fully restored, that is, the property must be returned to a condition which is at least as good as that which existed prior to the project; and
5. There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

Woods Cross High School Playing Fields

Woods Cross High School has 16.3 acres of sports fields located south of the school at 600 West 2200 South. These fields include a baseball field, softball field, football fields, tennis courts, grass playing fields, and parking lots.

The Action Alternative would result in a *de minimis* impact to the west edge of the playing fields south of Woods Cross High School. About 0.32 acre of land would need to be acquired, which would remove about 5 to 7 feet of property that consists of landscaping and sidewalk (Figure 1). Impacts would require replacing the chain link fence south of the baseball field.

UDOT is proposing the following mitigation measures. The chain link fence south of the softball field would be replaced. Impacts would be minimized to affect only landscaping and sidewalk on the west edge of the playing fields. UDOT would work with Davis School District to reconfigure the baseball and/or softball fields if replacing the fencing causes spacing issues for the baseball and/or softball fields. UDOT would compensate Davis School District for right-of-way acquired for the Action Alternative. UDOT would work with Davis School District to minimize any closures or detours on Wildcat Way when school is in session. Any disturbed areas would be revegetated.

Farmington Junior High School Playing Fields

Farmington Junior High School has 8.25 acres of grass playing fields on the west side of the school at 150 South 200 West.

The Action Alternative would result in temporary occupancy impacts to the west edge of the playing fields from constructing the new frontage road and potentially installing a noise wall (Figure 2). No right-of-way would be permanently converted.

UDOT is proposing the following mitigation measures. Any disturbed areas would be revegetated. UDOT would acquire a temporary construction easement and would coordinate with the Davis School District during construction to minimize any impacts to or closures of the playing fields.

Woods Cross Elementary School Playing Fields and Walking Path

Woods Cross Elementary School has 4.2 acres of sports fields on the east side of the school at 745 West 1100 South. These sports fields include grass playing fields and a paved walking path.

The Action Alternative would result in temporary occupancy impacts to the east edge of the playing fields and walking path from replacing a noise wall (Figure 3). No right-of-way would be permanently converted.

UDOT is proposing the following mitigation measures. Any disturbed areas would be revegetated. UDOT would acquire a temporary construction easement and would coordinate with the Davis School District during construction to minimize any impacts to or closures of the playing fields or walking path.

Figure 1. Section 4(f) Use of Woods Cross High School Playing Fields with the Action Alternative



- Impact Boundary
- Section 4(f) Boundary
- Section 4(f) Impact



*Only areas with public park and recreation area impacts present are shown in this series



**SECTION 4(F) IMPACTS - NORTH SEGMENT
FARMINGTON BOTH OPTIONS
I-15 EIS: FARMINGTON TO SALT LAKE CITY**

Figure 2. Section 4(f) Use of Farmington Junior High School Playing Fields with the Action Alternative



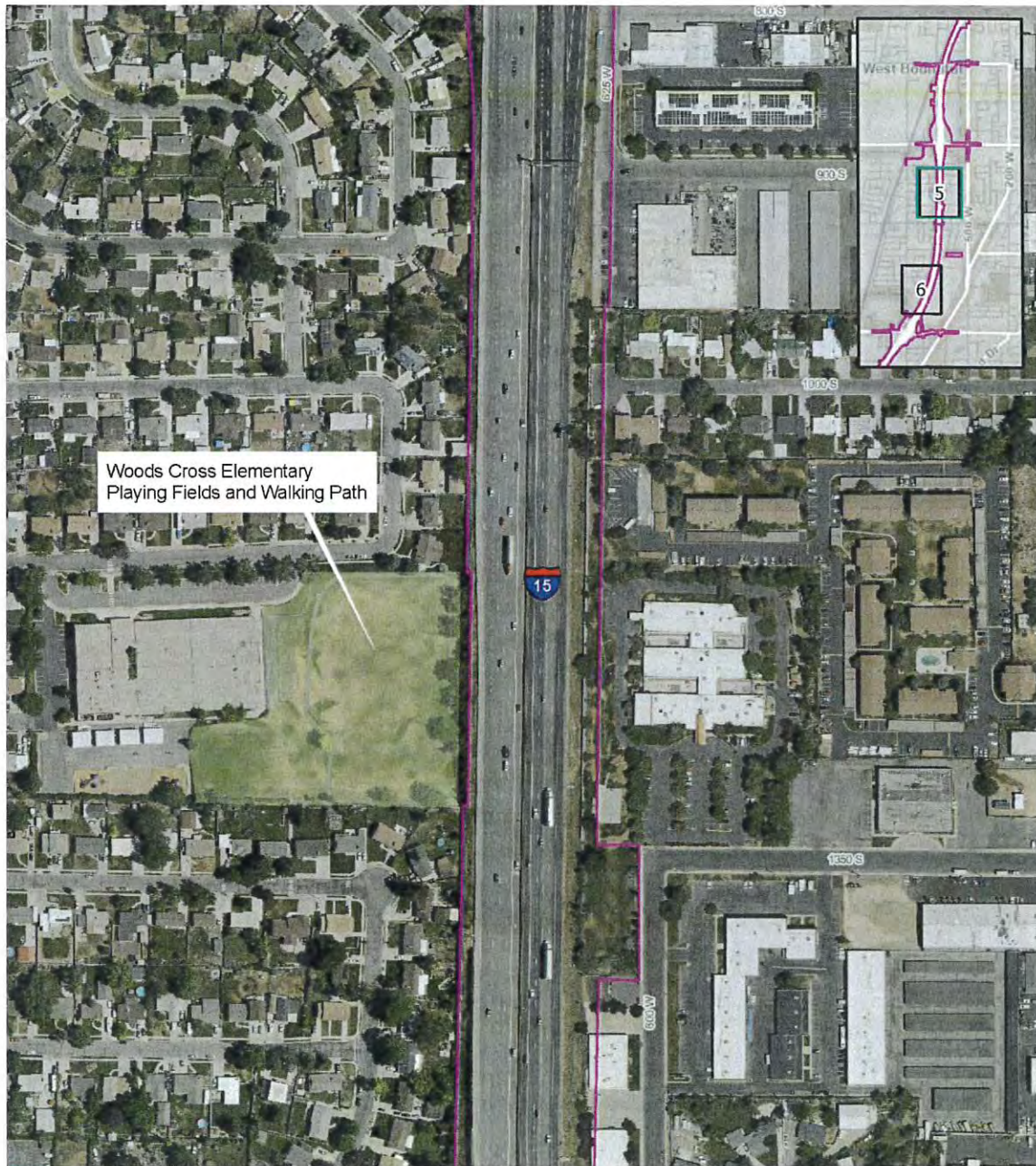
 Impact Boundary
 Section 4(f) Boundary

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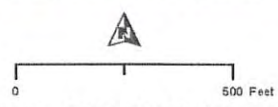
**SECTION 4(F) IMPACTS - NORTH SEGMENT
 FARMINGTON BOTH OPTIONS
 I-15 EIS: FARMINGTON TO SALT LAKE CITY**

Figure 3. Section 4(f) Use of Woods Cross Elementary School Playing Fields and Walking Path with the Action Alternative



Impact Boundary
Section 4(f) Boundary

*Only areas with public park and recreation area impacts present are shown in this series



**SECTION 4(F) IMPACTS - NORTH SEGMENT
FARMINGTON BOTH OPTIONS
I-15 EIS: FARMINGTON TO SALT LAKE CITY**

Public Notice and Opportunity for Public Comment

UDOT provided public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of Section 4(f) recreation resources in conjunction with the opportunity for public review of and comments on the Draft EIS. UDOT released the Draft EIS on September 29, 2021, followed by a 45-day public comment period that ended on November 13, 2023.

Request for Concurrence

UDOT did not receive any comments concerning the effects on the protected activities, features, or attributes of the Woods Cross High School playing fields, Farmington Junior High School playing fields, or Woods Cross Elementary School playing fields and walking path during the public comment period. We are now requesting your final concurrence that the I-15 project would not adversely affect the activities, features, or attributes that make these properties eligible for Section 4(f) protection. If you have any questions, please contact me at (801) 910-2035 or lizrobinson@utah.gov.

Sincerely,



Liz Robinson
Cultural Resources Program Manager
Utah Department of Transportation

Regarding the Woods Cross High School playing fields, Farmington Junior High School playing fields, or Woods Cross Elementary School playing fields and walking path, I concur with the Section 4(f) evaluation described above and with UDOT's intent to make a Section 4(f) *de minimis* impact finding for the impacts to the Woods Cross High School playing fields and a Section 4(f) temporary occupancy finding for the impacts to the Farmington Junior High School playing fields and the Woods Cross Elementary playing fields.



25 April 2024

Craig Carter
~~Superintendent~~ Business Administrator
Davis School District

Date



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.
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Deputy Director of Engineering and Operations

BENJAMIN G. HUOT, P.E.
Deputy Director of Planning and Investment

February 28, 2024

Clark Wilkinson
Mayor
Centerville City
250 N. Main Street
Centerville, Utah 84014

Subject: UDOT Project No. S-I15(369)309, I-15 Farmington to Salt Lake City Environmental Impact Statement, Davis and Salt Lake Counties, Utah (PIN 18857)
Section 4(f) *De Minimis* Impact Concurrence Request

Dear Mr. Wilkinson:

The purpose of this letter is to notify you that the Utah Department of Transportation (UDOT) intends to make a *de minimis* impact finding regarding one Section 4(f) recreation resource under your jurisdiction and make a conversion use finding regarding one Section 6(f) resource under your jurisdiction. UDOT requests your concurrence that the I-15: Farmington to Salt Lake City Project would not adversely affect the activities, features, or attributes that make this resource eligible for Section 4(f) protection and Section 6(f) protection.

This *de minimis* impact finding is pursuant to Section 4(f) of the Department of Transportation Act of 1966; Section 6009 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); and 23 Code of Federal Regulations Part 774. This conversion use finding is pursuant to Section 6(f) of the Land and Water Conservation Fund Act of 1964; and 54 United States Code Chapter 2003. The review, consultation, and other actions required by these laws and rules are being carried out by UDOT pursuant to 23 United States Code Section 327 and a Memorandum of Understanding dated May 26, 2022, and executed by the Federal Highway Administration and UDOT.

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- Farmington State Street Option
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- Salt Lake City 1000 North – Southern Option

Detailed information regarding the Action Alternative and subarea options is available in Chapter 2, *Alternatives*, of the Draft EIS. Avoidance, minimization, and mitigation measures have been considered while developing the Action Alternative. The Action Alternative would result in a *de minimis* impact to a Section 4(f) resource under your jurisdiction and a conversion use finding regarding one Section 6(f) resource under your jurisdiction as described below. There would not be any difference in impact from any of the subarea options.

Section 4(f)

Section 4(f) Recreation Resources

Section 4(f) applies to significant publicly owned parks and recreation areas that are open to the public. The land must be officially designated as a park or recreation area, and the officials with jurisdiction of the land must determine that its primary purpose is as a park or recreation area.

UDOT has identified one Section 4(f) recreation resource under Centerville City’s jurisdiction that would be potentially affected by this project: Centerville Community Park.

De Minimis Impact Definition

For a park or recreation resource, a *de minimis* impact is one that would not adversely affect the features, attributes, or activities of a property that qualify the resource for protection under Section 4(f). *De minimis* impact determinations are based on the degree of impact after including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) to address the Section 4(f) use (that is, the net impact).

Centerville Community Park

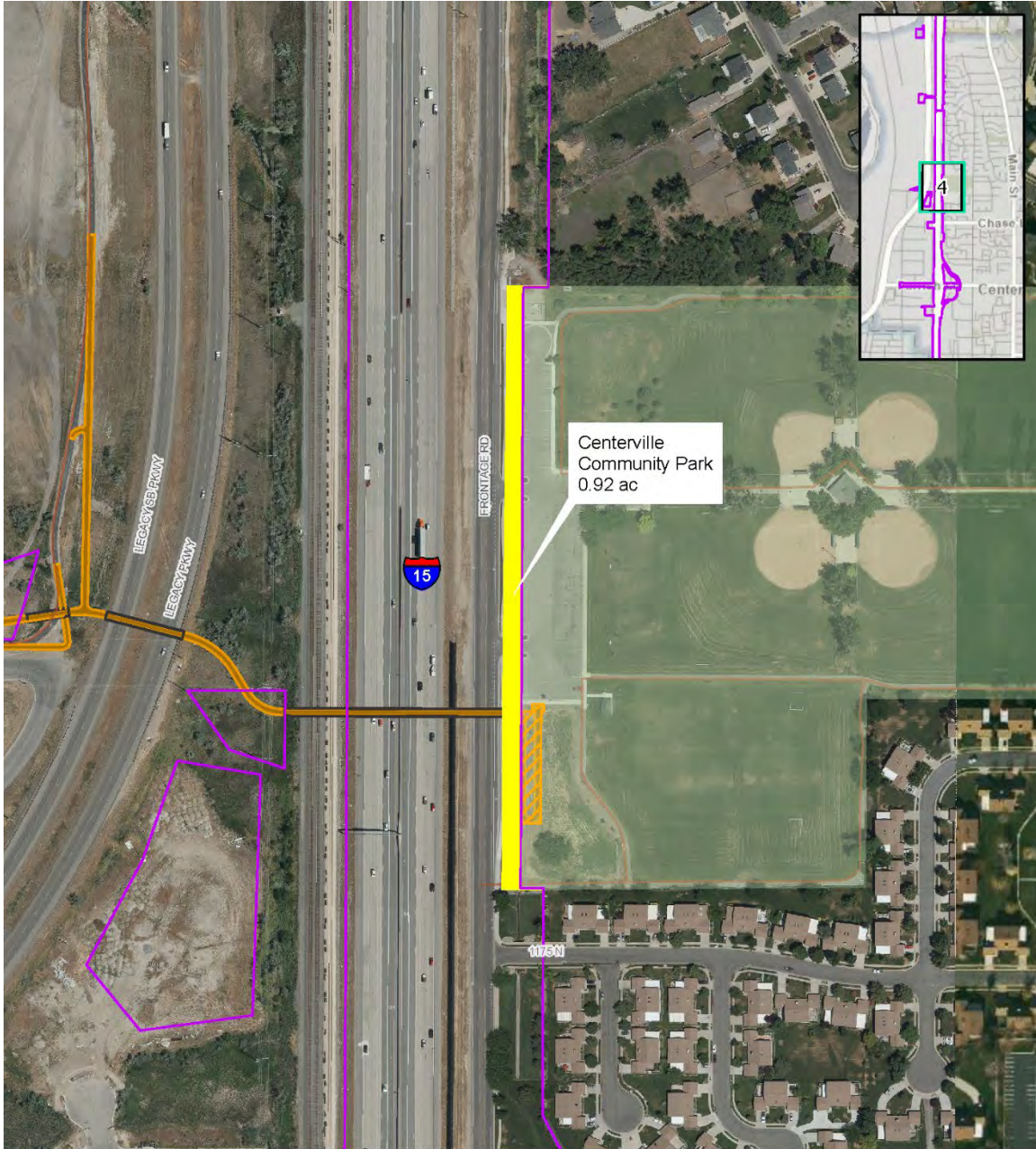
Centerville Community Park is a 30-acre park located at 1350 North 400 West. The entire 30-acre park is considered a Section 4(f) recreation resource. Of the 30-acre park, 23.95 acres received LWCF Act funds and are considered a Section 6(f) resource. The park is owned and maintained by Centerville City and includes six multisport fields, a 1-mile jogging path, a playground, a sand volleyball court, pavilions, bathrooms, drinking fountains, and parking areas.

Section 4(f) Impact to Centerville Community Park

The Action Alternative would result in a *de minimis* impact to the western edge of Centerville Community Park. The Action Alternative would permanently convert to transportation use 0.92 acre (3.1%) of the 30-acre area of Centerville Community Park protected under Section 4(f). The additional lanes that would be constructed on I-15 with the Action Alternative would require relocating Frontage Road and the sidewalk to the east, which would remove the landscaping between the parking lot and Frontage Road on the west edge of the park. There would not be any impacts to park recreation features, access, or parking. Constructing the new grade-separated crossings for pedestrians and bicyclists over I-15, the railroad tracks, and Legacy Parkway that would connect to the Legacy Parkway Trail and the Denver and Rio Grande Western Trail would use about 0.34 acre of Centerville Community Park (Figure 1). However, because this is a recreation facility and would enhance the recreation attributes of the park, it would be considered a Section 4(f) beneficial use.

UDOT is proposing the following mitigation measures: UDOT would build a new trail overpass that goes over I-15, the railroad tracks, and Legacy Parkway and connects Centerville Community Park with the Legacy Parkway Trail and the Denver Rio Grande Western Trail west of Legacy Parkway. Any disturbed areas would be revegetated.

Figure 1. Section 4(f) Use of Centerville Community Park with the Action Alternative



- Impact Boundary
- Section 4(f) Boundary
- Section 4(f) Impact
- Temporary Occupancy for Pedestrian Bridge
- Shared Use Path

*Only areas with public park and recreation area impacts present are shown in this series



**SECTION 4(F) IMPACTS - NORTH SEGMENT
FARMINGTON BOTH OPTIONS
I-15 EIS: FARMINGTON TO SALT LAKE CITY**

Section 6(f)

Section 6(f) Recreation Resources

The Land and Water Conservation Fund (LWCF) Act was established in 1964 to enable the purchase of land, water, and wetlands by federal, state, and local governments for the benefit of all Americans. It has been used to protect wildlife habitat, historic treasures, and clean water sources as well as to expand recreation opportunities such as parks and trails. Areas in which these funds were used have special protection under Section 6(f) of the LWCF Act. UDOT has identified one Section 6(f) recreation resource under Centerville City's jurisdiction that would be potentially affected by this project: Centerville Community Park.

Section 6(f) Conversion Definition

For a Section 6(f) park or recreation resource, a conversion of use occurs when a site identified by the Section 6(f) boundary map is wholly or partially converted to a use other than public outdoor recreation. No property acquired or developed with LWCF assistance may be converted to uses other than public outdoor recreation uses without the approval of the Secretary of the Interior. The Secretary's approval depends on substituting other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location. The Secretary also considers whether the proposed conversion and substitution are in accordance with the then-existing statewide comprehensive outdoor plan. To qualify, the replacement property must be contiguous with the current site, or another existing park or recreation area, and otherwise meet the eligibility requirements for an acquisition grant. Small conversions are partial conversions in which no more than 10% of the whole LWCF-assisted area will be converted to a use other than public outdoor recreation.

Section 6(f) Impact to Centerville Community Park

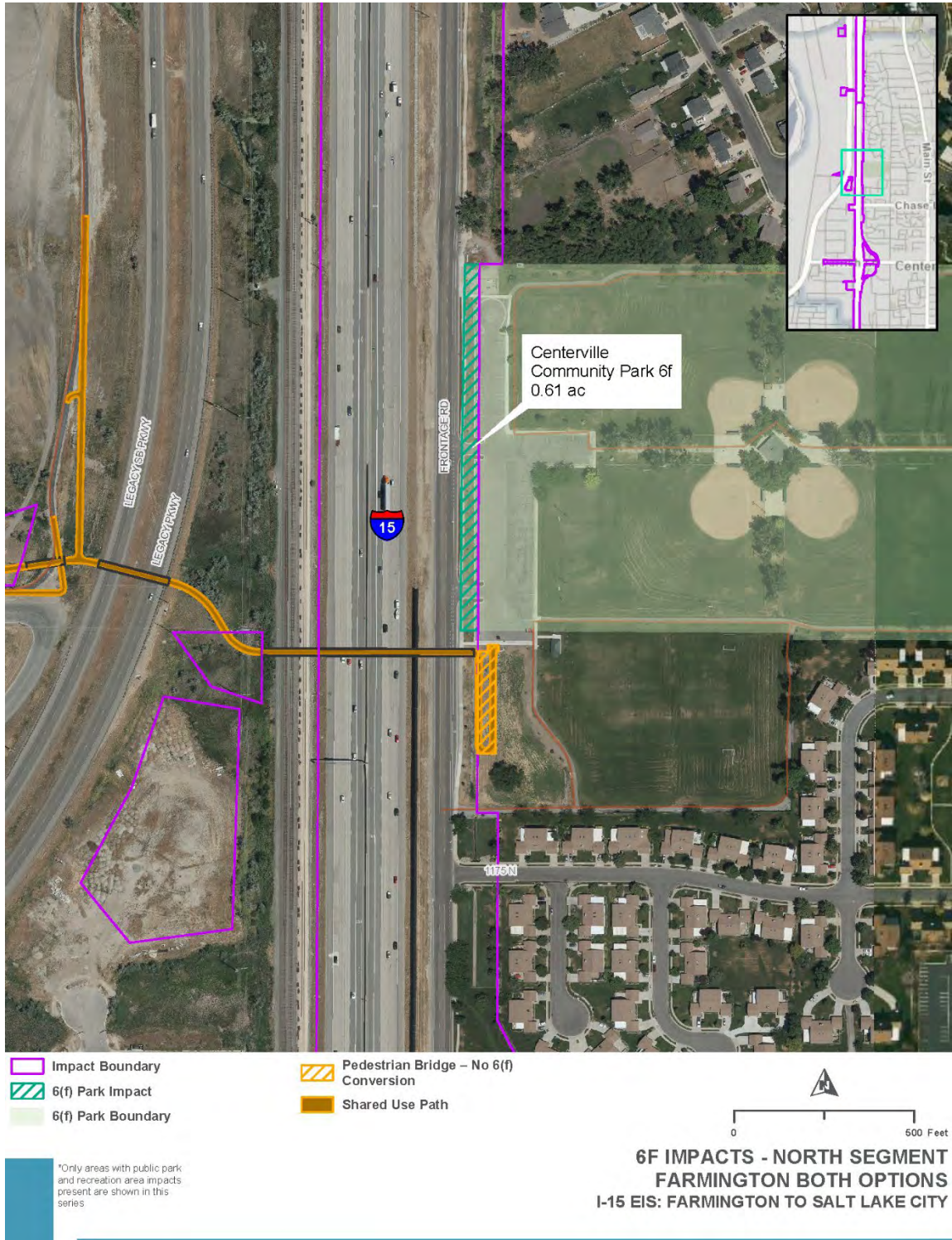
The Action Alternative would permanently convert to transportation use 0.61 acre (2.5%) of the 23.95-acre area of Centerville Community Park protected under Section 6(f) of the LWCF Act. The additional lanes that would be constructed on I-15 with the Action Alternative would require relocating Frontage Road and the sidewalk to the east, which would remove the landscaping between the parking lot and Frontage Road on the west edge of the park (Figure 2). Park recreation features, access, or parking would not be impacted. Pursuant to the requirements of Section 6(f), UDOT will continue to coordinate with Centerville City regarding potential Section 6(f) replacement properties and mitigation for the Section 6(f) conversion impacts to the park.

Converting 0.61 acre of Centerville Community Park would likely qualify as a small conversion if the following conditions are met:

- No more than 10% of the whole Section 6(f) area would be converted to transportation use. With the Action Alternative, 0.61 acre (2.5%) of the 23.95-acre area of Centerville Community Park protected under Section 6(f) would be converted to transportation use.
- This replacement property would need to be contiguous with an existing park or recreation area.
- Minor or no environmental impacts would occur to resources being removed from Section 6(f) properties, to the remaining Section 6(f) property, or to the contiguous new replacement recreation area.
- The proposed conversion would not be controversial.

If suitable contiguous replacement property is not available, or if UDOT cannot meet the other small-conversion criteria listed above, UDOT would need to follow the conversion procedures of the LWCF Act and look at replacement properties in different locations.

Figure 2. Section 6(f) Use of Centerville Community Park with the Action Alternative



Public Notice and Opportunity for Public Comment

UDOT provided public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of Section 4(f) recreation resources in conjunction with the opportunity for public review of and comments on the Draft EIS. UDOT released the Draft EIS on September 29, 2021, followed by a 45-day public comment period that ended on November 13, 2023.

Request for Concurrence

UDOT did not receive any comments concerning the effects on the protected activities, features, or attributes of Centerville Community Park during the public comment period. We are now requesting your final concurrence that the I-15 project would not adversely affect the activities, features, or attributes that make this property eligible for Section 4(f) protection. If you have any questions, please contact me at (801) 910-2035 or lizrobinson@utah.gov.

Sincerely,



Liz Robinson
Cultural Resources Program Manager
Utah Department of Transportation

Regarding Centerville Community Park, I concur with the Section 4(f) evaluation described above and with UDOT's intent to make a Section 4(f) *de minimis* impact finding.

DocuSigned by:

Clark Wilkinson

6/24/2024 | 9:14 PM MDT

Clark Wilkinson

Date

Mayor
Centerville City

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State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.
Executive Director

LISA J. WILSON, P.E.
Deputy Director of Engineering and Operations

BENJAMIN G. HUOT, P.E.
Deputy Director of Planning and Investment

May 14, 2024

Brett Anderson
Mayor
Farmington City
160 S. Main Street
Farmington, Utah 84025

Subject: UDOT Project No. S-I15(369)309, I-15 Farmington to Salt Lake City Environmental Impact Statement, Davis and Salt Lake Counties, Utah (PIN 18857)
Section 4(f) *De Minimis* Impact Concurrence Request

Dear Mr. Anderson:

The purpose of this letter is to notify you that the Utah Department of Transportation (UDOT) intends to make *de minimis* impact findings regarding three Section 4(f) recreation resources under your jurisdiction and to request your concurrence that the I-15: Farmington to Salt Lake City Project would not adversely affect the activities, features, or attributes that make these resources eligible for Section 4(f) protection.

These *de minimis* impact findings are pursuant to Section 4(f) of the Department of Transportation Act of 1966; Section 6009 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU); and 23 Code of Federal Regulations Part 774. The review, consultation, and other actions required by these laws and rules are being carried out by UDOT pursuant to 23 United States Code Section 327 and a Memorandum of Understanding dated May 26, 2022, and executed by the Federal Highway Administration and UDOT.

UDOT is preparing an Environmental Impact Statement (EIS) for I-15 between Farmington and Salt Lake City which has aging infrastructure and worsening operational characteristics for current and projected (2050) travel demand, both of which contribute to decreased safety, increased congestion, lost productivity, and longer travel times. The purpose of the I-15 project is to improve safety, replace aging infrastructure, provide better mobility for all travel modes, strengthen the state and local economy, and better connect communities along I-15 from Farmington to Salt Lake City.

Responses to the comments provided in your March 6, 2024, letter are included separately. This letter has been updated pursuant to the comments and additional conversation with city staff on March 18, 2024 and correspondence provided on April 22, 2024.

Action Alternative

One Action Alternative is being evaluated in the EIS. The Action Alternative includes five general-purpose lanes and one high-occupancy/toll lane on I-15, interchange improvements, and improvements to pedestrian and bicyclist facilities throughout the project study area. The Action Alternative also includes the following subarea options:

- Farmington 400 West Option
- Farmington State Street Option
- Salt Lake City 1000 North – Northern Option
- Salt Lake City 1000 North – Southern Option

Detailed information regarding the Action Alternative and subarea options is available in Chapter 2, *Alternatives*, of the Draft EIS. Avoidance, minimization, and mitigation measures have been considered while developing the Action Alternative. Both of the Farmington subarea options would result in a *de minimis* impact to a Section 4(f) resource under your jurisdiction as described below.

Section 4(f) Recreation Resources

Section 4(f) applies to significant publicly owned parks and recreation areas that are open to the public. The land must be officially designated as a park or recreation area, and the officials with jurisdiction of the land must determine that its primary purpose is as a park or recreation area.

UDOT has identified three Section 4(f) recreation resources under Farmington City's jurisdiction that would be potentially affected by this project: Ezra T. Clark Park, Farmington Creek Trail, and South Park.

***De Minimis* Impact Definition**

For a park or recreation resource, a *de minimis* impact is one that would not adversely affect the features, attributes, or activities of a property that qualify the resource for protection under Section 4(f). *De minimis* impact determinations are based on the degree of impact after including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) to address the Section 4(f) use (that is, the net impact).

Greater-than-*De Minimis* Impact Definition

For a park or recreation resource, a greater-than-*de minimis* impact is one that would adversely affect the features, attributes, or activities of a property that qualify the resource for protection under Section 4(f) after including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) to address the Section 4(f) use (that is, the net impact).

Ezra T. Clark Park

Ezra T. Clark Park is a 2-acre park located at 400 W. State Street. The middle 0.47 acre of the park that includes Farmington Creek Trail is owned by Farmington City. The remaining park (which includes the areas with the parking lot, pavilion, and historic monument) is located on parcels owned by UDOT.

400 West Option *De Minimis* Impact

The Action Alternative with the Farmington 400 West Option (UDOT's preferred alternative) would result in *de minimis* impacts to the west edge of Ezra T. Clark Park. About 0.04 acre of the 0.47-acre parcel owned by Farmington City and about 0.62 acre of the 2-acre total park acreage (including parcels owned by UDOT) would be partially acquired (Figure 1). The parking lot,

pavilion, and historic monument would not be impacted. There would be temporary impacts to the central part of the park in the areas where the Farmington Creek Trail is realigned (Figure 1).

UDOT is proposing the following mitigation measures. Any disturbed areas in Ezra T. Clark Park or around the Farmington Creek Trail would be revegetated, and UDOT would reconnect Farmington Creek Trail in Ezra T. Clark Park. UDOT would compensate Farmington City for the city-owned right-of-way acquired for the Action Alternative.

State Street Option Greater-than-*De Minimis* Impact

The Action Alternative with the Farmington State Street Option would result in greater-than-*de minimis* impacts to Ezra T. Clark Park. Realigning Frontage Road would impact the parking lot, pavilion, and historic monument and would require full acquisition of the 0.47-acre central parcel that is owned by Farmington City. New roadway would be placed on all 2 acres of the 2-acre park, including the parcels owned by UDOT (Figure 2). UDOT is proposing the following mitigation measures. UDOT would compensate Farmington City for the city-owned right-of-way acquired for the Action Alternative and would work with Farmington City to identify off-site mitigation (either a new park or enhancements to an existing park) for the impacts to Ezra T. Clark Park.

Farmington Creek Trail

Farmington Creek Trail is a 2.5-mile-long paved trail between the Davis County Fairgrounds and Farmington Canyon. The Farmington Creek Trail is a regionally significant east-west trail that connects regional north-south trails such as the Bonneville Shoreline Trail, the Legacy Parkway Trail, and the Denver and Rio Grande Western Trail. The trail is owned and managed by Farmington City. About 0.1 mile of the trail is located in Ezra T. Clark Park, and the trail crosses 400 West on the east side of the Frontage Road/400 West intersection. The trail uses a pedestrian crossing on the south side of State Street to cross I-15, the railroad tracks, and Legacy Parkway.

400 West Option *De Minimis* Impact

The Action Alternative with the Farmington 400 West Option would result in *de minimis* impacts to about 1,126 linear feet of Farmington Creek Trail that is located in Ezra T. Clark Park. Farmington Creek Trail would be realigned due to the Action Alternative with the 400 West Option (Figure 1).

The Action Alternative with the Farmington 400 West Option would not require a new crossing of 400 West and would provide a similar crossing of the Farmington Creek Trail crossing at the 400 West/Frontage Road intersection.

However, UDOT understands Farmington City's interest in improving the existing crossing by providing a new grade-separated crossing of 400 West for the Farmington Creek Trail and agrees that including a new grade-separated crossing with the Action Alternative with the Farmington 400 West Option would help improve the safety for pedestrians and bicyclists on the Farmington Creek Trail and would be consistent with UDOT's purpose of and need for the I-15: Farmington to Salt Lake City Project.

Based on Farmington City's interest in a grade-separated crossing, the Action Alternative with the 400 West Option includes a new box culvert under 400 West that would be sized to include both the Farmington Creek Trail and Farmington Creek. The Action Alternative with the 400 West Option will also include a new trail connection for the Farmington Creek Trail in Ezra T. Clark Park to connect to the existing Farmington Creek Trail. If a grade-separated crossing is determined to not be feasible during final design, UDOT would work with Farmington City to identify ways to improve the at-grade crossing of 400 West. Farmington City would be

responsible for the new trail connection on the east side of 400 West between the new box culvert and the existing Farmington Creek Trail.

UDOT does not consider a potential new grade-separated crossing a Section 4(f) mitigation measure since the Action Alternative with the 400 West Option would not require a new crossing of the Farmington Creek Trail. UDOT considers adding a new 400 West grade-separated crossing a betterment to the existing trail system that can be accommodated with the Action Alternative with the 400 West Option. Per discussions with Farmington City staff, UDOT anticipates that, in lieu of UDOT providing funding to Farmington City for impacted properties at Ezra T. Clark Park or other city-owned properties impacted by the Action Alternative with the 400 West Option, Farmington City would allow UDOT to direct these funds toward a new grade-separated trail crossing for the Farmington Creek Trail at 400 West up to the cost of the new grade-separated crossing.

UDOT would also revegetate any disturbed areas adjacent to the Farmington Creek Trail.

State Street Option *De Minimis* Impact

The Action Alternative with the Farmington State Street Option would result in *de minimis* impacts to about 1,126 linear feet of Farmington Creek Trail that are located in Ezra T. Clark Park. Farmington Creek Trail would be realigned to the east side of 400 West between 100 North and State Street with the State Street Option (Figure 2). With the State Street Option, there would not be a crossing of 400 West at Frontage Road because this intersection would be eliminated with the State Street Option.

With the State Street Option, UDOT would relocate the Farmington Creek Trail on the east side of 400 West/Lagoon Drive and continue it south to State Street, where it would reconnect with the existing Farmington Creek Trail. At State Street, there would be a signal-controlled crossing at both 400 West and State Street for pedestrians and bicyclists on the Farmington Creek Trail. UDOT would revegetate any disturbed areas adjacent to Farmington Creek Trail.

South Park

South Park is a 6.6-acre park located at 1384 S. Frontage Road. The park is owned and managed by Farmington City. Park features include basketball courts, a volleyball court, a playground, a softball field, a skate park, a pavilion, and parking.

The Action Alternative with both the Farmington 400 West Option and Farmington State Street Option would result in *de minimis* impacts to the west edge of South Park (Figure 3). About 0.40 acre of land would be acquired, which would remove some of the park strip and landscaping between the parking lot and Frontage Road and between the softball field and Frontage Road. For the South Park parking lot on the west side of the park, there would be at least 10 feet of space between the parking lot and the sidewalk with either the Farmington 400 West Option or Farmington State Street Option. UDOT does not anticipate there being concerns with the use of the parking lot due to the new sidewalk and does not anticipate the need to relocate the off-street parking area. The area of South Park used for the skate park would be impacted by relocating the Central Davis Sewer District pump station onto the skate park area.

The Final EIS design for the Action Alternative currently assumes that there would be about 15 feet between the new sidewalk and the existing softball backstop and fence on the west side of the softball diamond. UDOT currently anticipates that there would be enough space to continue to use the softball diamond, fences, backstop, and benches in their existing location.

UDOT is proposing the following mitigation measures. Any disturbed areas, including the existing skate park, would be revegetated and irrigation systems will be modified, repaired, or

replaced as necessary to ensure the irrigation system functions comparable to existing conditions. UDOT would compensate Farmington City for the right-of-way acquired for the Action Alternative. UDOT would provide funding to Farmington City to replace the skate park at a different recreational location in Farmington. If final design of the Action Alternative results in additional encroachment that would make the softball field unusable in its current location, UDOT would work with Farmington City to determine the distance needed to move the backstop, fencing, diamond, irrigation, play surface, etc., so that the softball field would continue to be usable.

Figure 1. Section 4(f) Use of Ezra T. Clark Park and Farmington Creek Trail with the 400 West Option



Figure 2. Section 4(f) Use of Ezra T. Clark Park and Farmington Creek Trail with the State Street Option

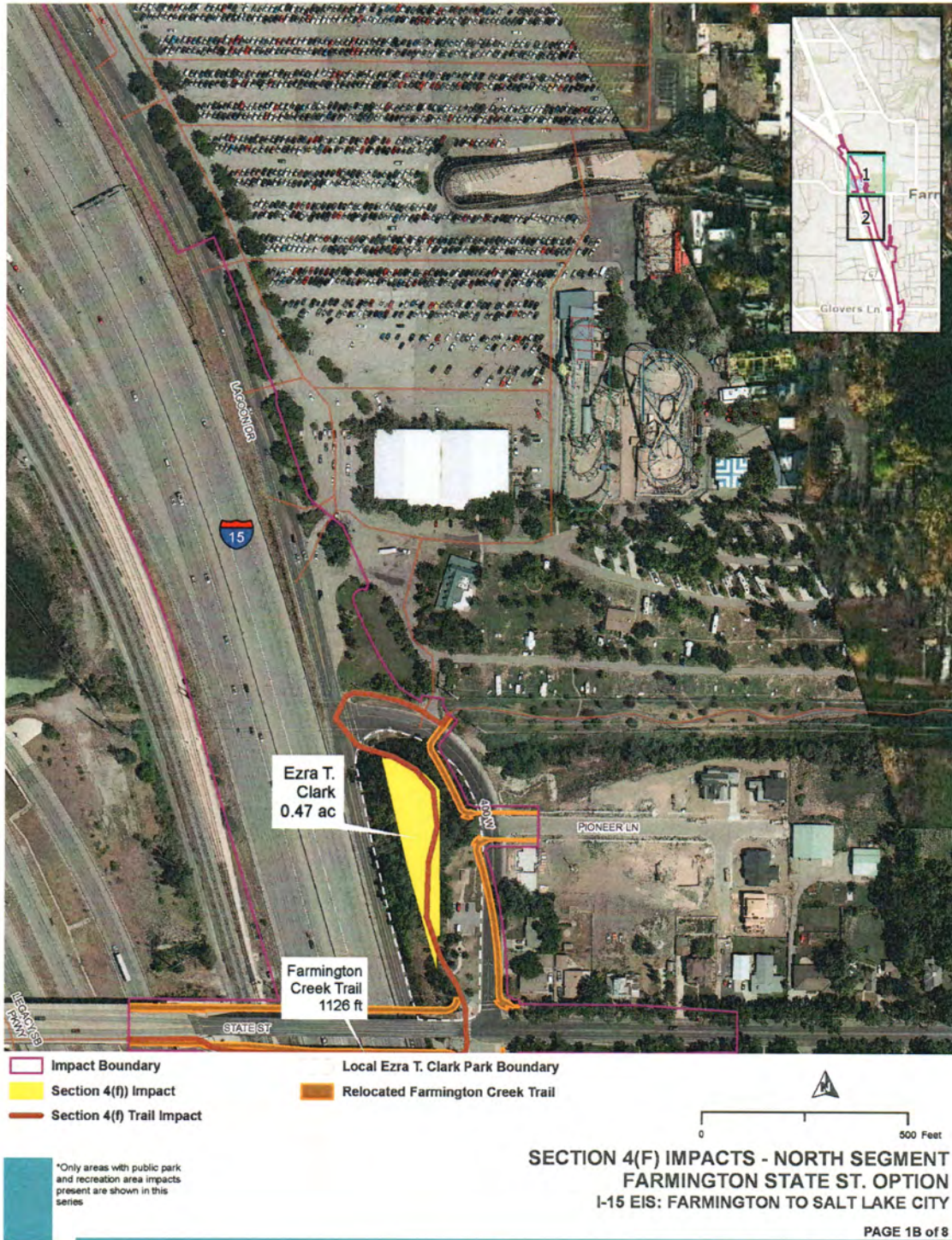
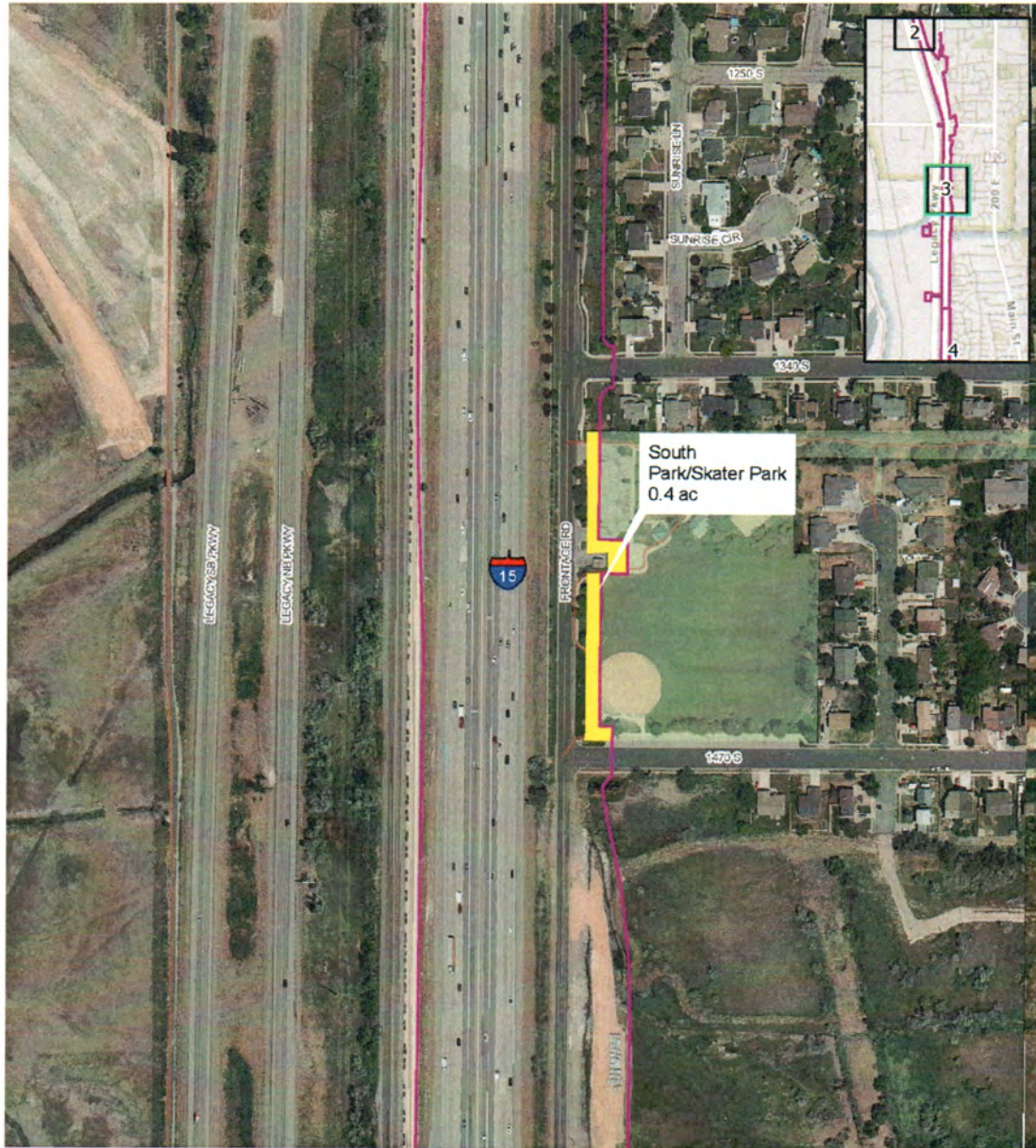


Figure 3. Section 4(f) Use of South Park with the Farmington 400 West Option and Farmington State Street Option



- Impact Boundary
- Section 4(f) Boundary
- Section 4(f) Impact

*Only areas with public park and recreation area impacts present are shown in this series.



**SECTION 4(F) IMPACTS - NORTH SEGMENT
FARMINGTON BOTH OPTIONS
I-15 EIS: FARMINGTON TO SALT LAKE CITY**

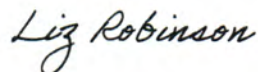
Public Notice and Opportunity for Public Comment

UDOT provided public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of Section 4(f) recreation resources in conjunction with the opportunity for public review of and comments on the Draft EIS. UDOT released the Draft EIS on September 29, 2021, followed by a 45-day public comment period that ended on November 13, 2023.

Request for Concurrence

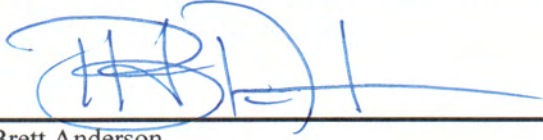
UDOT did not receive any comments concerning the effects on the protected activities, features, or attributes of Ezra T. Clark Park, South Park, or Farmington Creek Trail during the public comment period. We are now requesting your final concurrence that the I-15 project would not adversely affect the activities, features, or attributes that make these properties eligible for Section 4(f) protection. If you have any questions, please contact me at (801) 910-2035 or lizrobinson@utah.gov.

Sincerely,

A handwritten signature in cursive script that reads "Liz Robinson".

Liz Robinson
Cultural Resources Program Manager
Utah Department of Transportation

Regarding Ezra T. Clark Park (with the Farmington 400 West Option), South Park, and Farmington Creek Trail, I concur with the Section 4(f) evaluation described above and with UDOT's intent to make a Section 4(f) *de minimis* impact finding.



7-9-24

Brett Anderson
Mayor
Farmington City

Date

Comment-response Matrix

Document Title	Farmington City Section 4(f) Concurrence Letter	Reviewer(s)	Brigham Mellor, Farmington City
Document Date	May 14, 2024	Review Date(s)	June 4, 2024
Item	Reviewer	Comment	Response
1.	Brigham Mellor	The ball field off the frontage road. Like all cities, people occasionally leave the road in their vehicles and enter the parks - so we rarely have ballfields too close to the roadway, primarily for the comfort and safety of the spectators. The council is concerned that the road pushing closer to the ballfield is problematic for spectator safety. As it stands, the playing field sits 45 feet from the TBC on the frontage road. The council's issue is that they have yet to see a plan that shows how that field would still be kept safe for spectators at a relatively equitable distance from the roadway as it is now. If you have anything that can be presented to them to address this concern, that would be helpful.	The current frontage road does not allow parking and includes a curb and gutter on the east side by South Park. With the proposed I-15 EIS design, the frontage road would be shifted about 22 feet to the east and would include a curb and gutter. Similar to existing conditions, there are no plans to allow parking on the frontage road. East of the curb and gutter the I-15 EIS design would include an 8 foot wide sidewalk and 4 foot park strip. There would be approximately 12-13 feet from the east side of the sidewalk to the softball diamond 3rd base side fence (see attached figure for reference). Assuming any spectators would be east of the sidewalk, the spectators would have at least 32 feet of shoulder, curb and gutter, park strip, and sidewalk between them and traffic on the frontage road. It also worth clarifying that about 22 feet of the landscaped area on the east side of the frontage road is on a parcel owned by UDOT (see snip below from Davis County). Most of the impacts to the Farmington owned parcel would be in the areas with the new sidewalk. As stated in the Section 4(f) concurrence letter, UDOT currently anticipates that there would be enough space to continue to use the softball diamond, fences, backstop, and benches in their existing location. UDOT is proposing that any disturbed areas would be revegetated and irrigation systems will be modified, repaired, or replaced as necessary to ensure the irrigation system functions comparable to existing conditions. If final design of the I-15 EIS project results in encroachment that would make the softball field unusable in its current location, UDOT would work with Farmington City to determine the distance needed to move the backstop, fencing, diamond, irrigation, play surface, etc. so that the softball field would continue to be usable.
2.	Brigham Mellor	The skate park replacement. What does that look like? Are we designing it? If so, what are the resources available to address this use?	In meetings with Farmington City staff, City staff have requested that UDOT provide funds to Farmington City to replace the skate park at a different, unspecified recreational location in Farmington. UDOT is assuming the fair value of the existing, impacted skate park at South Park would be established through the UDOT ROW process (which has not started yet). Once the fair value is determined, Farmington City would receive the compensation for the impacted skate park. UDOT is assuming Farmington City would be responsible for determining the location, the design and construction of the new skate park.

Item	Reviewer	Comment	Response
3.	Brigham Mellor	We are all very interested in seeing the ped tunnel under 400 West for the lagoon trail, but the council is concerned that the UDOT monetary contribution toward the tunnel ends at the value of the property being consumed by the project at the Ezra Clark Property. If that is the case, it will not be of sufficient value to cover installing the ped tunnel. The council would like to know if the expectation is that the city picks up the remaining cost for the tunnel/culvert.	All property needed from Farmington City for the project could be applied in the trade for the ped tunnel box culvert. In addition to the minor impacts to the Farmington owned parcel for Ezra Clark Park, UDOT is currently anticipating that partial acquisition may be needed from 6 Farmington City parcels near the Frontage Road (one on the NW corner of Glovers and Frontage Road, the other 5 on the east side of the Frontage Road between ~925 South and ~1350 South), and the City owned portions of South Park. The acreage of impact for these parcels would be determined during final design and the valuation would be determined during the right-of-way process (which has not started yet). The City would be responsible for any remaining costs.
4.	Brigham Mellor	The Mayor, in particular, is anxious about the landscaping side treatments along the frontage road. The city has spent considerable resources toward the maintenance and installation of those improvements along the route. I am not sure if this is the time to address it, but as those are in UDOT ROW, what, if any, are the obligations for the reinstallation of in-kind improvements or compensation for their removal?	UDOT would work with Farmington City on revegetation plans for disturbed areas on the east side of Frontage Road. UDOT does not anticipate there being room for vegetation or replacement of the existing landscaping on the west side of Frontage Road with the I-15 project. Replacing similar space on the west side of Frontage Road with the I-15 project would result in additional impacts to residential areas and South Park. To the extent the I-15 project impacts parcels owned by Farmington City east of the Frontage Road, UDOT would provide fair compensation to Farmington City pursuant to right-of-way rules (which could be applied to the 400 West ped crossing tunnel per the previous response). UDOT is not proposing to replace this property. Unless there is an agreement between Farmington City and UDOT stating otherwise, there would not be any compensation for landscape improvements made within UDOT's ROW. There would be the opportunity to use some of the aesthetics budget to improve this area over baseline if Farmington City chooses.