



To: Utah Department of Transportation

From: Utahns for Better Transportation and the Sierra Club

Date: April 17, 2013

**A Shared Solution for
Future Livability and Mobility in West Davis and Weber Counties**
An Alternative to the West Davis Highway

Request

This is a formal request from Utahns for Better Transportation (UBET) and the Sierra Club to the Utah Department of Transportation (UDOT) to undertake additional study of an alternative-build solution that does not include the proposed new freeway. We have consulted with several experts and are optimistic that there may be a good strategy for creating a truly Shared Solution that leaves affected communities with something they'll find far more appealing than an expensive, destructive, under-utilized freeway. The Shared Solution also would have fewer impacts on parklands, wetlands, and historic properties. Additionally, we request that this alternative be included in the Draft West Davis Corridor Environmental Impact Statement as one of the required alternatives on which to receive public input.

The information in this request suggests that this is likely to be a feasible and practicable alternative that could meet the purpose and need for the project; is significantly different from those currently included in the DEIS analysis; and has a strong potential to have less significant impacts on the human and natural environment. We recognize that alternatives that did not include a freeway have already been considered and dismissed by UDOT earlier in the process. We believe those were not given the rigorous and thorough study required by NEPA, and we also believe there may be new ideas that have not yet been considered.

A Shared Solution to future mobility should rely on both transportation and land-use strategies to encourage a more balanced travel mode share in the future. Walking and biking can be viable options if destinations are close at hand and the walk-ways/bike-ways are safe and well designed. Peak hour dedicated van/bus/HOV lanes could provide transit priority on boulevard configurations. Innovative intersections could provide reduced delay, better safety, and economic development incentives that will reduce trip lengths by allowing residents to work and shop closer to home.

We are concerned about increasing vehicle miles travelled (VMT) and the associated air pollution that either of the proposed highway alternatives will produce. The potential impacts associated with degraded air quality from tailpipe emissions are felt region wide,

but particularly by those who live along high traffic corridors, as multiple, peer-reviewed studies have shown. There also are risks of further violations of National Ambient Air Quality Standards and additional or prolonged nonattainment status under the Clean Air Act.

As you are aware, degraded air quality along the Wasatch Front has become an increasing health problem and economic development concern. At times, several Utah counties are experiencing literally some of the worst air quality conditions in the nation. Just this past winter a group of more than 160 physicians and medical professionals submitted a letter to Governor Gary Herbert requesting that he declare our bad air a “health crisis.” Partly in response to that request, Governor Herbert has made numerous pleas to the citizens of Utah to decrease their driving and use alternative forms of transportation where possible. This is a primary reason why we believe it is necessary for a Shared Solution alternative to be considered.

We are also concerned about the direct farmland/wetland impacts of both alternatives, and the accelerated consumption of irreplaceable resources due to sprawling, auto-oriented land uses that will be induced by this highway. As you know, the agencies are required by law to evaluate all reasonable alternatives (under NEPA) and all less damaging practicable alternatives (under the Clean Water Act) that may have lower impacts on many of those resources. This new freeway will exacerbate Davis County’s jobs/housing imbalance, which is the worst in Utah. Many residents would like to see more employment opportunities in their area, but endless investment in freeways to accommodate the historic imbalance helps ensure the imbalance will continue to grow, ultimately overwhelming all freeways.

We are confident that a local-focus Shared Solution will help shorten trips, balance flows on I-15, reduce dependence on I-15, and reduce congestion more than another high-speed connection to Salt Lake City would. It is the policy of the Wasatch Front Regional Council to reduce the historic jobs/housing imbalance, in part by fostering mixed-use activity centers across the region. Weber and Davis counties want more jobs for their residents, and Salt Lake wants more residents for their jobs. That *is* the Wasatch Choice for 2040 Vision that all involved counties want. This freeway works against regional objectives, while alternative infrastructure investments and policies will support the region’s objectives.

We request that UDOT undertake this analysis of a Shared Solution alternative, and that it involve the experts we’ve identified who have expressed that there may yet be a way to craft an attractive Shared Solution that would be a better strategy for addressing growth than anything proposed to date. Working with the UDOT team they can—together—determine the design, analysis, and viability of this alternative.

We ask that the cost of creating, evaluating, and presenting the alternative to the public be borne by UDOT since it is part of the agency’s requirement under the National Environmental Policy Act to consider “all reasonable alternatives” in order to satisfy the primary objectives as defined in the Purpose and Need statement.

We believe that an integrated Shared Solution alternative would better address both future travel needs and desirable land use development in West Davis and Weber

counties. This alternative is based on improving existing infrastructure and integrating transportation and land-use development to reduce VMT, thereby reducing automobile congestion, addressing the air quality problem, and reducing the consumption of valuable lands.

The Shared Solution alternative would have several components, which include local-focus roadway design, innovative intersections, “boulevard community” development patterns, system management strategies and bicycle trail networks with good connections to transit. This alternative grows out of the region’s adopted vision for growth on the Wasatch Front—Wasatch Choice for 2040 (Wasatch2040). The alternative would focus on the efficiency and capacity of the existing roadways and intersections in West Davis and Weber counties, and improve access to the main transportation corridor of I-15 and FrontRunner.

Rationale

The ability to maintain our quality of life as our population grows will depend upon a balanced transportation approach and the sequencing of the transportation investments we make. The foundation for the Shared Solution alternative lies in the first two Wasatch2040 Growth Principles for a Bright Future:

Efficient Infrastructure—*Maximizing existing infrastructure and building more compactly and contiguously conserves green space, saves tax payers dollars, and makes high quality, lower cost services available to us all.*

Regional Mobility (Transportation Choice)—*With a balanced multi-modal transportation system, more transportation options, and jobs and services closer to home, we reduce the growth in per capita vehicle miles traveled, we spend less time in traffic and have more time for friends, family and doing what we enjoy.*

Wasatch2040 also proposes a development pattern for West Davis County that links land use development with creative transportation solutions:

Boulevard Communities—*A Boulevard Community is “a linear center coupled with a transit route... A Boulevard Community may not necessarily have a commercial identity, but may vary between housing, employment, and retail along any given stretch. Boulevard Communities create a positive sense of place for adjacent neighborhoods by ensuring that walking and bicycling are safe and comfortable even as traffic flow is maintained.”*

The rationale for this request for a Shared Solution alternative is based on UDOT’s own embrace of a shared solution approach to future mobility. *“From its earliest days, the Legacy Parkway has been designed as part of a ‘shared solution’ – along with mass transit – to ease traffic congestion in Davis County.”* Media Advisory, UDOT 3/16/02

Some of the components of a **Shared Solution Alternative** would include:

1. Creative Roadway Design

Improve existing arterial roadway network, east-west and north-south, by utilizing boulevard configurations that incorporate thru lanes with reduced side friction for longer distances, separated commercial access lanes, and priority van/bus lanes at peak travel times. Boulevards would provide efficient access to the main transportation corridor of I-15 and FrontRunner, supporting both car and transit travel. Speeds would be lower on these boulevards than on highways but driving slower could mean traveling faster if there are strong mode shifts, shorter trips, and less congested innovative intersections.

2. Innovative Intersections

Innovative intersections would provide safety, efficiency, and capacity improvements for all users. New designs have been shown to allow better flow for automobiles, while improving safe access for walkers, bikers and wheelchair users.

3. Boulevard Communities

A boulevard community will reduce daily VMT by placing housing, jobs, and services closer to each other. Housing for young and old could be provided in walkable communities along the boulevards with a well-designed mix of uses. The VMT outcome of these boulevard developments can be measured in part by “Envision Tomorrow Plus” (ET+) – a land-use analysis tool now being developed at the University of Utah to measure the effect on VMT of the so-called 7 "D"s, e.g., design, diversity, density, distance to transit, destinations, demand management, and demographics.

We look forward to working together to evaluate a Shared Solution alternative for West Davis and Weber counties that will reduce congestion, improve air quality, and enhance livability for the residents who live and work there now, and in the future. Thank you for your consideration of this request.

Sincerely,

Roger Borgenicht and Ann Floor, Co-Chairs
Utahns for Better Transportation
218 East 500 South
Salt Lake City, Utah 84111
801 355-7085
future@xmission.com

Tim Wagner, Sierra Club
2159 South 700 East
Salt Lake City, Utah 84106
801 467-9294
tim.wagner@sierraclub.org