



January 12, 2023

Dear UDOT I-15 EIS Team,

The purpose of this letter is to provide a formal response from Salt Lake City regarding the alternatives that have been presented by the Utah Department of Transportation (UDOT) project team for public review on the Interstate –15 (I-15) Salt Lake City to Farmington Environmental Impact Statement. In short, we support many of the proposed elements, but are deeply concerned about and oppose any widening of I-15 due to the adverse impacts it will have on our west side community.

We have been impressed with the UDOT project team's collaborative outreach efforts to connect and engage early on with residents and businesses about their needs and concerns with the project. We also appreciate the thoughtful ways in which the feedback has been incorporated into the two proposed alternatives. In many ways, this has been the best process we've seen for a project of this scale and type. We support the following project elements:

- a new interchange on the north end of the City to pull truck traffic out of the neighborhoods;
- additional connections under I-15 to improve some east/west connectivity;
- a redesign of the 600 North interchange to make it more usable for all travel modes, and;
- a protected bike path on Beck Street.

With that said, we are very concerned that both alternatives recommend widening I-15. We are at the point of diminishing returns on I-15. Due to increased weaving and lane changing, each additional lane provides a lower capacity per lane than the existing lanes and at a higher and higher cost. Even worse are the negative impacts widening would have on the regional air quality and the additional negative impacts to communities within the Salt Lake City portion of the project. We are particularly concerned about the impact on our more diverse communities in our City who, because of redlining, face historical and current obstacles to opportunities, health, and wellness. These impacts include:

- worse air quality due to increased traffic on I-15 due to the well-documented phenomenon of induced travel demand;
- increased negative health and economic impacts due to worse air quality;
- the risk of losing homes in this historic district, many of which are affordable in a time of a regional and statewide housing crisis;
- increased noise pollution due to the increased traffic;
- further physical reinforcement of the economic and racial divide between the east and west sides of Salt Lake City; and
- potential displacement of generational residents, with a likelihood to disproportionately displace residents and families of color without sufficient financial mitigation options in place.

As the UDOT project team is likely aware, Salt Lake City is one of the few cities in Utah where the Home Owners' Loan Corporation (HOLC) created a redlining map (1939) in an attempt to predict "safe" or "risky" home mortgage lending conditions, based in part on the racial composition of an area. Most neighborhoods west of the Salt Lake City freight rail tracks were designated as "hazardous" for lending and most of those neighborhoods are west of I-15 today. Unlike the experience of many white Americans in the 1940s, '50s, and '60s, historic redlining practices made wealth creation through homeownership more difficult for communities of color. This, combined with the physical obstacles of railroad tracks and the Interstate, has resulted in many of the City's lower-income communities and communities of color being physically isolated from the rest of the City in a way that perpetuates racial segregation and contributes to disparate economic, educational, and health outcomes for SLC's west side communities.

We also have concerns about the negative impacts that I-15 widening would have on the west side business community. For similar reasons that Salt Lake City's west side houses lower-income residential communities, it is also home to many of the city's diverse, underserved business communities. The expansion of I-15 would only add to existing barriers (like the railroad) which stunt business growth and further the perception that the west side of our city is not as accessible for residents to live, work, and play. These barriers keep out a customer base that can help lift the local businesses that are essential to creating more vibrant neighborhoods.

From a business recruitment and retention perspective, any major investment in infrastructure that contributes to poorer air quality poses great concerns to the business community. This is evidenced by Salt Lake City's annual business survey, conducted for the Salt Lake City Department of Economic Development, in which 25% of the respondents reported consistently over the past four years that they would consider moving/relocating due to poor air quality. An additional 10% responded that they felt it has stunted their ability to grow. Outreach and retention efforts by the Department of Economic Development among Salt Lake City's larger employers echo these concerns.

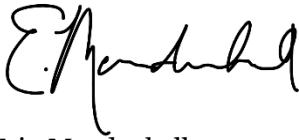
Because of these serious concerns, we ask that the I-15 EIS team explore alternatives that either go bigger or go smaller than the two alternatives that have been currently put forth. A big, visionary project could be truly transformative, setting our growing region up for success as a desirable, highly livable region in the decades to come. One idea brought up in the January 3 City Council briefing was to bury the freeway. Bury-and-cover projects have been done in Pittsburgh, Philadelphia, Denver, and Dallas. There are recently awarded RAISE grants for such projects in El Paso and Atlanta. This idea is also being considered in Syracuse, NY, Richmond, VA, and Austin and Houston, TX, among others. While such a project is likely to have some constructability challenges and potential short-term impacts, the end result could bring benefits that make the project truly positively transformative for neighboring communities, Utah's metropolitan center, and the region at large. The concept is worth serious consideration.

Conversely, a smaller project would look at how to thoughtfully rebuild and improve the freeway without expanding its footprint. This concept recognizes that a no-build scenario does not offer needed solutions. It would ask how we better manage traffic operations to make the most of the space we have. This could entail a suite of travel demand management strategies, may consider how technological and other advancements expected by 2050 would alter how we separate types of traffic to minimize conflicts, and could be supported by City policy decisions.

In situations where displacement cannot be avoided, we ask for a seat at the table in exploring and implementing mitigation strategies that improve outcomes for those most impacted. These mitigations should go above and beyond the standard protocols due to the unique history of disproportionate impacts that this community has had endured.

City staff is ready and willing to explore these additional approaches with you. Paired with the creative problem-solving skills already demonstrated by your team, this could yield a win-win for everyone. We recognize that there will trade-offs no matter which alternative advances into the next phase, but we believe that such a win-win solution exists and are excited by the prospect of positive outcomes for all. We look forward to working closely with your team to develop solutions that both maintain the above-mentioned project elements the City supports, and meet UDOT's broader goals, in lieu of the proposed alternatives which would have devastating impacts on our west side community.

Sincerely,



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Salt Lake City Mayor



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Reference Materials:

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