

FINAL PLAN-EIS COMMENTS

Warner Draw Watershed Plan-Environmental Impact Statement
Supplement No. 10
Gould Wash Flood Protection Project
Washington County, Utah
May 2026

	Comment	NRCS Response
1	Good day Eamon my name is REDACTED and I live in Hurricane at REDACTED. I was just looking at the notice I received in the mail regarding the Gould Wash improvements. I live just off the wash. If you googled my address, you'll see that I'm within two or 300 yards of the wash and I was just wondering how those improvements/changes are going to affect our neighborhood in that particular portion of the wash between SR 600 and State Street in Hurricane. Thanks in advance for your time in answering this inquiry.	Thank you for your interest in the Gould Wash Flood Protection Project (Project). The Project team received your email dated April 2, 2026, regarding how the improvements along Gould Wash would affect your neighborhood in the portion between SR 600 and State Street. The preferred alternative for the Project (New Detention Dam and 3,000 cfs Channel Modifications Alternative) would include installing a dry detention dam along Gould Wash upstream of Hurricane City to reduce the 100-year frequency flood flow of 8,820 cfs through Hurricane City down to 3,000 cfs. Channel modification along Gould Wash would also be performed to safely convey the anticipated flood flow of 3,000 cfs. The channel modifications between State Street and 600 N are proposed to extend from State Street northwest along the channel, ending approximately 800 feet downstream of 1580 W. These measures would include recontouring and armoring the banks with riprap. Soil would be placed over the riprap then the banks seeded after construction completion. Additionally, the 1580 W culvert would be replaced with a larger culvert. The map of the preferred alternative measures in Hurricane City from Appendix B (MapB4.1) of the Plan-EIS is attached for reference. Your residence appears to be approximately 400 feet from the Gould Wash improvements and impacts for your neighborhood during construction include short-term noise disturbance and decreased visual quality from construction disturbance/equipment along the wash, and short-term traffic detours at 1580 W for replacement of the culvert. Please refer to Sections 5.21, 5.22, and 5.23 of the Plan-EIS for more detailed descriptions of these short-term impacts for all alternatives analyzed. Long term benefits are expected for Hurricane City from reduced flooding. These include improved public health/safety and reduced flood damage to property, roads, utilities, and buildings, among others. Please refer to Sections 5.7, 5.16, and 5.18 of the Plan-EIS for more detailed descriptions of these long-term benefits for all alternatives analyzed. While the 100-year flood modeling performed for the Project does not show your residence at 1766 W 250 N flooding under current conditions during a 100-year flood, it does show flooding of roads, utilities, residences, and commercial properties located east and southeast of your residence. Refer to Maps C8.1 through C 8.3 in Appendix C to the Plan-EIS for flooding under existing conditions and after the alternative is installed.
2	Thank you for including us in the planning process for the upcoming wash reinforcement project. We appreciate the City's efforts to mitigate flooding risks in the area. I understand that REDACTED storage lot is currently being considered as a staging area (staging area #2). While we are supportive of the project, this particular location is actively in use and would create significant disruption to our operations and guests. I'd like to suggest a potential alternative site for your consideration. The vacant lot located just northwest of our property, which is immediately west and south of my place appears to offer several advantages, including: Currently unoccupied, minimizing disruption to existing operations; Comparable or greater wash frontage than our storage lot; Close proximity to the project area, maintaining logistical efficiency. Aerial photo below for reference. We believe this location could meet the project's needs while avoiding impacts to active businesses. We are more than willing to work collaboratively to help identify a solution that supports the City's goals while minimizing disruption to our property and tenants. Please let me know if you'd like to discuss this further or walk the site together. Thank you again for your efforts on this important project.	The Project Team understands that the staging area may not be available for use based on the information you provided. Construction easement extents for staging will be modified, if required, during the future final design phase of the project in coordination with landowners, considering development and conditions that exist at that time to address your concerns.

3	Thanks for sending this out to us all. I'm glad to see the project progress. My concern is a very specific one, one that I brought up at the public meeting last year. Our home is located at REDACTED. The map shows our home as a project area. It is very outdated map that does not show the construction of any of the homes in our neighborhood on the south side of the gulch. This is the area of a 30 ft. walled channel. There is open space and access to the gulch from the side of our home, but it concerned me then and concerns me now that the maps of the project show what appears to be 2 a convenient spot for access to the gulch, which is really not as large as it shows on the map because of at least four homes, including ours which have been built over the last five years. I would appreciate your insight to this area and what guarantees I have that the project leads understand that this space is not available as they envision it on the maps	The proposed temporary easements for construction access and staging were determined at a time prior to development of your property/adjoining properties to consider an enlarged footprint for environmental analysis and conservative estimate of easement costs. This allows flexibility to fine tune or narrow down temporary construction disturbance/easement extents to avoid/minimize impacts to sensitive areas (such as new development) during the next phase of the project (final design). It is understood that the conditions that exist currently were not present during the development of preliminary planning easement boundaries and some areas have since been developed. Construction easement extents will be modified, if required, during the future final design phase considering development and conditions that exist at that time to address your concerns.
4	I wanted to follow up on my previous email regarding the proposed staging area. In addition to suggesting the alternative location northwest of our property, we also wanted to mention a potential improvement concept for the portion of the wash that runs through the property at REDACTED. If the City is already evaluating structural enhancements in this area, we would be interested in discussing the feasibility of a closed culvert system along the stretch that runs through the property. This could allow us to make better use of the space while still supporting the City's flood control objectives. We understand this may go beyond the current scope of the project, but if it's something that could be incorporated or evaluated, we would be open to contributing financially toward the additional cost. Our goal is to be collaborative and explore options that create a long-term benefit for both the City and our property. Please let me know if this is something worth discussing further. Thank you again for your time and consideration.	The U.S. Army Corps of Engineers (USACE) has jurisdiction on this stretch of Gould Wash and any measures performed in the wash must be permitted and approved by USACE (refer to Section 3.2.6 of the Plan-EIS). The USACE was a cooperating agency in preparation of the Plan-EIS and required completion of a 404(b)(1) Alternatives Analysis to comply with the Clean Water Act. The USACE cannot issue a 404 permit for an alternative if another alternative exists that would have less adverse impact on the aquatic ecosystem than what is currently proposed and therefore, would not be the LEDPA and would not comply with the Clean Water Act. Please refer to the 404(b)(1) Alternatives Analysis attached in Appendix E (page 33 of Appendix E PDF document) for further information on the Alternatives Analysis performed to comply with the Clean Water Act.



State of Utah

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Governor

DEIDRE M. HENDERSON
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Department of Natural Resources

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April 30, 2026

Submitted electronically: Ammon.boswell@usda.gov

Ammon Boswell
Watershed Program Manager
USDA
Natural Resources Conservation Service
1950 West Main Street
Tremonton, UT 84337

RE: **Warner Draw Watershed -- Gould Wash Flood Protection Project: Final EIS**
RDCC Project No. 87148

Dear Mr. Boswell:

The State of Utah (State), through the Public Lands Policy Coordinating Office ("PLPCO"), has reviewed the Warner Draw Watershed Supplemental Watershed Plan No. 10 and Final Environmental Impact Statement (Plan-EIS) for the Gould Wash Flood Protection Project. The State supports the preferred alternative, the New Detention Dam and 3,000 cfs Channel Modifications. The preferred alternative proposes improvements along Gould Wash through Hurricane City and installation of a dry detention dam on land managed by the BLM upstream of Hurricane City, in Washington County. The State supports the proposed improvements that would reduce flooding in Hurricane City from Gould Wash, protecting people, structures, transportation infrastructure, public utilities, and property from floodwater damage.

The State provided comments (November 4, 2025) and incorporates those comments by reference. For your consideration, the State, in collaboration with the Utah Division of Water Rights (WRi), submits the following comments.

Currently, approximately 50% of properties adjoining Gould Wash experience flooding in any given year. A 100-year flood event threatens over 650 residences, 99 businesses, and 82 roads. The Preferred Alternative involves the construction of a dry detention dam on BLM land

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upstream of Hurricane City and significant channel modifications (rehabilitation and hardening) through the city itself to contain flows within the channel banks.

The project drastically reduces the risk of property loss and infrastructure damage, which currently serves as a significant economic drag on Hurricane City. By containing 100-year flood flows, the project minimizes the risk of loss of life and emergency service disruptions during monsoon events. The plan aligns with the National Watershed Program (PL 83-566) objectives, leveraging federal funding for local infrastructure.

Successful implementation should lead to revisions to FEMA Flood Insurance Rate Maps (FIRMs), potentially removing hundreds of properties from the mandatory flood insurance purchase requirement.

Division of Water Rights

WRi appreciates the inclusion in section 6.5.2.3 of the Gould Wash Final EIS of requirements for a stream alteration permit from the WRi and the review of plans by the Dam Safety engineer. However, both the heading and the body of this subsection should be corrected to identify the relevant state agency as the Utah Division of Water Rights. Throughout this section, the FEIS refers to these requirements as those of the Division of Water Resources rather than the Division of Water Rights. Although the Division of Water Resources is a sister state agency to the WRi, the requirements described in subsection 6.5.2.3 are not imposed or enforced by the Division of Water Resources; they are imposed and enforced by the WRi.

The State appreciates the opportunity to provide comments. Please contact me if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Redge B. Johnson', is written over a light gray rectangular background.

Redge B. Johnson
Director