



United States
Department of
Agriculture

Natural Resources Conservation Service

Scoping Report

Hobble Creek Watershed Plan-EA Utah County, Utah

April 2022



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1. Introduction

The United States Department of Agriculture Natural Resources Conservation Service (NRCS), with Springville City as the project sponsor, is proposing to partially fund through the Watershed Protection and Flood Prevention Act (Public Law [PL] 83-566), the Hobble Creek flood protection and restoration project in Utah County, Utah.

The NRCS, as the lead federal agency, is initiating National Environmental Policy Act (NEPA) analysis in the form of a new Watershed Plan and Environmental Assessment (Plan-EA) to analyze impacts to the natural and human environment from this project. There are no cooperating agencies on this project.

The Plan-EA will comply with the Council on Environmental Quality's (CEQ's) regulations at 40 CFR Parts 1500-1508, which require an evaluation of potential environmental impacts associated with federal projects and actions. The purpose of the Plan-EA is to develop a watershed project plan so that NRCS can decide whether to provide technical and financial assistance to Springville City for implementation of the alternative selected by Springville City.

1.1. Purpose and Need

Improvements are being proposed to 1) further the conservation, development, utilization, and disposal of water, 2) prevent flood damages, and 3) further the conservation and proper utilization of land. The project-specific purpose and need will be developed from scoping results and preliminary engineering; however, watershed protection, flood protection, and recreation were identified as the main purposes in the funding application.

1.2. Scoping Goals and Objectives

Scoping is the first step of and an integral part of the NEPA process. It is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR Part 1501.7). The objectives of the scoping process are to:

- Engage interested parties and the general public in the early identification of concerns, potential impacts, and possible alternative actions;
- Determine the scope and the significant issues to be analyzed in depth in the Plan-EA;
- Identify potentially significant issues related to the proposed action, as well as identifying and eliminating issues that are not significant or that have been covered by prior environmental review;
- Identify the scope of issues to be addressed and integrate analyses required by other environmental laws (e.g., Endangered Species Act, National Historic Preservation Act); and
- Identify technical studies needed to adequately address potential impacts of the project.

2. Scoping Process

2.1. Schedule

The following dates outline the milestones for the scoping announcement and activities that occurred in preparation for the formal scoping comment period. The public scoping comment period opened on October 13, 2021, and closed on November 12, 2021. An additional scoping period was designated for residents bordering Hobble Creek, and this scoping period began on December 15, 2021 and ended on December 31, 2021.

- June 22, 2021: Kick-off meeting with sponsor and the NRCS
- October 12, 2021: Scoping flyers were sent to agencies and stakeholders
- **October 13, 2021: Opening of formal public comment period**; scoping notice was published in the *Daily Herald* newspaper
- October 13, 2021: Project information and scoping comment portal posted on website built by Jones & DeMille Engineering for this project
- October 13, 2021: Springville City posted the scoping notices on their social media accounts
- October 18, 2021: Scoping notice was published in the Daily Herald newspaper for the second time
- October 19, 2021: Scoping letters were sent to Tribal contacts
- October 20, 2021: Notice was posted to Utah state clearinghouse website
- October 20, 2021: Scoping notice and public meeting details were published to the NRCS project website
- October 21, 2021: Scoping notice was published in the Daily Herald newspaper for the third time
- October 28, 2021: Public scoping meeting was held virtually through the Zoom Webinar application in English and in Spanish
- November 4, 2021: Public scoping open house at the Springville City Civic Center
- **November 12, 2021: Close of formal public comment period**
- December 15, 2021: Additional scoping notice mailed to residents bordering Hobble Creek
- December 31, 2021: End of additional scoping period for residents bordering the creek

2.2. Kick-off Meeting

A kick-off meeting that included the sponsor and agency personnel was held on June 22, 2021, at 1:00 p.m. at the Springville Administration Building in Springville, Utah. The meeting included discussions of the PL-566 program, as well as the scope and schedule of the project.

2.3. Notice

The public scoping notice invited all interested members of the relevant agencies and general public to participate in the August 28 public scoping meeting, and provided details for submitting comments by email, mail, and via the on-line comment portal. The scoping notice materials are attached in Appendix A. Springville City wanted to ensure that scoping efforts engaged both English and Spanish-speaking residents. For this reason, the public scoping notice was prepared both in English and Spanish languages. The public scoping notice was distributed widely prior to the October 28 public scoping meeting. The official scoping comment period opened on October 13, 2021, and closed on November 12, 2021. The public notice was published in the *Daily Herald* newspaper on October 13, 18, and 21. Springville City posted the scoping notice on their social media accounts. The public notice was also posted to the NRCS website, and emailed to each agency and stakeholder (15 total) on the project contact list on October 12, 2021.

Springville City chose to undertake an additional scoping effort to engage residents adjacent to Hobble Creek. A scoping letter was mailed to these residents on December 15, 2021, requesting comments on the project by December 31, 2021.

2.4. State Clearinghouse Notification

Notice of the project was published to the State of Utah's Resource Development Coordinating Committee (RDCC) Project Management System website on October 20, 2021. The notice is attached in Appendix A.

2.5. Contact List

A project contact list was compiled by the NRCS, Springville City, and Jones & DeMille Engineering to identify the entities that would receive scoping materials directly. A total of 15 entities were sent the materials. A tribal mailing list was prepared by the NRCS, and letters were sent to Rupert Steele and Clell Pete with the Confederate Tribes of the Goshute Reservation, Betsy Chapoose and Luke Duncan with the Ute Indian Tribe of the Uintah & Ouray Reservation, and Candace Bear with the Skull Valley Band of Goshute Indians. A copy of the tribal scoping letter is attached in Appendix A.

2.6. Public Scoping Meeting and Open House

A public scoping meeting was held virtually on October 28, 2021, via the Zoom Webinar application (in English from 5:30 to 6:30 PM and in Spanish from 7:00 to 8:00 PM). The meeting began with a presentation of the PL 83-566 program, the proposed watershed area, known deficiencies in the watershed, and an introduction to the NEPA process. The meeting included a welcome and introduction from the NRCS, Springville City, and Jones & DeMille Engineering, a prerecorded and narrated slideshow presentation, and a question-and-answer session after the presentation. Attendees were encouraged to provide scoping comments via email, mail, and through the online comment portal associated with the project website. At least 23 people attended the English public scoping meeting. Twelve of these were with the NRCS, Jones & DeMille Engineering, and the sponsor. The meeting attendance record is attached as Appendix B. There were no public attendees for the Spanish meeting besides the project team.

A public scoping open house was held on November 4, 2021 from 7:00 to 8:00 PM at the Springville City Civic Center in Springville, Utah. The open house consisted of an open discussion format to answer any questions from the public. Questions were answered by the project team, which consisted of staff from the NRCS, Springville City, and Jones & DeMille Engineering. Spanish interpretation services were provided at the open house meeting. Attendees were encouraged to provide comments via email, mail, and through the online comment portal associated with the project website.

3. Comments

The formal open public comment period was from October 13 to November 12, 2021. Comments could be submitted by email, mail, or through the project website's online comment portal. All public comments within the comment period were submitted via the online comment portal and totaled 26 comments. One agency comment was provided via a letter to the Utah NRCS. No comments were received from Tribe contacts.

Springville City chose to undertake an additional scoping effort to engage residents adjacent to Hobble Creek; the comment period for this scoping effort began on December 15, 2021 and ended on December 31, 2021. This additional scoping effort produced two emailed comments and five online comment portal comments. Each comment received during the scoping periods was considered and summarized in Appendix C.

4. Summary of Identified Issues

The following list summarizes the comments and concerns that were expressed during the scoping process:

- Commenters provided the project team with suggestions regarding design criteria for both levees and trails, improvements to existing infrastructure associated with Hobble Creek, advertising fishing in the creek, suggestion of resources to analyze in NEPA document, and future development plans in the area.
- Commenters expressed support for improvements to trails and infrastructure around Hobble Creek, beaver dam establishment along the creek, and restoring the natural meander of the creek.
- Commenters expressed concern about:
 - Crime, unwanted access, and trash along trails
 - Tree removal along Hobble Creek
 - Stagnant water and mosquito infestations
 - Damaged retaining wall along creek
 - Not wanting to enclose any section of the channel
 - Wanting additional information on how the project would impact their property, especially property value

All comments submitted will be given full consideration; however, not all of the comments and concerns expressed are relevant to the analysis of the Proposed Action. Those comments that are relevant will be carried forward in the environmental analysis.

Appendix A. Scoping Notice Materials

- A.1. Agency Scoping Notice
- A.2. Public Scoping Notice (English)
- A.3. Public Scoping Notice (Spanish)
- A.4. Scoping Notice Affidavit of Publication
- A.5. Additional Scoping Letter for Residents Bordering Hobble Creek
- A.6. RDCC Notice
- A.7. Tribal Consultation Letter

Hobble Creek Watershed Plan Environmental Assessment (Plan-EA) Springville, Utah

Agency Scoping Notice



Project Information

The U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), with the assistance of Springville City as the project sponsor, is proposing improvements within the Hobble Creek Watershed in Springville, Utah, under authority of the Watershed Protection and Flood Prevention Act (Public Law [PL] 83-566). Improvements are being proposed along the lower reach of Hobble Creek, primarily between Main Street and I-15.

The main objectives of the project are to improve flood control, enhance and protect fish habitat, and improve public recreation.

USDA-NRCS and Springville City will hold an online meeting to provide information about the proposed project and to gather data. Technical studies are anticipated to take place during 2021, with a draft Plan-EA circulated to the public in mid- to late 2022.

Agency Meeting

Agencies who may have interest or involvement in the project are invited to attend a virtual meeting:

October 26, 2021 - 10:00 AM

The meeting will be virtual, and can be accessed by following the link below:

<https://jonesanddemille.zoom.us/j/84828518683?pwd=dIRiaFBkdG0zUWs2RmxZQk40cUpJZz09>

Comments

All comments should be directed to Wyatt Shakespeare.

Website:

Comments may also be submitted on the project website:

<https://hobblecreekwatershedplan.com/>

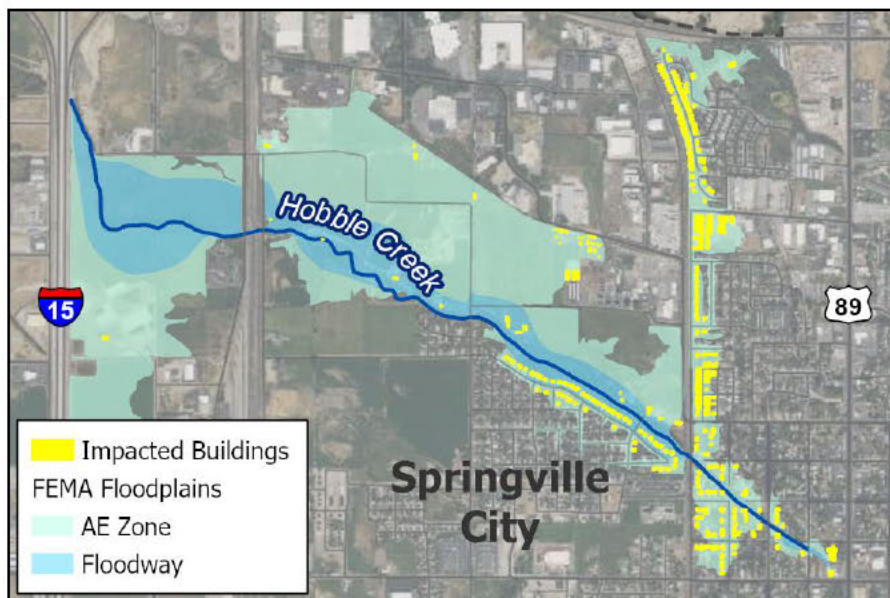
Email:

w.shakespeare@jonesanddemille.com

Mailing Address:

Jones & DeMille Engineering
 1535 S. 100 W.
 Richfield, UT 84701

Project Area Overview



Hobbble Creek Watershed Plan Environmental Assessment (Plan-EA) Springville, Utah

Public Scoping Notice



Project Information

The U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), with the assistance of Springville City as the project sponsor, is proposing improvements within the Hobbble Creek Watershed in Springville, Utah, under authority of the Watershed Protection and Flood Prevention Act (Public Law [PL] 83-566). Improvements are being proposed along the lower reach of Hobbble Creek, primarily between Main Street and I-15.

The main objectives of the project are to improve flood control, enhance and protect fish habitat, and improve public recreation.

USDA-NRCS and Springville City will hold an online public meeting to provide information about the proposed project and gather comments. Technical studies are anticipated to take place during 2021, with a draft Plan-EA circulated to the public in mid to late 2022.

At this time, the NRCS is requesting comments on the project to identify issues and resource sensitivities. Written comments can be submitted during the open comment period starting October 13, 2021, and ending on November 12, 2021.

Comments must be received by November 12, 2021.



Public Scoping Meeting

The public is invited to attend, discuss, and submit a comment during the online public scoping meeting:

October 28, 2021 - 5:30 PM to 6:30 PM

The virtual meeting can be accessed by following the link below:

<https://jonesanddemille.zoom.us/j/83691918364>

Public Scoping Open House

The public is invited to attend, discuss, and submit a comment during the public open house:

November 4, 2021 - 7:00 PM to 8:00 PM

The public scoping open house will be held at the Springville City Civic Center, located at 110 South Main Street

How to Submit a Comment

All comments should be directed to Wyatt Shakespear. Comments may be submitted during the scoping meeting and the open house. Comments may also be emailed, mailed, or submitted via the project website (see information below). All comments must be received by November 12, 2021.

Website:

<https://hobbblecreekwatershedplan.com>

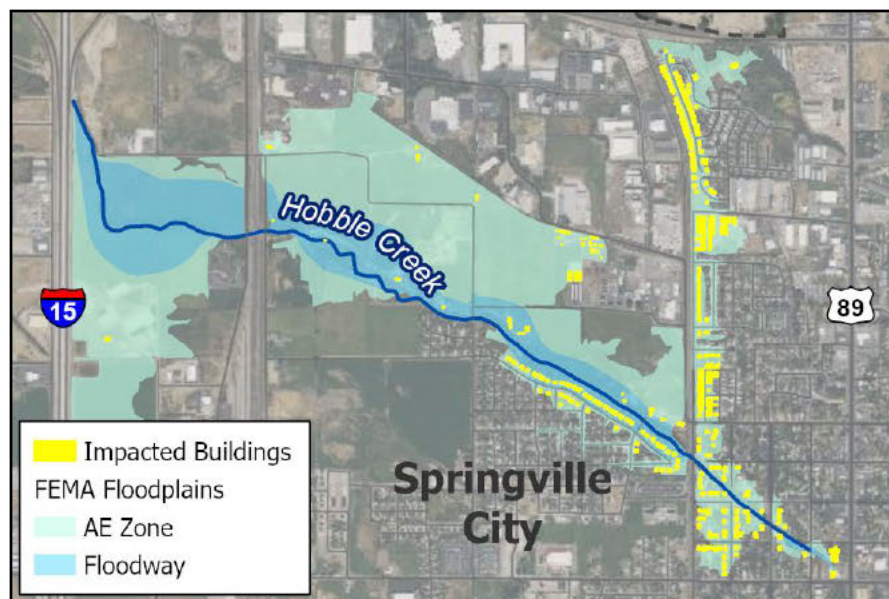
Email:

w.shakespear@jonesanddemille.com

Mailing Address:

Jones & DeMille Engineering
1535 S. 100 W.
Richfield, UT 84701

Project Area Overview



Natural
Resources
Conservation
Service

nrcs.usda.gov/



Plan para la cuenca de Hobbble Creek Evaluación ambiental (plan-EA) Springville (Utah)

Aviso de alcance público

Información del proyecto

El Servicio de Conservación de Recursos Naturales del Departamento de Agricultura de los EE. UU. (U.S. Department of Agriculture Natural Resources Conservation Service, USDA-NRCS), con la asistencia de la ciudad de Springville como patrocinadora del proyecto, está proponiendo mejoras en la cuenca de Hobbble Creek en Springville (Utah), con el amparo de la Ley de Protección de Cuencas Hidrográficas y Prevención de Inundaciones (Watershed Protection and Flood Prevention Act) (Ley Pública [Public Law, PL] 83-566). Las mejoras propuestas se extienden a lo largo del extremo inferior de Hobbble Creek, principalmente entre Main Street e I-15.

Los principales objetivos del proyecto son mejorar el control de inundaciones, mejorar y proteger el hábitat de los peces y mejorar los espacios de recreación pública.

El NRCS del USDA en la ciudad de Springville celebrará una asamblea pública para brindar información sobre el proyecto propuesto y para recibir comentarios. Se espera que los estudios técnicos se desarrollen durante 2021 y que el plan de evaluación ambiental (EA) se haga público a mediados de 2022.

En este momento, el NRCS solicita comentarios sobre el proyecto para identificar los problemas y abordar las áreas sensibles. Los comentarios escritos pueden enviarse durante el periodo abierto para comentarios que comienza el 13 de octubre de 2021 y finaliza el 12 de noviembre de 2021.

Los comentarios deben enviarse antes del 12 de noviembre de 2021.



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Asamblea de alcance público

Se invita a todo el público a asistir, a debatir y a compartir comentarios durante la asamblea virtual de alcance público:

28 de octubre de 2021, de 7:00 p. m. a 8:00 p. m.

Se podrá acceder a esta asamblea virtual a través del enlace siguiente:

<https://jonesanddemille.zoom.us/j/85490017526>

“Casa abierta” de alcance público

Se invita a todo el público a asistir, a debatir y a compartir comentarios durante esta “casa abierta” pública:

4 de noviembre de 2021, de 7:00 p. m. a 8:00 p. m.

La “casa abierta” de alcance público se llevará a cabo en el Centro Cívico de la ciudad de Springville, ubicado en 110 South Main Street

Cómo enviar un comentario

Todos los comentarios deben dirigirse a Wyatt Shakespear. Los comentarios pueden compartirse durante la “casa abierta” y la asamblea de alcance público. También pueden enviarse por correo electrónico, por correo postal o a través del sitio web del proyecto (ver información a continuación). Todos los comentarios deben enviarse antes del 12 de noviembre de 2021.

Sitio web:

<https://hobbblecreekwatershedplan.com>

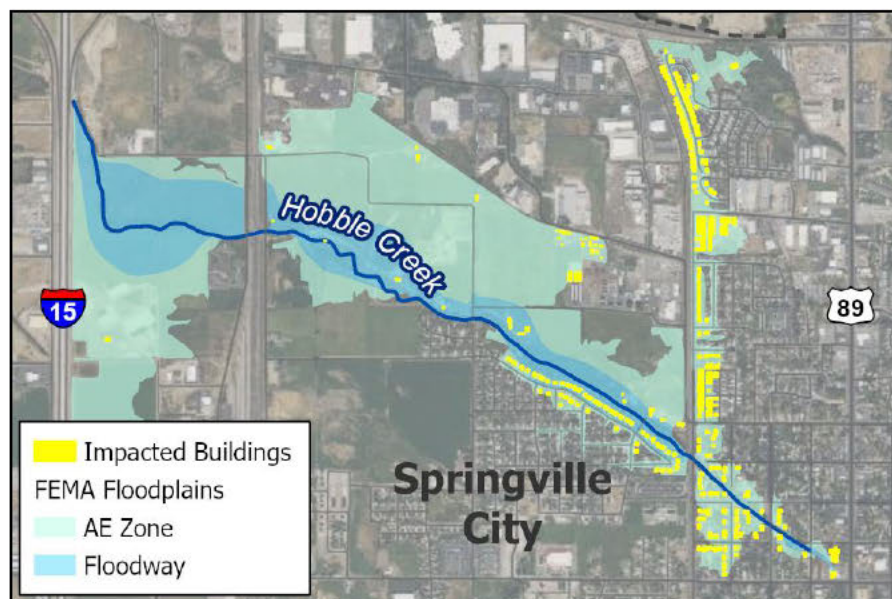
Correo electrónico:

w.shakespear@jonesanddemille.com

Dirección de correo:

Jones & DeMille Engineering
 1535 S. 100 W.
 Richfield, UT 84701

Vista general del área del proyecto



Natural
 Resources
 Conservation
 Service

nrcs.usda.gov/

Daily Herald

86 N. University Ave, Suite 300
Provo, UT 84601
Phone: 801-625-4532

3496

PUBLIC NOTICE ADVERTISING AFFIDAVIT

SPRINGVILLE CITY - LEGALS

110 S MAIN ST

SPRINGVILLE, UT 84663

Account Number: U02321

Proof Date: 10-25-21

Ad Number: 8692

ACCOUNT #	DESCRIPTION	LINES	TIMES	PROOF	TOTAL CHARGES
U02321	Hobble Creek Watershed Plan Environmental As	214	8	.00	1483.02

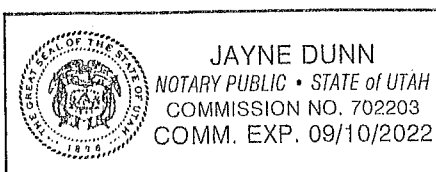
PROOF OF PUBLICATION

Jamie Rivera who being duly sworn according to law, deposes and says that she is
Legals Billing Clerk of the Daily Herald, which is, and was at the times of publication, hereinafter
mentioned, a newspaper printed and published in Provo, Utah County State of Utah, and that the annexed
advertisement was published in said paper on:

Daily Herald: 10-13-21, 10-18-21, 10-21-21

That said newspaper was regularly issued and circulated on those dates. Same was also published online at
utahlegals.com, according to Section 45-1-101 -Utah Code Annotated, beginning on the first date of publication, for at
least 30 days thereafter and a minimum of 30 days prior to the date of scheduled.

Sworn to and subscribed before me this 25th day of October 2021



86 N. University Ave, Suite 300
Provo, UT 84601
Phone: 801-625-4532

Proof Date: 10-25-21

Ad Number: 8692

PUBLIC NOTICE ADVERTISING AFFIDAVIT

Hobble Creek Watershed Plan Environmental Assessment News Release

Project Information

The U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), with the assistance of Springville City as the project sponsor, is proposing improvements within the Hobble Creek Watershed in Springville, Utah. Improvements are being proposed along the lower reach of Hobble Creek, primarily between Main Street and I-15.

The main objectives of the project are to improve flood control, enhance and protect fish habitat, and improve public recreation.

The effects of the proposed project will be evaluated and documented in a Plan-Environmental Assessment (Plan-EA) in accordance with the rules and guidelines of the National Environmental Policy Act (NEPA) and Council on Environmental Quality (CEQ). The Plan-EA is being funded under the NRCS Watershed Flood Prevention and Protection Program (PL 83-566), which provides both technical and financial assistance to help communities protect, improve, and develop water and land resource in watersheds up to 250,000 acres.

USDA-NRCS and Springville City will hold an online public meeting to provide information about the proposed project and gather comments. Technical studies are anticipated to take place during 2021, with a draft Plan-EA circulated to the public in mid to late 2022.

At this time, the NRCS is requesting comments on the project to identify issues and resource sensitivities. Written comments can be submitted during the open comment period starting October 13, 2021, and ending on November 12, 2021.

Public Scoping Meeting

The public is invited to attend, discuss, and submit a comment during the online public scoping meeting to be held on Thursday, October 28, 2021, from 5:30 PM to 6:30 PM.

The virtual meeting can be accessed by following the link: <https://jonesanddemille.zoom.us/j/83691918364>

Public Scoping Open House

The public is invited to attend, discuss, and submit a comment during the public open house to be held on Thursday, November 4, 2021, from 7:00 PM to 8:00 PM.

The public scoping open house will be held at the Springville City Civic Center, located at 110 South Main Street, Springville, UT 84663.

How to Submit a Comment

All comments should be directed to Wyatt Shakespear. Comments may be submitted during the scoping meeting and the open house. Comments may also be emailed, mailed, or submitted via the project website (see information below). All comments must be received by November 12, 2021.

Website:

<https://hobblecreekwatershedplan.com>

Email:

w.shakespear@jonesanddemille.com

Mailing Address:

Jones & DeMille Engineering
1535 S. 100 W.
Richfield, UT 84701

Comunicado de prensa sobre la evaluación ambiental del plan para la cuenca de Hobble Creek

Información del proyecto

El Servicio de Conservación de Recursos Naturales del Departamento de Agricultura de los EE. UU. (U.S. Department of Agriculture Natural

Resources Conservation Service, USDA-NRCS), con la asistencia de la ciudad de Springville como patrocinadora del proyecto, está proponiendo mejoras en la cuenca de Hobble Creek en Springville, Utah. Las mejoras propuestas se extienden a lo largo del extremo inferior de Hobble Creek, principalmente entre Main Street e I-15.

Los principales objetivos del proyecto son mejorar el control de inundaciones, mejorar y proteger el hábitat de los peces y mejorar los espacios de recreación pública.

Los efectos del proyecto propuesto se evaluarán y documentarán en un plan de evaluación ambiental (Plan-EA) de acuerdo con las normas y directrices de la Ley Nacional de Política Ambiental (National Environmental Policy Act, NEPA) y el Consejo de Calidad Ambiental (Council on Environmental Quality, CEQ). El plan de evaluación ambiental se financia en el marco del Programa de Prevención y Protección de Inundaciones de Cuencas del NRCS (PL 83-566), que ofrece asistencia técnica y financiera para ayudar a las comunidades a proteger, mejorar y desarrollar los recursos hídricos y terrestres en cuencas de hasta 250,000 hectáreas.

El NRCS del USDA en la ciudad de Springville celebrará una asamblea pública para brindar información sobre el proyecto propuesto y para recibir comentarios. Se espera que los estudios técnicos se desarrollen durante 2021 y que el plan de evaluación ambiental (EA) se haga público a mediados de 2022.

En este momento, el NRCS solicita comentarios sobre el proyecto para identificar los problemas y abordar las áreas sensibles. Los comentarios escritos pueden enviarse durante el período abierto para comentarios que comienza el 13 de octubre de 2021 y finaliza el 12 de noviembre de 2021.

Asamblea de alcance público

Se invita a todo el público a asistir, a debatir y a compartir comentarios durante la asamblea virtual de alcance público que se celebrará el jueves 28 de octubre de 2021, de 7:00 p. m. a 8:00 p. m.

Se podrá acceder a esta asamblea virtual a través del enlace siguiente: <https://jonesanddemille.zoom.us/j/85490017526>

"Casa abierta" de alcance público

Se invita a todo el público a asistir, a debatir y a compartir comentarios durante la "casa abierta" de alcance público que se celebrará el jueves 4 de noviembre de 2021, de 7:00 p. m. a 8:00 p. m.

La "casa abierta" de alcance público se llevará a cabo en el Centro Cívico de la ciudad de Springville, ubicado en 110 South Main Street, Springville, UT 84663.

Como enviar un comentario

Todos los comentarios deben dirigirse a Wyatt Shakespear. Los comentarios pueden compartirse durante la "casa abierta" y la asamblea de alcance público. También pueden enviarse por correo electrónico, por correo postal o a través del sitio web del proyecto (ver información a continuación). Todos los comentarios deben enviarse antes del 12 de noviembre de 2021.

Sitio

<https://hobblecreekwatershedplan.com>

Correo

electrónico:
w.shakespear@jonesanddemille.com

Dirección de correo:

Jones & DeMille Engineering
1535 S. 100 W.
Richfield, UT 84701

Legal Notice 8692 Published In Daily Herald on October 13, 18, 21, 2021



October 18, 2021

Reference: Hobble Creek Watershed Plan-EA

Dear

The United States Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), with the assistance of Springville City as the project sponsor, is proposing improvements within the Hobble Creek Watershed in Springville, Utah County, Utah, under authority of the Watershed Protection and Flood Prevention Act (Public Law [PL] 83-566).

Improvements are being proposed along the lower reach of Hobble Creek, primarily between Main Street and I-15 in Springville. The main objectives of the project are to improve flood control, enhance and protect fish habitat, and improve public recreation.

In cooperation with Springville City, USDA-NRCS is in the planning stages of preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) to consider and analyze potential impacts from the action. For the purposes of compliance with NEPA and Section 106 of the National Historic Preservation Act (NHPA), USDA-NRCS is the designated lead agency. Pursuant to Section 106 of the NHPA, Executive Order 13007, the American Indian Religious Freedom Act, we write to you at this time regarding the project and we welcome any information you would like to share with us regarding historic properties or places of traditional religious and cultural importance near the proposed project area that we should consider as part of our analysis.

We invite you to attend the upcoming virtual scoping meeting and scoping open house. We look forward to hearing from and working with you on this important project. We welcome your call if you have questions on the proposed project, if you wish to arrange a meeting, or if you wish to initiate government-to-government consultation regarding this project.

If you have any questions, comments, or concerns, please contact Shelley Szeghi, Cultural Resources Specialist at 801-597-4522, or email at shelley.szeghi@usda.gov. We look forward to receiving your comments and discussing this project further.

Sincerely,

EMILY FIFE
State Conservationist

Enclosure: Project map

October 18, 2021

Page 2

cc:

Shelley Szeghi, State Cultural Resources Specialist, NRCS, Salt Lake City, UT

Norm Evenstad, ASTC-Partnerships, NRCS, Salt Lake City, UT

Derek Hamilton, Water Resources Coordinator, NRCS, Salt Lake City, UT

Wyatt Shakespear, Environmental Specialist, Jones & DeMille Engineering, Richfield, UT

Leslie Warta, NRCS, Environmental Coordinator, NRCS, Salt Lake City, UT



December 15, 2021

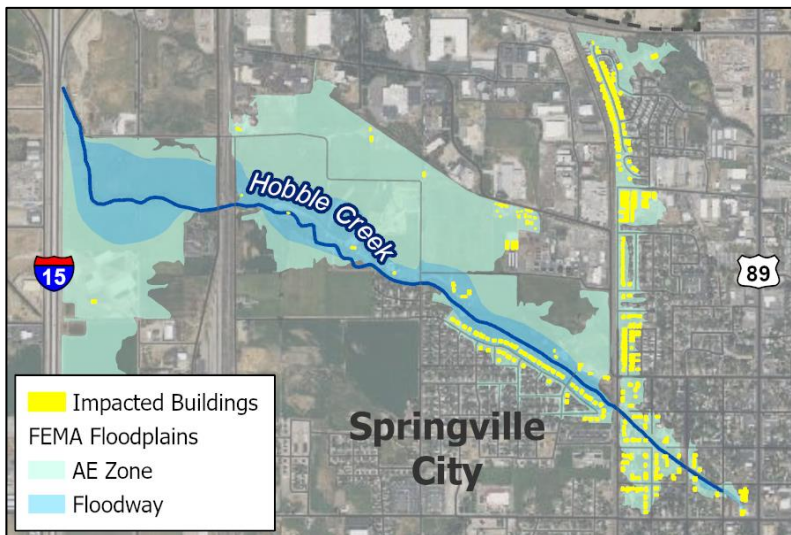
Dear Resident,

In October, a Public Scoping Notice was mailed to residences and businesses in the general area of Lower Hobbie Creek (see map below). The notice included information on the Hobbie Creek Watershed Plan Environmental Assessment (Plan-EA), which is being funded by the Natural Resources Conservation Service. Springville City is the sponsor for the project and is excited for the opportunities this project will provide to benefit flood control, enhance and protect fish habitat, and improve public recreational opportunities.

The development of the Plan-EA facilitates public involvement, meaning that you have an opportunity to provide comments that will be considered and will help guide project development. The public scoping period for this project began on October 13th and ended on November 12th 2021; however, because your home is located adjacent to Hobbie Creek and the creek is a primary feature of the project, we would like to provide you with an additional opportunity to comment on the project.

If you would like to ask questions or provide comments to be considered, it is imperative that you submit them before December 31st. Please take a few minutes to review the website listed below. There are several ways to submit comments as outlined on the website. We would also be happy to schedule a meeting with you to review any comments or questions that you may have.

Website: <https://hobblecreekwatershedplan.com>



*The existing condition FEMA floodplain types consist of a Zone AE and Floodway - in summary, these represent varying level of flood risk and flood insurance is required for certain residential and commercial loans. The impacted buildings shown are primarily residential homes, with some commercial businesses.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey L. Anderson".

Jeffrey L. Anderson, P.E.
City Engineer/Asst. Public Works Director

Services

Agencies

Search Utah.gov



Projects

Government
Agency Login

Utah.gov

Main PLPCO Site

View Project

Project #81129

Key Info:

Sponsor: USDA/Natural Resources Conservation Service

Title of Action: Hobble Creek Watershed Plan EA

Federal ID:

Project URL Link: <https://hobblecreekwatershedplan.com>

Project Start Date:

Location: Springville City

Location/Supplemental Attachment:

[Springville Agency Scoping Notice NRCS 10-11-21.pdf](#)[Springville_Scoping_Notice_NRCS_English_10-11-21.pdf](#)

Counties: Utah

Has local government been contacted? No

Date Local Government was Contacted: N/A

Acquisition: No

Date of Acquisition: N/A

Have the state representative and state senator been contacted? No

Project abstract:

The U.S. Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), with the assistance of Springville City as the project sponsor, is proposing improvements within the Hobble Creek Watershed in Springville, Utah, under authority of the Watershed Protection and Flood Prevention Act (Public Law [PL] 83-566). Improvements are being proposed along the lower reach of Hobble Creek, primarily between Main Street and I-15.

The main objectives of the project are to improve flood control, enhance and protect fish habitat, and improve public recreation.

USDA-NRCS and Springville City will hold an online public meeting to provide information about the proposed project and gather comments. Technical studies are anticipated to take place during 2021, with a draft Plan-EA circulated to the public in mid to late 2022.

Public Scoping Meeting

The public is invited to attend, discuss, and submit a comment during the online public scoping meeting:

October 28, 2021 - 5:30 PM to 6:30 PM

The virtual meeting can be accessed by following the link below:

<https://jonesanddemille.zoom.us/j/83691918364>

Public Scoping Open House

The public is invited to attend, discuss, and submit a comment during the public open house:

November 4, 2021 - 7:00 PM to 8:00

PM

The public scoping open house will be held at the Springville City Civic Center, located at 110 South Main Street

How is the local government(s) likely to be impacted?

NA

Possible significant impacts likely to occur:

NA

Consistency Review

No Consistency Review Document

Record of Decision

No Record of Decision Document

State Comments

No State Comments

For further information please contact project sponsor.

Appendix B. Scoping Meeting Materials

B.1. Public Scoping Meeting Attendance Record

Attendance Record for the Hobble Creek Watershed Plan EA Public Scoping Meeting

Meeting Format: Zoom Webinar

Date: October 28, 2021

Time: English from 5:30 to 6:30 PM and in Spanish from 7:00 to 8:00 PM.

Project Team Attendees (Both English and Spanish Meetings):

1. Derek Hamilton - NRCS
2. Aimee Rohner - NRCS
3. Tony Beals - NRCS
4. Brad Stapley - Springville City
5. Jeff Anderson - Springville City
6. Marcie Clark - Springville City
7. Kelly Carter - JDE
8. Jenna Jorgensen - JDE
9. Ricky Anderson - JDE
10. Wyatt Shakespear - JDE
11. Alfonso Flores – Spanish Interpreter Contracted through JDE

Public Attendees (English only, no public attendance for Spanish meeting):

1. Jennifer Wimber (jenniferkwimber@gmail.com)
2. Jason Miller (jamiller_@hotmail.com)
3. Kurtt Boucher (kurttboucher@gmail.com)
4. HickenFam (a.hicken0809@gmail.com)
5. Anonymous (no@email.com)
6. Erik Skousen (erik.skousen@progleasing.com)
7. Lee (lee buckwalter@gmail.com)
8. Jeannie (jdjw3_8@msn.com)
9. Marissa Anderson (thebeststudentever@gmail.com)
10. Brittany Richards (brittany@smartystreets.com)

Appendix C. Comments

C.1. Public Comments

C.2. Agency Comments

Hobble Creek Watershed Plan-EA Public Scoping Comments

Period October 13 through November 12, 2021

1. There are those of us whos property is on one or both sides or Hobble Creek and we do not want a walking trail through our property, or easier access to our property at all. We already deal with criminal activity on a regular basis. The police are no help
2. "Improving access via trails, etc. Fishing access, making it clear that fishing is allowed – signage. Consider making an area quality water, maybe catch and release only to help with bigger fish. Springville could market the fishing more"
3. Nice talking with at the public open house. Would love to see a paved trail from I-15 to Main St. on one side of the river. Possibly a dirt trail on the other side. The paved trail is in the pending active transportation plan for Springville.
4. We want to look at sheet pilings for the levee to reduce the amount of land we lose to the levee. With a sheet pile, we believe we can still berm up the south side of the levee and use that space for buildings and other land development.
5. We are interested in extending the levee to the road on the west rather than following the course of the creek. This will allow the road to establish the western line of the berm and give us full agricultural use of the land north of the berm.
6. We plan to allow people to access the land north of the berm where we will have a farm, parks, gardens, beehives, and a walking path that follows the creek through the trees. We want to have pavilions that do not measurably obstruct the flow of the creek.
7. 12' wide asphalt-paved multi-use path along Hobble Creek to connect west-side residents with downtown amenities, allow safe routes to schools, and promote active modes of transportation and recreation.
8. 12' wide asphalt-paved multi-use path along Hobble Creek to connect west-side residents with downtown amenities, allow safe routes to schools, and promote active modes of transportation and recreation.
9. 12' wide asphalt-paved multi-use path along Hobble Creek to connect west-side residents with downtown amenities, allow safe routes to schools, and promote active modes of transportation and recreation.
10. 12' wide asphalt-paved multi-use path along Hobble Creek to connect Springville residents with places of employment and to Lakeshore Parkway Trail, and to promote active modes of transportation and recreation.
11. 12' wide asphalt-paved multi-use path along Hobble Creek to replace/improve current 10' wide path.
12. Improved RR xing to allow for continuous 12' multi-use path along Hobble Creek from current paved trail west of RR tracks and across 400 W.
13. The north section of the wall on 100 n 200 w has fallen into the creek and needs attention, I have been trying to work with the city for over 3 years to get this addressed with no luck. This is a danger to my home, family, and surrounding homes.
14. Please put shared use trails over berms and levees.
15. As a resident of Springville living in the area between Main Street and I-15, I have special interest in promoting an expanded trail system along Hobblecreek. As more of this area develops, our access to this natural ecosystem becomes more valuable.

16. Please consider biking trails in your project. Trails are worth the cost in lives saved and more people exercising!
17. If levees or embankments are built, they should be topped with a wide bike/ped trail, which may occasionally dip down into the natural space between the levees, or occasionally traverse wetland areas on a boardwalk.
18. The city's draft bike/ped plan includes a proposed Hobble Creek Trail. The bridge span for future 1200W should be long enough to accommodate a wide trail under it, as well as enough room for the meandering river. This may affect any levees or embankments.
19. Beavers are a sign of a healthy river ecosystem & are beneficial to the threatened June Sucker and Utah Lake water quality. Beavers have recolonized this area of the Hobblecreek. I would like to see them remain, perhaps with the use of "beaver deceivers".
20. If the channel/open box is rebuilt in this area, I would like to see a trail included, perhaps on a stepped ledge just above the river, down within the channel. This would provide extra capacity when flooding, but would be a trail when levels are normal.
21. The Hobblecreek should be restored to a more natural course in this area and be given space to meander. As more land is developed in Utah County, this space is crucial for wildlife, migrating birds, Utah Lake water quality, and threatened June Sucker.
22. I don't want to see this section (or any section) of the river placed inside a pipe. Many other cities are currently undoing that type of river piping --at great expense. There is no reason we should repeat the mistakes of the 20th century.
23. If it is possible to build better RR bridges here, let's make sure that they include a bike/ped crossing to enhance connectivity for active transportation modes. Currently these tracks serve as a barrier to both floodwaters and mobility.
24. The span of any road bridge built here should be long enough and tall enough to include a river trail underneath it. Inclusion of a trail will serve as extra river capacity in major flood years (public access can be closed off as needed).
25. If these railroad bridges are reconstructed, the opportunity should be taken to increase active transportation connectivity by including a trail and/or a bike/ped crossing as part of the Hobble Creek Trail proposed by Springville's Active Transport' Plan.
26. Emphasis should be made to recreate/restore a natural, winding creek. This will help to soak more water into our aquifers, clean water before it enters the lake, provide habitat for June Sucker & migrating birds, & provide nature space for generations.

Additional Scoping for Residents Bordering Hobble Creek, Period December 15 through December 31, 2021

1. There is almost zero info on the website ie how will this affect my property, home, what are they planning to do in my back yard? I do not want access made easier to my property which is both sides of the creek.
2. We are trying to do improvements to our property when will we know what the impact of this will be are we suppose to put off this for years? We know there is a easement for the creek we will hold any impact of this project to the confines of this easement
3. I'm concerned that the large trees on the path behind my house will die due to lack of water or will be removed if the creek is redirected and a new path way is created. I am also concerned with an increase in crime, noise & trash due to higher traffic.

4. I am concerned that large stagnant water areas will be created and become a huge mosquito breeding ground just like the changes further down the creek. There are cases of West Nile virus in the area and I don't want to increase my chances of getting it.
5. I am concerned that if the creek is redirected or moved from its current location my property value will decrease. We purchased a lot along the creek and paid a premium for the lot. If the creek is moved my home value will decrease.
6. A recent letter encourages us to ask questions now regarding possible changes coming our way for the Hobbie Creek Watershed Plan. Before we can ask questions, it might be easier for you to verbally explain, or visually show, what the plans are and how they will effect us. Only us. Then we can move forward with any questions or concerns.
7. As a concerned resident of the Lower Hobbie Creek area in Springville Utah I would like to voice serious concerns over the proposed Hobbie Creek Watershed Plan Environmental Assessment which is funded by the Natural Resources Conservation Service and Sponsored by Springville City and was open for Public Scoping in October 2021. The option to submit online comments for this project on the Hobbie Creek watershed plan are limited to comments of 250 characters which almost seems intentional to avoid a larger public outcry. I have had to resort to an email to voice my concerns. Below are three initial concerns that need to be addressed before this project moves forward.
 - a. Changes to the flow and redirection of Hobbie Creek could be a Health Hazard. In a recent 2021 Utah Department of Health Study the West Nile virus has been detected in Utah Mosquitoes and according to Hannah Rettler, Utah Department of Health (UDOH) Vectorborne/Zoonotic Epidemiologist the "West Nile virus is a yearly presence in Utah and it isn't going away." (1.) Also, there have been multiple West Nile virus cases in Utah County which were recently reported by Utah County officials. The recent redirection and flow changes to Hobbie Creek made by the Hobbie Creek Watershed plan just west of the park on 950 West and 700 North have spawned huge numbers of Mosquitos in that area. Many times, residents have had to retreat in that area due to the new vast number of mosquitoes in the park and along the creek. Many of us have walked this path for years and the mosquito population has obviously increased which has prevented us and our families from enjoying the park and the outdoors in that area. The stagnant ponds and slack waters created by the man-made dams and creek redirections have become a huge breeding ground for mosquitoes. This slack water and stagnant ponds which are what the June Sucker thrives in and would seem to be required for the Hobbie Creek project. If that is the plan for the Hobbie Creek area on Devon Glen Drive (550 North) I am opposed to this. We as a family do not want an increase in the mosquito population around and near our home which would limit our ability to enjoy the great outdoors near our home and would expose us to an increasing possibility of infection by the West Nile virus caused by mosquitoes.

We also question the need for increasing the spawning area for the June sucker since in a press release by the US Fish and Wildlife Serve in December 31, 2020 and reported by Interior Assistant Secretary for Water and Science Dr. Tim Petty the "June Sucker has been downlisted from Endangered to Threatened and is on the path to recovery." (2.) It is clear that the June Sucker endangered status is quickly improving. Why would a

government sponsored program be allowed to endanger our health and the health of our families and friends due to an increase in mosquito breeding areas?

- b. Changes to the Hobbie Creek direction and flow would certainly affect and kill many of the large trees along the pathway. Many of these trees are cottonwood and willow trees which require large amounts of water to survive. Moving the creek away from the current pathway would greatly stress these trees and cause many of them to die. Even if the trees were replaced it would take many decades before any replacement trees would grow to the same size. This change would also ruin the current beauty and solitude of the pathway.
- c. Home values would be reduced if Hobbie Creek were to be redirected away from the current pathway and large stagnant sections were created. When we purchased our lot to build our home in 2006 which backed up to Hobbie Creek we paid a premium for this lot. If Hobbie Creek is moved back away from my lot the property value will decrease. If Hobbie Creek is redirected and moved far away from the current pathway the government will need to compensate every home and land owner that backs up to Hobbie Creek affected by the reduction in property value under the doctrine of Eminent Domain. The government is taking value of property by redirecting the creek.

We are not opposed to the improvement of flood control and public recreation but we do oppose the need for drastic changes to the current Hobbie Creek flow and location which possibly would affect our health, and the health of our families, friends and neighbors and also threatens to kill large trees and decrease property values. Before the government plows forward with this project these serious concerns need to be addressed. Vague descriptions of the project parameters and vague answers to our questions, only make us as residents more suspicious that this project is being pushed forward for reasons other than the ones stated.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

November 10, 2021

Ref: ORA-N

Norm Evenstad–NRCS
125 S. State Street, Room 4420
Salt Lake City, UT 84138
(Transmittal by email)

Dear Mr. Evenstad:

The U.S. Environmental Protection Agency Region 8 reviewed the Scoping Notice, PL-566 Watershed Proposal, and attended the agency scoping meeting held October 26, 2021 for the Hobble Creek Watershed Plan-Environmental Assessment (EA) being prepared by the United States Department of Agriculture-Natural Resources Conservation Service (NRCS). The following scoping comments are provided in accordance with our responsibilities under the National Environmental Policy Act (NEPA).

NRCS proposes to provide federal funding to Springville City to install flood control measures and fish habitat improvements in the Hobble Creek in the city of Springville, Utah (Project). The proposed Project would include installing a Federal Emergency Management Agency (FEMA) certified flood control levee system adjacent to Hobble Creek and restoring natural features within the creek's corridor to improve habitat for native fish species, including critical habitat for the endangered June Sucker.

We commend your plan to partner with members of the June Sucker Recovery Implementation Program to incorporate improvements to critical habitat for this endangered species. Based on our current understanding of the Project and the area, the EPA has identified the following key topics that we recommend evaluating in the NEPA analysis so that potential impacts or benefits to public health and the environment can be fully understood: (1) surface water resources (2) air resources; (3) purpose and need; (4) range of alternatives; and (5) construction alternatives and failure response. Our comments are based on the information available including the scoping notice description and the sponsor's application documents, provided to EPA by NRCS.

We appreciate your consideration of our comments at this early stage of Project planning and request a future notification to review the Draft EA. If further explanation of our comments is desired, please contact me at (303) 312-6665 or margason.laura@epa.gov, or NEPA Branch Chief, Philip Strobel at (303) 312-6704 or strobel.philip@epa.gov.

Sincerely,

Laura Margason

Laura Margason
NEPA Branch
Office of the Regional Administrator

Enclosure

cc:

Chet Fitzgerald, Area Conservationist, NRCS, Ogden, UT
Jenny Jo Cox, District Conservationist, NRCS, Provo, UT
Derek Hamilton, Water Resources Coordinator, NRCS, Salt Lake City, UT

Enclosure - EPA Scoping Comments : NRCS Hobbie Creek Watershed Plan-EA

(1) Surface Water Resources

If used within the range of Project alternatives, please evaluate the potential for streambank armoring (i.e. concrete, riprap, synthetic liners, etc.) in Hobbie Creek to impede the natural functions of the riverbank and floodplain. Armoring can create an impermeable layer along stream reaches that effectively cuts off a riparian zone from stream waters. When this happens, the separation degrades the available wildlife habitat through the elimination of riverbank vegetation and vegetation diversity and limits places of refuge during high water events and can leave fish at risk for exposure or predation. Rocks that comprise armoring can also reflect light into the water, increasing water temperatures to a degree damaging to fish. Structural degradation of the armoring may also arise during high water events, leading to the need for ongoing monitoring and maintenance. Often increased flow velocity within a hard armored channel can also simply transfer flooding and bank erosion issues to downstream segments and landowners. For these reasons EPA recommends the consideration of alternatives that will improve flood conveyance while minimizing the disturbance of the natural stream channel and associated floodplain processes.

While developed land and high flood flow velocities may place limitations on the range of possible channel designs, there are many techniques that can be applied within stream corridors to improve flood conveyance that limit or do not require the construction and placement of hard armoring. Maintaining well-developed streambank vegetation is often the cheapest, least labor-intensive way to provide long-term bank stability with corresponding benefits like slowing and filtering runoff, trapping and holding sediments and woody debris (which assists in replenishing soils and rebuilding banks), and providing shade and improved habitat for fish and invertebrates. Natural or bio- engineering techniques such as securing logs along the toe of a riverbank or installing logjams or brush mattresses and planting vegetation within sandbag armored banks can add roughness to the channel, increase flow resistance and slow a river down. This slowing leads to recruitment processes that increase complexity, distributes the system's energy, and improves fish habitat and ecological productivity. Both FEMA and EPA have resources and case studies on these approaches that can be provided if the NRCS or applicant desires. Such methods are also potentially covered under a U.S. Army Corps of Engineers (Corps) Clean Water Act (CWA) Section 404 nationwide or general permit in Utah while structural systems like hard armoring would likely require a more intensive individual permit process.

In addition to the above considerations, we recommend the NEPA analysis identify and discuss how surface water quality will be protected during Project activities. To this end, the EPA recommends the NEPA analysis include:

- A list of Best Management Practices (BMPs) that will be required to protect surface water resources from impacts during construction;
- A discussion of the circumstances under which the BMPs would be applied (e.g., proximity to surface water resources, presence of erosive soils, slope, floodwater discharge, etc.); and,
- An explanation of how NRCS or another government entity would ensure that the BMPs would be monitored to ensure timely and correct implementation as well as timely maintenance.

Protection of Wetlands and Riparian Areas

Wetland and riparian resources increase landscape and species diversity, support many species of wildlife, and are critical to the protection of water quality and designated beneficial water uses. In

addition, these areas warrant protection under Section 404 of the CWA and any dredge or fill in Waters of the U.S. warrants permitting administered jointly by the Corps and EPA. We recommend that NRCS analyze potential impacts from all Project alternatives to the following:

- Total wetland area (jurisdictional and non-jurisdictional) and function, such as from reduced floodwater inundation and/or reduced overbank flow;
- Wetland vegetation, riparian habitats, and aquatic biota; and
- Wetland erosion or aggradation from floodwater channelization or redirection.

We also recommend that the NEPA analysis evaluate methods to protect surrounding wetlands and riparian areas, such as including specific mitigation requirements and BMPs applicable for construction, maintenance and reclamation activities to prevent adverse impacts to aquatic resources downslope of the Project sites. These could include silt fences, detention ponds and other stormwater control measures.

(2) Air Resources

Dust suppression from disturbed areas is an important mitigation consideration in many areas of the West. Given the proximity of the project to residential communities, the EPA recommends the NEPA analysis include a plan for addressing dust control during construction. We suggest the plan include the level of required or anticipated dust control, control methods, inspection schedules, documentation procedures, and accountability processes. The EPA recommends reducing surface disturbance to effectively reduce fugitive dust. Impacts can also be reduced by reclaiming disturbed areas as soon as practicable.

Construction vehicle emission analyses are also recommended in the EA. The Project area is within an area of designated nonattainment for the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS), and the 2006 24-hour particulate matter less than 2.5 micrometers in diameter (PM_{2.5}) NAAQS. The project area is also within the 2006 24-hour particulate matter less than 10 micrometers in diameter (PM₁₀) NAAQS maintenance area (see 40 CFR 81.345). Emissions will occur within the nonattainment areas through planned transportation and construction activities. It will therefore be beneficial for NRCS to analyze air responsibilities under the requirements of Clean Air Act Section 176(c) and the implementing regulations at 40 CFR part 93, subpart B for general conformity that apply within nonattainment areas.

Pollutants to consider for ozone include nitrogen oxides (NO_x) and volatile organic compounds (VOC). Pollutants for PM_{2.5} and PM₁₀ that would need to be considered include directly emitted PM_{2.5} and PM₁₀ as well as precursors including NO_x, sulfur dioxide (SO₂), and VOC. Due to the Project area being in a nonattainment area, the thresholds in 40 CFR 93.153(b)(1) should be used for the applicability analysis to determine whether a conformity determination is needed. We are available to assist NRCS with their responsibility to assess general conformity.

(3) Purpose and Need

Projects that trigger both NEPA and CWA Section 404 permitting should include a purpose and need statement broad enough to meet the requirements of both statutes. As such, the purpose and need statement should allow for analysis of a range of both reasonable (NEPA) and practicable (CWA) alternatives for meeting the basic, underlying project purpose. In particular, the statement should not be written narrowly to constrain the range of alternatives and thereby eliminate alternatives that may be considered practicable under the CWA Section 404 implementing regulations.

Developing an agency-coordinated purpose and need statement between the NRCS and the Corps is critical prior to developing screening criteria or identifying alternatives.

(4) Range of Alternatives

The NRCS sponsor's application document for this project mentions the need for a CWA Section 404 permit. If this permit is necessary, under CWA regulations the Corps can only issue a permit for a discharge of dredged or fill material into waters of the U.S. if it can be demonstrated that it is the least environmentally damaging practicable alternative (LEDPA). To assure that this is achieved, the NEPA document needs to include a full range of alternatives with the goal of avoiding and minimizing impacts to waters of the U.S. while meeting the basic purpose of the action.

Pursuant to the Section 404 requirements, the burden to clearly demonstrate that an alternative is not practicable (i.e., available and capable of being accomplished taking into consideration existing technology, logistics, and cost) rests on the applicant. If an alternative is a standard industry norm, then it is likely practicable unless clearly demonstrated otherwise (40 CFR § 230.10). Practicability based on cost should not be evaluated according to what the applicant can afford (its financial standing) or on whether costs of an alternative are more or less than other alternatives, but whether the cost of an alternative is within the range of similar projects or industry norms in a region.

The NEPA documentation should summarize the criteria used to screen reasonable alternatives, including the CWA regulatory criteria used to develop practicable alternatives. Environmental, logistical, technological, and cost criteria should all be considered. The NEPA document should clearly explain the reasoning used to eliminate alternatives.

(5) Construction and Failure Response

Proposed Alternative Construction

We understand that the EA will not directly authorize construction within the watershed. We nonetheless recommend including specific information about flood control structure construction so that anticipated impacts can be considered when selecting between alternatives. These details include a description of the following factors:

- Structural specifications, materials, and locations;
- Anticipated support facilities including structural yards, maintenance buildings, roads, construction camps and materials sites;
- Anticipated temporary land use locations;
- Sensitive plant and animal life in the Project area; and,
- Topography, geology and surficial hydrology in the vicinity of each structure.

Based on these criteria, we recommend choosing flood control structure locations proposed in each alternative in cooperation with the Utah Department of Natural Resources and the regional FEMA office to minimize environmental impacts.

Failure Response

Given the trend toward increased urbanization and severe storm events in the Project area, we recommend the EA include an evaluation of potential adverse impacts from the structural failure of the proposed flood control measures. This should include potential adverse impacts to surface waters, public

or private water supplies, human health, vegetation, and wildlife. In this part of the analysis, it would be useful to discuss the probabilities and likely frequencies of different types and volumes of potential failure events over the life of each alternative. We expect this information would be useful in evaluating the environmental impacts of potential structural failures and in determining emergency transportation corridor locations. We also recommend describing the failure detection and repair program for this Project, their associated costs for each alternative, and the margin and methods of potential error for each program.