

# UTAH WATERFOWL ASSOCIATION



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*Preserving Utah's Waterfowl, Waterfowl Habitat and Utah's Rich Waterfowling Heritage*

May 24, 2007

Wasatch Front Regional Council  
Attn: Chuck Chappell and Sam Klemm

*Re: Sheep Road Expansion*

Wasatch Front Regional Council:

In its recent Regional Transportation Plan, the Wasatch Front Regional Council proposes a four lane thoroughfare abutting the eastern edge of the state's flagship waterfowl management area and bisecting important wetlands. Extending over three miles in length, this road would not only require filling many acres of high value wetlands but it would bring heavy traffic flow with its attendant noise, air pollution, debris and disruption to an otherwise idyllic portion of the Farmington Bay Waterfowl Management Area. Untold thousands of waterfowl, shorebirds and other wildlife depend on the protected wetland habitats in this area. Avocets, black-necked stilts, cinnamon teal and other birds nest and raise their broods there. Moreover, the FBWMA has become an increasingly important mecca for waterfowl and birding enthusiasts.

Developing a road in this area has already been flatly rejected once due to regulatory restrictions. Nothing has happened in the interim that would change that result and, in fact, much has happened to make it even less permissible. For instance, the road would abut or fill a portion of the Legacy Nature Preserve, a federally approved mitigation site, that did not exist several years ago.

Aside from the road's inability to meet federal requirements, the UWA's concerns fall into several categories. First, the proposed road will fill valuable wetlands. Second, the road will bisect important wetlands complexes. Third, the road will degrade surrounding habitat through indirect impacts. Fourth, the road will promote the filling of additional wetlands. Fifth, the road will reduce recreational opportunities for local residents.

The proposed road will directly fill up many acres (possibly several dozen) of high value wetlands. These are not isolated, degraded wetlands. Rather, they are high functioning and adjoin larger wetlands complexes. They are heavily used and cannot be replaced. Mitigation attempts to replace this calibre of wetland are notoriously ineffective. Moreover, there are few

areas close to the proposed impact that are suitable for mitigation. In short, filling these wetlands will permanently reduce the quantity of high value habitat in this area.

The proposed road bisects important wetlands complexes to the west and east. There are several large wetlands complexes on either side of the Sheep Road. As it currently exists, the Sheep Road is a narrow dirt road receiving only limited use. If transformed into a much wider paved and heavily trafficked road, it will effectively create a barrier between these wetlands complexes that will reduce the value of each side, particularly the eastern side that is more dependent on its connection with the larger Farmington Bay area.

A four lane road will bring heavy traffic with its attendant noise, commotion, air pollution and debris. This will substantially degrade the wetlands complexes on either side. There will likely be other impacts from alterations in groundwater and surface water flows, lights and roadway contaminants.

Roads bring development and this road will be no exception. The UWA strongly suspects that one of the primary reasons for this proposal is to develop the land just west of the Legacy Highway in Centerville and Farmington. This would require filling dozens of additional acres of wetlands, further altering flow, further increasing pollution and disruption and further reducing the habitat value of areas even somewhat distant from the road itself. All told, the combined effects will produce a loss of a vital segment of the precious remaining habitat on the south shore of the Great Salt Lake. The UWA cannot countenance the piecemeal destruction of an irreplaceable natural resource and invaluable part of our natural and cultural heritage.

Finally, local citizens are increasingly looking to FBWMA and other GSL areas for a respite from the urbanization they are otherwise surrounded by. Many thousands travel to FBWMA each year to watch bald eagles or swans or to hunt waterfowl. The development of most private land in Salt Lake County, Davis and Weber Counties have left areas for waterfowlers and birders to pursue their interests. This roadway will further limit those areas. It is unacceptable to suggest this loss is only incremental. Each successive impact could be justified in this fashion until nothing is left.

In sum, given all of the foregoing, the road will have a tough time navigating the regulatory restrictions. More importantly, the road's impacts should disqualify it from further consideration.

Best Regards,

John D. Ray

cc: Jeff Richards