Heber Valley EIS NEPA Scoping Report FAQ

The following comment and question themes were frequently submitted to the Utah Department of Transportation (UDOT) during the April 30 to June 14, 2021, public comment period during National Environmental Policy Act (NEPA) scoping for the Heber Valley Corridor Environmental Impact Statement (EIS).

1. **Were there any common themes in the comments submitted during scoping?**
    - Common themes taken from the public comments include the following:
        - Heber City Main Street is congested
        - Main Street is uninviting and not walkable due to congestion and noise
        - Main Street is unsafe for all vehicles, bikes, and pedestrians
        - Truck traffic is a problem on Main Street; trucks should be restricted or tolled
        - North fields are a treasured resource (open space, ecosystems, viewshed)
        - Concern for impacts to natural resources and open space
        - Support for or opposition to bypass (differing opinions)
        - Bypass should be on west side or east side (differing opinions)
        - Improve existing roads instead of building a new road
        - Concern for impacts to neighborhoods (noise, pollution, safety, property values)

2. **Why is this project taking so long?**
    - Many steps are needed for large transportation projects. The first step is when a need or project is identified in a long-range transportation plan. The next step is an environmental study, like the current EIS, to provide an in-depth analysis of impacts to the natural and human environments for a range of alternatives. In order ensure a thorough evaluation of alternatives and seek public input on those alternatives and associated impacts, the EIS process can take 2 years or longer. Once a decision has been made regarding a preferred alternative, the project can move to final design and right-of-way acquisition. After those are complete, construction can begin. At each step of the process, funding must be identified to complete that aspect of the project. Funding is allocated through a rigorous, statewide prioritization process.

3. **Why doesn't UDOT just build the original western bypass proposal?**

   - In 2008, a bypass study was conducted to help the Mountainland Association of Governments (MAG), Heber City, Wasatch County, and UDOT identify a preliminary footprint for corridor preservation purposes.
   - In 2019, another planning study built on previous studies in more detail using updated traffic data. It analyzed the feasibility of and need for a new corridor, evaluated what type of facility it should be, and looked at potential alignments. Ultimately, the 2019 study did not recommend a final alignment but recommended additional evaluation in a future environmental study.
   - In 2019, the Utah Transportation Commission, with the support of Heber City and Wasatch County, funded an EIS as the appropriate next step. An EIS requires evaluating a range of alternatives to determine the best solution to meet the purpose of and need for the Heber Valley Corridor Project. That EIS is now underway.

4. **How will prior plans or proposals be used as alternatives are developed?**

   - Alternatives from previous plans and proposals that could meet the current project's purpose and need will be evaluated in the EIS, along with new alternatives suggested by the public and agencies during the scoping process.
   - Alternatives will be developed to the same level of detail for comparison, regardless of where they originated. They will be evaluated using the screening criteria developed for the EIS.
   - Previously studied alternatives do not have an advantage over newly suggested alternatives.

5. **Why does the project's purpose and need focus on Heber City's vision for the historic town center and not the vision of surrounding communities?**

   - There are only two principal arterials in the Heber Valley, U.S. 40 and U.S. 189, which converge into a single principal arterial that also serves as Heber City's Main Street. The character and function of U.S. 40 changes from a 65-miles-per-hour (mph) limited-access freeway north of town to a 35-mph Main Street in Heber City with signalized intersections. Traffic throughput on U.S. 40 is traded for increased access within Heber's historic core, resulting in congestion and delay for not only Heber City residents but also all those who travel through the region.
   - The transportation needs identified are primarily found on U.S. 40 in Heber City. All signalized intersections are expected to fail (that is, intersections will be heavily congested because demand exceeds capacity) during the PM peak hour by 2050 if no improvements

are made. Vehicle queue lengths will increase and spill back to other intersections and onto U.S. 40 north of town where the posted speed is 55 mph, resulting in safety concerns.

- Heber City clearly defined their vision for the historic town center in the *Heber City Envision 2050 General Plan*, adopted in 2020, which the study team will account for as it studies potential solutions for U.S. 40 mobility issues.
- The goals, objectives, and guidelines from the *Wasatch County General Plan* (2010), *Daniel Town Land Use Plan* (2009), and *Midway City General Plan* (2017) will also be considered after screening when alternatives are evaluated in detail.

6. Will the project include a trail, bike lanes, and sidewalks?

- Nonmotorized transportation was initially included as a secondary objective of the EIS. Based on comments received during scoping, the purpose and need was revised to include opportunities for nonmotorized transportation as a primary purpose, along with improving mobility on U.S. 40.
- Nonmotorized components such as trails, bike lanes, and sidewalks will be incorporated into the design of each alternative that passes through the screening process and is evaluated in detail in the EIS.
- Nonmotorized components will be consistent with local and regional planning documents (*Wasatch County Regional Trails Master Plan*, *Heber City Parks, Trails, and Open Space Master Plan*, and *Heber City Envision 2050 General Plan*). Nonmotorized components could vary from one alternative to another to fit within the context of each alternative.

7. Will truck traffic decrease with a transition to renewable energy, or with a pipeline or train from the Uinta Basin?

- It is difficult to predict the future demand for crude oil produced in the Uinta Basin.
- A separate EIS (the Uinta Basin Railway EIS) has been prepared to evaluate a new rail line from the Uinta Basin. The purpose of the proposed rail line would be to provide common-carrier rail service connecting the Basin to the interstate common-carrier rail network using a route that would provide shippers with a viable alternative to trucking. According to the Uinta Basin Railway Final EIS:

> In the short term, OEA [the U.S. Surface Transportation Board's Office of Environmental Analysis] does not expect that the proposed rail line would divert truck transportation of crude oil to rail transportation for the purpose of serving existing oil refineries in Salt Lake City because those refineries currently do not have rail access. However, OEA anticipates that the proposed rail line would eliminate the existing tanker truck traffic transporting crude oil from production areas in the Basin to the Price River Terminal.

- If the Uinta Basin Railway is constructed, it would not reduce oil tanker truck traffic on U.S. 40 because that is the route the trucks take from the Uinta Basin to the refineries in Salt Lake City.
- Currently there are no known funded plans for a pipeline from the Uinta Basin to the Salt Lake City terminals.

8. Why aren't there screening criteria for impacts to open space, water quality, and visual resources?

- Impacts to open space, water quality, and visual resources will be considered for alternatives that are evaluated in detail. These impacts are considered when selecting a preferred alternative after alternatives are screened out based on more proscriptive legal standards.
- Level 2 screening criteria include impacts to key resources with the highest level of regulatory protection. Section 404 of the Clean Water Act and Section 4(f) of the U.S. Department of Transportation Act of 1966 are proscriptive laws, and these regulations dictate what can be permitted or approved.
    - Waters of the United States (WOUS) are protected by Section 404 of the Clean Water Act. A Section 404 permit from the U.S. Army Corps of Engineers (USACE) is required for projects that impact WOUS. Water quality impacts to WOUS are considered by USACE. USACE cannot issue a permit if a practicable alternative exists that would have less adverse impacts to the aquatic ecosystem. There is no point in evaluating alternatives in detail that could not be permitted.
    - Section 4(f) properties are protected under Section 4(f) of the U.S. Department of Transportation Act of 1966. UDOT can approve an alternative that uses Section 4(f) properties only if there is no feasible and prudent alternative. There is no point in evaluating alternatives in detail that could not be approved.
- For comparison, laws protecting most other resources (such as land use and open space) are procedural laws. NEPA requires decision-makers to consider impacts to these resources and to avoid, minimize, and mitigate impacts. However, the laws do not dictate the outcome of the consideration.
- It is not practical or cost-effective to analyze impacts to alternatives that might be screened out. It takes time and money to conduct water quality analyses and visual simulations.

9. Who gets to decide whether an alternative is eliminated? Who gets to pick the preferred alternative?

- UDOT is the lead agency for the Heber Valley Corridor Project and is responsible for decisions regarding the screening of alternatives and for selecting a preferred alternative. UDOT considers agency and public involvement when making these decisions.

10. How is public input used in making a decision? Does the majority rule?

- The NEPA EIS process is not a vote. Rather, public input is only one of several elements that will be considered. UDOT must also consider technical data, established environmental policies, and agency input. A preferred alternative will be selected using an objective, data-driven approach that is informed by all public input received during the various comment periods throughout the NEPA process alongside the technical data and analysis.

11. When will UDOT present the alternatives in more detail?

- UDOT will present the conceptual alternatives for public and agency comment once they have been developed in enough detail to allow for meaningful comment. An alternatives open house is anticipated in the fall of 2021 and will include a 30-day comment period. Alternatives screening will take place after this comment period.
- Alternatives that make it through the screening process will be evaluated in detail in the Draft EIS. UDOT will identify a preliminary preferred alternative in the Draft EIS based on detailed analysis. UDOT anticipates that the Draft EIS will be available for review and comment in summer or fall of 2022. A public hearing will be held at that time with a 45-day comment period. UDOT will make a final determination on the preferred alternative, taking into account comments on the Draft EIS.

12. How will UDOT balance impacts to natural resources and neighborhoods?

- UDOT will evaluate impacts (both adverse and beneficial) for all alternatives studied in detail in the EIS. When selecting a preferred alternative, UDOT will consider how well an alternative meets the purpose of and need for the project, resource impacts, and cost. In balancing these factors, UDOT strives to identify the transportation solution that is in the best interest of the public.
- A community impact analysis will consider neighborhood and community cohesion, quality of life, safety, traffic, recreation resources, public services, and community facilities. A noise analysis will estimate noise impacts and assess potential mitigation measures. The analysis will be detailed enough to estimate noise impacts at specific locations (for example, homes, businesses, and parks). Property impacts will be evaluated including easements, acquisitions, and relocations.

- UDOT will evaluate impacts to natural resources according to applicable laws, including the Farmland Protection Policy Act, Clean Air Act, Historic Preservation Act, Clean Water Act, Endangered Species Act, and Migratory Bird Treaty Act. UDOT will also consider state and local laws and regulations.
- Visual impacts will be assessed for each alternative evaluated in detail. Views from each alternative and toward each alternative will be considered.

13. How does UDOT account for future growth?

- The planning horizon for the EIS is the year 2050. The Kem C. Gardner Policy Institute produces long-term demographic and economic projections for the state of Utah and its counties. Wasatch and Summit Counties are projected to have large increases in population, employment, and households by 2050. These projected increases are expected to result in continued increased travel demand on the transportation network including U.S. 40. UDOT uses these growth projections in developing potential alternative solutions considered in the EIS.
- The Summit–Wasatch travel demand model was developed to forecast future traffic. The Mountainland Association of Governments, the Wasatch Front Regional Council, UDOT, and Summit County worked together to develop the model. It is a traditional four-step travel demand model consisting of trip generation, trip distribution, model split, and trip assignment.
- Refinements were made to the Summit–Wasatch model to better represent existing travel patterns and improve forecasts. The geographical subdivisions within a travel demand model are called traffic analysis zones, or TAZs. Each TAZ is populated with household, population, and employment estimates.

14. Will the project include changes to zoning or development plans?

- Local governments are responsible for zoning and approval of development plans. UDOT relies on local governments to provide zoning and development plans for analysis in the EIS.
- UDOT will not make any decisions regarding zoning or development in the Draft EIS.

15. Can truck traffic be restricted on Main Street or through the Heber Valley?

- U.S. 40 is included in the National Network, which is a network of approved state highways and interstates for commercial truck drivers in the United States. It is not possible to restrict truck traffic on a road that is included in the National Network.
- UDOT does not have the authority to restrict truck traffic on U.S. 40 to nighttime hours or to require trucks to use an alternate route.

- If a bypass were to be constructed, and if the bypass were to be designated as U.S. 40, it would become the new National Network route. Main Street would no longer be part of the National Network, and jurisdiction could be transferred from UDOT to Heber City. Even then, it would be difficult or impossible to restrict truck traffic entirely, but Heber City could implement changes that would make Main Street less desirable for trucks (changes such as slower speeds, more stops, and/or narrower lanes).

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June 14, 2020

Ref: 8ORA-N

Naomi Kisen
Environmental Program Manager
Utah Department of Transportation
4501 South 2700 West, Box 148450
Salt Lake City, Utah 84114-8450

Dear Ms. Kisen:

The U.S. Environmental Protection Agency Region 8 is responding to the May 11, 2021, Notice of Intent published by FHWA on behalf of UDOT to prepare the Heber Valley Corridor Environmental Impact Statement (EIS). We offer the enclosed scoping comments consistent with our authority under Section 102(2)(C) of the National Environmental Policy Act.

The project purpose is identified to improve regional and local mobility on U.S. 40 from S.R. 32 to U.S. 189 through 2050 while allowing Heber City to meet their vision for the historic town center. The enclosure provides our comments on the following topics: (1) air quality; (2) aquatic resources including water quality and wetlands; and (3) purpose and need.

We appreciate the opportunity to participate as a cooperating agency in the Heber Valley Corridor EIS NEPA process. We hope our comments will assist UDOT in identifying, evaluating and developing mitigation for potential environmental impacts. If you have any questions, please contact me at (303) 312-6500 or hubner.matt@epa.gov.

Sincerely,

Matt Hubner
Lead NEPA Reviewer
Office of the Regional Administrator

Enclosure to EPA's Heber Valley Corridor EIS Scoping Letter

1. Air Quality

We recommend that the Draft EIS include a description of current air quality conditions and trends and estimates of future conditions under the possible alternatives. The following air quality comments address: (a) existing air quality; (b) recommendations for assessing environmental consequences; and (c) mitigation of air quality impacts.

a) Existing Air Qualtiy

We recommend the Draft EIS describe baseline air quality conditions for criteria pollutant and Air Quality Related Values (AQRVs) by including the following in the document:

- A summary of background air quality by disclosing current design values based on the most current and representative air quality monitors compared to the respective National Ambient Air Quality Standards (NAAQS). We recommend working with the Utah Air Quality Division (UDAQ) to determine appropriate design values. EPA is also available to assist.
- A summary of existing trends in AQRVs within the region of the project including at any Class I areas or Class II areas with sensitive resources of value.
- Estimates of current vehicle emissions based on traffic data and EPA's latest version of MOVES (currently MOVES3). Available at: https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves.

b) Environmental Consequences

To disclose impacts from the project we recommend estimates be presented of the related construction and post-construction emissions for each alternative, and evaluate the impacts resulting from those emissions for each alternative. The pollutants of interest include the criteria pollutants (CO, PM_{10}, $PM_{2.5}$, NO_2, SO_2), hazardous air pollutants (HAPs), and greenhouse gases (GHG). We recommend the following items be included in the document:

- A description of the equipment and sources associated with project construction for each alternative. Based on the inventoried sources and the schedule for construction we recommend emissions be calculated for each alternative using EPA's MOVES modeling system for mobile sources and appropriate emission factors for any stationary sources that may be needed for project construction (e.g., asphalt or concrete batch plants).
- An inventory of mobile source emissions from traffic after project construction has completed based on vehicle type and vehicle miles traveled and EPA's MOVES modeling system for each alternative and year of interest.
- Based on the emission information, we recommend an analysis of impacts that appropriately discloses impacts. Based on the level of the emissions and receptors of interest methods could include quantitative air quality assessment or qualitative analysis.
- An analysis of cumulative impacts to criteria pollutants, HAPs, and GHG.

c) Hazardous Air Pollutants

Recent studies demonstrate a variety of health-related effects near high traffic areas. HAPs are known or suspected of causing cancer and other serious health and environmental effects. In a rulemaking published on March 29, 2001, the EPA identified 21 Mobile Source Air Toxics (MSATs), a subset of HAPs associated primarily with diesel exhaust and organic gases.

The level of MSAT analysis is most appropriately determined on a case-by-case basis, recognizing that each project has a unique scope and characteristics. We recommend the document consider an emissions inventory of MSATs (as stated above) for the No Action and Action Alternatives. For purposes of comparison, it will be useful to determine how post-project conditions will compare to each other as well as to baseline conditions, and whether there are human health concerns with those emissions and concentrations (if a quantitative analysis is conducted). In addition, we recommend the MSATs analysis in the document include:

- A description of the proximity of the highway to homes, schools, and businesses;
- An analysis of potential impacts to these areas from exposure to MSATs;
- A summary of available, relevant MSAT monitoring data and MSAT studies; and
- An analysis of baseline and post-project diesel truck traffic and MSAT emissions.

d) Mitigation of Impacts

We recommend the Draft EIS consider methods that could be employed to mitigate any negative air quality impacts of the project, including air quality impacts from construction related activities. Further, we recommend the proposed mitigation measures include details on how, when, and where the mitigation will be implemented, and how effective the measures are expected to be. In addition, we recommend that design features of the alternatives selected for analysis include a focus to minimize population exposure to emissions from heavy freight diesel truck traffic that is passing through the Heber Valley. There may also be opportunities for UDOT to consider operational mitigation by considering designs that incorporate vegetation as a barrier to reduce pollutants. For more information please *see* https://www.epa.gov/air-research/recommendations-constructing-roadside-vegetation-barriers-improve-near-road-air-quality.

e) Air Quality Monitoring

We recommend that the Draft EIS include a discussion on whether any construction-related activities could create air quality impacts to residents, or occupied structures. If construction near residences or occupied structures will occur and air quality impacts of concern appear possible, real-time air quality monitoring during construction activities may be appropriate. Factors to consider include:

- the proximity of construction activity to homes, schools, businesses, and sensitive populations;
- the amount of soil disturbance and the soil type; and
- the duration and magnitude of emissions from construction equipment.

Although we expect Best Management Practices (BMPs) will be utilized during construction, potential localized impacts from $PM_{2.5}$ and PM_{10} emissions have occurred with some construction projects. Local air monitoring could demonstrate the effectiveness of the mitigation measures in minimizing adverse effects and allow for BMP modifications if air quality problems are detected.

2. Water Resources

We recommend the Draft EIS further delineate existing aquatic resources in the project area beyond what is currently provided in scoping materials, including wetlands and waters of the U.S., such as the northwest wetland complex and Provo River Restoration area. New construction and road alignment changes have the potential to impact the hydrology, water quality, and wildlife habitat of the creek and other water resources. We appreciate that early scoping has already started the process of identifying sensitive areas in the project areas and further defining them will help with selection of alternatives and identifying and mitigating impacts.

To describe effects to aquatic resources in the project area, we recommend that the Draft EIS specifically include the following analyses or descriptions:

- Clear maps, indicating wetlands and other aquatic resources, such as rivers, creeks and springs, private wells and other groundwater interfaces.
- The baseline description of aquatic resources that discuss the abundance, distribution, function, and condition of aquatic resources and wetlands within the project area. This would include identifying any impaired waterbodies or waterbodies with a TMDL within the project area that could be impacted by project activities.
- An analysis of impacts to all waters in the project area (e.g. both directly impacted or hydrologically impacted but spatially removed from the actual construction footprint). It is important to include the impacts to waters from changes in hydrology, changes in water quality, other impacts to aquatic organisms and wildlife; and the aggregate impacts to waters from future development scenarios, should future growth be expected. These impacts may result from reductions in vegetative cover; increased impervious surface, runoff and sedimentation; changes in hydrology of the area; and potentially result in changes to floodplain, wetland and riparian areas, changes in habitat area and connectivity, introduction of invasive species and changes in land use.
- An impact analysis that includes disclosure of potentially adverse impacts to aquatic resources from reasonably foreseeable development associated with the roadway improvements. Also, it is valuable to include analysis of any additional development impacts to the degree the project may enable or induce development beyond that which is already accounted for in land use, economic, and transportation plans.
- If wetlands may be significantly impacted, such as the northwest wetland complex, the Provo River Restoration riparian complex, or other locations within the project area, we recommend including a wetland delineation and descriptions that include a wetland functional analysis in the Draft EIS. We are pleased that UDOT has engaged with the US Army Corps of Engineers as a cooperating agency. Due to the potential for impacts to wetlands and the possible need for an individual permit for the project, we highly

recommend that the project concurrently address the necessary permit requirements under Clean Water Act (CWA) Section 404 during the NEPA process, should that be necessary.

- Clearly identify or cite BMPs for water quality protection and possible mitigation measures for impacts to aquatic resources.

3. Purpose and Need

Because the purpose and need are defined as the primary screening criteria for alternatives development, it is important that the purpose and need be clearly identified to ensure that alternatives advanced to the Draft EIS are adequate to meet the project needs but do not inadvertently screen out feasible alternatives, especially if there is potential for a CWA Section 404 individual permit, which will require selection of the least environmentally damaging practicable alternative, or LEDPA. From our review of the public input gathered during the early scoping comment period and the included 2003 Heber City General Plan, it is apparent that re-routing of truck traffic is a significant component of the project, though project materials indicate truck traffic as a small percentage of total traffic observed. Considering that US 40 to Heber City is a main artery for truck traffic in and out of the Uinta Basin to Salt Lake City, we recommend UDOT determine whether rerouting of truck traffic should be included as a primary project purpose to better develop a reasonable range of project alternatives.

Further, as level 2 screening is applied, we recommend that if the "Right-of-way" criteria be utilized, it should be noted in the Draft EIS that the 2003 Heber City General Plan indicated that at the time 40% of the right-of-way for a bypass west of town had been acquired. If more land has since been acquired, that should be identified in the Draft EIS as well. This is valuable information because, under the proposed level 2 screening criteria, if the number of remaining land acquisitions is minimal and results in a lower cost (which is another proposed level 2 screening criteria), this could artificially narrow the range of practicable alternatives.

Practicability criteria, under the CWA Section 404 (b)(1) Guidelines (Guidelines) means available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purpose. For example, many projects have secondary project screening criteria, which represent desirable outcomes, but these criteria typically are narrower in scope than the overall project purpose (i.e. cost effectiveness). Incorporating criteria that are not part of the overall project purpose limits the alternatives analysis and is not consistent with the Guidelines.

The intent of the cost criteria, as stated in the preamble to the Guidelines is to consider those alternatives which are reasonable in terms of the overall scope and cost of the proposed project. To determine what a reasonable cost range would be for a project, the project should consider what the industry norm, or typical cost estimate, would be for that type of project in that area. If the cost of an alternative falls within the standard industry norm for constructing the alternative at that site, then the project may still be practicable. Project costs, including construction costs, land acquisition, housing relocation, mitigation, etc., can be included in a cost analysis.

Cost, however, should not be presented as a direct comparison between alternatives. The cost analysis is not an economic evaluation where an increase over the lowest cost alternative

establishes a cost threshold for determining practicability. Only if the cost of an alternative makes a project infeasible should the alternative be considered not practicable. In other words, if an alternative can be constructed considering the scope and cost of the project and still be economically viable, the alternative may still be practicable under the Guidelines. As such, we recommend that cost-effectiveness and rights-of-way be consolidated and used to determine practicability of an alternative, but not as alternatives screening criteria. As noted above, incorporating these screening criteria could artificially narrow the range of alternatives.

Comment Response Matrix

Document Title	EPA Scoping Comments	Preparer	
Document Date	June 14, 2020	Organization	EPA
Commenter	Matt Hubner		

Item	Page	Section	Comment	How Addressed
1	2	1. Air Quality	We recommend that the Draft EIS include a description of current air quality conditions and trends and estimates of future conditions under the possible alternatives.	The Draft EIS will include both a discussion of current air quality conditions and a qualitative discussion of future conditions with the proposed reasonable alternatives.
2	2	1. Air Quality a) Existing Air Quality	We recommend the Draft EIS describe baseline air quality conditions for criteria pollutant and Air Quality Related Values (AQRVs) by including the following in the document: • A summary of background air quality by disclosing current design values based on the most current and representative air quality monitors compared to the respective National Ambient Air Quality Standards (NAAQS). We recommend working with the Utah Air Quality Division (UDAQ) to determine appropriate design values. EPA is also available to assist. • A summary of existing trends in AQRVs within the region of the project including at any Class I areas or Class II areas with sensitive resources of value. • Estimates of current vehicle emissions based on traffic data and EPA's latest version of MOVES (currently MOVES3). Available at: https://www.epa.gov/moves/latest-versionmotor-vehicle-emission-simulator-moves.	The Heber Valley lies in a micropolitan statistical area. Heber City, the most urbanized area in the Heber Valley, contained an estimated population of less than 18,000 in 2019, according to US census data. 40 CFR appendix D to part 58 describes when regulatory monitors, from which design values can be derived, should be placed based on minimum population thresholds. There are no locations that meet the population thresholds within the project study area or within Wasatch County. The nearest regulatory monitor is located approximately 20 miles to the southwest in Lindon, Utah, and does not provide meaningful comparison. Part C of Title I of the Clean Air Act, Prevention of Significant Deterioration, describes AQRVs as attributes identified by Federal Land Managers that could be adversely affected by a change in air quality in areas designated as Class 1 federal lands, such as national parks, national wilderness areas, national monuments and similar lands. While the project area is near lands that are managed by federal agencies, they are not considered Class 1 lands and there are no AQRVs that have been identified for these areas. The closest Class 1 federal land is Capitol Reef National Park, which is approximately 175 miles south of the study area. Any changes to air quality resulting from a project alternative would be imperceptible at this location. Transportation conformity is required under the Clean Air Act Section 176(c) to ensure that Federally supported transportation activities are consistent with ("conform to") the purpose of a State Implementation Plan (SIP). Transportation conformity requirements apply in areas that either do not meet or previously have not met national ambient air quality standards (NAAQS) for ozone (O3), carbon monoxide (CO), particulate matter (PM10 and PM2.5), or nitrogen dioxide (NO2). These areas are known as "nonattainment areas" and "maintenance areas," respectively. The Heber

					Valley project is located in Wasatch County, Utah, which is an attainment area for all of the above mentioned pollutants. As an attainment area, transportation conformity requirements do not apply, and quantitative modeling of mobile source emissions is not required. Emissions will be discussed qualitatively in the draft EIS.
3	2	1. Air Quality b) Environ-mental Conse-quences		To disclose impacts from the project we recommend estimates be presented of the related construction and post-construction emissions for each alternative, and evaluate the impact resulting from those emissions for each alternative. The pollutants of interest include the criteria pollutants (CO, PM10, PM2.5, NO2, SO2), hazardous air pollutants (HAPs), and greenhouse gases (GHG). We recommend the following items be included in the document: ● A description of the equipment and sources associated with project construction for each alternative. Based on the inventoried sources and the schedule for construction we recommend emissions be calculated for each alternative using EPA's MOVES modeling system for mobile sources and appropriate emission factors for any stationary sources that may be needed for project construction (e.g., asphalt or concrete batch plants). ● An inventory of mobile source emissions from traffic after project construction has completed based on vehicle type and vehicle miles traveled and EPA's MOVES modeling system for each alternative and year of interest. ● Based on the emission information, we recommend an analysis of impacts that appropriately discloses impacts. Based on the level of the emissions and receptors of interest methods could include quantitative air quality assessment or qualitative analysis. ● An analysis of cumulative impacts to criteria pollutants, HAPs, and GHG.	Transportation conformity is required under the Clean Air Act Section 176(c) to ensure that Federally supported transportation activities are consistent with ("conform to") the purpose of a State Implementation Plan (SIP). Conformity requirements apply in areas that either do not meet or previously have not met national ambient air quality standards (NAAQS) for ozone (O3), carbon monoxide (CO), particulate matter (PM10 and PM2.5), or nitrogen dioxide (NO2). These areas are known as "nonattainment areas" and "maintenance areas," respectively. The Heber Valley project is located in Wasatch County, Utah, which is an attainment area for all of the above-mentioned pollutants. As an attainment area, transportation conformity requirements do not apply and quantitative modeling of emissions (criteria pollutants, HAPS, GHG, construction-related emissions, and mobile source emissions) is not required. UDOT will utilize vehicle miles traveled (VMT) to address GHG in the EIS. Emissions will be discussed qualitatively in the draft EIS.
4	2-3	1. Air Quality c) Hazard-ous Air Pollutants		Recent studies demonstrate a variety of health-related effects near high traffic areas. HAPs are known or suspected of causing cancer and other serious health and environmental effects. In a rulemaking published on March 29, 2001, the EPA identified 21 Mobile Source Air Toxics (MSATs), a subset of HAPs associated primarily with diesel exhaust and organic gases.	FHWA's *Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents* (FHWA 2016) provides direction on the consideration of MSATs during the NEPA process. Tier 2 projects, those with low potential MSAT effects, require a qualitative MSAT analysis. The Heber Valley project is considered a Tier 2 project because design year traffic is projected to be less than 140,000 to 150,000 annual average daily traffic (AADT). The alternatives are unlikely to produce a meaningful increase in MSAT emissions and will be assessed qualitatively.

				The level of MSAT analysis is most appropriately determined on a case-by-case basis, recognizing that each project has a unique scope and characteristics. We recommend the document consider an emissions inventory of MSATs (as stated above) for the No Action and Action Alternatives. For purposes of comparison, it will be useful to determine how post-project conditions will compare to each other as well as to baseline conditions, and whether there are human health concerns with those emissions and concentrations (if a quantitative analysis is conducted). In addition, we recommend the MSATs analysis in the document include: ● A description of the proximity of the highway to homes, schools, and businesses; ● An analysis of potential impacts to these areas from exposure to MSATs; ● A summary of available, relevant MSAT monitoring data and MSAT studies; and ● An analysis of baseline and post-project diesel truck traffic and MSAT emissions.	
5	3	1. Air Quality d) Mitigation of Impacts		We recommend the Draft EIS consider methods that could be employed to mitigate any negative air quality impacts of the project, including air quality impacts from construction related activities. Further, we recommend the proposed mitigation measures include details on how, when, and where the mitigation will be implemented, and how effective the measures are expected to be. In addition, we recommend that design features of the alternatives selected for analysis include a focus to minimize population exposure to emissions from heavy freight diesel truck traffic that is passing through the Heber Valley. There may also be opportunities for UDOT to consider operational mitigation by considering designs that incorporate vegetation as a barrier to reduce pollutants. For more information please *see* https://www.epa.gov/airresearch/recommendations-constructing-roadside-vegetation-barriers-improve-near-road-airquality	Mitigation measures will be considered and discussed in the Draft EIS.
6	3	1. Air Quality e) Air		We recommend that the Draft EIS include a discussion on whether any construction-related activities could create air quality impacts to residents, or occupied structures. If construction near residences or occupied structures will occur	Impacts from construction-related activities on air quality will be considered in the Draft EIS. Construction related BMPs will follow UDOT standards for minimizing construction related emissions.

		Quality Monitoring		and air quality impacts of concern appear possible, real-time air quality monitoring during construction activities may be appropriate. Factors to consider include: ● the proximity of construction activity to homes, schools, businesses, and sensitive populations; ● the amount of soil disturbance and the soil type; and ● the duration and magnitude of emissions from construction equipment. Although we expect Best Management Practices (BMPs) will be utilized during construction, potential localized impacts from PM2.5 and PM10 emissions have occurred with some construction projects. Local air monitoring could demonstrate the effectiveness of the mitigation measures in minimizing adverse effects and allow for BMP modifications if air quality problems are detected.	
7	4	2. Water Resources		We recommend the Draft EIS further delineate existing aquatic resources in the project area beyond what is currently provided in scoping materials, including wetlands and waters of the U.S., such as the northwest wetland complex and Provo River Restoration area. New construction and road alignment changes have the potential to impact the hydrology, water quality, and wildlife habitat of the creek and other water resources. We appreciate that early scoping has already started the process of identifying sensitive areas in the project areas and further defining them will help with selection of alternatives and identifying and mitigating impacts. To describe effects to aquatic resources in the project area, that the Draft EIS specifically include the following analyses or descriptions: ● Clear maps, indicating wetlands and other aquatic resources, such as rivers, creeks and springs, private wells and other groundwater interfaces. ● The baseline description of aquatic resources that discuss the abundance, distribution, function, and condition of aquatic resources and wetlands within the project area. This would include identifying any impaired waterbodies or waterbodies with a TMDL within the project area that could be impacted by project activities.	UDOT will conduct field surveys in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual, appropriate regional supplement and ordinary high water mark field guide to identify aquatic resources throughout the EIS study area. The current study area includes portions of the northwest wetland complex but does not include the Provo River Restoration area as this area is not under consideration for alternative development. The Draft EIS will describe direct and indirect effects to aquatic resources in the project area, including clear maps indicating aquatic resources and a discussion of the baseline abundance, distribution, function, and condition of aquatic resources within the study area. The Draft EIS will also describe the designated beneficial uses of waterbodies in the study area and impaired waterbodies or waterbodies with a TMDL.
	4	2. Water		● An analysis of impacts to all waters in the project	The Draft EIS will include an analysis of impacts to all waters in the project

		Resources (cont.)		area (e.g. both directly impacted or hydrologically impacted but spatially removed from the actual construction footprint). It is important to include the impacts to waters from changes in hydrology, changes in water quality, other impacts to aquatic organisms and wildlife; and the aggregate impacts to waters from future development scenarios, should future growth be expected. These impacts may result from reductions in vegetative cover; increased impervious surface, runoff and sedimentation; changes in hydrology of the area; and potentially result in changes to floodplain, wetland and riparian areas, changes in habitat area and connectivity, introduction of invasive species and changes in land use. ● An impact analysis that includes disclosure of potentially adverse impacts to aquatic resources from reasonably foreseeable development associated with the roadway improvements. Also, it is valuable to include analysis of any additional development impacts to the degree the project may enable or induce development beyond that which is already accounted for in land use, economic, and transportation plans.	area, including directly and indirectly impacted resources. The Draft EIS will include disclosure of potentially adverse impacts to aquatic resources from reasonably foreseeable development associated with the roadway improvements.
	4-5	2. Water Resources (cont.)		● If wetlands may be significantly impacted, such as the northwest wetland complex, the Provo River Restoration riparian complex, or other locations within the project area, we recommend including a wetland delineation and descriptions that include a wetland functional analysis in the Draft EIS. We are pleased that UDOT has engaged with the US Army Corps of Engineers as a cooperating agency. Due to the potential for impacts to wetlands and the possible need for an individual permit for the project, we highly recommend that the project concurrently address the necessary permit requirements under Clean Water Act (CWA) Section 404 during the NEPA process, should that be necessary. ● Clearly identify or cite BMPs for water quality protection and possible mitigation measures for impacts to aquatic resources.	An aquatic resource delineation report will be prepared as a technical report to support the Draft EIS. In addition to identifying the distribution of wetlands, streams, and other aquatic resources in the study area, this report will describe the general functions and conditions of the aquatic resources. The project will consider potential permit requirements under CWA Section 404 during the NEPA process. The Draft EIS will identify BMPs for water quality projection and possible conceptual mitigation measures for impacts to aquatic resources.
8	5	3. Purpose and Need		Because the purpose and need are defined as the primary screening criteria for alternatives development, it is important that the purpose and need be clearly identified to ensure that alternatives advanced to the Draft EIS are adequate to meet the project needs but do not inadvertently screen out feasible	UDOT evaluated whether it would be possible to reroute truck traffic off U.S. 40 (or restrict truck traffic on U.S. 40) during the early scoping phase. Through coordination with FHWA, it was determined that it is not possible to restrict truck traffic on U.S. 40. because it is on the National Network.

				alternatives, especially if there is potential for a CWA Section 404 individual permit, which will require selection of the least environmentally damaging practicable alternative, or LEDPA. From our review of the public input gathered during the early scoping comment period and the included 2003 Heber City General Plan, it is apparent that rerouting of truck traffic is a significant component of the project, though project materials indicate truck traffic as a small percentage of total traffic observed. Considering that US 40 to Heber City is a main artery for truck traffic in and out of the Uinta Basin to Salt Lake City, we recommend UDOT determine whether rerouting of truck traffic should be included as a primary project purpose to better develop a reasonable range of project alternatives.	The National Network, authorized by the Surface Transportation Assistance Act of 1982, is a network of approved state highways and interstates for commercial truck drivers in the United States. Additionally, truck restrictions on other routes within 1 road mile of the National Network are prohibited except for specific safety reasons. For these reasons, restricting truck traffic is not part of the project purpose and need.
9	5	3. Purpose and Need (cont.)		Further, as level 2 screening is applied, we recommend that if the "Right-of-way" criteria be utilized, it should be noted in the Draft EIS that the 2003 Heber City General Plan indicated that at the time 40% of the right-of-way for a bypass west of town had been acquired. If more land has since been acquired, that should be identified in the Draft EIS as well. This is valuable information because, under the proposed level 2 screening criteria, if the number of remaining land acquisitions is minimal and results in a lower cost (which is another proposed level 2 screening criteria), this could artificially narrow the range of practicable alternatives.	Note that Level 2 screening criteria also includes impacts to Waters of the U.S. The desire is to have a single range of alternatives that satisfies NEPA requirements as well as Section 404(b)(1) Guidelines requirements. Level 2 screening criteria includes right-of-way impacts: ● Number of full property acquisitions and relocations (commercial and residential) ● Number of partial property acquisitions Wasatch County Parcel data obtained in 2021 will be used to quantify right-of-way impacts. Alternatives will not be eliminated based solely on cost.
10	5	3. Purpose and Need (cont.)		Practicability criteria, under the CWA Section 404 (b)(1) Guidelines (Guidelines) means available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purpose. For example, many projects have secondary project screening criteria, which represent desirable outcomes, but these criteria typically are narrower in scope than the overall project purpose (i.e. cost effectiveness). Incorporating criteria that are not part of the overall project purpose limits the alternatives analysis and is not consistent with the Guidelines.	Even if an alternative meets or potentially meets the purpose and need, it can still be rejected as unreasonable based on one or more other factors, including environmental impacts, engineering, and cost, and limited ability to meet purpose and need (AASHTO Practitioner's Handbook *Defining the Purpose and Need and Determining the Range of Alternatives for Transportation Projects*). Level 2 screening criteria also includes impacts to Waters of the U.S. The desire is to have a single range of alternatives that satisfies NEPA requirements as well as Section 404(b)(1) Guidelines requirements.
11	5	3. Purpose		The intent of the cost criteria, as stated in the preamble to the Guidelines is to consider those alternatives which are	UDOT understands the EPA's guidelines regarding using cost to screen alternatives.

		and Need (cont.)		reasonable in terms of the overall scope and cost of the proposed project. To determine what a reasonable cost range would be for a project, the project should consider what the industry norm, or typical cost estimate, would be for that type of project in that area. If the cost of an alternative falls within the standard industry norm for constructing the alternative at that site, then the project may still be practicable. Project costs, including construction costs, land acquisition, housing relocation, mitigation, etc., can be included in a cost analysis.	
12	5-6	3. Purpose and Need (cont.)		Cost, however, should not be presented as a direct comparison between alternatives. The cost analysis is not an economic evaluation where an increase over the lowest cost alternative establishes a cost threshold for determining practicability. Only if the cost of an alternative makes a project infeasible should the alternative be considered not practicable. In other words, if an alternative can be constructed considering the scope and cost of the project and still be economically viable, the alternative may still be practicable under the Guidelines. As such, we recommend that cost-effectiveness and rights-of-way be consolidated and used to determine practicability of an alternative, but not as alternatives screening criteria. As noted above, incorporating these screening criteria could artificially narrow the range of alternatives.	UDOT understands the EPA's guidelines regarding using cost to screen alternatives.

Utah Reclamation Mitigation & Conservation Commission
230 South 500 East Suite 230 Salt Lake City, UT 84102-2045
Phone: (801) 524-3146 – Fax: (801) 524-3148

June 2, 2020

Utah Department of Transportation
Heber Valley Corridor EIS
c/o HDR, Inc.
2825 W Cottonwood Parkway #200
Salt Lake City, UT 84121

Subject: Heber Valley Corridor EIS Comments

Dear Heber Valley Corridor EIS Team:

The Utah Reclamation Mitigation and Conservation Commission (Mitigation Commission) appreciates the opportunity to be a participating agency in the preparation of the Heber Valley Corridor Environmental Impact Statement (EIS). The comments below are offered as follow up to comments that Mitigation Commission staff offered during the agency scoping meeting held on April 29, 2021 and a comment letter submitted by the Mitigation Commission in September 2020. As a reminder, the Mitigation Commission and the U.S. Bureau of Reclamation manage over 1,500 acres of land in Wasatch County adjacent to the Provo River between Jordanelle and Deer Creek reservoirs. This property is known as the Provo River Restoration Project (PRRP). The land was acquired, and the Provo River restored through this corridor, as partial mitigation for fish and wildlife impacts from the Central Utah Project (CUP).

The Purpose and Need statements for the Heber Valley Corridor EIS should be comprehensive and include all forms of transportation and planning for future connectivity. The current purpose statement for the EIS does not include multi use trail systems as a primary purpose. While "active transportation" is identified as a secondary objective, the Purpose and Need Technical Report states that it will not be considered in the evaluation of alternatives. Trail systems or "active transportation" should be incorporated into the primary purpose for the project to ensure a comprehensive evaluation of all forms of transportation and to provide consideration for future needs in the Heber Valley.

Heber City recently completed a planning process that resulted in a general plan known as Heber City Envision 2050, which found that two-thirds of survey respondents expressed strong support for a "lake to lake" trail that would connect Jordanelle and Deer Creek reservoirs (page 54 of Heber City Envision 2050 report). The Wasatch County Trails Regional Master Plan also emphasizes connectivity of communities by trails as a high priority.

Our agency participated in the planning process with UDOT for the West Davis Corridor for over a decade. Trails were incorporated into the West Davis Project as an integral component of the transportation solution on that project, and we advocate for including multi use trails as a primary purpose of the Heber Valley EIS.

We again call your attention to the importance of protecting and preserving the property in and around the PRRP corridor. Information shared at the April 2021 agency scoping meeting indicated that the planned corridor would avoid any direct impacts to the PRRP lands. We are appreciative of that recognition. We ask that you also consider any potential indirect impacts to the PRRP in the EIS. Of particular concern are indirect impacts to wildlife and water quality. Impacts to wildlife from motorized transportation can extend beyond 0.5 miles from roads. Storm water and associated runoff from the future highway may pose water quality concerns to the Provo River and surrounding watershed.

As identified in the PRRP Final Environmental Impact Statement (FEIS), the PRRP purposes are habitat restoration, biodiversity, and fish and wildlife conservation. The PRRP FEIS goes on to state "the public areas along the Provo River between the two reservoirs will be managed under baseline conditions as a natural resource area, with primary recreational uses consisting of angling and other low-impact pursuits." While some may view the PRRP as a suitable location for a multi-use trail, such a trail is not an authorized use of the PRRP. Construction of a multi-use trail through the PRRP would conflict with the purposes of the PRRP.

Given the constraints related to the PRRP lands, the Heber Valley Corridor Project may represent the best option for achieving the vision of a "lake to lake" trail. As such, all of the alternatives considered should include provisions for a future multi-use trail associated with the proposed highway alignments.

I appreciate the opportunity to provide comments on the purpose and need for this NEPA process. Please contact me at the letterhead address if you have any questions.

Sincerely,

Mark A. Holden
Executive Director

ec: Commissioners Brad Barber, Robert Morgan, Gene Shawcroft
Reed Murray, Central Utah Project Completion Act Office
Kent Kofford, U.S. Bureau of Reclamation, Provo Area Office
Tom Bruton, Central Utah Water Conservancy District
Heber City Council
Doug Smith, Wasatch County Planner
Jason Vernon, Utah Division of Wildlife Resources
Jordan Nielson, Trout Unlimited

Comment Response Matrix

Document Title	URMCC Scoping Comments	**Preparer**	
Document Date	June 2, 2020	**Organization**	Utah Reclamation Mitigation & Conservation Commission
Commenter	Mark Holden		

Item	Page	Section		Comment	How Addressed
1	1			The Utah Reclamation Mitigation and Conservation Commission (Mitigation Commission) appreciates the opportunity to be a participating agency in the preparation of the Heber Valley Corridor Environmental Impact Statement (EIS). The comments below are offered as follow up to comments that Mitigation Commission staff offered during the agency scoping meeting held on April 29, 2021 and a comment letter submitted by the Mitigation Commission in September 2020. As a reminder, the Mitigation Commission and the U.S. Bureau of Reclamation manage over 1,500 acres of land in Wasatch County adjacent to the Provo River between Jordanelle and Deer Creek reservoirs. This property is known as the Provo River Restoration Project (PRRP). The land was acquired, and the Provo River restored through this corridor, as partial mitigation for fish and wildlife impacts from the Central Utah Project (CUP).	
1	1	2nd para.		The Purpose and Need statements for the Heber Valley Corridor EIS should be comprehensive and include all forms of transportation and planning for future connectivity. The current purpose statement for the EIS does not include multi use trail systems as a primary purpose. While "active transportation" is identified as a secondary objective, the Purpose and Need Technical Report states that it will not be considered in the evaluation of alternatives. Trail systems or "active transportation" should be incorporated into the primary purpose for the project to ensure a comprehensive evaluation of all forms of transportation and to provide consideration for future needs in the Heber Valley.	UDOT is committed to incorporating active transportation into solutions developed for the Heber Valley Corridor EIS. Considering input received during the scoping comment period, UDOT has determined that active transportation will be incorporated into the primary purpose for the project. A revised purpose and need will be made available when conceptual alternatives are published.
2	1-2	3rd para. P.1		Heber City recently completed a planning process that resulted in a general plan known as Heber City Envision 2050, which found	UDOT is committed to incorporating active transportation into solutions developed for the Heber Valley Corridor EIS.

		1st para. P.2		that two-thirds of survey respondents expressed strong support for a "lake to lake" trail that would connect Jordanelle and Deer Creek reservoirs (page 54 of Heber City Envision 2050 report). The Wasatch County Trails Regional Master Plan also emphasizes connectivity of communities by trails as a high priority. Our agency participated in the planning process with UDOT for the West Davis Corridor for over a decade. Trails were incorporated into the West Davis Project as an integral component of the transportation solution on that project, and we advocate for including multi use trails as a primary purpose of the Heber Valley EIS.	UDOT will develop an active transportation component for each alternative based on the *Heber City Envision 2050 Master Plan*, the *Heber City Parks, Trails, & Open Space Master Plan* (currently in draft), and the *Wasatch County Trails Regional Master Plan.* UDOT appreciates URMCC's recognition that the trails successfully incorporated into the West Davis Corridor (WDC) project were an integral component of the transportation solution.
3	2	2nd para. P. 2		We again call your attention to the importance of protecting and preserving the property in and around the PRRP corridor. Information shared at the April 2021 agency scoping meeting indicated that the planned corridor would avoid any direct impacts to the PRRP lands. We are appreciative of that recognition. We ask that you also consider any potential indirect impacts to the PRRP in the EIS. Of particular concern are indirect impacts to wildlife and water quality. Impacts to wildlife from motorized transportation can extend beyond 0.5 miles from roads. Storm water and associated runoff from the future highway may pose water quality concerns to the Provo River and surrounding watershed.	UDOT does not anticipate any direct impacts to the PRRP lands. West bypass alternatives will be evaluated in the EIS. However, preliminary traffic modeling shows that a bypass that would impact PRRP lands would be too far west to draw traffic off U.S. 40 and would not meet the purpose of the project. It is too early to know the proximity of alternatives near the PRRP. UDOT will consider the indirect impacts of the alternatives on wildlife and water quality.
4	2	3rd and 4th para. P. 2		As identified in the PRRP Final Environmental Impact Statement (FEIS), the PRRP purposes are habitat restoration, biodiversity, and fish and wildlife conservation. The PRRP FEIS goes on to state "the public areas along the Provo River between the two reservoirs will be managed under baseline conditions as a natural resource area, with primary recreational uses consisting of angling and other low-impact pursuits." While some may view the PRRP as a suitable location for a multi-use trail, such a trail is not an authorized use of the PRRP. Construction of a multi-use trail through the PRRP would conflict with the purposes of the PRRP. Given the constraints related to the PRRP lands, the Heber	UDOT is committed to incorporating active transportation into solutions developed for the Heber Valley Corridor EIS. UDOT will develop an active transportation component for each alternative based on the *Heber City Envision 2050 Master Plan*, the *Heber City Parks, Trails, & Open Space Master Plan* (currently in draft), and the *Wasatch County Trails Regional Master Plan.* For some alternatives, a multi-use trail may be appropriate. For other alternatives, bike lanes may be appropriate.

				Valley Corridor Project may represent the best option for achieving the vision of a “lake to lake” trail. As such, all of the alternatives considered should include provisions for a future multi-use trail associated with the proposed highway alignments.	

June 7, 2021

Utah Department of Transportation
658 N. 1500 West
Orem, Utah 84057
Attn: Craig Hancock

To Whom It May Concern,

I am writing regarding the open comment period that ends June 14th for the Heber Valley Corridor study. Thank you for the opportunity to comment. We appreciate UDOT going through the public process to determine how to address the traffic issues in the Heber Valley. We are hopeful that an acceptable option will be identified through this EIS process.

If the study does determine that a bypass route is the preferred option we support and recommend a non-motorized trail along the bypass route. We have discussed this as a council and, while there are differing opinions regarding a bypass route, we are all in agreement that if a bypass route is the preferred alternative that it does include a non-motorized trail. The Wasatch County Trails Master plan, adopted by the County Council, shows a 10' wide asphalt trail along the alignment of the bypass route. Please take this into consideration as you continue to plan and implement the outcomes of the study.

We continue to see increasing use of our trail systems in Wasatch County and would like to provide a diverse trail system with connections to various locations so that people have options to use non-motorized travel and not just motorized vehicles.

I appreciate your time and would be happy to discuss further with you or the entire council if needed.

Sincerely,

Mark Nelson
Wasatch County Council Chair

Comment Response Matrix

Document Title	Wasatch County Scoping Comments	**Preparer**	
Document Date	June 7, 2020	**Organization**	Wasatch County
Commenter	Mark Nelson		

Item	Page	Section		Comment	How Addressed
1	1			I am writing regarding the open comment period that ends June 14t h for the Heber Valley Corridor study. Thank you for the opportunity to comment. We appreciate UDOT going through the public process to determine how to address the traffic issues in the Heber Valley. We are hopeful that an acceptable option will be identified through this EIS process.	
2				If the study does determine that a bypass route is the preferred option we support and recommend a non-motorized trail along the bypass route. We have discussed this as a council and, while there are differing opinions regarding a bypass route, we are all in agreement that if a bypass route is the preferred alternative that it does include a non-motorized trail. The Wasatch County Trails Master plan, adopted by the County Council, shows a 10' wide asphalt trail along the alignment of the bypass route. Please take this into consideration as you continue to plan and implement the outcomes of the study. We continue to see increasing use of our trail systems in Wasatch County and would like to provide a diverse trail system with connections to various locations so that people have options to use nonmotorized travel and not just motorized vehicles.	UDOT is committed to incorporating active transportation into solutions developed for the Heber Valley Corridor EIS. UDOT will develop an active transportation component for each alternative based on the *Heber City Envision 2050 Master Plan*, the *Heber City Parks, Trails, & Open Space Master Plan* (currently in draft), and the *Wasatch County Trails Regional Master Plan.* For some alternatives, a multi-use trail would be appropriate. For other alternatives, bike lanes would be appropriate. Preliminarily, UDOT believes a multi-use trail may be appropriate for a bypass alternative.