

APPENDIX 3E

UDOT Comments on the Heber Airport Master Plan

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State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.
Executive Director

TERIANNE S. NEWELL, P.E.
Deputy Director of Planning and Investment

LISA J. WILSON, P.E.
Deputy Director of Engineering and Operations

October 7, 2022

VIA ELECTRONIC MAIL ONLY: tbiggs@heberut.gov, jmcalistert@to-engineers.com

Heber Valley Airport / Flightpath Team

Attention: Travis Biggs, Heber Valley Airport Manager
Jeremy McAlister, Airport Master Plan Project Manager

Subject: Comments on Airport Alternatives Process

Dear Flightpath Team:

The Utah Department of Transportation (UDOT) appreciates the opportunity to comment on the Airport Alternatives Process and the currently proposed Runway Shift to Southwest Alternative. We are providing comments based on coordination meetings between the Heber Valley Corridor Environmental Impact Statement (EIS) Team and the Airport Master Plan Team on June 29 and September 16, 2022.

As you are aware, UDOT is in the process of preparing the Heber Valley Corridor EIS. We published alternatives screening results on June 7, 2022, and are currently refining the design of bypass alternatives that will be carried forward for detailed evaluation in the EIS. More-detailed design is necessary to address connectivity to local road networks, drainage and stormwater treatment, and avoidance or minimization of impacts to key resources.

Five action alternatives for a bypass are being evaluated in the EIS. All five share the same alignment north of the Heber Valley Airport and include an intersection with Daniels Road. UDOT evaluated three options for this intersection, as described below.

1. **Proposed full intersection (see Figure 1).** The south leg of the proposed intersection avoids the existing Runway Protection Zone (RPZ), but it overlaps the RPZ of the proposed Runway Shift to the Southwest Alternative by about 160 feet. Although the intersection overlaps the proposed RPZ, UDOT determined that this is the best option because it provides a connection to Daniels Road with a single intersection and avoids the Royal Coachman Mobile Home Park. This option would require UDOT to relocate several buildings for the bypass that are currently within the proposed RPZ. As a result, the proposed RPZ would have fewer occupied buildings in it. UDOT intends to move forward with this option and incorporate it into all five action alternatives.
2. **Full intersection shifted southeast (see Figure 2).** This option shifts the intersection away from the proposed RPZ toward the Royal Coachman Mobile Home Park. It would require UDOT to acquire about six mobile homes and relocate the residents. The Royal

Coachman Mobile Home Park is an environmental justice (EJ) community (low income and/or minority). Impacts to EJ communities must be evaluated during the National Environmental Policy Act (NEPA) process. UDOT is required to avoid, minimize, or mitigate disproportionately high impacts to EJ populations. Regardless of their EJ status, it would be very difficult to relocate residents of the mobile home park. The mobile homes are older, and it would not be possible to simply move them to another mobile home park. It is difficult or impossible to find other mobile home parks in the community. Royal Coachman is at full capacity and has a waiting list. UDOT determined that it would be preferable to encroach in the proposed RPZ than to relocate residents of this community.

3. **Offset T intersections (see Figure 3).** This option splits the connection to Daniels Road into two three-way intersections—one connecting to the north, another connecting to the south. This is undesirable from a traffic operations standpoint. With the offset T intersections, drivers wanting to continue straight through the intersection on Daniels Road would need to make a left turn at the first intersection followed by a right turn at the second intersection. The multiple lane changes associated with a left turn followed by a quick right turn would create more risk for crashes. Vehicle queuing between the intersections could be problematic, especially as traffic in the area increases. A single intersection is preferable because movements would be consolidated in one location—drivers could travel straight through on Daniels Road. Additionally, it is desirable to have fewer intersections on the bypass to reduce travel time, since this reduction is critical to attract traffic away from Main Street. UDOT determined that it would be preferable to encroach in the proposed RPZ than to split the connection to Daniels Road in two intersections.

In closing, UDOT will pursue the single full intersection (Figure 1) in the EIS because it is best for roadway operations, safety, and public access. The intersection was carefully aligned to avoid impacting the current RPZ and the EJ neighborhood at Royal Coachman Mobile Home Park. If the Federal Aviation Administration determines that the proposed road realignment is incompatible with the planned RPZ expansion, UDOT requests that the Flightpath Team consider shifting the runway farther south to prevent the RPZ from encroaching on the intersection of the highway with Daniels Road.

We appreciate the opportunity to coordinate with your team during your Airport Master Plan Process and our EIS process. If you have any questions, please contact me at 801-928-9758.

Sincerely,



Craig Hancock
Heber Valley Corridor EIS Project Manager

Figure 1 - Proposed Full Intersection with Daniels Road for EIS Alternatives

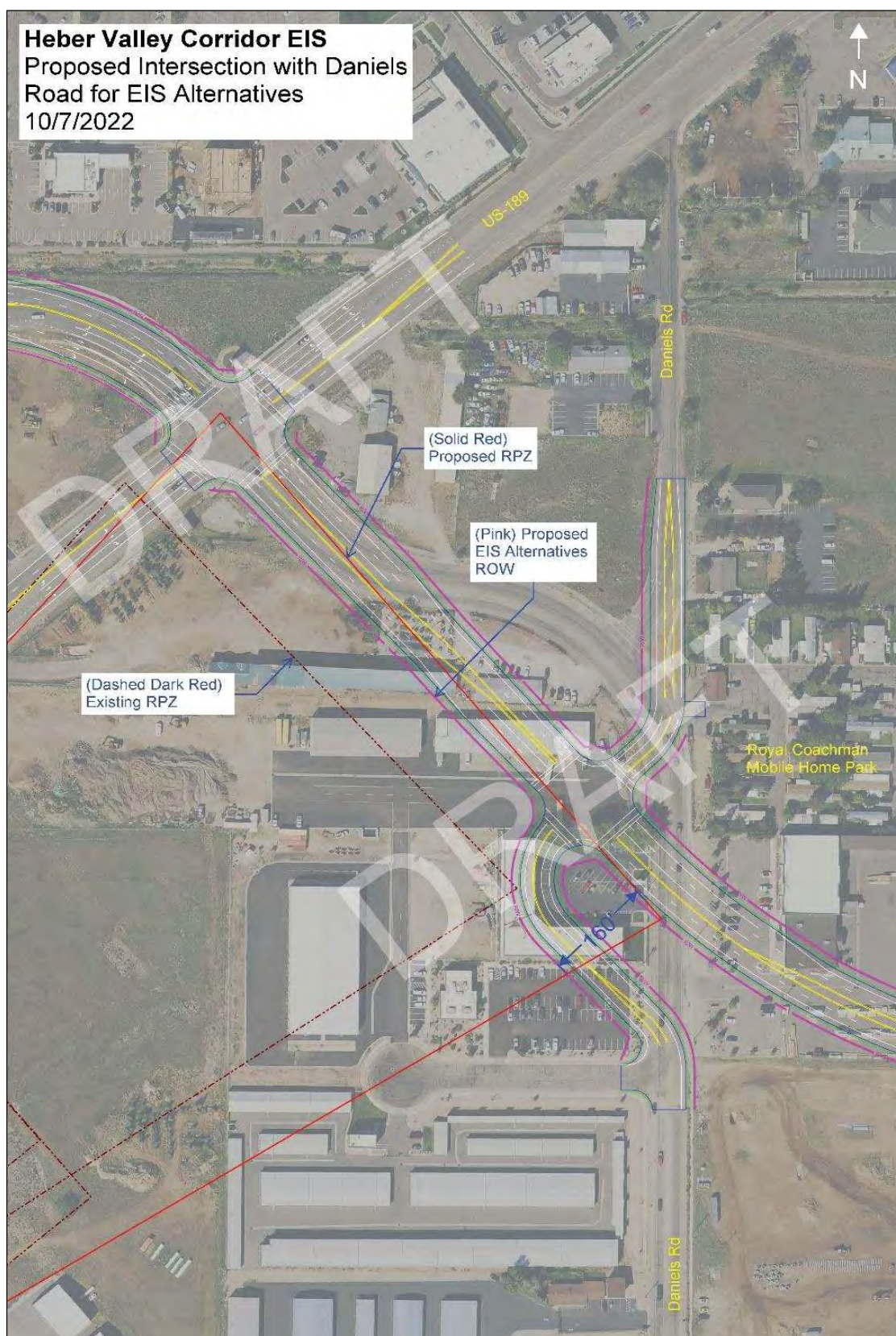


Figure 2 - Full Intersection Shifted Southeast

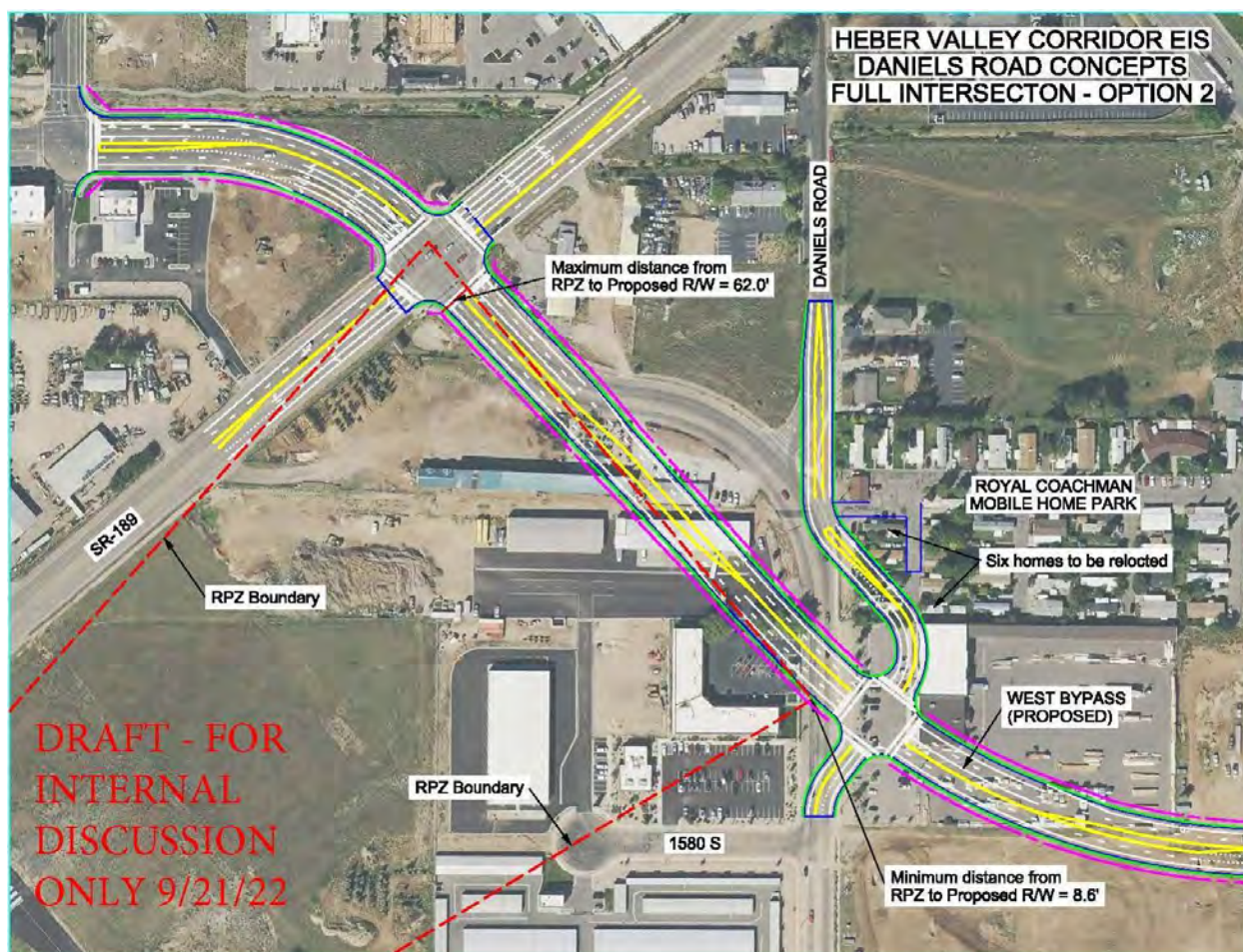
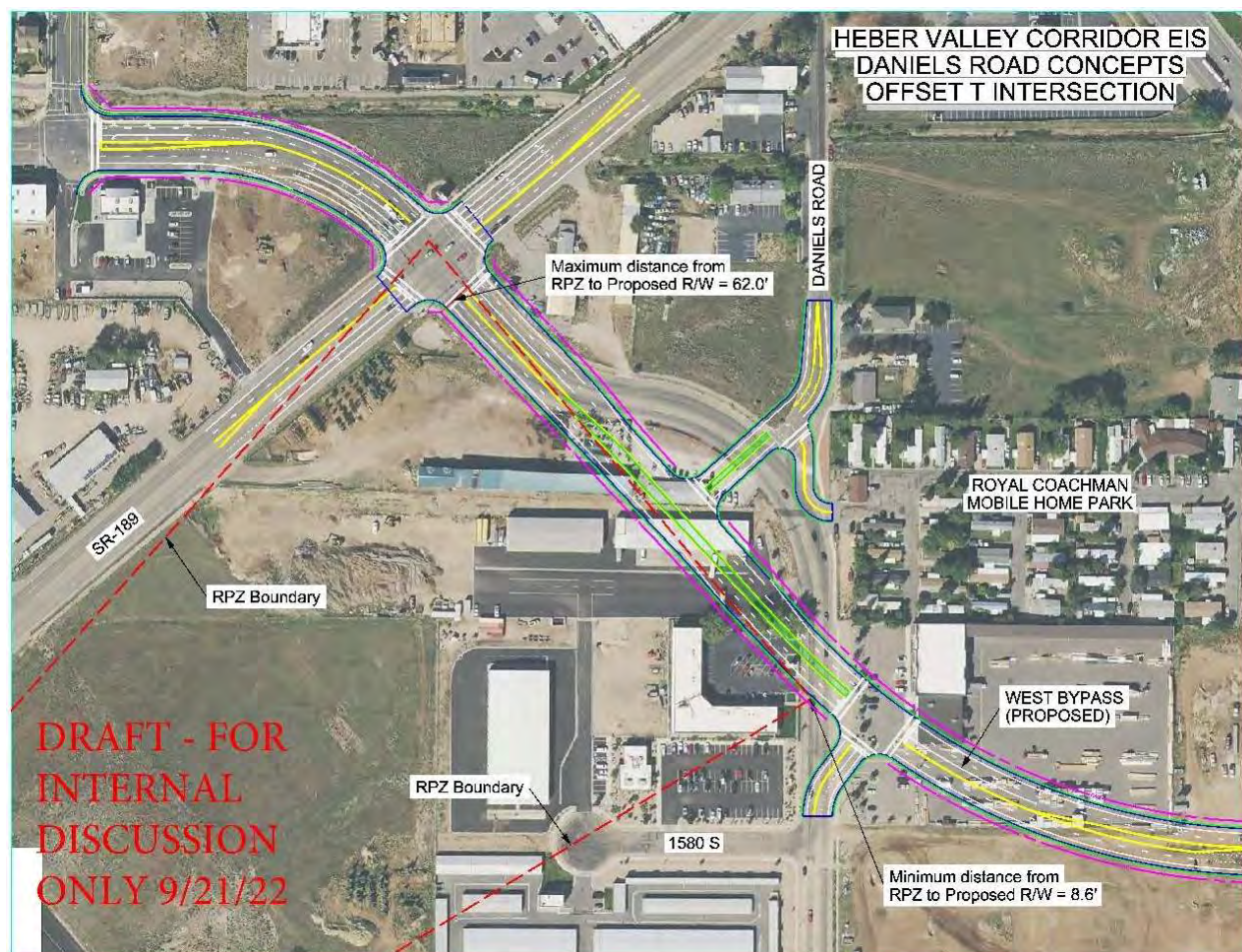


Figure 3 - Offset T Intersections





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BENJAMIN G. HUOT, P.E.
Deputy Director of Planning and Investment

December 17, 2024

Heber Valley Airport Environmental Study Team
Attention: Travis Biggs, Heber Valley Airport Manager
Vince Barthels, Ardurra Environmental Services Manager
Sent via email to tbiggs@heberut.gov; vbarthels@ardurra.com

Subject: Scoping letter response to planned improvements and upcoming environmental studies for Heber Valley Airport, Heber City, Utah, and request for additional information from the study team by January 21, 2025

Dear Travis Biggs, Vince Barthels, and Environmental Study Team:

The Utah Department of Transportation (UDOT) appreciates the opportunity to respond to the Heber Valley Airport scoping letter and request for information. As you are aware, UDOT is in the process of preparing the Heber Valley Corridor Environmental Impact Statement (EIS). Coordination between UDOT and the Heber Valley Airport has been ongoing throughout the preparation of UDOT's EIS, which began with its own early scoping process in 2020. As we were preparing to publish the Draft EIS in the fall of 2023, a new travel demand model became available that projected substantially more traffic in 2050 than we had previously forecast. The action alternatives that we analyzed were not sufficient to accommodate this increased traffic, and this change in the traffic forecast delayed publication of the Draft EIS. This letter summarizes the current state of coordination and potential issues between the Heber Valley Corridor EIS and the airport that will require resolution in our two environmental processes.

Overlap between the RPZ and UDOT facilities. Through its scoping and EIS process, UDOT has found that the current Runway Protection Zone (RPZ) overlaps with the existing US-189 and other nearby roads. The airport's proposed and expanded RPZ continues to overlap with existing roads and UDOT's proposed alternatives. UDOT is considering the RPZ in its EIS process and, through its coordination with the airport, is operating under the assumption that this overlap between the RPZ and adjacent roads is not a critical flaw in UDOT's alternative screening because of the historical and proposed future RPZ overlap proposed by the airport. If the overlap is not acceptable, UDOT recommends that the airport's Environmental Assessment (EA) explore alternatives that avoid the existing and proposed UDOT roads.

Constraints of UDOT's proposed Daniels Road intersection. Based on our previous coordination with you, we learned that the airport plan proposed to expand the RPZ into a road alternative we were designing for the EIS. We provided comments on the airport's plan and alternatives on October 7, 2022 (attached). In the comment letter, we reviewed our alternatives

development and screening process and the environmental constraints for an intersection with Daniels Road near the airport. As stated in our 2022 letter, UDOT intends to pursue the single full intersection (Figure 1 in the attached letter) in the Heber Valley Corridor EIS because it would be best for roadway operations, safety, and public access. The intersection was carefully aligned to avoid impacting the approved RPZ in place at that time and the environmental justice (EJ) neighborhood at Royal Coachman Mobile Home Park.

UDOT is currently in the process of publishing an addendum to its June 7, 2022, *Alternatives Development and Screening Report*. The alternatives in the addendum are refinements to the alternatives that passed screening in 2022. These refinements are needed to accommodate the additional traffic projected by the updated regional travel demand model for Summit and Wasatch Counties mentioned above. The alternative alignments are the same as proposed in 2022. The location of the Daniels Road intersection (Figure 1) in the addendum is also unchanged from 2022.

If there are critical considerations with the current overlap with the RPZ that would prevent this intersection or other existing roadway encroachments from being approved by the Federal Aviation Administration, UDOT respectfully requests a response by January 21, 2025, with more information. A timely response to this question will help UDOT maintain our current EIS schedule. UDOT will publish our Draft EIS in the fall of 2025 and publish our Final EIS and Record of Decision in the spring of 2026. If there is a fatal flaw in the design of the Daniels Road intersection, now is the ideal time for those discussions because UDOT will complete our EIS before the airport completes its EA. Again, if the RPZ overlap is not acceptable, UDOT recommends the airport's EA explore alternatives that avoid the existing and proposed UDOT facilities.

Continued coordination for UDOT's design refinements. Additionally, as a result of the higher traffic projections from the updated regional travel demand model, UDOT is considering the addition of "free-flow" connections throughout its EIS alternatives. These free-flow connections include additional ramps and grade separation to accommodate the projected increase in traffic. UDOT recognizes that these features could have vertical constraints near the airport. We appreciate the information provided by Ardurra regarding height above ground clearances on December 3, 2024, which we are currently evaluating. UDOT will continue to consult with the airport as these designs are refined.

We appreciate the opportunity to coordinate with your team. If you have any questions, please contact me at 801-928-9158.

Sincerely,



Craig Hancock
Heber Valley Corridor EIS Project Manager

cc: Rob Clayton, UDOT Region Three Director, robertclayton@utah.gov
Project file, hebervalleyeis@utah.gov

Attachment: October 7, 2022, Letter from UDOT to the Heber Valley Airport and Flightpath Team



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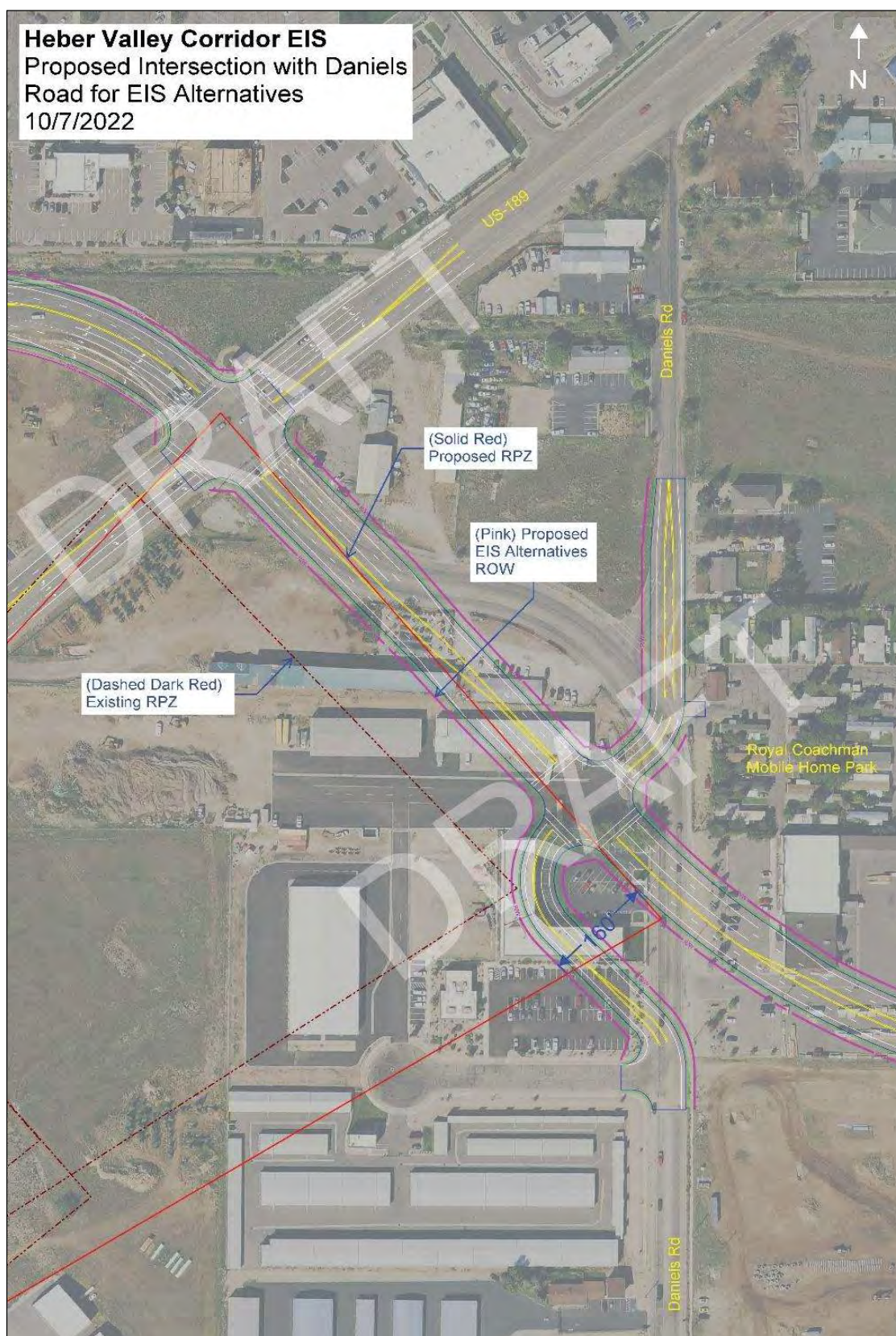


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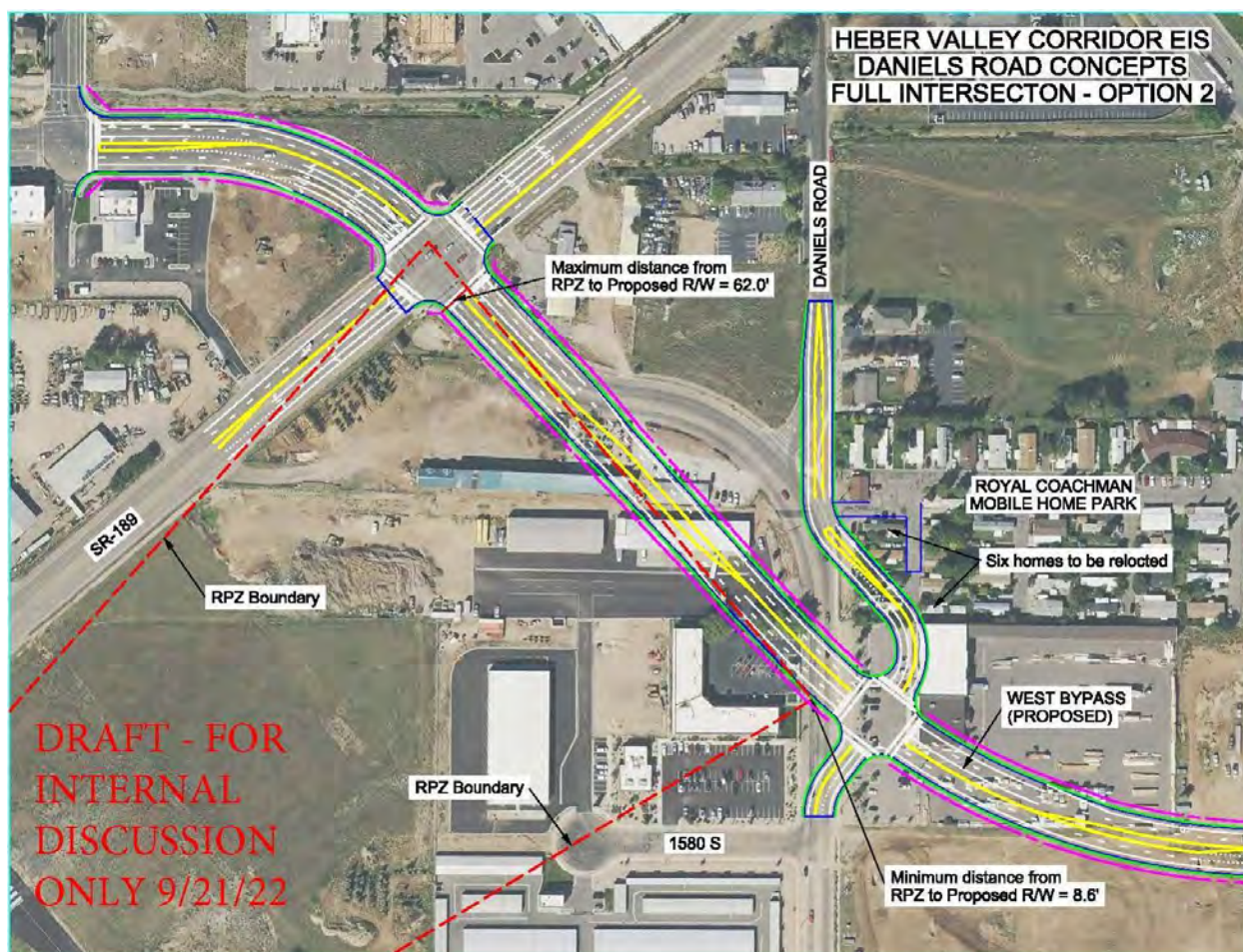


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