

SUGGESTIONS FOR PUBLIC COMMENTS TO UDOT

These suggestions are just that – suggestions - to help you get started or know what to write. Try to put your ideas into your own words (said nobody's sixth grade teacher, ever, haha, but please try). There are a lot of ideas here, and you don't have to read them all. Just scroll through and pick out what calls to you. THANK YOU!

Here are the different sections:

- 1. ABOUT THE VISION AND LEGACY OF HEBER VALLEY**
- 2. UDOT DOES NOT UNDERSTAND WHAT THE CITIZENS OF HEBER VALLEY WANT AND HAS NOT PROPERLY INFORMED OR INCLUDED THE CITIZENS IN ITS PLANS**
- 3. UDOT SHOULD NOT HAVE DISMISSED ALL THE MAIN STREET OPTIONS – OR THE “NO ACTION” OPTION**
- 4. UDOT HAS IGNORED, DISMISSED OR FAILED TO ADEQUATELY STUDY ENVIRONMENTAL AND OTHER IMPACTS OF ITS FIVE ALTERNATIVES (INCLUDING DESTRUCTION OF PEOPLE'S HOMES), ESPECIALLY ALTERNATIVES WB3 AND WB4**
- 5. UDOT HAS FAILED TO UNDERSTAND THE IMPACT OF A HIGHWAY THROUGH THE NORTH FIELDS ON DEVELOPMENT AND THE QUALITY OF LIFE FOR LOCAL CITIZENS IN HEBER VALLEY**

1. ABOUT THE VISION AND LEGACY OF HEBER AND HEBER VALLEY

- UDOT has demonstrated a lack of understanding of "Envision Heber 2050," Heber City's General Plan. The number one desire of the citizens who helped create the plan was **preservation of open space and Heber's rural character. A four-lane divided highway through the length of the North Fields severely alters its rural character both visually and functionally.** Destroying the North Fields with a highway is in complete opposition to Heber City citizen's express desire.

- In its process of developing and proposing WB3 and WB4, UDOT has misunderstood and misrepresented Heber City's vision, developed by citizens and elected officials over a significant period of time.

UDOT instead substitutes the "vision" of the "Parkway group", a subset of Heber City officials (former and current, including members of the current Heber City Council and people from former Mayor Kelleen Potter's office) and Main Street business people, for the citizen's rural "Envision Heber 2050".

-Alternatively, UDOT substitutes for the clear rural vision of Heber City's - "Envision Heber 2050", UDOT's **own** version of Heber City's vision.

- The numbers do not work in the "vision for Heber City" that UDOT says it wants to promote. UDOT's process fails to numerically address how through traffic into Heber City can be significantly slowed and still be adequately compensated for by any other roadway system.

- UDOT has not analyzed how the retail and restaurants on Main St would be impacted by rerouting traffic.

- UDOT parrots language from certain ambiguous writings of Heber City about a "walkable downtown Heber," but there is a serious flaw, in that neither Heber City nor UDOT have clearly defined what a "walkable downtown" is.

-UDOT seems to be expanding Heber City's "walkable downtown" beyond what was contemplated and addressed In "Envision Heber 2050".

-"Envision Heber 2050" defines a "walkable downtown" as streets with sidewalks and trees, as on Main Street. Bike lanes and parking would also be addressed but where in the downtown is not specified.

-Construction approved by Heber City and started since "Envision Heber 2050" was adopted (see the languishing, unfinished 3 story building at the corner of 100 East Center Street) does not comport to UDOT's version of Heber City's "walkable downtown" vision.

- UDOT'S flawed description of what it believes to be the "vision of downtown Heber" is not the vision of downtown Heber that is stated in

"Envision Heber 2050." UDOT has failed to understand Heber City's General Plan.

- Envision Heber (page 5) “Heber city is nestled in a green valley, brimming with historic agricultural uses, the beautiful Provo River, and unmatched views of the Wasatch Mountains. Our residents value this beautiful and unique setting and are committed to preserving its character while growing and nurturing our city. Together, we desire to: Preserve the beautiful open lands that surround us; . . . [W]e foster a vibrant community and a quiet countryside – a place residents and visitors alike will enjoy for generations to come.” [Emphases in the original]. **UDOT has ignored this important part of Heber City's Vision, instead focusing on a vaguely defined and poorly understood notion of a "walkable downtown."**

- UDOT has failed to understand the significance of Heber Valley's historic livestock corridors to the legacy of Heber Valley. A bypass through these would devastate them and destroy an important, living part of Heber Valley's legacy.

2. UDOT DOES NOT UNDERSTAND WHAT THE CITIZENS OF HEBER VALLEY WANT AND HAS NOT PROPERLY INFORMED OR INCLUDED THE CITIZENS OF ITS PLANS

- What UDOT has taken as the "citizens view" comes from too small of a sampling to know what the citizens really want. And its method of sampling and choices are not transparent or clear. Were people given the choice of UDOT's version of Heber City Downtown versus the cost of destruction of the North Fields?

- The notion of a bypass through the North Fields (at first called "Western Bypass D) was suddenly sprung on the citizens in October of 2021, long after all the other bypass alternatives had been presented.

In contrast, other Heber Valley bypass routes have been studied for two decades, involving multiple municipalities and much citizen input. These municipalities (such as Heber City and Wasatch County)

formally and jointly approved routes based on long deliberation. UDOT failed to acknowledge this long history and these agreements in favor of blindsiding the public with a plan of murky recent origin.

-After at least two years of scoping and screening processes, and several public comment periods, **TWO** of the routes chosen to be in the five final alternatives HAD NEVER BEEN PRESENTED TO THE PUBLIC, NOR HAD THE PUBLIC BEEN ALLOWED TO COMMENT ON THEM

- In its revelation of the "five preferred routes" in June 2022, "Western Bypass D" had changed by UDOT into not one, but **TWO** (now called WB3 and WB4) of the five alternatives, with NO citizen input.

- UDOT has failed to understand the will of the people of Heber Valley regarding preservation of the Valley's rural nature.

- UDOT appears ignorant of the will of the people regarding preserving the rural nature of the North Fields. A citizen referendum in 2016 overturned a vote to allow 10-acre zoning in the North Fields. 74% of our valley voted to NOT rezone the North Fields, keeping the zoning at one home per 20 acres.

- An attempt was made in 2016 to rezone areas of the North Fields to 10 acres per home. A citizen referendum resulted in putting it to the vote of the people, and 74% of our valley voted to NOT rezone the North Fields, keeping the zoning at one home per 20 acres.

- A highway through the North Fields seriously jeopardizes the \$10 million bond that was passed by Wasatch County in 2018. That bond was largely planned to be used in the North Fields for open space preservation. With a highway through the North Fields on the table, the bond will be in limbo for years, and may never be used. UDOT's action is flawed because it shows that they did not study or understand the bond. This flawed action violates the will of the people.

- UDOT is ignorant of or has chosen to disregard a 2018 citizens referendum ballot issue where a 62.74% majority overturned Wasatch

County's approval of a landowner's request to rezone his property, which would have introduced higher density into the beloved Central Zone by the North Fields.

- Instead of understanding and adhering to Heber City's General Plan, UDOT has chosen to listen to, respond to and promote the plan of a group of individuals ("The Parkway Group"). This has seriously damaged UDOT's process and has given an inappropriate amount of importance to the desires of certain parties who may be acting in their own self-interest.

- UDOT seems to be relying on some surveys that were done in 2019 to determine what the people want regarding downtown Heber and the bypass concept. A LOT has changed since 2019! Before embarking on a project this big and life-changing, UDOT should have surveyed the current thoughts of the citizens. Not taking the current pulse of the citizens makes UDOT look negligent and lazy.

- UDOT says it ruled out a number of alternatives because of their impacts on "Valued Places," but it does not specifically say what those Valued places are. It is a big flaw in UDOT's plan that it hasn't included the North fields as a valued place (which it is to countless citizens, and has been for generations) that would necessitate ruling out WB3 and WB4.

UDOT did not properly inform citizens that the Five Alternatives were being revealed on June 7, and that there was a Public Comment Period. Many landowners whose homes were in the path of one of the roads and would potentially be slated for destruction did not even know what was going on. This is irresponsible of UDOT.

3. UDOT SHOULD NOT HAVE DISMISSED ALL THE MAIN STREET OPTIONS - OR THE "NO ACTION" OPTION

UDOT should make it known to the citizens that the “NO ACTION” model **is an alternative**. In its “Level 1 Screening Results Summary,” table, UDOT indicates that the travel time on US 40 from River Road/SR-32 to the US 40/Highway 189 intersection is currently 8 minutes and 20 seconds. It estimates that BY THE YEAR 2050 it would be 17 minutes and 40 seconds. That is a difference of less than 10 minutes! Yet, UDOT is willing to throw people out of their homes and destroy their lands, along with destroying one of the prime areas of natural beauty in the Valley, County and State to maybe save people less than ten minutes of travel time in 2050? In addition, how has UDOT arrived at that 2050 estimate? Please provide data. Is it by estimating the number of people who will move into the developments on the east side of US 40? Given the current state of the economy, problems with supply chains and the generally unstable condition of the world, who knows how many of those developments will be built and occupied, and when? It seems precipitous and capricious to make such a major alteration to the Valley as especially WB3 and WB4 , but really all the 5 alternatives, would do based on so much uncertainty. There is no need for a bypass right now! NO ACTION should be the chosen alternative.

- UDOT says that making improvements to Main Street and keeping Main Street as what it has always been - a Highway - will keep Heber City from putting in things it wants like "wide sidewalks, bike lanes, landscaping and **a reduced speed limit.**" But as a Federal Highway, US 40 has to keep a certain speed limit by law. And by how much does Heber City want to reduce the speed limit? It is seriously doubtful that someone traveling from the north side of Heber who needs to go, say, to Wasatch High School, Ace Hardware, Lee's Market or the Heber Valley Medical Center is going to want to drive slowly down Main Street admiring the landscaping and the wide sidewalks. And they are not going to want to circle around town on a bypass. UDOT has

failed to assess the real needs of the local residents who utilize Highway 40 for their life/transportation needs and has instead focused on the fact that Heber City might want to have some tourists sitting at sidewalk cafes.

- UDOT says that one of the "Purposes and Needs" of the project is to allow Heber City to meet their vision for the historic town center. They say improving Main Street (Highway 40) would threaten historic buildings, meaning buildings that are listed on the National Register of Historic Places. UDOT appears not to have thoroughly studied this. In its "Level 1 Screening Results," UDOT claims that between 9 and 36 "Downtown Historic Buildings" would be impacted by the various plans involving Main Street. **Research into the National Register of Historic Places indicates that there are actually only 13 buildings in Heber that are on the National Register of Historic Places, and of those 13, only 3 are on Main Street, and those are set well back from the road.** It seems a glaring flaw in UDOT's process to summarily eliminate all options for Main Street and advocate for destroying the North Fields because of 3 buildings. Surely, work on Main Street could be done with enough care to protect those buildings.

- UDOT says that one of the "Purposes and Needs" of the project is to allow Heber City to meet their vision for the historic town center. Heber City has not openly revealed to the citizens exactly what that vision is. So, how does UDOT know? If UDOT has withheld information from the citizens about exactly what they understand this "vision" to mean, then that is a big flaw and omission in their process.

- The buildings in Heber that are listed on the National Register of Historic Places are: 312 S. Main St; 139 N. Main St; Main St. at 100 North St. and 100 West St. corners; 81 E. Center St; 421 E.

200 North; 4800 E. Lake Creek Rd; 188 W. 3rd North; 124 E. 400 South; 1st West and Center Sts; 261 N. 400 West; 115 E. 300 North; 55 W. Center St; 315 E. Center St.. Three are on Main Street. UDOT does not address how the other ten (out of 13) registered historic buildings that are NOT on Main Street would be negatively impacted by improving Main Street.

- UDOT ruled out all the Main Street alternatives. This was very short sighted and narrow minded. One of the main reasons for this was because those alternatives "didn't allow Heber City to achieve its vision." Nobody really knows what that means. Yet, **saving the North Fields and the rural and agricultural legacy of Heber Valley is just as big and important a "VISION" for thousands of citizens,** and everybody knows what that means! Why would UDOT choose to destroy that VISION of the people? It's just as important!

- UDOT ruled out all the Main Street alternatives, and one of the biggest reasons was because they didn't "Allow Heber City to Achieve Vision." There is a big problem with this. Nowhere is it explained exactly what that Vision is.

- The number one wish of citizens who helped create "Envision Heber 2050" was preserving open space and the rural and agricultural legacy of Heber. UDOT has committed a serious error by not honoring that and only focusing on Downtown Heber.

4. UDOT HAS IGNORED, DISMISSED OR FAILED TO ADEQUATELY STUDY ENVIRONMENTAL AND OTHER IMPACTS OF ITS FIVE ALTERNATIVES (INCLUDING DESTRUCTION OF PEOPLE'S HOMES), ESPECIALLY ALTERNATIVES WB3 AND WB4

- UDOT has minimized or dismissed the importance of the Federal Provo River Mitigation Project and Corridor, which would be seriously compromised by options WB3 and WB4

- UDOT's process has ignored important input from the Bureau of Reclamation.

- UDOT has failed to adequately study the importance of groundwater in the North fields, and how it would be impacted by a highway. The groundwater goes back into the Provo River and is an important source of water for Deer Creek Reservoir and water users downstream from Deer Creek Reservoir. The irrigation water that is applied because of the agricultural uses of the North Fields of Heber Valley is very important to the water supply of other communities, such as those in Utah Valley. Among other effects, a highway would compact the ground and interfere with or prevent the needed water flowing back into and replenishing the Provo River.

-The EPA has said to UDOT; *One of our primary concerns regarding the project was the potential for the development of a western bypass that would be more likely to impact waterbodies and wetland complexes.*

Why has UDOT ignored this admonition?"

-- UDOT did not perform adequate studies or testing on the areas where they propose to put routes WB3 and WB4, including pollution to the Provo River and damage to Heber Valley's Class1A Aquifer.

- By UDOT's own admission, bypass options WB3, WB4 impact a much larger area of wetlands than the other three alternatives.

- In addition to the severe damage to the North Fields, the impacts on right-of-way and property are greater for WB3 and WB4 than for the other bypass options, which connect to US 40 near 800 North (WA1, WB1 and WB2).

-Threatened and/or endangered species have important habitat in the North Fields. Examples include the Columbia Spotted Frog and the orchid, *Spiranthes diluviales* (UTE Ladies-Tresses). The North Fields are also a flyway for numerous raptors and other bird species, and provide habitat for important birds such as Sandhill Cranes.

5. UDOT HAS FAILED TO UNDERSTAND IMPACT OF A HIGHWAY THROUGH THE NORTH FIELDS ON DEVELOPMENT ON DEVELOPMENT AND THE QUALITY OF LIFE FOR LOCAL CITIZENS IN HEBER VALLEY

- UDOT says that one of the "Purposes and Needs" of having a bypass is to "Provide Opportunities for Nonmotorized Transportation." However, a big flaw in this is that plans WB3 and WB4 would be highways or freeways with vehicles going 45 - 55 mph or faster. Most people do not want to walk or bike next to a highway or freeway with vehicles (including big trucks) going those speeds. It would be very unpleasant.

- UDOT says that one of the "Purposes and Needs" of having a bypass is to "Provide Opportunities for Nonmotorized Transportation." However, a big flaw in this is that plans WB3 and WB4 would be located in the North Fields. If walkways and bikeways are supposed to be for people to get to where they live and work, without having to drive a car, then the North Fields is not the place to put them!

- Why should the "Vision of Heber" become a "Project Purpose" for UDOT? UDOT is only the proponent of the Bypass Project. This (vague) Vision should not be used by UDOT as an excuse to avoid the work it would take to thoroughly study the variety of reasonable alternative routes before just ruling them out.

- UDOT says it wants to plan roads for the future growth of Heber. It's not UDOT's responsibility to manage (or mismanage) the growth of Heber. **But a Highway through the North Fields is shouting "if you build it, they will come."** UDOT has failed to realize that by building a highway through the North Fields, it will open the door to development in that area, and only make the future traffic problems bigger and more difficult. Heber City has already approved way more development than is healthy for this Valley, UDOT should not encourage and contribute to that problem.

- UDOT has failed to address the need for robust arterial roads in the developments to be built on the east side of Highway 40. UDOT should include this as part of their planning and proactively work with Heber City on this major issue. Rather, UDOT appears to be taking a "wait and see" approach to whether or not Heber City will stand up to developers and make them responsible for the traffic needs they are creating. UDOT must not have the *laissez-faire attitude*, that "Oh well, we will just build a big

highway through the North Fields in case they decide to dump all their traffic onto US 40."

UDOT has failed to be forthcoming and address unintended (or intended) consequences of WB3 and WB4, including jurisdictional changes to current Highway 40. **This could result in current Highway 40 being transferred to Heber City resulting in commercial development by Heber City of the North Fields Highway 40 corridor. Thus, options WB3 and WB4, could result in high density development along the west side of current Highway 40 and into the North Fields** if UDOT transfers jurisdiction of present Highway 40 to Heber City and renames WB3/WB4 Highway 40.

Regarding the possible hosting of the Winter Olympics in 2030 or 2034. An important consideration is that by having a bypass, Heber City and other local communities would lose tourist dollars. People would not go through town and patronize the local businesses.