

Conserve Southwest Utah | 321 N Mall Dr, Ste B202, St George, UT 84790 | www.conserveswu.org

May 1st, 2023

Dixie Metropolitan Planning Organization (DMPO) 1070 W 1600 South Building B St George, UT 84770

Submitted via email to: rtpcomments@fivecounty.utah.gov

RE: Comments on 2023-2050 Regional Transportation Plan

Dear DMPO:

Conserve Southwest Utah appreciates the opportunity to provide comments on the 2023-2050 Regional Transportation Plan (RTP). Conserve Southwest Utah is a 501(c)(3) nonprofit based in St. George, Utah, with over 15 years of experience protecting public lands and natural resources in Southern Utah. Our mission is to conserve our area's natural and cultural resources and advocate for the implementation of Smart Growth policies that enable conservation for the benefit of present and future generations.

CSU supports the RTP's emphasis on transportation alternatives and other Vision Dixie smart growth principles, but believes that stronger emphasis on and direction from these principles is needed to create and sustain a livable community in Washington County that is prosperous, equitable, eco-conscious, connected, and healthy.

Vision Dixie Principle 5 calls for "balanced Transportation that includes a System of Public Transportation, Connected Roads, and Meaningful Opportunities to Bike and Walk." The RTP states:

"Exceptional evidence also points to the need for expanded bicycle facilities, pedestrian facilities, and regional transit systems throughout the Urbanized Area as outlined in Chapters 12 and 13." (RTP, Chapter 1)

However, the RTP fails to adequately address—and often omits—transportation alternatives. For example, the construction of important Active Transportation Corridors is pushed too far into the future (phases 2 and 3) to contribute to the pressing goals of congestion reduction and road safety, and to mitigate the need for new highway construction and road widening projects. Public transit projects remain in early planning stages and no timelines are included in the RTP, which suggests that a multi-modal transportation strategy for this region is insufficient and not prioritized.

Northern Corridor Highway/Red Cliffs NCA

The Red Cliffs National Conservation Area is one of only 17 National Conservation Areas (NCA) within the United States. These NCAs were established to protect and conserve the land for current and future generations because of their exceptional scientific, cultural, ecological, historical, and recreational value. By protecting this land, we support and enhance our own lives and species biodiversity, which is interconnected with the livability of our local community. The Red Cliffs NCA is currently threatened by the Northern Corridor Highway—a proposed four-lane highway that would slice through the natural ecosystems and beautiful landscapes, destroying habitat, scenic views, and recreational value, while setting a dangerous precedent for protected lands everywhere.

In our comments on the 2019-2050 Regional Transportation Plan, we extensively laid out our objections to the Northern Corridor Highway, but the RTP continues to pursue the Northern Corridor Highway without regarding its impact on critical habitat and the Red Cliffs NCA, and without sufficient consideration of alternatives, which should include multi-modal approaches and active forms of transportation focused on moving people, not vehicles.

Congestion Management (Chapter 9)

"Managing congestion on a constrained transportation network (while accommodating population growth) requires careful decision making and the addition of network connections. The proper mix of highways, surface roads, public and private transit, bicycle, and pedestrian facilities must be found to help maintain the quality of life and economic vitality desired in Utah's Dixie." (RTP, Chapter 9)

The planned projects listed in the RTP do not suggest sufficient prioritization of transportation alternatives as a means of congestion management. Further, transit services are not sufficiently included in considerations for traffic and congestion reduction. See comments on Chapter 13/Map 9.

Many of the Active Transportation Projects (Chapter 12) planned along major travel corridors that could contribute to reducing congestion and improving road safety are pushed decades into the future and relegated to Phase 2 and 3. For example:

Phase 2

- Project 172-177 Virgin River Trail, Gould Wash Trail, Hurricane Canal Trail.
 Shared Use Path
- Project 276 Telegraph Street, Washington Parkway to SR9. Shared Use Path
 - Two bicyclists were killed in this location in 2022, crash data indicates additional crashes with serious injuries.
- Project 195 State Street, Hurricane. Bike Lane
 - Another high-risk location. The planned bike lane would not offer sufficient protection for vulnerable users.

Phase 3

Project 284 State Street SR-9 Segment 4 - From I-15 to Southern Parkway.
 Paved Shared Use Path.

Other core transportation corridors are not included or unfunded in active transportation planning. For example:

- Project 334. Bluff Street Path.
- Project 377-378 Sunset Blvd. Separated Bike Lane.
- Project 363 Red Cliffs Drive Path. Multi-Use Trail.
- River Road not included.
- Telegraph Street between Saint George and Washington Not included.

Transit Service (Chapter 13/Map 9)

"Transit expansion areas have been identified within St. George City, Washington City, Hurricane City and Springdale. Planners and elected officials throughout the Dixie Area continue to value public transit services to low-wage earners and to tourists to the area." (RTP, Chapter 13)

Transit expansion needs to be strategically and swiftly implemented to be a feasible transportation alternative, an instrument for congestion reduction and general mobility for all residents. The focus on 'low-wage earners and tourists' in this chapter is misguided.

A comprehensive plan with transit projects and phasing should be included in the RTP to ensure transparency and implementation.

Timely implementation should be prioritized for both transit and active transportation projects.

Active Transportation (Chapter 12)

"Vision Dixie calls for the implementation of "complete streets" criteria to ensure streets and roads accommodate all users including drivers, transit riders, pedestrians, and bicyclists, as well as for older people, children, and people with disabilities. Complete Street designs are also intended to improve motorist attitude and behavior toward other street users."

In November 2021, the City of St. George passed a Complete Streets Policy and the DMPO points out that a call for Complete Streets was part of Vision Dixie—however, many of the listed projects continue to prioritize highway construction and widening projects, and exclude safe, convenient alternatives. For example:

- Project 69a (Phase I) River Road Widening.
- Project 147 (Phase II) 1450S George Washington Blvd. from River Road to Washington Fields Road Widening to 7 lanes.

Stakeholder coordination

The RTP's stated objective to "foster coordination" (Chapter 1) with stakeholders is insufficiently addressed. For example, CSU's requests from 2012 and 2019 for more details on the assumptions, constraints, and inputs to traffic modeling, and financial concerns have not been addressed.

Safety Management (Chapter 7)

As of 2023, the Dixie MPO received a \$1 million award from the Safe Streets and Roads Discretionary Grant Program (provided by Bipartisan Infrastructure Law under the Biden administration) to develop a Safety Action Plan in Washington County, Utah. This funding will be available through FY2023-2026. The Safety Action Plan Grant will allow the MPO to analyze all roadway safety and roadway fatality concerns within Washington County and how to plan to reduce roadway fatalities and serious injuries.

We applaud the DMPO's efforts in enhancing traffic safety. We suggest that the stakeholders representing vulnerable road users should be included in the development of a Safety Action Plan. Further, we suggest that the plan needs to include implementation strategies and timelines to be viable.

Strong emphasis should be placed on the safety of vulnerable road users such as pedestrians, bicyclists, and wheelchair users, children, and older people. For older road users, special and immediate attention should be paid to creating alternatives to driving and to minimizing the need to drive (e.g., transit services and mixed-use neighborhoods). For children, prioritize traffic calming in residential neighborhoods, pedestrian safety in school zones, and intersection safety.

Thank you for your consideration of our comments.

Sincerely,

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