



August 2, 2019

Sent via email to: RTPcomments@fivecounty.utah.gov

Myron Lee
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RE: Comments on Northern Corridor Highway and 2019-2050 Regional Transportation Plan (RTP)

Reference: [RTP Public Comment Period Announcement](#)

Dear Director Lee,

Founded in 2006, Conserve Southwest Utah (CSU) is a citizens' group advocating for conservation of our public lands, natural and cultural resources, water, air, and of smart growth policies that enable that conservation. CSU supports Dixie Metropolitan Planning Organization's (DMPO) Regional Transportation Plan (RTP) following the Vision Dixie smart growth principals mentioned in the plan. However, the plan omits a major component of those principals: respect for the environment. We CSU members understand that the DMPO's planning is made more difficult because city zoning decisions often do not comply with those principles and do not consider the traffic problems they create.

The focus of our comments is on our disagreement with DMPO's continued pursuit of a highway through the Red Cliffs Desert Reserve/Red Cliffs National Conservation Area (NCA), while failing to undertake a full analysis of transportation alternatives outside the NCA. In 1995, county officials signed a [Habitat Conservation Plan](#) (HCP) to permanently protect tortoise habitat inside the Reserve. In trade, 300,000 acres of land outside the Reserve were released for growth and economic development throughout the county. The HCP management committee, which consists of federal, state and county officials, has worked well for 24 years to protect the tortoise, the scenic open space, and recreational values that make Washington County such an appealing place to live. We believe that including a highway in the current RTP, which requires fundamental changes to management of the HCP, is not in the community's best interests.

Now that the development that was allowed in exchange for environmental protection has been partially accomplished, local officials and DMPO want to violate the agreement by building a highway through protected areas. Over \$75 million has been spent on land trades and land

purchases to permanently protect the land inside the NCA for present and future generations.¹ The county is proposing creation of a new satellite reserve, Zone 6, to mitigate damage caused by the highway. However, Zone 6 fails to mitigate damage caused by routing a highway through the best tortoise habitat in the entire NCA. Additionally, the RTP lists at least 6 projects that would fragment or impact Zone 6, significantly reducing its value as mitigation.

The DMPO offers the “*Washington Parkway Study: Integration of East-West Transportation Needs with Conservation Objectives for Desert Tortoise in Washington County, Utah 2012*” to argue that a highway in the NCA can be designed to recover and enhance the threatened Mojave Desert Tortoise population. However, The Desert Tortoise Council (Council) reviewed this study and found that the impacts of highway cannot be mitigated. The Council took exception to the following statement:

“This study illustrates that a comprehensive approach to roadway design and associated management can ameliorate many existing threats, contribute to improving conditions, and provide future management options for the tortoise on the Reserve.” First of all, there are no “improving conditions” in a population that has declined by almost half since the HCP was implemented and the Reserve established. In fact, when the Reserve was first established many raised concerns that it was too small to provide a viable area of habitat for the tortoise. It is extremely misleading to claim that the project itself, which is probably immitigable, will somehow benefit tortoise conservation elsewhere. Such statements redirect the readers’ attention away from the impacts associated with the proposed project by promising conservation elsewhere. Since this conservation is already guaranteed by an HCP with its adaptive management contingency plans, there is no need for the “additional” conservation proposed by this new project. The HCP makes it clear that connected areas are preferable. The idea of small “satellite” areas providing needed benefit is unsubstantiated.”²

The RTP ignores an important element of the Omnibus Public Land Management Act of 2009 that designated the Red Cliffs Desert Reserve as the Red Cliffs National Conservation Area (NCA). This added another layer of federal protection to lands inside the Red Cliffs Desert Reserve and protects additional values. The NCA’s purpose is to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the National Conservation Area; and to protect species that are listed as threatened or endangered. This special designation by Congress reflects the national interest of seeing the Red Cliffs National Conservation Area protected by the federal, state, and local officials.

CSU first became aware of the highway across the NCA was in the 2006 Washington County Conservation and Growth Act, which failed to pass. The Washington County Commissioners wanted a highway to the Ledges so it was included in the 2006 legislation. The

¹ Washington County Habitat Conservation Plan review, HCAC meeting, Part 4, October 19, 2010

² <http://conserveswu.org/wp-content/uploads/2011/11/Washington-County-Roads.12-19-2012.pdf>

Ledges was projected to be a large residential development, although it has not grown as anticipated. It's important to also note that the 2006 legislation had a provision that a corridor outside the NCA should be evaluated. It stated that:

“(iii) evaluating, at a minimum—

(I) a corridor within the Red Cliffs National Conservation Area established by section 604(a), beginning on the western boundary of the Conservation Area at a point, to be identified by the Secretary, between Diamond Valley and Winchester Hills, and ending on the eastern boundary of the Conservation Area at a point, to be identified by the Secretary, between milepost 10 and milepost 16 of Interstate 15; and

(II) a corridor outside the Red Cliffs National Conservation Area.” (emphasis added)

Specific Comments on the RTP

Below are CSU's specific comments on RTP (RTP excerpts are shown in italics):

Chapter 1 – Executive Summary

“The RTP objective is to foster coordination of community leaders, the public, and stakeholders to plan for the transportation of people, goods, and services through goals centered on safety, air quality, congestion management, corridor preservation, public transit, pedestrian movement, and respect for the environment.” (emphasis added)

The RTP has not fostered coordination with stakeholders to achieve the objective of respect for the environment. Coordination is "the act of making all the people involved in a plan or activity work together in an organized way." The RTP does not treat the local environmental community, including but not limited to CSU, as a recognized stakeholder. We were not involved in the creation of the RTP or in any organized, collaborative problem-solving exercises. Additionally, neither governing bodies of DMPO, the Dixie Transportation Executive Council (DTEC), nor the Dixie Transportation Advisory Committee (DTAC) have a position that represents environmental interests. CSU is interested in working with the DMPO in a meaningful way. Though DTEC and DTAC meetings are open to the public, public comment is never an agenda item for which time is allocated. It appears that the decisions are already made, and then released for public comment without supporting data. Utah Code also directs UDOT to construct transportation systems that are environmentally sensitive.

Utah Code Title 72-1-201(d):

“among other guidance, directs UDOT to plan, develop, construct, and maintain state transportation systems that are safe, reliable, environmentally sensitive, and serve the needs of the traveling public, commerce, and industry.” (emphasis added)

The RTP continues:

“This plan relies on principals defined in Vision Dixie, a visioning effort undertaken in 2006-08 to document the vision of Dixie’s desired future development as defined by the public, elected officials, public service agencies, business interests, and other socioeconomic forces. From a transportation perspective, Vision Dixie calls for a variety of roads, transit, and pedestrian facilities, community connectivity and access to a greater variety of human services, businesses, and residential units.”

The RTP mentions the Vision Dixie Smart Growth Principals as something DMPO wants to continue, and we applaud your efforts. However, this RTP works against major tenets of the Vision Dixie 2007 process: critical habitat should be conserved for recreation and open space. The Vision Dixie planning process took two years, cost \$500,000 and had the participation of over 3,000 people through surveys, workshops and meetings. Citizens showed overwhelming support for preserving the environment while accommodating growth and reducing sprawl. We don’t believe that the RTP incorporates the conservation values expressed in the Vision Dixie principles. Especially, as they relate to the NCA as a place that was permanently set aside by Congress for protection of tortoise habitat and nine other resource values.

The public chose [Vision Dixie Scenario C](#) as the best way to grow to 2035. Scenario C outlines the following goals for Land-Use and Transportation:

- Most growth occurs adjacent to the edge of cities. This growth takes the form of villages where single family housing surrounds a center that mixes offices, shopping, townhouses and condos. Growth also fills in vacant developable land within cities.
- To accommodate this pattern of growth, some BLM lands in areas within existing city limits are converted to private ownership. A boulevard links the east and west sides of the St. George Metro area by connecting south of St. George. A rapid busway, essentially light rail on rubber tires, is introduced to the St. George metro area on Sunset Boulevard and SR9. Sun Tran also extends bus service further into neighboring cities, and buses operate much more frequently than they do in 2007.
- Ridgetops, river corridors, steeper slopes, floodplains, and designated critical habitats are conserved for recreation or open space.

The RTP continues:

“Projected transportation demand in the St. George area was modeled using state-approved computer programs and verifies the Vision Dixie Call for a variety of future transportation facilities.”

While CSU commends the DMPO for using state-approved computer programs for modeling, it is important that the proper questions are asked so that “the variety of future transportation facilities” are not artificially limited. This cannot be done without an actual alternative to the “2050 Build” scenario being modeled. This would be a scenario that includes the full complement of transportation projects built throughout Phases 1-3, but without the inclusion of the Northern Corridor Highway through the NCA. It is also important to note here that such an alternative scenario would need to include phased transportation projects that ease congestion that would otherwise be alleviated by the Northern Corridor project.

Chapter 4 – Projected Transportation Demand

The DMPO states in the RTP that the traffic model has been updated: Version 3 of the Dixie MPO Travel Model was completed in March 2019. CSU has asked numerous times for the data and evidence supporting the claim that the Northern Corridor Highway is the *only* feasible way of relieving future traffic congestion in St. George, and we have yet to receive it. This lack of transparency leads to more questions.

One of DMPO's claims for the need for Northern Corridor is the need for another east-west highway:

‘Traffic volumes across the north side of the City are projected to exceed the capacity of the Red Hills Parkway’

However, the Red Hills Parkway already fulfills the need for the east-west highway through the NCA. The RTP does not convincingly demonstrate that there is a need to create another highway further north that would bisect the NCA. It is possible that current and future transportation needs for the community can be met by widening and improving the existing roads and chokepoints rather than damaging the vulnerable NCA. Although, this cannot be quantitatively determined without a valid alternative modeling analysis.

It appears that the Northern Corridor is needed to accommodate east-west traffic between Hurricane and Ivins. Construction in the Ivins/Santa Clara area is currently booming, but it will be built-out relatively soon. Most of the future growth such as: residential areas, schools, the university, employment and commercial centers will be on the east side of the metro area (northeast, east, and southeast, including major developments like Desert Color, not in the northeast, north and northwest side. These are the areas that will need new funding to increase transportation capacity.

CSU supports the DMPO in meeting its goal to *stay current on socioeconomic factors and changes that may affect the demand for transportation.*

Although, has the DMPO's traffic modeling incorporated future trends, including self-driving vehicles (faster with less separation), electric vehicles (negating the issue of pollution caused by traffic/idling), shared vehicles, mass transit independent of projected congestion points, automated delivery services, etc. These trends have the potential of significantly changing traffic projections.

Chapter 5 – Financial Plan

The RTP reveals that funding for all projects falls \$87.4 million dollars short. Given this shortage, the fact that the contentious Northern Corridor project is still on the project phase lists is troubling. Total cost for all Northern Corridor/Washington Parkway-related projects is \$148,840,000 (see table at bottom of page 10). Again, CSU emphasizes the need for the DMPO to set up and run an actual alternative scenario for the travel demand model without the Northern Corridor so that its cost-effectiveness can be accurately judged. The total cost of all Northern Corridor / Washington Parkway-related projects is \$150,943,000. Does it make economic sense

to build the Northern Corridor Highway to just service mainly residential properties and not be able to develop any commercial property that creates jobs along its route?

Other cities across the nation are looking at alternatives to building highways. The *Congress for the New Urbanism* explains in their report, *Highways to Boulevards* that new highways are no longer the right answer to managing traffic. The report states that:

“As Federal and State Departments of Transportation confront shrinking budgets, and cities look for ways to increase their revenues, replacing freeways with surface streets has gained recognition as both a practical alternative to rebuilding expensive highways and as a means to restore and revitalize communities. Cities as diverse as Portland, OR, San Francisco, CA, Milwaukee, WI, and Seoul, South Korea, have successfully replaced urban highways with boulevards and surface streets, saving billions of dollars in infrastructure costs, increasing real estate values on adjacent land, and restoring urban neighborhoods.”³

Chapter 6 – Existing and Proposed Transportation Facilities

CSU Supports Projects that Reduce Traffic Congestion

CSU commends the DMPO for the special attention focused on expanded bicycle facilities, pedestrian facilities and regional transit systems in the RTP. CSU also supports many of the projects listed in the Projects and Phasing table that will reduce traffic congestion at the same choke points that the proposed Northern Corridor Highway is anticipated to relieve. CSU would like to see projects outside the NCA analyzed together so that their combined efficacy could be compared to that of the Northern Corridor.

CSU also commends the DMPO for working with SunTran to expand bus service to more Washington County residents. We support consideration of additional of transit lines to Washington and Hurricane, in addition to the Springdale-St. George Transit Route. Expanded bus service will be attractive to residents and visitors alike, and will go a long way toward reducing individual vehicle trips. The 2016 St. George to Springdale Public Transit Feasibility Study estimates that this route could attract an annual ridership of 272,000 trips. This service could be especially effective at providing employees inexpensive ways to get to work and reduce the congestion on our roadways caused by especially high visitation to Zion National Park.

CSU supports the projects from the 2019-2050 RTP listed below. These projects illustrate how local planners can find traffic solutions that serve our fast-growing population while working within our region’s geographical constraints in an environmentally-friendly manner. These projects will reduce congestion without damaging open space like that protected in the NCA.

³ CNU Congress for the New Urbanism, see at: <https://www.cnu.org/our-projects/highways-boulevards>

CSU supports the following projects for creating a more “porous” I-15 with additional under/overpasses and interchanges. These projects will facilitate east-west travel across I-15, taking pressure off the St. George Blvd. and Green Springs Exits.

18	SG	0.5	400 South Pedestrian Underpass	New Construction	\$2,800,000
60	SG	0.5	100 South Underpass at I-15 in St. George	Widen/Reconstruct	2,500,000
129	SG	0.5	700 South Widening under I-15 in St. George	Widen/Reconstruct	10,920,000
145	SG	0.3	I-15 Install Interchange at 700 South	New Construction	25,000,000
89	SG	3.0	400 East I-15 Ped Tunnel Crossing	New Construction	4,800,000

At the 2019 Dixie Transportation Expo, CSU presented additional options for a more “porous” I-15. These included over or underpasses for vehicles at 2450 East and 400 East. We encourage the DMPO to consider these options as well.

CSU would like to express support and thanks for the following projects that directly or indirectly reduce congestion at the Green Springs and St. George Blvd. exits and that improve east-west travel on Red Hills Parkway. CSU views Red Hills Parkway as an important east-west corridor. Improvements made to this roadway could negate the need for an additional east-west route like the Northern Corridor.

25	SG	0.9	Red Hills Parkway, 2000 East to Green Springs	Widen/Reconstruct	\$4,320,000
30	W	1	Green Springs and Telegraph Intersection Improvements	Widen/ Reconstruct	2,640,000
32	SG	0.2	Wal-Mart / Home Depot Connection between Washington & St. George	New Construction	1,107,000
143	SG	0.5	SG Blvd/ Red Cliffs Dr. – Intersection Improvements	Widen/Reconstruct	1,200,000
144	SG	0.4	1000 East- Widen to 5-lanes from SG Blvd to Red Hills Parkway	Widen/Reconstruct	2,520,000
159	SG	0.3	I-15 MP 8 Industrial Road direct connect	New Construction	500,000

At the 2019 Dixie Transportation Expo, CSU presented additional options for reducing congestion at the Green Springs and St. George Blvd. Exits. These included the Red Hills Parkway Flyovers, a One-way Timed Loop in Downtown St. George, and an Efficient Intersection at Red Hills Parkway and 900 East. Please consider CSU’s Transportation Alternatives outside the Red Cliffs NCA by visiting; <https://conserveswu.org/wp-content/uploads/CSUs-Potential-Candidate-Alternatives-to-the-Northern-Corridor.pdf>

A combination of projects like the ones listed above could reduce traffic congestion at choke points and maintain appropriate volume to capacity ratios on critical sections of I-15, Red Hills Parkway, St. George Blvd, and Bluff Street. These projects, in addition to a combination of multi-modal, active transportation, and traditional solutions proposed by CSU, may be as effective, or more effective, than the proposed Northern Corridor Highway. CSU advocates for combined analysis of outside-NCA solutions, especially given the fact that the DMPO admits that the Northern Corridor Highway will not eliminate congestion on critical roadways.

Despite the Northern Corridor’s shortcomings, it appears that the DMPO may be unwilling to fully and fairly consider transportation alternatives outside the NCA. The RTP treats the Northern Corridor Highway as a “given” and shows that the DMPO has not produced a back-up plan in case the Northern Corridor Highway is not granted. The 2050 build and no-build scenarios present an all or nothing choice: either the DMPO builds all projects in the plan (including the Northern Corridor) or no projects are built at all. This black-and-white comparison is lacking. A range of scenarios must be modeled, especially when there are projects as controversial, costly, and uncertain as the proposed Northern Corridor Highway. CSU advocates for modeling of a third scenario: a 2050-Build option Without the Northern Corridor Highway. Evaluation of a third scenario is critical, not just for the RTP, but for the upcoming NEPA process for the Northern Corridor Highway. As a tax-payer funded organization, the DMPO should responsibly consider the possibility that the Northern Corridor Highway will not be granted, and create a plan for relieving traffic congestion through alternate methods.

The following projects will adversely impact the NCA

The RTP should disclose that these projects could be determined to violate existing agreements and environmental laws, and therefore may not be approved. For this reason, DMPO should work on developing a plan that meets future traffic needs while excluding roads in the NCA. The environmental impacts of projects inside or adjacent to the NCA should be considered together:

68	UDOT	4.6	Northern Corridor Phase 1 (First 2 Lanes)	New Construction	\$58,000,000
74	UDOT	5	Northern Corridor (BLM ROW Application Support)	Environmental/ROW	4,800,000

81	SG	0.5	Red Hills Parkway- Install interchange at Northern Corridor Intersection	Widen/Reconstruct	26,000,000
82	UDOT	7.2	Northern Corridor -Phase 2 (Second 2 Lanes)	New Construction	46,800,000
97	SG	3.0	Cottonwood Springs Dr from Red Hills Pkwy to Washington Parkway	New Construction	8,640,000
73	W	3	Washington Parkway (Green Springs to I-15 Exit 13)	Widening/New Const.	4,600,000

Reviewing the RTP, CSU also identified multiple projects that would fragment or impact the County's proposed Zone 6 mitigation for the damage caused by the Northern Corridor Highway. The RTP should disclose that some of these projects could be determined to violate future agreements if Zone 6 is added to the Red Cliffs Desert Reserve, and thus may not be granted. These projects may be determined to reduce the mitigation value of Zone 6. Their environmental impacts should also be considered together.

62	SC/SC	1.52	Plantations Drive- Sunbrook to Western Corridor	New Construction	\$13,000,000
63	UDOT	1.52	Western Corridor- Old Hwy 91 to Plantations Drive	New Construction	46,000,000
150	SC	1.5	Santa Clara Dr to Western Corridor Connector Road	New Construction	2,000,000
77	UDOT	10	Western Corridor, Sun River Parkway to Plantations Drive (1 st Barrel)	New Construction	117,600,000
132	SG	2.6	Green Valley Drive- extend road to Western Corridor	New Construction	22,464,000 unfunded
133	SG	1.9	Navajo Drive- extend road to Western Corridor	New Construction	11,340,000 unfunded

Furthermore, the proposed Babylon Road through Zone 4 of the NCA should be identified as a project that may violate existing agreements and environmental laws. Zone 4 has long functioned as a translocation zone for tortoises displaced by development in other parts of the County. This is another example of a project that damages mitigation and undermines promised made in the HCP.

91	EWC	4	Babylon Road	New Construction	40,000,000 not funded
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Chapter 11 – Environmental Mitigation

CSU doesn't see that DMPO has these environment resource interests included its stakeholder committees.

“The Dixie MPO recognizes that transit, road, and trail projects bring positive and negative impacts on natural and built environments. Therefore, the MPO strives to establish steering and stakeholder committees to guide early corridor planning studies. Committees are comprised of resource agencies, land managers, environmental groups, developers, and others who consider impacts to air quality, farmland, fish and wildlife, historical/archeological resources, geologic hazards, floodplains, water quality, and wetlands.” (emphasis added)

CSU is not aware of any other environmental groups who have been participating in meetings. As we have mentioned in these comments DMPO hasn't taken into consideration the impact to the tortoise in its proposed roads in the RTP. This chapter has a picture of the tortoise yet doesn't discuss anything about roads being planned through critical habitat of the tortoise.

DMPO mentions that the roads in the RTP are just concepts without any environmental review, yet the Northern Corridor Highway has been through a NEPA process and was denied:

Integration of NEPA into the Planning Process

“This plan does not attempt to perform a comprehensive Environmental Analysis or Environmental Impact Statement as regulated by National Environmental Policy Act (NEPA). At this point, projects included in this plan are for planning and modeling purposes only. Some projects amount to little more than a proposed line on a map. It is not intended to identify specific alignments for planned corridors. When a formal proposal is made, the NEPA process will follow.”

However, this plan is being used by contractors to shape HCP renewal and the upcoming NEPA process for the Northern Corridor Highway. To say that this RTP is not part of the NEPA process is not entirely accurate. In addition, UDOT and the Federal Highway Administration already considered a Northern Corridor Highway through the Red Cliffs Desert Reserve in the 2007 [Environmental Assessment](#) (EA) for the expansion of Red Hills Parkway, and it was eliminated due to the concern of U.S. Fish and Wildlife Service. The EA stated:

“such a road would compromise the commitments on which the Washington County Habitat Conservation Plan (HCP) was based, is likely to compromise the biological integrity of the Upper Virgin Recovery Unit (already the smallest recovery unit), and may result in an adverse modification of designated critical habitat.”

In addition, the U.S. [Fish and Wildlife letter](#) to the County Commission during the Vision Dixie process, “RE: Fragmentation of the Red Cliffs Desert Reserve,” dated June 4, 2007, stated: *“A Northern Corridor” transportation route through the Red Cliffs Desert Reserve would severely threaten the survival and recovery of the desert tortoise within this recovery unit. Any transportation corridor would further increase the risk to the desert tortoise population and accelerate its decline by increasing fire frequency, noise disturbance, increase human access, and direct mortality along the corridor.”*

These issues and legal restrictions should be disclosed in the RTP so that local officials and citizens can be fully aware of the concerns about building this highway through the NCA. This chapter should include details about the challenges that building the Northern Corridor Highway would present. The highway raises unique challenges that other roads on the project lists do not. To not give the local officials and citizens all this information about this highway does not serve the public well. Although the RTP makes it clear that the plan “does not attempt to perform a comprehensive Environmental Analysis or Environmental Impact Statement,” local officials and citizens deserve more information so they can make educated choices about transportation planning.

In addition, the Washington Parkway 2012 Study recognized that the proposed Northern Corridor Highway is a complex, controversial and costly project. Therefore, the study authors recommend that a FHWA planning and environmental linkage study be completed before a NEPA study is undertaken. Studies such as these are meant to “better define the purpose and need for a transportation improvement and can help define problems or identify potential solutions to carry forward into the NEPA and project development process.” CSU is not aware of any such study having been completed. Completing this study may help the DMPO identify potential solutions for a highway, or improvements *outside* the NCA that could be included in later NEPA analysis to ensure that an adequate range of alternatives are studied.

Furthermore, multiple transportation planning processes are underway in Washington County on municipal, state, and federal lands. These planning processes are separate but overlapping, and in the spirit of collaboration, CSU encourages DMPO to work with the BLM St. George Field Office on its upcoming draft county-wide [Transportation Management Plan](#) that may be released by the end of 2019. The TMP will evaluate roads and trails on BLM lands in Washington County and determine whether they should remain open, open with limitations, or closed. Future designations will interact with some of the projects listed in the 2019-2050 RTP. Coordination between DMPO and BLM during NEPA for the TMP will be important in preserving connectivity between recreation, tourism, wildlife habitat, and local quality of life.

Meeting Our Transportation Needs without the Northern Corridor Highway

CSU has offered a package of possible transportation alternatives that were well received at this year’s Dixie Transportation Expo. 58% of the people who commented on transportation plans opposed the highway across the NCA. This was because our alternatives reduced traffic while protecting the NCA and the Mojave Desert Tortoise critical habitat, along with recreation, tourism and quality of life that this land supports.

The Northern Corridor Highway has been proposed to more effectively transport vehicles along the northern edge of St George between I-15 exits 13 and 8, and to relieve congestion around exits 10 and 8. However it appears that there has been an inadequate alternatives analysis of solutions outside the protected NCA boundary. We suggest that a traffic scenario be modeled to exclude the highway, and then consider solutions to the resulting congestion points that are outside of the NCA boundary.

Without having access to the model and the experts who execute it, CSU has identified several [Potential Solutions outside the NCA](#). These are presented only as examples of the types of solutions that should be considered. Only evaluating the “highway” and the “no build” scenarios is an inadequate analysis. Alternatives should consider both the traditional vehicle-centric model and a multi-modal and active forms of transportation that move people, not vehicles. A combination of both approaches will be necessary to meet Washington County’s transportation needs in the future.

It’s important to remember that transportation needs are linked to the way cities grow. When rapid development drives infrastructure needs, the system is out of balance and must be corrected. Implementing Vision Dixie Smart Growth Principles in our cities would make multi-modal and active transportation a reality for more people.

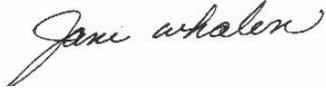
In summary, CSU’s multiple requests for a technical review of DMPO’s transportation demand model that supports the need for the proposed Northern Corridor Highway have been ignored. We seek this technical review so that we can understand the constraints, conditions, assumptions and inputs to the model in order to more effectively understand transportation alternatives *outside* the NCA. We will continue requesting a technical review and advocating for meaningful opportunities for the public to engage in the transportation decisions that impact so many facets of our lives.

Recommendations

1. Strike a balance between the need for more roads and respect for the environment.
2. Run the travel demand model excluding the Northern Corridor Highway in order to study alternative methods of solving transportation issues outside of NCA.
3. Develop environmental impact studies for all Northern Corridor/Washington Parkway-related projects as a unit.
4. Develop environmental impact studies for all Western Corridor-related projects as a unit because these projects would impact the mitigation value of the proposed “Zone 6.”
5. Address the possibility that roads within the NCA could be denied and identify alternative solutions the DMPO could provide.
6. Abide by and honor the existing HCP agreement and 2009 legislation that protect tortoise habitat and open space in the NCA.
7. Designate an environmental representative on the DTAC committee so that future RTPs will successfully balance transportation and conservation needs.

It is unclear why the DMPO continues to pursue this highway across the NCA when local, state and federal officials agreed 24 years ago to permanently protect this area for the tortoise and for Washington County residents. We look forward to receiving any data the DMPO could provide that supports the need for the Northern Corridor Highway.

Sincerely,



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