

To: Bureau of Land Management  
Attn: Long Valley ROW  
345 East Riverside Drive, St. George, UT 84790

Re: Conserve Southwest Utah's Comment on the Long Valley Road Extension Right-of-Way Environmental Assessment DOI-BLM-UT-C030-2020-0004-EA

Reference: [Long Valley Road Extension ROW Environmental Assessment](#)

### **Organization Background**

Conserve Southwest Utah is a 501(c)(3) non-profit environmental conservation organization focused on Southwest Utah and Washington County in particular. It was formed in 2006 and has approximately 3,000 local members. Our mission is to advocate conservation and stewardship of our area's natural and cultural resources and advocate implementation of the Smart Growth policies that enables conservation for the benefit of present and future generations.

The Red Cliffs Coalition is comprised of non-profit environmental organizations focused on retaining protections on public lands. They each have significant memberships in Utah and in Washington County. See List 1 in the attachment.

### **Issues with the Subject Environmental Assessment**

#### **1. Inadequate Alternatives Analysis**

The Long Valley Road Extension is proposed as the only reasonable way to provide the necessary access to a new development: "No additional alternatives were considered. Due to the topographical features of the area and the location of the Southern Parkway, including the planned 3650 South Interchange, no other alternative would reasonably meet the purpose and need of the project; therefore, the only alternatives considered in this EA are the Proposed Action and the No Action Alternative."<sup>1</sup> This is an inadequate explanation and on the surface seems false. An interchange could be developed near MP 13, completely negating the need for extending the Long Valley Road and for disturbing the Area of Critical Environmental Concern. See the attachment, Maps 1-3.

The scale of the maps used in the EA are inadequate to provide the project's context and to envision alternative solutions. See the attachment, Maps 1-3.

The topographical features are the area are fairly consistent from MP 15 to MP10, allowing adequate space to develop an interchange anywhere along that section of the Southern Parkway. See the attachment, Photos 1-4.

There are existing interchanges at MP 10 (Warner Valley/Washington Fields) and 15 (Washington Dam/Long Valley). Adding a new one as planned at MP 11 rather than at MP 13 is arbitrary, perhaps even unjustified considering the proximity of the MP10 interchange. Doing so while disturbing an ACEC seems unwarranted. The reasons presented for not considering any other alternatives appears to be invalid.

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<sup>1</sup> EA section 2.4 Alternatives Considered but not Analyzed in Detail

## **2. Shape of the ROW**

The ROW is defined as routing from north of MP 13 to an interchange near MP11, a distance of about 2.5 miles, yet the ROW description indicates it is only 1 mile long. Also, the purpose of the unusual shape of the ROW is not described. These details should be explained. See Map 2 of the attachment.

## **3. Public Involvement**

Section 1.6<sup>2</sup> of the EA addresses public involvement, but mentions no such involvement. Public engagement could have helped identify alternatives.

## **4. Unjustified Impacts to the ACEC**

There will clearly be significant impacts to the ACEC. “Areas of Critical Environmental Concern or ACEC designations highlight areas where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources.” “ACECs are areas within existing public lands that require special management to protect important and relevant values.”<sup>3</sup> The area contains many ESA-listed species and cultural resources (see attachment photo 5). Disturbance of this area appears arbitrary, contrary to BLM’s own guidance, and should be avoided.

## **5. Inadequate Analysis of Cumulative MDT Impacts**

It is likely that Mojave desert tortoise occupy the ACEC. The EA fails to address the long-term cumulative effects on the species of continued habitat destruction. Their protected habitat in the Red Cliffs NCA has experienced fire and is under development pressure from proposals like the Northern Corridor Highway. The proposed Zone 6 will be under additional developmental pressure. The cumulative effects of this habitat destruction should be taken into account in considering the impacts of the proposed road through the ACEC.

## **Conclusion**

We request BLM perform a proper alternatives identification and analysis activity, and avoid any disturbance to the Warner Ridge/Fort Pierce Area of Critical Environmental Concern. The proposed ROW seems to be unnecessary and arbitrary. Thank you for your consideration.



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<sup>2</sup> EA Page 4: 1.6 Scoping and Public Involvement and Issues

<sup>3</sup> From the [BLM’s website describing Special Planning Designations](#)