



U.S. Department of the Interior
Bureau of Land Management
Fish and Wildlife Service

Northern Corridor – Highway Right-of-Way with Associated Issuance of an Incidental Take Permit and Resource Management Plan Amendments

Scoping Report

April 2020



Table of Contents

1	INTRODUCTION	1
2	SCOPING PROCESS.....	1
2.1	Purpose of Scoping	1
2.2	Scoping Outreach.....	1
2.2.1	Publication of the Notice of Intent (NOI)	1
2.2.2	Other Outreach Methods.....	1
2.3	Opportunities for Public Comment	2
2.4	Public Scoping Meeting.....	2
2.5	Cooperating Agency Involvement	2
2.6	Tribes	3
3	SUBMISSION PROCESSING AND COMMENT CODING.....	3
3.1	Submission-Level Processing	3
3.2	Comment-Level Coding.....	4
4	ISSUES RAISED THAT WILL NOT BE ADDRESSED AS PART OF THIS PLANNING PROCESS	6
5	SUMMARY OF PUBLIC CONCERNS AND ISSUES.....	7
5.1	Vegetative Communities, Including Noxious Weeds	7
5.2	Wildlife	7
5.3	Proposed Zone 6.....	8
5.4	Geology, Mineral Resources and Soils	8
5.5	Paleontology.....	9
5.6	Water Resources.....	9
5.7	Air Quality	9
5.8	Visual Resources	9
5.9	Cultural Resources and Native American Concerns.....	10
5.10	Recreation Resources.....	10
5.11	Red Cliffs National Conservation Area	10
5.12	Fire and Fuels Management	11
5.13	Noise	11
5.14	Human Health and Safety	11
5.15	Socioeconomics	11
5.16	Public Involvement	12
5.17	Compliance with Laws and Regulations	13
5.18	Traffic	13
5.19	Alternatives.....	14
6	FUTURE STEPS IN THE ENVIRONMENTAL IMPACT STATEMENT PROCESS	17
7	CONTACT INFORMATION.....	19



Figures

Figure 1. National Environmental Policy Act and Land Use Planning Process Graphic.....	18
--	----

Tables

Table 1. Scoping Meeting	2
Table 2. Summary of Submissions by Type	4
Table 3. Comments by Issue Category	5

1 INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended; the Federal Land Policy and Management Act of 1976 (FLPMA), as amended; and the Endangered Species Act (ESA) of 1973, as amended, the Bureau of Land Management (BLM) and the U.S. Fish and Wildlife Service (USFWS) as co-lead agencies intend to prepare an Environmental Impact Statement (EIS). The EIS will consider a right-of-way application, referred to henceforth as the Northern Corridor, submitted by the Utah Department of Transportation (UDOT), potential amendments to the St. George Field Office and Red Cliffs National Conservation Area (NCA) Resource Management Plans (RMPs), and the issuance of an Incidental Take Permit (ITP) and associated Habitat Conservation Plan (HCP) to Washington County, Utah, under Section 10(a)(1)(B) of the ESA.

The BLM began a scoping process on December 5, 2019, to solicit public comments and to identify issues to be addressed in the development of the EIS. Comments were submitted via U.S. Postal Service mail, email, hand-delivered, and a website form. Verbal and written comments were also submitted at the public scoping meeting via comment forms and verbal comments were dictated to a court reporter and verified for accuracy. The scoping period ended on January 6, 2020. This report summarizes the issues identified in the comments submitted.

2 SCOPING PROCESS

2.1 Purpose of Scoping

In accordance with the Council on Environmental Quality (CEQ) NEPA regulations (40 Code of Federal Regulations [CFR] 1501.7), it is through the scoping process that the lead agency will do the following: 1) determine the scope and significant issues to be analyzed in depth in the EIS; 2) identify and eliminate from detailed study the issues that are not significant, narrowing the discussion of such issues to a brief presentation in the EIS regarding why they will not have a significant effect on the human environment; and 3) identify a range of reasonable alternatives that address issues identified during scoping.

2.2 Scoping Outreach

2.2.1 *Publication of the Notice of Intent (NOI)*

The formal public scoping process began on December 5, 2019, with the publication of the Notice of Intent (NOI) in the Federal Register informing the public of the BLM's and USFWS' intent to prepare an EIS to consider a Northern Corridor right-of-way with associated issuance of an ITP, HCP, and RMP Amendments in Washington County, Utah (Federal Register Vol. 84, No. 234, Thursday, December 5, 2019; available on the BLM's ePlanning website). The NOI defined the end date of the scoping period as January 6, 2020.

2.2.2 *Other Outreach Methods*

Other public outreach methods included the following:

- A media release distributed on December 2, 2019 identified methods by which interested parties could comment, and the date and location of the public meeting.

- Scoping notification letters were sent to the BLM's and USFWS' interested party lists on December 10, 2019.

2.3 Opportunities for Public Comment

Members of the public had several methods for providing comments during the scoping period as follows:

- Comments could be submitted via the BLM's ePlanning website at <https://go.usa.gov/xpC6H>.
- Emailed comments could be sent to a dedicated email address: BLM_UT_NorthernCorridor@blm.gov.
- Individual letters and comment forms could be mailed via U.S. Postal Service to the following: Bureau of Land Management, Attn: Northern Corridor, 345 East Riverside Drive, St. George, UT 84790.
- Comments could be handwritten on comment forms at the scoping meeting. Comment forms were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting or deliver them to the St. George Field Office at a later date. Comments could also be dictated to a court reporter during the meeting.

Comments received after the scoping period ended were added to the administrative record, but are not published as part of this report.

2.4 Public Scoping Meeting

The BLM and USFWS hosted a public scoping meeting to provide the public an opportunity to become involved and offer comments on issues to be addressed in the EIS (Table 1).

Table 1. Scoping Meeting

Date and Time	Location	Approximate No. Attendees
Tuesday, Dec. 17, 2019 4:30 p.m. to 7:30 p.m.	Dixie Convention Center 1835 South Convention Center Dr St. George, UT 84790	158

2.5 Cooperating Agency Involvement

The CEQ's regulations implementing NEPA require federal agencies (as lead agencies) to invite Tribal, State, and local governments, as well as other federal agencies, to serve as cooperating agencies during the NEPA process. To serve as a cooperating agency, the potential agency or government must have either jurisdiction by law or special expertise relevant to the environmental analysis. For more information on cooperating agencies, please see the 2012 publication *A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners*.

The following agencies have been invited to be cooperators:

- U.S. Army Corps of Engineers (USACE)
- State of Utah Public Lands Policy Coordinating Office (PLPCO)
- Utah School and Institutional Trust Lands Administration (SITLA)
- Dixie Metropolitan Planning Organization (MPO)
- City of St. George
- City of Ivins
- Santa Clara City
- Washington City
- City of Hurricane

2.6 Tribes

The United States has a unique legal relationship with federally recognized Native American tribes established through and confirmed by the Constitution of the United States, treaties, statutes, executive orders, and judicial decisions. In accordance with that relationship, the BLM is charged with engaging in regular and meaningful consultation and collaboration with federally recognized tribes in the development of federal policies and decisions that have tribal implications. Consultation is designed to ensure relevant and timely meetings or discussions with elected or duly appointed tribal leaders (or their authorized representatives) and BLM decision-makers as they pertain to proposed BLM actions. Consultation is an opportunity for tribes to discuss the potential effects of planned agency actions on tribal interests and to make recommendations to the agency.

The following tribes were invited to participate in government-to-government consultation on this study:

- Navajo Nation
- Paiute Indian Tribe of Utah
- Indian Peaks Band of Paiutes
- Las Vegas Paiute Tribe
- Moapa Band of Paiute Indians
- Shivwits Band of Paiutes
- Kaibab Band of Paiute Indians
- Cedar Band of Paiutes
- San Juan Southern Paiute Tribe
- Koosharem Band of Paiutes
- Kanosh Band of Paiutes
- Chemehuevi Indian Tribe
- Pueblo of Zuni
- The Hopi Tribe

3 SUBMISSION PROCESSING AND COMMENT CODING

The following sections describe the methodology for reviewing and coding comments.

3.1 Submission-Level Processing

The BLM received 17,258 submissions from the public during the official public scoping period. Comments were received by U.S. Postal Service mail, email, delivery to the St. George Field Office, and a website form, as well as by dictated and written comments submitted at the

scoping meeting. Duplicate submissions received through more than one submission method are excluded from this total. All comments were given equal consideration, regardless of method of submittal. Table 2 details the submittal types.

Table 2. Summary of Submissions by Type

Type	No. Of Submissions
Unique	576
Form Letter 1	46
Form Letter 1 Plus	13
Form Letter 2	0
Form Letter 2 Plus	19
Form Letter 3	208
Form Letter 3 Plus	17
Form Letter 4	7,721
Form Letter 4 Plus	211
Form Letter 5	7
Form Letter 5 Plus	0
Form Letter 6	8,297
Form Letter 6 Plus	143
Total	17,258

Of the 17,258 submissions, 576 were unique and 16,682 were part of organized letter campaigns (Table 2). A letter campaign refers to identical copies of a letter or email (“form letters”) that are sent in by multiple individuals. One representative letter (i.e., “form master”) from each campaign was entered into the comment-tracking database, with all other exact duplicate letters identified as form copies. Letters that presented variations of the form master—unique comments added to, embedded in, or altered from the form master—were defined as “form-plus” letters, and any unique comments within a form-plus letter were added to and coded into the database. As shown in Table 2, there were 403 form-plus submissions.

3.2 Comment-Level Coding

The 17,258 submissions received during the public scoping process were documented, reviewed, and parsed into individual comments to be coded according to issue categories. For example, if a letter brought up four different issues, the text was parsed into four separate comments. This parsing process resulted in approximately 2,637 individual comments, which were then coded according to planning issue categories. Table 3 shows the relative percentage of comment by issue category.

Table 3. Comments by Issue Category

Issue Category	Count	Percentage
Vegetative Communities	76	3.0%
Wildlife	341	13.0%
ESA Section 6 Land Acquisition Grants	117	4.4%
Geology Mineral Resources	12	0.5%
Paleontology	23	0.9%
Water Resources	69	2.6%
Air Quality	77	2.9%
Visual Resources	280	10.6%
Cultural Resources and Native American Concerns	99	3.8%
Recreation Resources	127	4.8%
BLM Travel and Transportation Management	46	1.7%
National Conservation Area (NCA)	274	10.4%
Fire and Fuels Management	59	2.2%
Noise	134	5.1%
Human Health and Safety	42	1.6%
Socioeconomics	209	8.0%
Public Involvement	70	2.7%
Compliance with Laws and Regulations	93	3.5%
Traffic	64	2.4%
Alternatives	221	8.4%
Out of Scope	198	7.5%
Total	2,637	100%

Section 5 presents summaries of public concerns and issues by resource topic. In some instances, comments contained multiple intertwined issues, and it was not possible to parse these comments into separate comments. Therefore, some of the issues and topics are not reflected in the comment coding above. However, all issues and topics are captured in the issue statements and comment summaries. The individual comments about issues that are outside of the decision space for the planning process are summarized in Section 4.

4 ISSUES RAISED THAT WILL NOT BE ADDRESSED AS PART OF THIS PLANNING PROCESS

Submissions included comments on the following issues that are out of the decision space for this planning process:

Has the decision to allow construction of the proposed Northern Corridor roadway already been made?

Comment Summary

Commenters expressed concern that decisions regarding the proposed road have already been made. Commenters also asked why the proposed Northern Corridor roadway is being considered when it has been rejected in the past.

Does the BLM have adequate resources to complete the environmental document and any associated activities?

Comment Summary

Commenters expressed the desire for the BLM to have adequate staff to complete the environmental process and also to complete any required mitigation. Commenters also expressed concern that the BLM does not currently have enough staff or funding to complete the process comprehensively.

Would the proposed Northern Corridor roadway set a precedent for future impacts to protected areas?

Comment Summary

Commenters expressed concern that approving the proposed Northern Corridor roadway would set a precedent that allows for future impacts to protected areas, including other areas of the Red Cliffs NCA, the proposed Zone 6 mitigation area, and other conservation areas across the country.

Is there undue influence on the lead agencies?

Comment Summary

Commenters expressed concern that the desires of the public would be overlooked and that the wishes of developers, government officials, political considerations, and others had undue influence on the decisions being made by the BLM and USFWS. Commenters questioned whether the lead agencies could independently evaluate the information provided by the study proponents, including traffic models. Some commenters worried that public opinion would not have significant influence on the outcome of the NEPA process.

Why are changes to the Red Cliffs NCA Resource Management Plan and/or Washington County Habitat Conservation Plan being considered?

Comment Summary

Commenters questioned why changes to the established Habitat Conservation Plan and other conservation commitments were being considered. Commenters expressed their belief that any change to protections for the Red Cliffs NCA would break previously made promises and would make it difficult to trust any future commitments. Some commenters questioned why the route of the proposed road had changed from routes shown on earlier plans.

Other miscellaneous out of scope comments.

Comment Summary

Commenters expressed disapproval of the proposed Lake Powell Pipeline and how the comment period overlapped with the Northern Corridor comment period. Commenters expressed disapproval of the proposed Black Desert Resort. Some comments included general complaints about the current presidential administration policy and were not tied to the specific study.

5 SUMMARY OF PUBLIC CONCERNS AND ISSUES

The following key issues and concerns have been extracted from the public comments and summarized for future consideration in the EIS process. The issues presented in the forthcoming Draft EIS may include additional issues raised by cooperating agencies or Tribes.

5.1 Vegetative Communities, Including Noxious Weeds

How would the proposed Northern Corridor roadway impact the plants and ecology of the area?

Comment Summary

Commenters expressed concern that the Northern Corridor would impact the natural plants and ecology of the Red Cliffs NCA and Red Cliffs Desert Reserve (Reserve). Commenters stated that these impacts could result in a chain reaction of harm to the wildlife in the area. Commenters expressed concern about an increase of invasive plant species if the Northern Corridor were to be constructed. Other commenters stated their personal opinions favoring the extensive flora and fauna available at their fingertips and how they want to pass that passion on to their future generations.

5.2 Wildlife

How would the proposed Northern Corridor roadway impact the Mojave desert tortoise?

Comment Summary

Commenters expressed concern that the Mojave desert tortoise would be impacted by the Northern Corridor. Commenters discussed how the tortoise population is threatened and would be negatively impacted by the Northern Corridor. Commenters expressed concerns that the tortoise would become extinct, be exposed to increased predation by other animals, face an unfamiliar habitat, have reduced resistance to diseases, be unable to safely cross the road, have social structures impacted, and have atypical genetics and breeding patterns. Commenters expressed concern that the tortoise population would not be protected in the proposed Zone 6 mitigation area and would continue to decline.

Would proposed mitigation measures allow tortoises to cross the new road?

Comment Summary

Commenters expressed concern, based on experiences with the Red Hills Parkway effort, that tortoises would not use tunnels to cross a new road.

How would the proposed Northern Corridor roadway impact all wildlife in the area?

Comment Summary

Commenters mentioned concerns for wildlife other than the Mojave desert tortoise, including rabbits, snakes, deer, mountain lions, bobcats, coyotes, chuckwallas, wild turkeys, roadrunners, and quail. Specific species mentioned are the Great Basin rattlesnake, California kingsnake, kit fox, mule deer, golden eagle, red-tail hawk, and the great horned owl.

Should the HCP be amended for the proposed Northern Corridor roadway?

Comment Summary

Commenters stated that the HCP should not be amended for the proposed Northern Corridor roadway. Commenters stated that the impact of changing the existing HCP in a high density Mojave desert tortoise area is too drastic on the endangered species.

Could impacts to the Mojave desert tortoise be successfully mitigated?

Comment Summary

Commenters stated that the HCP and NCA were designed to permanently protect the Mojave desert tortoise habitat and the proposed Zone 6 was insufficient mitigation for the impacts that would be incurred by the proposed Northern Corridor roadway.

5.3 Proposed Zone 6

Could the proposed Zone 6 successfully mitigate for impacts to the Mojave desert tortoise?

Comment Summary

Commenters expressed concern about the proposed Zone 6 having insufficient mitigation for the impacts on tortoise habitat in the NCA. Commenters stated that the proposed Zone 6 is already being used for recreation and other land uses (e.g., target shooting, camping, mountain biking, cattle grazing). The concern is that the proposed Zone 6 land is a lower quality environment that is unsuitable for the recovery of the Mojave desert tortoise population. Commenters expressed concern that isolating the Mojave desert tortoise from the primary tortoise population would impact their growth. Commenters questioned if Zone 6 would have increased protections since Zone 6 is already protected as a designated ACEC. Commenters do not believe that Zone 6 is a "fair trade" for the area in the NCA that would be acquired for the Northern Corridor right-of-way. Commenters stated that the ITP should not be issued.

How would the management of the proposed Zone 6 impact existing recreation use?

Comment Summary

Commenters worried that additional protections on the proposed Zone 6 would reduce or prohibit future recreation use in that area.

5.4 Geology, Mineral Resources and Soils

How would the proposed Northern Corridor roadway impact environmental resources?

Comment Summary

Commenters expressed concern about possible effects to soil, rock formations, and biological soil crusts. Commenters stated that the unique ecotone of Washington County should be preserved.

5.5 Paleontology

How would the proposed Northern Corridor roadway impact paleontological resources?

Comment Summary

Commenters expressed concerns about possible impacts to the paleontological resources in the Red Cliffs NCA.

5.6 Water Resources

How would the proposed Northern Corridor roadway affect water quality and water resources?

Comment Summary

Commenters expressed concern that the proposed Northern Corridor roadway would impact or interrupt the flow of surface water in the area and could lead to the diversion of flash floods into new areas.

How would construction of the proposed Northern Corridor roadway affect surface and groundwater?

Comment Summary

Commenters expressed concern about the impacts of the proposed Northern Corridor roadway on local seeps and springs used for local culinary and irrigation water. Commenters stated that the proposed Northern Corridor roadway has the potential to pollute the water through gas, oil and toxic chemical spills and as a result could contaminate drinking water and harm plant life.

5.7 Air Quality

How would the proposed Northern Corridor roadway impact the air quality of the community?

Comment Summary

Commenters expressed concerns regarding air quality, since St. George is known for many outdoor activities that require good air quality. Commenters stated that poor air quality would decrease the availability and opportunity to enjoy the community.

5.8 Visual Resources

How would visual resources be maintained and protected?

Comment Summary

Commenters expressed a desire to preserve the beautiful landscape that makes the St. George area unique. Commenters stated that a roadway could cause pollution and smog from the cars that could impact the outdoor activities in the area. Commenters suggested that a roadway could increase trash, wildfires, air pollution and destruction of wildlife that would lead to an overall decline in the beauty of the area. Commenters expressed concern that this proposal would impact the views others hold of the area and its residents.

Would the proposed Northern Corridor roadway bring increased light impacts?

Comment Summary

Commenters mentioned concerns about the environmental impacts of the proposed Northern Corridor roadway, including light that could negatively impact the plant and animal species and

residents that live in this area. Commenters stated that the light pollution will affect night sky viewing.

5.9 Cultural Resources and Native American Concerns

How would cultural and historic resources be preserved?

Comment Summary

Commenters expressed a desire to protect all cultural and historic resources. Commenters specifically mentioned protecting Native American ancestral homeland, prehistoric Native American artifacts, and prehistoric petroglyphs and pictographs. Commenters also expressed concern over how the area would be preserved for future research and site studies.

5.10 Recreation Resources

How would the proposed Northern Corridor roadway impact existing recreational activities?

Comment Summary

Commenters referenced the importance of the recreational areas being in close proximity to their homes. Commenters specified that the reason they moved to the St. George area was directly connected to living near the Reserve and the NCA. Commenters described how they frequently enjoy hiking, biking and trail running on the T-bone, Cottontail, Pioneer Hills, Pioneer Rim, City Creek, Owen's Loop, Middleton Powerline, Mill Creek, Sand Hill, Dino Cliffs, Grapevine, and many other trails in the Red Cliffs NCA. Additionally, commenters described how they enjoy camping, horseback riding, hunting, rock climbing, and photography. Commenters stated that all of these activities require open, natural space, and the impacts of a roadway bisecting the Red Cliffs NCA would decrease the availability and opportunity to enjoy these recreational activities.

How would the management of the proposed Zone 6 impact existing recreation resources?

Comment Summary

Commenters worried that additional protections related to the proposed Zone 6 would reduce or prohibit future recreation use in that area.

5.11 Red Cliffs National Conservation Area

Would the Red Cliffs NCA be harmed by the proposed Northern Corridor roadway?

Comment Summary

Commenters expressed general concern that the proposed Northern Corridor roadway would impact the Red Cliffs NCA. Commenters expressed concern that recreational and educational opportunities in the Red Cliffs NCA would be reduced by the proposed Northern Corridor roadway. Commenters also expressed concern that the roadway would allow future development of protected areas.

5.12 Fire and Fuels Management

Would the proposed Northern Corridor roadway introduce invasive plant species and result in an increased risk of fire?

Comment Summary

Commenters expressed concern about an increase of invasive plant species if the roadway were to be constructed. Further, commenters expressed concern that the increase in invasive plant species would result in a higher risk of fire in the area.

5.13 Noise

Would noise from the proposed Northern Corridor roadway have an effect on the surrounding residents and wildlife?

Comment Summary

Commenters expressed concern for the amount of continuous noise that would come from a roadway. Commenters stated that this noise could be impactful to both humans and animals that live in the surrounding area. Several commenters suggested that if a road is put in place then the traffic speeds should be lowered to around 30 mph to mitigate noise pollution.

5.14 Human Health and Safety

How would the proposed Northern Corridor roadway affect the human environment?

Comment Summary

Commenters expressed concern that the proposed Northern Corridor roadway would negatively impact the mental health of those in the area who use and enjoy the distraction and relaxation provided by the Red Cliffs NCA. Commenters also expressed concern that impacts to the natural environment would affect residents' and visitors' physical and emotional health.

5.15 Socioeconomics

How would the proposed Northern Corridor roadway impact the local economy of Washington County?

Comment Summary

Commenters expressed concern that if scenic views, clean air quality, and quiet trails are lost as a result of the roadway, it would lead to a severe decline in recreational activities and recreation-dependent sectors of the local economy. Commenters mentioned how vacationers come from all over the world to hike, bike, climb, and otherwise explore the red rocks in Washington County and explained how this inflow of visitors boosts the economy. Additionally, commenters who own outdoor equipment rental shops were concerned about the impacts to their business.

How would the proposed Northern Corridor roadway impact local businesses?

Comment Summary

Commenters suggested that the proposed Northern Corridor roadway would impact local business by discouraging visitors and new residents from coming to the area.

How would the proposed Northern Corridor roadway impact homes in the area?

Comment Summary

Commenters expressed concern about the proximity of the proposed Northern Corridor roadway to their properties. Some of the commenters referenced the probable design of the roadway and noted that their homes are within 200 feet of the proposed roadway location. Other comments from residents near the proposed roadway expressed concern about a possible invasion of their privacy. Commenters expressed concern that the proposed roadway would impact existing neighborhoods, including lowering property values. Additionally, comments referenced how the land is protected through the NCA and that they believed there would never be development behind their homes.

5.16 Public Involvement

How was the date chosen for the public comment period?

Comment Summary

Commenters expressed concern that the scoping period was held during the December holiday period. Commenters stated that it was difficult to focus on the issues raised during the scoping period while also managing a busy time of year. Some commenters expressed a belief that the scoping period was deliberately chosen to discourage public involvement. Some commenters also expressed concern that the scoping period was held at the same time as the scoping period for the unrelated Lake Powell Pipeline project. Some commenters requested that the scoping period be extended to allow for additional public comment, as they did not feel 30 days was sufficient time to comment. Some commenters stated that not enough public outreach was conducted.

Why was additional information not available for review during the scoping period?

Comment Summary

Commenters requested that additional information be made available and expressed concern that it was not available during the scoping period. This requested information included the draft updates to the HCP, information regarding previous decisions by federal agencies on the Northern Corridor, the Draft EIS, as well as traffic modeling and other information from the Dixie Metropolitan Planning Organization (DMPO) and UDOT.

Will a summary of scoping commenters be made available to the public?

Comment Summary

Commenters requested a summary of scoping comments, with the number of comments received in each category.

Will a public hearing or hearings be held?

Comment Summary

Commenters requested that a public hearing be held where members of the public can speak regarding the environmental study.

5.17 Compliance with Laws and Regulations

Was the Notice of Intent (NOI) adequate?

Comment Summary

Commenters alleged various inadequacies in the NOI, including whether it allowed the evaluation of an adequate range of alternatives, whether it identified the proposed action in sufficient detail, and whether it included enough detail on related issues such as the HCP and ITP.

Is the study adequately following the environmental process?

Comment Summary

Commenters expressed concern that the proposed Northern Corridor roadway was moving through the environmental process too quickly and that consultation with other federal agencies (including the USFWS and U.S. Army Corps of Engineers (USACE)) would be inadequate. They also questioned the adequacy of the purpose and need and alternatives (including cost-benefit analyses) being evaluated in the EIS, and whether Section 4(f) of the Department of Transportation Act had been considered. Other commenters asked whether UDOT would prepare a separate NEPA document for the construction of the Northern Corridor roadway, if the right-of-way request is approved.

Does the proposed Northern Corridor roadway comply with applicable federal laws?

Comment Summary

Commenters questioned whether the proposed Northern Corridor roadway is in compliance with federal laws including NEPA, the ESA, the Omnibus Public Lands Management Act (OPLMA), and the FLPMA as well as federal plans and regulations such as BLM and USFWS policy, RMPs, and the HCP. Commenters also questioned whether the NEPA process was executed appropriately considering possible connected actions including, but not limited to, the Washington Parkway Extension.

Is a Washington Parkway extension allowed?

Comment Summary

Commenters stated that the proposed Northern Corridor roadway has been improperly segmented from a previously approved extension of Washington Parkway.

5.18 Traffic

Would the Northern Corridor alleviate existing congestion?

Comment Summary

Commenters stated the Northern Corridor roadway can help the current traffic congestion in St. George, especially on Red Hills Parkway and St. George Boulevard.

Would the proposed Northern Corridor roadway provide additional access for commuters and residents?

Comment Summary

Commenters noted that there would be safety benefits to building the Northern Corridor roadway, since it would provide another access (or inlet) into the area for emergency vehicles as well as for residents commuting on less congested roads (less congestion means fewer traffic accidents).

Is the proposed Northern Corridor roadway needed for the anticipated growth in the area?

Comment Summary

Commenters expressed concern about the projected future growth and the necessary infrastructure to meet the transportation demands. Some commenters stated that the Northern Corridor roadway is necessary to meet future demand and are in favor of the proposed alternative.

What other changes would be made to support the future traffic demands?

Comment Summary

Commenters expressed concern that if the roadway were to be built, traffic would increase in a once-quiet area. Commenters expressed concern for residents in the area and a desire to sustain the population and have minimal traffic flow. Commenters mentioned tourism and how the effects of growth may impact vacationers. Others stated that there may not be enough room for the roadway and adding new roads without substantial infrastructure and resource updates could be consequential. Commenters stated that the growth would eventually slow down and plateau if development were to stop.

5.19 Alternatives

Why would this location be chosen for the proposed Northern Corridor roadway?

Comment Summary

Commenters expressed concern about the specific location of the proposed Northern Corridor roadway. Commenters suggested that most of St. George's growth will be to the south of the proposed roadway, so commenters suggested the new roadway might be more beneficial if it were shifted south. Other commenters stated that the roadway could also be pushed north to avoid disrupting the Reserve and the Red Cliffs NCA.

Could Red Hills Parkway be used as an alternative to the proposed Northern Corridor roadway? Could access from Red Hills Parkway to I-15 be provided? Would the BLM consider Conserve Southwest Utah's Community Transportation Alternative?

Comment Summary

Commenters suggested using Red Hills Parkway as an alternative to the proposed Northern Corridor. Some commenters included the need for a connection between Red Hills Parkway and I-15, while others proposed the improvement of Red Hills Parkway and Buena Vista Boulevard. Commenters suggested improvements, including widening, partial grade-separation, traffic circles, and limited access. Other commenters discussed a route similar to that followed by the Red Hills Parkway.

Would a cost-benefit analysis of alternatives be performed?

Comment Summary

Commenters requested the completion of an analysis weighing the costs and impacts of the proposed Northern Corridor roadway against other alternatives.

Are alternatives to the proposed Northern Corridor roadway outside of the Red Cliffs NCA available?

Comment Summary

Commenters suggested consideration of alternatives outside of the Red Cliffs NCA without specifying which alternatives should be considered.

Would a No-Action alternative to the proposed Northern Corridor roadway be considered?

Comment Summary

Commenters suggested not building the Northern Corridor roadway without proposing a replacement alternative. Some commenters suggested that the projected level of delay would be acceptable. Some of these commenters suggested that major areas of growth are south and east of St. George and that a Northern Corridor roadway is unnecessary.

Could improvements to other roadways in St. George or Washington County be used as an alternative to the proposed Northern Corridor roadway?

Comment Summary

Commenters suggested improvements to other roads in St. George, including adding a one-way couplet in downtown St. George; adding crossings of I-15 at 400 East, 700 East, 1240 East, and/or 2450 East; widening I-15; transportation system management; completing the Southern Parkway (SR-7); and adding an interchange on I-15 at Washington Main Street or in other locations. Other commenters suggested the imposition of a toll road system to manage travel demand.

Could transit improvements be used as an alternative to the proposed Northern Corridor roadway?

Comment Summary

Commenters suggested improvements to the local transit system to reduce travel demand. Suggested improvements included a general desire for better transit, circulator trollies serving Dixie Regional Medical Center and along Main Street and 400 South, light rail, and increased east-west bus service.

Could alternative land use development strategies be used as an alternative to the proposed Northern Corridor roadway?

Comment Summary

Commenters suggested changes to land use development patterns, particularly following the Vision Dixie Smart Growth Principles. These included concentrating development in walkable centers. Other commenters suggested limiting development in areas that would need new roads including Diamond Valley, Dammeron Valley, and Winchester Hills. Other commenters suggested limiting the number of daily visitors to the Red Cliffs NCA if visitor numbers were influencing congestion. Commenters also suggested encouraging additional commercial development in outlying communities to reduce travel to major commercial centers.

Could local roads be used as an alternative to the proposed Northern Corridor roadway?

Comment Summary

Commenters requested consideration of impacts to other local roads, including Washington Parkway, Washington Main Street, Green Spring Drive, Mall Drive, Cottonwood Springs Road,

1000 East, Red Hills Parkway, and Bluff Street (SR-18). These commenters included suggestions regarding possible traffic flow and intersection issues.

Could active transportation improvements be used as an alternative to the proposed Northern Corridor roadway?

Comment Summary

Commenters suggested improvements to the active transportation network to reduce reliance on vehicle travel.

Could a more northern route be used as an alternative to the proposed Northern Corridor roadway?

Comment Summary

Commenters suggested the construction of a roadway between I-15 and SR-18 north of the Red Cliffs NCA or in the northern portion of the Red Cliffs NCA where there is less critical habitat for Mojave desert tortoises and the impact on residents would be reduced. Commenters also suggested that the proposed route should be shifted farther north to follow existing power line easements.

Could the proposed Northern Corridor roadway be elevated to limit impacts to sensitive areas?

Comment Summary

Commenters suggested constructing the proposed Northern Corridor roadway as an elevated roadway to avoid impacts to sensitive areas.

Would mitigation for the effects of the proposed Northern Corridor roadway be included?

Comment Summary

Commenters suggested possible mitigation if the roadway is constructed, including maintaining natural views, providing limited trail access, protecting desert tortoise habitat, educational signage, installing tortoise fencing and tunnels, not allowing above-ground utility installation, restricting the transport of hazardous waste, and constructing the road to full width at the beginning instead of widening at a later point.

Could an alternative route to the proposed Northern Corridor be considered that avoids impacts to Green Springs' residents?

Comment Summary

Commenters also suggested realigning the road to avoid impacts to the neighborhoods in the Green Springs area.

Would the proposed Northern Corridor roadway allow utility easements in the same right-of-way?

Comment Summary

Commenters expressed concern that the proposed Northern Corridor roadway would allow new utility rights-of-way, including above-ground utilities, in or adjacent to the Northern Corridor roadway right-of-way.

Would the proposed Northern Corridor roadway result in additional congestion to area roadways?

Comment Summary

Commenters expressed concern that the proposed Northern Corridor roadway would result in additional congestion on area roadways including Green Spring Drive, I-15 Exit 10, Bluff Street, and Red Hills Parkway. Some commenters also included concerns about safety and speed on the proposed Northern Corridor roadway and other area roadways.

Is the proposed Northern Corridor roadway a viable solution to accomplish the traffic objectives?

Comment Summary

Commenters expressed disagreement with the effectiveness of the proposed route as an alternative to existing roads based on expected driver choices. Commenters also disagreed with the suggested benefits of the proposed route as compared with the cost of constructing a road that would not solve traffic issues. Commenters suggested that changes in driving patterns in younger people as additional schools are added in the outlying areas would reduce the need for the road in the future.

What is the role of the Red Bluff Area of Critical Environmental Concern (ACEC) in the environmental study?

Comment Summary

Commenters suggested designating the entire Red Bluff ACEC as the new reserve, rather than only the eastern portion of it.

6 FUTURE STEPS IN THE ENVIRONMENTAL IMPACT STATEMENT PROCESS

Scoping is the first public involvement opportunity in the planning process. Several more steps are necessary in the NEPA process, such as formulating alternatives, analyzing the effects of alternatives, publishing a Draft EIS, gathering public feedback through a 90-day comment period, publishing a Final EIS, and issuing the Record(s) of Decision. Figure 1 shows where the BLM and USFWS are at in the NEPA process currently as well as future major milestones and public involvement opportunities.

The BLM and USFWS have revised the project mailing list to address scoping comments from individuals and organizations asking to be added or removed from the mailing list. The next step in the EIS process is to consider comments and concerns as well as environmental and social constraints that were presented by the public during scoping and by cooperating agencies and Tribes. This will enable the BLM and USFWS to develop a range of alternatives to be included in the Draft EIS. The impacts that could result from implementing the alternatives will be analyzed and documented in Draft EIS. These alternatives will generally fall into two categories: 1) alternatives to be analyzed in detail in the Draft EIS, or 2) alternatives that are considered, but eliminated from detailed analysis. The Draft EIS will provide rationale for any alternative eliminated from detailed analysis.

A Notice of Availability (NOA) will be published in the Federal Register when the Draft EIS is available for the public to review during a 90-day public comment period. The BLM and USFWS may hold a public meeting in a key location during this comment period to provide information

on the Draft EIS and to solicit public and agency comment on the draft documents. Once the 90-day comment period is completed, the BLM and USFWS will respond to substantive comments and prepare the Final EIS. A NOA will be published in the Federal Register when the Final EIS is available for the public to review.

Following publication of the Final EIS, the BLM will provide a 30-day protest period and a concurrent Governor's consistency review (up to 60 days at the Governor's discretion) regarding the proposed Red Cliffs NCA and ST. George Field Office RMP amendments. Once all protests are resolved, the BLM and USFWS will prepare and publish one or more Record(s) of Decision (see Figure 1).

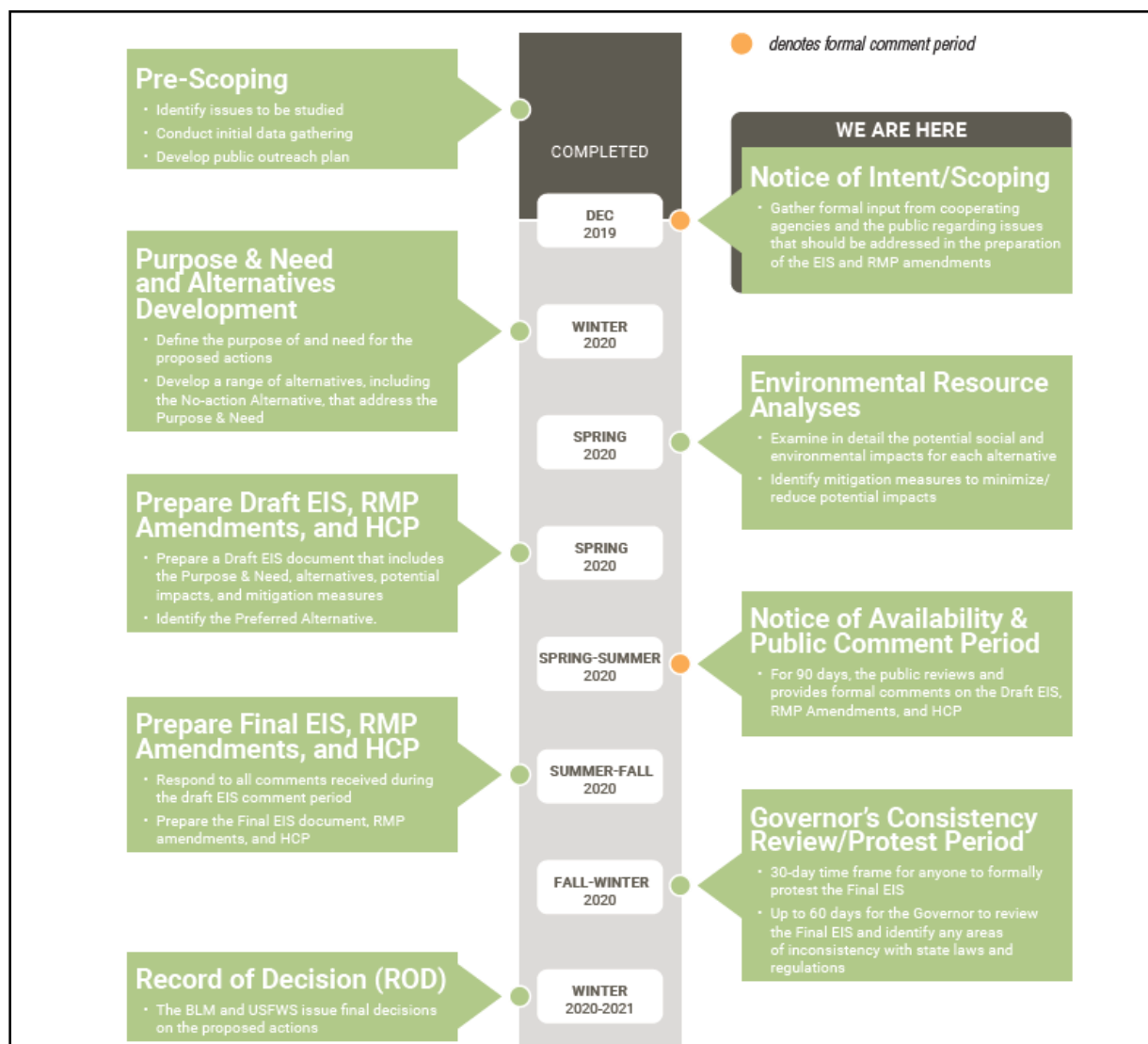


Figure 1. National Environmental Policy Act and Land Use Planning Process Graphic



7 CONTACT INFORMATION

BLM's ePlanning website: <https://go.usa.gov/xpC6H>

Email: BLM_UT_NorthernCorridor@blm.gov

Mail: Bureau of Land Management (BLM)
Attn: Northern Corridor
345 East Riverside Drive
St. George, UT 84790