



U.S Department of the Interior  
Bureau of Land Management  
4001 E. Aviator Circle Dr.  
St. George, Utah 84790  
Northern Corridor Highway Right-of-Way Environmental Assessment  
DOI-BLM-UT-C030-2025-0041-EA  
Applicant: Utah Department of Transportation  
Case Number: UTU-93260

*I have considered the factors mandated by the National Environmental Policy Act (NEPA). This environmental assessment represents the Bureau of Land Management's (BLM's) good-faith effort to fulfill NEPA's requirements by prioritizing documentation of the most important relevant considerations within the statutorily mandated page limits and timeline. This prioritization reflects the BLM's expert judgment; and any considerations addressed briefly or left unaddressed are, in the BLM's judgment, comparatively non-substantive and would not meaningfully inform the BLM's consideration of environmental effects and the decision to be made. The EA is substantially complete, considers the factors mandated by NEPA, and, in my judgment, contains analysis adequate to inform the BLM's decision regarding the proposed action.*

**Responsible Official:** \_\_\_\_\_

**Gloria A. Tibbetts**  
**BLM Color Country District Manager**

**Date:** \_\_\_\_\_

# TABLE OF CONTENTS

<b>Chapter 1 Introduction .....</b>	<b>1</b>
1.1 Purpose and Need.....	1
1.2 Decision to be Made.....	2
<b>Chapter 2 Alternatives .....</b>	<b>3</b>
2.1 Introduction.....	3
2.2 UDOT ROW Alignment .....	3
2.3 T-Bone Mesa Alignment.....	3
2.4 Southern Alignment .....	4
2.5 St. George Boulevard/100 South One-way Couplet.....	4
2.6 No Action Alternative .....	6
2.7 Alternatives Considered but Eliminated from Detailed Analysis .....	6
2.7.1 Red Hills Parkway Expressway.....	6
<b>Chapter 3 Affected Environment and Environmental Effects .....</b>	<b>10</b>
<b>Chapter 4 Consultation and Coordination .....</b>	<b>11</b>
4.1 Endangered Species Act Section 7 Consultation.....	11
4.2 Tribal Consultation.....	11
4.3 National Historic Preservation Act Section 106 Consultation .....	11

## APPENDICES

*Appendix A Final Supplemental Environmental Impact Statement To Reconsider a Highway Right-of-Way Application and Associated Amendment of an Incidental Take Permit, Washington County, UT (DOI-BLM-UT-C030-2023-0038-EIS)*

*Appendix B Final Environmental Impact Statement to Consider a Highway Right-of-Way, Amended Habitat Conservation Plan and Issuance of an Incidental Take Permit for the Mojave Desert Tortoise, and Proposed Resource Management Plan Amendments, Washington County, UT (DOI-BLM-UT-C000-2020-0001-RMP-EIS)*

## CHAPTER 1 INTRODUCTION

This Environmental Assessment (EA) (DOI-BLM-UT-C030-2025-0041-EA) was prepared by the U.S. Department of the Interior's Bureau of Land Management (BLM) St. George Field Office in compliance with the National Environmental Policy Act of 1969, as amended (NEPA). In light of new information that has been provided, the EA reassesses an application from the Utah Department of Transportation (UDOT) requesting a right-of-way (ROW) for the Northern Corridor (a proposed highway) (UTU-93260) in Washington County, Utah (County). A ROW grant was originally approved and issued on January 13, 2021. To address the effects of the highway to desert tortoises and habitat within the Red Cliffs Desert Reserve (Reserve), the Washington County Restated and Amended Habitat Conservation Plan (HCP, 2020) included a Northern Corridor changed circumstance. A significant part of the changed circumstance was to establish, administer, and manage the Reserve expanded by 6,813 acres through the designation of a new sixth zone (Zone 6), as described in Section 9.1.1 in the Amended HCP. Additional commitments include directly acquiring and permanently protecting acres in Zone 6 at a 3:1 ratio for the ground disturbed by the highway; providing community education and outreach regarding the need to protect Zone 6; and installing tortoise crossings under Cottonwood Springs Road in Zone 3 of the Reserve to increase genetic diversity in the Zone where the highway would be built.

On November 8, 2024, the BLM and United States Fish and Wildlife Service (FWS) released the Final Supplemental Environmental Impact Statement To Reconsider a Highway Right-of-Way Application and Associated Amendment of an Incidental Take Permit, Washington County, UT (DOI-BLM-UT-C030-2023-0038-EIS) (2024 Final SEIS).

On December 19, 2024, the Acting Deputy Secretary of the Interior signed a Record of Decision terminating the existing ROW and endorsing the Red Hills Parkway Expressway alternative as described in the 2024 Final SEIS. Since the changed circumstance related to construction of the Northern Corridor across the Reserve was no longer triggered, Zone 6 was removed from the Reserve.

This EA follows the receipt of additional information submitted by UDOT that demonstrates the technical and economic infeasibility of the Red Hills Parkway Expressway Alternative, which was selected as the BLM's preferred alternative in the 2024 Final SEIS and endorsed in the subsequent Record of Decision in combination with the selection of the Terminate UDOT's ROW alternative. Reassessment of the original ROW application is warranted to remove the Red Hills Parkway Expressway from consideration and identify a different agency preferred alternative for public review.

### 1.1 Purpose and Need

The purpose of the BLM's action is to fulfill the agency's statutory responsibilities under the Federal Land Policy and Management Act of 1976 and its regulatory requirements, as stated at 43 CFR 2800, with regard to processing and evaluating applications for ROWs for the use of public lands. Additionally, the BLM must comply with both Sections 1974 and 1977 of the Omnibus Public Land Management Act of 2009 (OPLMA) (Public Law 111-11, Title 1, Subtitle O). As such, the BLM is compelled to reassess the 2018 UDOT ROW application to determine

whether the BLM will affirm the 2024 decision to terminate the ROW grant or reinstate the ROW grant based on one of the proposed alignments considered in the 2020 Final Environmental Impact Statement to Consider a Highway Right-of-Way, Amended Habitat Conservation Plan and Issuance of an Incidental Take Permit for the Mojave Desert Tortoise, and Proposed Resource Management Plan Amendments, Washington County, UT (DOI-BLM-UT-C000-2020-0001-RMP-EIS) (2020 Final EIS) and 2024 Final SEIS. The need for the BLM's action is to respond to new information that was provided by UDOT that affects the agency preferred alternative in the 2024 Final SEIS. This EA provides public disclosure of this new information and identifies a different agency preferred alternative.

In applying for the ROW, UDOT's goal is to reduce congestion, increase capacity, and improve east-west mobility on arterial and interstate roadways between State Route 18 (SR 18) and Interstate 15 (I-15) at milepost 13. This objective is driven by the current and forecast population growth within the County, which will continue to increase demand on the transportation network. Currently, the existing transportation network between SR 18 and I-15 is not adequate to meet future (2050) travel demand in the northeastern and northwestern areas of St. George based on traffic projections from the Dixie Metropolitan Planning Organization's (DMPO) regional travel demand model (DMPO 2024).

## **1.2 Decision to be Made**

Based on new information that has been provided, the BLM must decide whether to grant, grant with modifications, or deny the ROW application.

## **CHAPTER 2 ALTERNATIVES**

### **2.1 Introduction**

The 2020 Final EIS described five alternatives (UDOT ROW Alignment, T-Bone Mesa Alignment, Southern Alignment, Red Hills Parkway Expressway, and St. George Boulevard/100 South One-way Couplet) that were considered in detail for the Northern Corridor and a No Action alternative. The five alternative routes for the Northern Corridor highway that were considered in detail in the 2020 Final EIS were carried forward in the 2024 Final SEIS, as was an alternative that would terminate UDOT's ROW grant in the Red Cliffs National Conservation Area (NCA), which was most similar to the "no action" alternative included in the 2020 Final EIS.

After the BLM completed the 2024 Final SEIS and issued the 2024 ROD, UDOT provided additional information demonstrating the technical and economic infeasibility of the Red Hills Parkway Expressway alternative. The BLM reviewed that submission and in light of the information it provides, the BLM is dismissing this alternative from further analysis as described in Section 2.4.1 of this EA.

The four remaining ROW alternatives for the Northern Corridor highway that were considered in the 2020 Final EIS and 2024 Final SEIS are carried forward in this EA, as is a No Action alternative that would deny UDOT's application for a ROW for the Northern Corridor highway within the NCA. The BLM has identified the UDOT ROW Alignment as the agency's preferred alternative.

### **2.2 UDOT ROW Alignment**

The UDOT ROW Alignment was the Proposed Action in the 2020 Final EIS, and the BLM granted the ROW for this alternative in the 2021 ROD. Following completion of the 2024 Final SEIS and issuance of a new ROD in 2024, the ROW grant was terminated. Under this alternative, the BLM would reinstate UDOT's ROW grant across public lands in the NCA for the Northern Corridor (Figure 1).

The UDOT ROW Alignment would connect Green Spring Drive on the east to Red Hills Parkway on the west just north of the Pioneer Hills trailhead parking area. The Northern Corridor would be approximately 4.5 miles long, approximately 1.9 miles of which would be across BLM-managed lands. Under this alternative, the changed circumstance related to construction of the Northern Corridor across the Reserve described in Section 9.1.1 of Washington County's Amended HCP would be triggered, and Zone 6 would be reinstated as part of the Reserve.

### **2.3 T-Bone Mesa Alignment**

The BLM would issue the ROW grant to UDOT across public lands in the NCA but the T-Bone Mesa Alignment would be the approved highway corridor. This alignment would connect Green Spring Drive on the east to Red Hills Parkway on the west just north of the Pioneer Hills trailhead parking area. Under this alternative, the Northern Corridor would skirt the southern edge of T-Bone Mesa. The Northern Corridor would be approximately 4.2 miles long, 2.2 miles of which would be across public lands in the NCA (Figure 1). Under this alternative, the changed circumstance related to construction of the Northern Corridor across the Reserve described in

Section 9.1.1 of Washington County's Amended HCP would be triggered, and Zone 6 would be reinstated as part of the Reserve.

## **2.4 Southern Alignment**

The BLM would issue the ROW grant to UDOT across public lands in the NCA but the Southern Alignment would be the approved highway corridor (Figure 1). Under this alternative, the Northern Corridor would be near the southern border of the NCA, connecting Green Spring Drive on the east to Red Hills Parkway on the west just south of, and slightly encroaching onto, the Pioneer Hills trailhead parking area. The Northern Corridor would be approximately 5.5 miles long, approximately 1.5 miles of which would be across public lands in the NCA. Under this alternative, the changed circumstance related to construction of the Northern Corridor across the Reserve described in Section 9.1.1 Washington County's Amended HCP would be triggered, and Zone 6 would be reinstated as part of the Reserve.

## **2.5 St. George Boulevard/100 South One-way Couplet**

The One-way Couplet alternative proposes changes to existing St. George Boulevard and 100 South in the City of St. George (Figure 1). This alternative would have to be implemented by the City of St. George because it does not cross any BLM-managed lands.

This alternative would include modifications to St. George Boulevard and 100 South to respond to future transportation demands in the greater St. George metropolitan area. The two roadways would be converted into a one-way couplet system between I-15 and Bluff Street, wherein St. George Boulevard would only accommodate westbound traffic and 100 South would only accommodate eastbound traffic. St. George Boulevard would be converted from its existing two lanes in each direction (with a raised center median and turn pockets) to three westbound lanes. Modifications to the cross streets between I-15 and Bluff Street would disallow eastbound left and right turns from the cross streets. Similarly, 100 South would be converted from its existing one lane in each direction (with a center-turn lane), to three eastbound lanes. Modifications to the intersections at cross streets between I-15 and Bluff Street would disallow westbound left and right turns from the cross streets. Other minor reconstructions to storm drain and utility systems may be required to safely convert these streets to one-way operations.

On St. George Boulevard, the raised and landscaped medians and irrigation systems would be removed, and the median lighting would be replaced or relocated to the sides of the road. In addition, the Diverging Diamond Interchange at I-15/St. George Boulevard would be reconfigured to a more conventional diamond intersection configuration. On 100 South, the center two-way left-turn median and shoulders would be reconfigured. In addition, the existing interchange with I-15 at St. George Boulevard would be reconfigured and combined with a new interchange at 100 South to provide a split interchange system between these two roadways connected by one-way ramps. Southbound interstate traffic would exit at St. George Boulevard and enter from 100 South. Similarly, northbound interstate traffic would exit at 100 South and enter from St. George Boulevard.

Under this alternative, the changed circumstance related to construction of the Northern Corridor across the Reserve described in Section 9.1.1 of Washington County's Amended HCP would not be triggered, and the Reserve would not be expanded to include Zone 6.

### Figure 1. Proposed Northern Corridor Alternatives

## **2.6 No Action Alternative**

Under the No Action Alternative, the BLM would deny UDOT's application for a ROW grant across public lands in the Red Cliffs NCA for the Northern Corridor. Under this alternative, the changed circumstance related to construction of the Northern Corridor across the Reserve described in Section 9.1.1 of Washington County's Amended HCP would not be triggered, and the Reserve would not be expanded to include Zone 6.

## **2.7 Alternatives Considered but Eliminated from Detailed Analysis**

During the preparation of the 2020 Final EIS, the BLM identified several alternatives that do not meet the criteria for alternatives to be analyzed in detail. Section 2.7 of the 2020 Final EIS describes the alternatives that the BLM considered during the alternatives development process that were not carried forward for detailed analysis.

One additional alternative has now been eliminated from detailed analysis, as described below.

### **2.7.1 Red Hills Parkway Expressway**

The Red Hills Parkway Expressway alternative proposes modifying the existing Red Hills Parkway so that it would function as an expressway.

This alternative would convert Red Hills Parkway into a grade-separated expressway between I-15 and Bluff Street. Improvements would include new east-to-north and south-to-west connections to I-15 that would connect Red Hills Parkway directly to I-15, including an additional lane in each direction extending most of the length between 200 East and 900 East. The alternative would also convert the existing at-grade signalized intersections at 200 East (Skyline Drive) and 1000 East to grade-separated interchanges with necessary modifications to the mainline roadway to accommodate the new interchanges. New flyover ramps would be constructed to connect Red Hills Parkway to I-15. The intersections at 900 East and Industrial Road would be closed or converted to right-in-right-out movements only because of their proximity to the 1000 East interchange and I-15 flyover ramps. The intersection at Highland Drive would be closed. Existing driveways to public and private properties along the existing roadway would either be closed or converted to right-in-right-out movements only; all left turns in and out would be prohibited.

Additional widening of Red Hills Parkway at various locations between 200 East and 900 East would be required to add exclusive turning lanes for access to individual properties or public use areas where feasible. Fencing with tortoise mesh exists along Red Hills Parkway wherever it crosses tortoise habitat, and widening the road to accommodate turning lanes may require moving the existing tortoise fencing. The existing pedestrian trail along Red Hills Parkway would be relocated in various locations between 200 East and 900 East to accommodate improvements, including lengthening of the existing pedestrian tunnel under Red Hills Parkway in the Pioneer Park area.

If the planned improvements exceed the boundaries of the existing ROW, the BLM may need to grant necessary ROW amendments to the City of St. George's existing ROW for the Red Hills Parkway, subject to all other applicable approvals, laws, and regulations. In this case, the City of St. George, or assignee, would need to submit an application to amend the existing ROW.

Under this alternative, the changed circumstance related to construction of the Northern Corridor across the Reserve described in Section 9.1.1 of Washington County's Amended HCP would not be triggered, and the Reserve would not be expanded to include Zone 6.

The design and potential implementation of this alternative has severe technical and economic challenges.

First, the proposed connection to Interstate 15 is located in an area with substantial existing development, infrastructure, utilities, and a cut through a bluff with existing residential development and communication facilities located on top. The currently proposed design that would connect Red Hills Parkway directly to Interstate 15 immediately north of the existing St. George Boulevard interchange (Exit 8) does not conform to Federal Highway Administration (FHWA) requirements for interstate configurations. The FHWA is responsible for Interstate 15 and UDOT would be required to consult and obtain approval of an Interchange Access Change Request from the FHWA due to physical constraints in the area.

Specifically, the conceptual design includes ramps that would only allow travelers heading east on Red Hills Parkway to connect to northbound Interstate 15 and travelers only on southbound Interstate 15 to connect to westbound Red Hills Parkway. There would be no direct connection for eastbound travelers on Red Hills Parkway to connect to southbound Interstate 15 or travelers on northbound Interstate 15 to go westbound on Red Hills Parkway. This type of configuration is known as a partial interchange. FHWA interstate system access regulations generally require interchanges to provide for all traffic movements. However, if constructed, FHWA policy recommends that partial interchanges have the ability to be expanded to full interchanges in the future. The Red Hills Parkway Expressway interchange as proposed in the 2020 Final EIS and 2024 Final SEIS would not be able to be converted to a full interchange due to the interchange type, configuration and proximity to the Exit 8 interchange. Preferred interchange spacing is a minimum of one mile in urban areas. The Red Hills Parkway Expressway interchange would be only 0.6 miles from the Exit 8 interchange. The FHWA Utah Division Interstate Access Change Request Guidance Document recommends that designs should "consider mitigating closely spaced interchanges by constructing braided ramps, collector-distributor roads, or frontage roads, especially where separation between adjacent interchanges is less than 1 mile." Construction of these types of mitigation measures would require a substantially larger footprint than was assumed for the Red Hills Parkway Expressway alternative in the 2020 Final EIS and 2024 Final SEIS and may not even be possible to accommodate given the existing space constraints at the proposed interchange location.

Further, the lack of direct connections to southbound Interstate 15 from Red Hills Parkway and to Red Hills Parkway from northbound Interstate 15 would require travelers to use surface streets to access their destinations.

Second, further review of the conceptual design included in the 2020 Final EIS and 2024 Final SEIS revealed that the road design does not meet the American Association of State Highway and Transportation Officials (AASHTO) standards, which have been adopted in rule by the FHWA and by state highway agencies, including UDOT. Roads managed by UDOT must comply with the AASHTO standards - A Policy on Geometric Design of Highways and Streets,

7th Edition (AASHTO Green Book), the UDOT Roadway Design Manual (RDM, 2021); the UDOT Structures Design and Detailing Manual (2022), and several other standards, specifications, and manuals of instruction. The AASHTO Green Book and the RDM require that the minimum design speed for an expressway should not be less than 50 miles per hour (mph) and that the design speed be equal to or greater than the regulatory speed limit. The conceptual design for the Red Hills Parkway Expressway alternative included in the 2020 Final EIS and 2024 Final SEIS used a posted speed of 45-50 mph and a design speed of 40-50 mph that does not meet these design requirements.

Additionally, to meet operational and safety objectives, roadway designs are adapted to account for anticipated operating speed, topography, land use, and similar considerations (e.g., the UDOT ROW Alternative included a posted speed limit of 50 mph and a design speed of 60 mph which the UDOT concept team determined would be the appropriate design speed for a Northern Corridor). The AASHTO Green Book further notes “it is desirable that the running speed of a large portion of drivers be lower than design speed.” The footprint that was analyzed would not provide enough space to sufficiently upgrade Red Hills Parkway to comply with design criteria required by FHWA, AASHTO, and UDOT standards. The footprint expansions to accommodate a wider road cross-section and increased curve radii would need to occur directly west of the Interstate 15 interchange connection and in several places within the Red Cliffs Desert Reserve, thus increasing the impacts anticipated in both developed areas and designated critical Mojave desert tortoise habitat.

Third, a fundamental aspect of the design of this alternative is that access must be controlled and limited to maintain the speeds necessary to achieve a reasonable level of east-west congestion relief in accordance with the purpose and need for the ROW application. In order to do so, the 2020 Final EIS and 2024 Final SEIS disclosed that at least 33 properties would need to be completely or partially acquired and that additional properties would lose their current direct access to the parkway, therefore also requiring acquisition or partial acquisition. At least 13 of the existing operating businesses located on these properties would need to be closed or relocated. Several of the properties are unique in form and function (e.g., power substation, homeless shelter) and it may not be technically feasible to relocate them.

Fourth, through additional review of the proposed design of the Red Hills Parkway Expressway, UDOT determined that the cost of these acquisitions would be approximately \$100 million (up from the \$85 million disclosed in the 2024 Final SEIS). Additionally, because the road would likely need to be upgraded to meet UDOT’s standard road design, an updated planning-level cost estimate was prepared by UDOT and submitted to the BLM on August 6, 2025. It demonstrated that the full cost of the ROW acquisitions and road upgrades would come to approximately \$475 million, which is more than double the cost of the other viable alternatives.

The Fiscal Responsibility Act of 2023 (FRA, Public Law 118-5) went into effect on June 3, 2023. Section 321 of the FRA amended the National Environmental Policy Act at 42 United States Code 4332(2)(C)(iii), which previously required responsible officials to disclose “alternatives to the proposed action,” to now require disclosure of “a reasonable range of alternatives to the proposed agency action, including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal.”

In light of the new information provided by UDOT regarding the technical infeasibility and the substantial cost of this alternative in comparison with other reasonable alternatives, the Red Hills Parkway Expressway was not carried forward for detailed analysis in this EA.

### **CHAPTER 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS**

The BLM completed agency scoping to identify any issues that were not adequately addressed in the 2020 Final EIS and/or the 2024 Final SEIS or if any significant new information became available since publication of the 2024 Final SEIS that would require analysis in this EA. No additional issues or significant information relevant to environmental impacts that would substantially change the analysis in the existing NEPA documents have been identified; therefore, no further analysis is provided in the EA beyond what was published in the 2024 Final SEIS (see Appendix A) and 2020 Final EIS (see Appendix B).

## CHAPTER 4 CONSULTATION AND COORDINATION

### 4.1 Endangered Species Act Section 7 Consultation

Section 7(a)(2) of the ESA requires that each Federal agency ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat. If an action agency determines a proposed action may affect listed species or designated critical habitat, consultation between that agency and the FWS is required under Section 7 of the ESA.

The BLM is in the process of completing a formal consultation with the FWS under Section 7 of the ESA regarding the potential impacts of the proposed ROW. The BLM submitted a Biological Assessment to the FWS to initiate the formal Section 7 consultation process in October 2025. The BLM will not sign a decision until the formal Section 7 consultation is complete.

### 4.2 Tribal Consultation

Federal law requires the BLM to consult with American Indian Tribes during the planning and NEPA process. On September 26, 2025, the BLM initiated government-to-government consultations with 14 American Indian Tribes and Bands that claim affiliation to southwestern Utah, as listed in Table 1. Tribal consultations will be ongoing throughout this planning and NEPA process.

Table 1. American Indian Tribes Invited to Participate in Government-to-Government Consultation

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

### 4.3 National Historic Preservation Act Section 106 Consultation

Section 106 consultations on the Northern Corridor project were initiated in 2020 and continued during the preparation of the 2024 Final SEIS. Section 4.2.2 of the 2024 Final SEIS summarizes the Section 106 process and includes a timeline of the consultations and the dates when concurrence was received from the Utah State Historic Preservation Office (SHPO).

To resolve potential adverse effects to historic properties that could result from BLM's decision related to the Northern Corridor highway alternatives, the agency consulted with the Utah SHPO, culturally affiliated Indian Tribes, other Federal and State agencies with involvement in the undertaking, representatives of local governments, the project proponent, and organizations and individuals with a demonstrated interest in the undertaking.

A Programmatic Agreement (PA) was developed and finalized in 2024 and was included as Appendix G in the 2024 Final SEIS. Amendments including minor updates to the language of the Final PA are being made to ensure alignment with the reassessment of the ROW application

through this EA. The amended PA will be executed between the BLM and Utah SHPO, with UDOT and Utah State Trust Lands Administration as Invited Signatories, and the Paiute Indian Tribe of Utah, Shivwits Band of Paiute, Utah Public Lands Policy Coordinating Office, Washington County, City of St. George, and Conserve Southwest Utah as Concurring Parties. The stipulations of the PA will remain unchanged for each of the ROW alternatives.