

## Appendix D

# Public Comments On 2015-2040 Regional Transportation Plan (May 2015)

## General Comments Received

Gary Zabriskie

The plan looks like it covers all facets of transportation in the MPO area.

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Bryan Thiriot

Recommend that the MPO and St. George City consider an additional I-15 Freeway Interchange at 700 South in St. George. In addition to reducing traffic at Exit's 6 and 8 in St. George City and reducing traffic congestion on surface streets, the traffic feature would also create a quicker and more efficient emergency route to the Dixie Regional Medical Center on River Road and 700 South.

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## MPO Response to I-15 Interchange at 700 South, St. George

Traffic volumes on the planned transportation system through 2040 do not show a capacity need for an additional freeway interchange at 700 South in St. George within the current traffic demand model – which is based on forecasts of population growth and future land-use calculations. However, further analysis of this solution may be appropriate as the project “700 South, Widen from 700 East to Bluff St.” is considered during Phase I of this long-range plan. Further analysis may also be warranted as this Regional Transportation Plan is updated in 2019 to include growth forecasts through 2050.

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## Toquerville Bypass Comments Received

David Pope

The Toquerville bypass project needs to be moved up on the plan. There is safety issues with having tourist traffic and semi's going through the small main highway is dangerous. There have been several deadly accidents in the area between the post office and Diamond G Ranch. There are many blind areas on that stretch of road that make it dangerous for vehicles to pull out on the main highway. A bypass road would reduce traffic significantly through the town, and prevent many future accidents in the area. For emergency

management concerns, having a bypass will give the town alternate evacuation routes that will prevent a bottleneck scenario.

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Sandy Cordova

I am a resident of Toquerville and have been for 36 years. I live on the Toquerville blvd and feel the need to express to you the need for this bypass route. In the 16 years that I have lived on the boulevard there has been several things that have concerned me. There is a LOT of traffic that rolls through on this small city road. Because of the heavy amounts of traffic I have put up a fence to keep my children and animals safe. Diesels come barreling through town and shake my windows as they shift down to slow down, sometimes not even slowing down. People from out of town take their time coming up the twist from LaVerkin then speed through town to get to the highway. This is a regular occurrence... being slowed by the Zion traffic between LaVerkin and Toquerville then being left in their dust as they hit the boulevard and speed through town.

I know that there is a bypass route located #48 on Phase two of the plans, but would like to ask that it be moved forward to phase one. Last night was a great example of the dangers of having all of this traffic forced through our small neighborhood. The police were chasing a car, bumping him left and right with helicopter flying closely above. The car was all over the road and went up into someone's lot (two doors down) before the police rammed him into the side of the bridge. Had this bypass route been there this chase would've likely been taken down this route away from the residents keeping us and our children safe. There are a lot of questionable people that ride through SR-9, I'm sure you are aware. Keeping them off of our boulevard will not only keep us safe but it will help us to keep our home-town feel.

Scenic drivers are welcome! Come on in and see how beautiful Toquerville is, but please keep the diesels, excess Zion traffic, drug smugglers, and craziness out of town. Thank you for considering the urgency of this.

Sandy Cordova

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[Clarissa Chamberlain Nuckles](#)

I'm writing to you concerning the Toquerville Bypass road. As someone who grew up in Toquerillve, on Toquer Blvd, and hopes to move back and raise my own family there someday, it is of the utmost importance to me and my family that the bypass be moved up to as soon as possible. I've always felt that way, but after last night's incident (the high-speed chase that ended on Toquerville Blvd), I felt the need to share my opinion. I really appreciate everything you do to keep our county looking and functioning so well. Please do what you can to move up this project and make it happen as soon as possible so that we can stop worrying about our children playing in the front yard so much because of fast cars, traffic, and so many strangers brought to town on the road.

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Katrina Lantz

Please place a high priority on completing the Toquerville bypass road. Yesterday a high speed police chase that began in Kanab ended with a crash through our town. A bypass road would help the citizens so much by cutting down the noise and danger to pedestrians of huge semi trucks, charter buses, and trailers that regularly zip through our main street. The sooner, the safer! Thank you!  
Let's get the traffic off our little city road!

All my best,

Katrina Lantz  
280 N. Hillside Dr.  
Toquerville, UT 84774  
805-279-8221

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[Jennifer](#)

Dear Myron Lee, Dixie MPO:

Please place a high priority on completing the Toquerville bypass road. Yesterday a high speed police chase that began in Kanab ended with a crash through our town. A bypass road would help the citizens so much by cutting down the noise and danger to pedestrians of huge semi trucks, charter buses, and trailers that regularly zip through our main street. The sooner, the safer!

Thank you!

Let's get the traffic off our little city road!

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[Kay Chamberlain](#)

The members of the community of Toquerville would like to see the SR-17--Toquerville Bypass project moved to a Phase one project. With the visitation to Zion Park increasing rapidly every year, the traffic through Toquerville is becoming more and hazardous, with most cars traveling 45-50 mph in a residential neighborhood. Even more annoying is the noise. Residents cannot even hear each other's speech, during summer months, while outside or with the windows open in our homes. The safety is a concern for not only children, but adults crossing the street. Please make it a priority!!

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Karlene Young

We would sure like to see a bypass road in Toquerville sooner than 10-20 years. This is a small town and the steady stream of tourists and large trucks are unbearable. We had a high speed chase end here last night! Please help us get the main stream of traffic off of our Main Street.

Sincerely,

Karlene Young

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Waren S. Wright

I expect you folk are doing the best job you can under the circumstances. Planning for transportation is always playing catch-up, and funding for such always a black hole. It is very difficult to do the sensible thing (especially here in Utah it seems), when the making of money and desire of prestige is always first and foremost with those of influence.

The only thing I have to suggest (and have been harping on for the past 15 years), is for the State of Utah, and particularly her in Washington County, is to stop priming the Growth/Promotion Pump and inviting the world to move here. A reduction in a 2% annual population increase would make a world of difference in dealing with these problems. I ask you, why do you want Utah and (where I live), the St. George Metro-area, to grow faster than it needs to? That always falls on deaf ears I know!

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Renee Garner

Toquerville has planned and worked toward the construction of a by-pass road west of city center for more than ten years. The city has contracted easements from most or all of the property owners involved so the process will be a painless as possible. Five Counties did an independent study on the concept just a year or two ago and estimated the cost would be less than the planned road expansion of SR-17. It would be a matter of transferring the expenditure of funds from one Utah Department of Transportation entity to another rather than a large new cost to be managed.

Toquerville greatly needs this by-pass road sooner rather than later. The Water Conservancy District is making plans for a reservoir here. We are hoping for some possible commercial development and growth in conjunction with that. The by-pass road is the center piece of our commercial development plan.

Please consider the benefit this would have on the area as Toquerville is the northern gateway road to Zion Park.

Thank you,  
Renee Garner

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Jeanie

The Toquerville bypass is urgently needed. It's heavily trafficked and the cars just speed by. It's a real safety issue. There is no safe way to cross this street. It's a real danger for everyone, people and animals included. I've personally witnessed children nearly being run over. It's terrifying! We live on the blvd. and the noise level is deafening. We literally can not be in the front yard and hear each other talk because of all the traffic. Our windows rattle when the big trucks whiz by. We thought it was bad windows so we replaced them all

and they still rattle! It's just not safe. I hope you consider building the bypass sooner than later.

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Jeff and Shay Meyers

We are responding to the Toquerville bypass plan that is on the future agenda for the transportation needs of Washington County. As a resident of Toquerville I am in favor of moving the bypass plan along as quickly as possible. We are owners of a historic pioneer home on the Boulevard in Toquerville where we reside. The heavy truck traffic and traffic flow in general takes a tremendous toll on the historic structures of our community. Our home, as well as many others, is built of adobe and rock. The vibration that occurs from the traffic erodes the mortar that holds these homes together. We have had to reface the outside of our home twice because of the cracks that occur. We are excited to know that there is a better option for traffic flow and home preservation. We hope that the bypass project will be considered for approval sooner than later to preserve these historic homes. It will also provide a safer environment for the children that walk to the bus stops along this busy highway.

Thank you for your consideration.

Sincerely,

Jeff and Shay Meyers

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[Randy and Jane Scott](#)

Re: Toquerville Bypass

Toquerville residents have wanted a bypass for years, in fact, they've been talking about it for the past 45 years. As residents living just one house down the block off Toquer Blvd. for the past 27 years, we can attest to the traffic noise, and also to the concerns we have for people crossing the street- especially children and the elderly. Can you imagine cars, trucks and semi-trucks loaded up barreling down your neighborhood street at 40 mph? Even though the city fathers years ago made the decision to have the highway run through town, the times have definitely changed, with millions of cars traveling to and from Zion National Park and other destinations. We are a main road to Zion from the north via I-15. These travelers and other commuters and commercial vehicles would appreciate not having to slow down to go through town, and it would be much faster for them. We hope that you will choose to speed up the time frame for this project.

Thank you.

Randy and Jane Scott

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[David Pope](#)

The Toquerville bypass project needs to be moved up on the plan. There is safety issues with having tourist traffic and semi's going through the small main highway is dangerous. There have been several deadly accidents in the area between the post office and Diamond G Ranch. There are many blind areas on that stretch of road that make it dangerous for vehicles to pull out on the main highway. A bypass road would reduce traffic significantly through the town, and prevent many future accidents in the area. For emergency management concerns, having a bypass will give the town alternate evacuation routes that will prevent a bottleneck scenario.

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## Phone Calls Received

The following individuals called during the public comment period of the Long-Range Plan to express their support for moving the Toquerville bypass project from Phase 2 to Phase 1 of the Plan:

- Marian Bates
- Leanne Bates
- Ester Dehart
- Ray McQuivy
- Alex Chamberlain
- Shea Meyers
- Tammy Young
- Linda Olves
- Lynn Olves
- Willis'
- Kay Chamberlin
- Heather Crochet
- Morgan Jensen
- Polk Family
- Kim Robins

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## MPO Response to Toquerville Bypass Comments

The Toquerville Bypass Road is currently listed on the Toquerville City Master Transportation Plan as an alternate route to the current State Route 17 that connects Interstate Highway 15 through Toquerville to LaVerkin City and eventually Zion National Park. Both Toquerville City and the Utah Department of Transportation (UDOT) are aware of the safety and economic development benefits of a bypass noted in the comments above. Toquerville City is actively acquiring rights-of-way to build the bypass. And UDOT has expressed a willingness to do a jurisdictional transfer (trade) of State Route 17 for a bypass road, once that road is built (directing traffic away from the rural section of Toquerville).

The Dixie MPO Long-Range Plan primarily examines transportation capacity issues. A capacity analysis based on the MPO's Travel Demand Model indicates a current traffic volume of 5,700 vehicles per day on State Route 17, with an expected 14,700 vehicles per day by 2040 – indicating that a capacity project will be needed at some point in Phase 2 of the Long Range Plan.

As the need for maintenance or reconstruction/widening of SR-17 approaches, and as the City continues to obtain and preserve rights-of-way for the bypass, Toquerville City and UDOT are encouraged to closely coordinate their respective plans to find mutually beneficial solutions. Since neither entity has sufficient financial resources to accelerate the project from Phase 2 (2025-2034) of the Long Range Plan to Phase 1 (2015-2024) based solely on a "capacity" need, opportunities should also be sought to identify "safety" or "economic development" funds that may be available for that purpose. Those funding mechanisms are not identified in this plan.

## Comments Received from Lisa Rutherford

### Dixie MPO 2015-2040 Draft Regional Transportation Plan Public Comment Lisa Rutherford, Ivins, Utah

As a citizen who attempts to study transportation issues in our area, I have reviewed the extensive 70-page plan and offer the following comments for the public record. First, let me say that Dixie MPO has put together a lot of information and has provided a fairly comprehensive document with much for citizens to consider and digest. The draft plan seems to cover the relevant points of concern to a citizen such as myself but in some cases left me with more questions than answers. Here are my main concerns that I will provide more on in my comments:

- The plan does not put enough focus on public transportation although it references the importance of public transportation for a sustainable future several times.
- The plan lacks specifics on traffic accidents - specifics that citizens need to understand our current situation. Figures provided don't make sense.
- Network Vehicle Delay does not provide enough information to citizens to know what improvements have been achieved with the road work already done in our area.
- Population numbers used in this plan to justify future traffic projections do not jibe with population figures in other studies including the earlier Horrocks 2011 study.
- Washington County major growth areas south of I-15 make expensive highway projects to the north questionable, particularly when earlier studies (Washington Parkway Cost/Benefit Study) indicate they will not relieve congestion very much on main arteries.
- Cost/benefit information for the "build scenario" does not provide enough detail for citizens to understand if the process was objective.
- The plan lacks adequate details about possible funding options for public transportation - information that is readily available in other studies and could have been included in the current draft plan in greater detail for citizens' benefit.
- Not enough work is being done to deal with potential air quality issues (e.g., ozone) in our county.
- The plan fails to prove that planned road projects will achieve desired results.
- Public process may be flawed by transportation entities being more focused on achieving their plans than listening to citizens' concerns.

The 2015-2040 plan references the 2006-2008 Vision Dixie process – a countywide public planning process in which approximately 3,000 citizens participated. The plan even states clearly the Vision Dixie transportation principle: Build balanced transportation that includes a system of public transportation, connected roads, and meaningful opportunities to bike and walk. I applaud Dixie MPO's effort to highlight Vision Dixie, but as I read the plan I kept asking one question. If a system of public transportation is listed first in the Vision Dixie principle, why does it seem to end up last on the list of topics when it comes to getting real results and get little attention in the draft report? We see lots of road construction but not much with regard to public transportation other than Ivins recently coming on board with a SunTran route. Several studies have been done over the past five years, so you and others in the transportation field get credit for that. I think that Dixie MPO wants to do what's right by Vision Dixie for our future needs, but perhaps too much pressure is on them by local leaders and citizens to focus on the other transportation areas: roads, biking, walking. In fact, the plan clearly states: "Thus, while auto use will continue to be dominant, roads will not be able to meet all our mobility needs decades into the future. Public transportation is especially important to keep us from being overwhelmed by gridlock."

I plan to address the public transportation issue in some detail because I feel it's so very important for the future of our area given the challenges we face in an area with geological beauty that draws visitors and new

residents but also constrains roads. First, let's consider some of the information pertaining to our current traffic situation and the 2015-2040 plans for dealing with and, if not correcting, at least alleviating the problems.

"For this plan, the total vehicle hours were compared on the entire transportation system in the model year 2040 in both the build (meaning all potential projects have been constructed) and no-build (meaning no potential projects have been constructed) scenarios." DixieMPO's CUBE modeling platform, used to analyze future traffic demand to project future congestion based on "Network Vehicle Delay," compared the "...total network travel time per day in the no-build scenario where current capacities are maintained but not expanded. This is compared to the 10,500 vehicle hours if all the projects are built. Thus the build scenario represents a total savings of 34,500 hours per day leading up to and beyond 2040." The plan provides much more detail on this but this is it in a nutshell. It does not compare the vehicle hours prior to road work I've witnessed over my 15 years in Washington County, so we have no way of knowing what goals have been achieved in that regard. As taxpayers, it would be nice to know if we're getting some results from all the money we've poured into UDOT over the past. We should also remember that these are just models based on future population projections, which, by the way have been all over the place based on past population projections. The earlier Horrocks study utilized a population projection of approximately 550,000 by 2040. The 5 County Association of Governments' 2012 projection for Washington County's 2040 population is 371,743 (same as the 2015-2040 plan) – 178,257 less than the Horrocks study. How reliable are the study's traffic projections at this point? The Horrocks study and the draft transportation plan currently under review show the majority of the future growth – however much that might be – occurring south of I-15 not in the northern part of our county.

The draft plan references an analysis completed by Cambridge Systematics. That analysis shows contributing factors in severe and fatal crashes in Washington County which include "multiple vehicles." However, factors on a plan chart provided by UDOT (Figure 4) make no reference to "multiple vehicle" crashes but include such factors as single vehicle, roadway geometry, roadway departure, overturn rollover, intersection related, speed related, motorcycle involved, older driver involved, teenage driver involved, DUI, distracted driving, adverse weather, etc. Nowhere is a "total" number of crashes shown on Figure 4 or in the associated text. 163 "single vehicle" crashes is the highest figure. The UDOT chart makes no reference to "multiple vehicle" crashes. With no crash "total" provided, we cannot know the number of "multiple vehicle" crashes and are left to wonder what the number is. There's also no way to know how these different factors relate since that level of detail is not provided. When all the crashes on the chart are added together, the total number of crashes comes to 1139, but that total includes all "single vehicle" as well as other categories related to those incidents such as "single vehicle, DUI," I assume. As I reviewed the chart and the accompanying information which seemed lacking in necessary detail, I began to wonder:

How many of the single vehicle crashes involved older drivers?

How many of the roadway departure crashes involved impaired driving versus improper use of safety equipment?

How many of the single vehicle crashed involved young drivers?

The information provided not only omitted information (multiple vehicle crashes) but also left many unanswered questions.

Additionally, the map that shows serious and fatal accidents does not provide enough detail to citizens to determine if the tax money used for new and completed road work has either helped or not helped with overall accident numbers. The crash chart covers 2010-2014 and a lot of work has been done during that time, but what were the crash patterns and numbers before then. Are we getting the bang for our buck that we should as taxpayers? It's true that with growth we will see an increase in overall numbers as the plan notes, but there should be some improvement that can be clearly quantified.

Interestingly, although aggressive driving and speeding are seen as increasing problems by both drivers and law enforcement, only 60 speed-related crashes are shown on the chart. Since we don't know what the total number of crashes really is, it's difficult to evaluate this figure. It also makes me wonder because I see very few people ever driving the speed limit. If the posted speed is 40, then people drive 45 to 55 or more. So it's difficult to believe that more crashes are not speed related.

Aggressive driving crashes numbered 11 on the UDOT chart, which is interesting since the plan states that "The Surface Transportation Policy Project estimated that aggressive actions contributed to 56 percent of all fatal crashes." Given the 11 crashes noted, we are way below that 56 percent, but given what is being witnessed nationally, this warrants attention by law enforcement. Defining "aggressive driving" is part of the problem. If more people drive that way, it may not be considered aggressive in the future? Who knows?

There are some suggestions made about how to prevent accidents such as "keep vehicles from encroaching on the roadside" which makes me wonder about Red Hills Parkway which was expanded a few years ago but where people park alongside the road even with available nearby parking possibly because those who park in the south parking lots would risk their lives crossing the road where speeds reach 45-50 on the 40-mph posted road. There seems to be a disconnect between what Dixie MPO advises and what's actually being done.

The plan provides an extensive list of objectives and strategies for dealing with the causes of crashes. Most seem reasonable and are achievable "physical" fixes, but all will come with costs even on existing roads. Some, however, will be more challenging such as: "Deter aggressive driving in specific populations, including those with a history of such behavior, and at specific locations." They have a few ideas listed to achieve the goal of stopping aggressive driving, but from what I've witnessed no matter how "convenient" they make streets for drivers, there are those who will feel it's just not fast or convenient enough.

As for dealing with aging drivers, several objectives and strategies are listed but public transportation is not on the list. As a person who will be 68 this year, I wonder how many more years I will want to drive and what my options will be then. If a good public transportation system were available that could get me from Ivins out to Springdale and Zion Park, what a better option that would be than trying to drive that hour-long drive. Many others may feel the same. Seniors are included in "transit dependent populations" according to the 2010 Hurricane to Zion Canyon Transit Study. Traditional fixed-route transit systems may need some additional paratransit service to get some more elderly or disabled citizens to pick up points, but our area already has paratransit services that may be able to support this effort. Again, public transportation could serve an important role in our community with a high number of aging citizens.

The plan includes a "Cost Benefit Analysis" table showing the total time saved in hours with the build scenario, assuming two scenarios which incorporate an hourly delay cost of \$20 and of \$30. According to their cost-benefit calculations, both show a positive ratio over 1.0 with - 1.87 and 2.80, respectively. Cost-benefit analysis has become the darling of project justification over many years, but according to easy-to-access online studies and articles the process can be flawed. One notes there is no algorithm to tell us what should count as a cost or a benefit making for a subjective process rather than objective. In fact, a study from San Jose State University Department of Economics notes that care must be taken to not double count the benefits. In an effort to support the need for these projects, has that been done?

In summary, given the vehicle load challenges facing Washington County with projected growth and the plan's earlier statement that road building will not solve our transportation problems, it's appropriate to look at the mass public transportation and work to understand how that might help relieve congestion and provide options for drivers and those who are unable to drive to move around Washington County. Whether one uses it or not, public transportation would provide overall benefits for all in Washington

County.

There have been efforts in the past few years to move along with better public transportation in Washington County, but it's been a slow, grinding process that seems to have lacked real public and political support. The Dixie MPO Regional Transit Study was done in 2012. Prior to 2012 the Hurricane to Zion Canyon Transit Study was completed in 2010 and the Coordinated Human Services Transit Plan followed in 2013. The current plan under review and out for public comment does address public transportation but not to the level of the other reports just noted. In fact, out of seventy pages, the plan allots a mere two pages to public transportation with some minor references scattered here and there.

The 2012 Dixie MPO Regional Transit Study states, "The purpose of this study was to evaluate the governance and funding options available to the Dixie region as it seeks to expand and diversify transit service." The study evaluated several funding options that might help to enlarge the current system provided by SunTran and operated by the City of St. George and, at that time, limited to its boundaries. As noted, the system was recently extended to include Ivins City this year. The 2012 study notes an expansion will require additional funding but the plan states that "Existing federal formula funding is available and may go unused unless additional local match funding can be generated. Additional local funding could be contributed by outlying jurisdictions – such as Ivins, Santa Clara and Washington – as transit is extended into their respective communities." The plan now under review notes that, "...the first phase is currently being implemented through inter-local agreements in Ivins, with the initial phases of such agreements occurring in Washington City and the Hurricane/Zion Corridor. The Dixie MPO Transportation Executive Committee (DTEC) has officially endorsed the financial assumption that ¼% sales tax will be implemented by 2020. This assumption is contingent upon public support. The Dixie MPO will support the region's communities as they plan for improved regional transit service." The 2012 study noted, "...with SunTran's existing governance these jurisdictions would have limited decision-making power over the level of transit service in their communities. Therefore, many officials and stakeholders have expressed interest in the consideration of a new governance and funding structure for operating regional public transportation." Although no specifics are provided, perhaps these new inter-local agreements will help to iron out some of the prior governance deficiencies and will make other cities more willing to participate since the governance structure did not facilitate shared decision making. If other jurisdictions provide funding for transit they should surely have some decision-making power concerning the level of service for their communities

Although not under review at this time, I reference the 2012 Dixie MPO Regional Transit because it is unfortunate that the information in that study seems to have been lost in this new plan under review. Dixie MPO's earlier study provided comparison information between six different areas that provide public transportation and much more detail concerning possible funding options. The current plan under review prefers to say "here's the problem" and "here are the roads we plan to build to deal with the problem" while admitting openly that more roads will not solve our problems.

To help identify possible funding, six areas were studied for the 2012 transit report and included California, Arizona, Idaho, Colorado, Montana and Utah's existing transit system. These were compared to the existing St. George SunTran system. The time period studied was 2000-2010. Many of the areas studied had smaller population growth over the study period than St. George, while spending more on their public transportation and moving more people on their existing roads. The urbanized area populations studied ranged from 57,000 to just over 200,000 compared to St. George's nearly 63,000 at that time. 8.11 to 24.07 annual riders per capita were moved by the various areas studied compared to SunTran's 5.46 annual riders per capita. Total riders ranged from 555,550 to 2,074,580 compared to SunTran's 342,154. 2010 budgets ranged from \$2.5-\$9.8 in the areas reviewed versus SunTran's \$1 million. Three of the studied systems for towns of similar size to St. George provided significant local dedicated funds.

In fact, Table 2-3 in the 2012 study shows that the transit systems studied were able to fully leverage their 5307 funds ([http://www.fta.dot.gov/grants/13093\\_3561.html](http://www.fta.dot.gov/grants/13093_3561.html)) doing so through various local, state and other sources while also leveraging additional federal funds. The earlier study notes that Utah has several dedicated taxing options to fund a regional transit service. Additionally, several options exist for local governments to raise revenue. Communities along the Wasatch Front have used several tax options to generate revenue for public transportation and transit systems. The average for all taxing entities in Washington County for the 2012 study was 6.16% with an average of 6.07% if Springdale is excluded due to their 1.60% Resort Community tax. The average sales and use taxes for all State of Utah taxing agencies was 6.4%. Communities that assess Mass Transit (MT) (Utah Code §59-12-2213) and Additional Mass Transit taxes (MA) (Utah Code §59-12-2214) had an average combined tax rate with both MT and MA of 6.8%. If at that time, Ivins, Santa Clara, St. George and Washington City had initiated similar taxes, their respective tax rates would have reached the 6.8% level.

The 2012 study recommends the MA tax as an option for St. George to help fund public transit and is the recommended option for long-term transit funding of a transit system, but the study clearly states:

“While the MA tax is also an option for St. George to assist in funding public transit, it is recommended that this funding mechanism be reserved for the future as a dedicated funding source to assist in funding projects or services related to the airport.”

Given the need for public transit and the heartburn that many citizens still have over the St. George Airport and money spent there, is it wise to dedicate money to the St. George Airport when that money could be used for more necessary public transit, which to date has been overlooked, given what many other communities have achieved?

The 2012 study does list several other funding options in addition to the Mass Transit and Additional Mass Transit taxes:

- Mass Transit Fixed Guideways Tax (MF) (§59-12-2216): County Option including cities and towns
- County Option Transportation (CT) (§59-12-2217): County Option including cities and towns
- County Airport, highway, Public Transit (HH) (§59-12-2218): A portion of this tax could be dedicated to fund a regional transit system. It is currently in place and does not require voter approval or an additional tax increase.

The 2012 study makes it clear that as “...transit service expands and becomes regional, a dedicated revenue and funding source is mandatory.” It is advised that of the options available a combined Mass Transit Tax and Additional Mass Transit Tax, authorized under Utah Code §59-12, seems the most viable option, but both taxes may not be necessary depending on the size and type of service. Apparently, the Highway Tax currently imposed by potential participating cities was, at the time, earmarked for other projects and, hence, not helpful.

There is more in the 2012 study regarding taxes that might be used and many of the potential participating entities already assess these taxes. It's clear from the study that short-term, interim funding options will be essential to taking full advantage of federal funding and extending services. Many of the funding options presented in the 2012 report are already being assessed by the potential participating entities. Allocation of the tax money for public transit would be needed. In addition to the aforementioned taxes, a long list of tourism taxes were presented. Many are existing taxes so there would be no tax increase, but a discussion of re-prioritizing public service needs would be required. Given the demands and benefits that tourism brings to our county and the need for low-income service workers tourism generates, it seems reasonable that some of these funds should be re-prioritized for this purpose. Additionally, other areas studied

generate funding through contracts with local colleges and/or university and some minor funding through sponsorships and service agreements.

There is one source for funding capital improvements called the Permanent Community Impact Fund Board (CIB) program. This program provides low interest loans and/or grants to state agencies and state subdivisions for public facility funding. A Capital Improvements List at the county level is maintained and projects must be on the list to be eligible, unless there's a qualified emergency need. Regional transit system projects could be added each year.

The U.S. Department of Transportation, Federal Transit Administration (FTA) at the time of the report (2012) sponsored two types of grant programs: Formula Grant Programs and Discretionary Grant Programs (<http://www.fta.dot.gov/grants/13093.html>). It appears that these may have expired in 2012 and would not apply to new projects. It's unfortunate that advantage was not taken prior to 2012. Projects already in the system apparently still receive funds.

Alternative financing options for capital projects include: general obligation bonds, lease revenue bonds and sales tax revenue bonds. Tax Increment Financing (TIF) or Special Assessment Areas is also available for a regional transportation system.

Section 4.6 of the study "Most Promising Funding Sources" notes the following for short-term and long-term funding strategies.

For short-term funding the following are suggested:

- The Highway Tax (HT) §59-12-2215 can be used for the construction and maintenance of highways and to fund a system for public transit.
- Class B & C Road funds can be used for roadway improvements and appurtenances, which may include planning for public transit impacts.
- Interested Cities may fund transit services in the short-term through an appropriation of sales tax revenues from its general fund.
- Appropriation of Revenues Attributable to Growth: Another alternative to funding transit in the short-term consists of a combination of the above options with a contribution of a percentage of the funds only attributable to growth.

For long-term funding the study recommends a Dedicated Transit Oriented Tax.

It's clear from the 2012 study and others that much has been done to identify problems and solutions regarding the mass transit issue and much ground work has been established. What seems lacking is the real will to make it happen. The draft plan under review does citizens a disservice by not providing details of these earlier studies for citizens to consider.

While considering the costs of a public transportation system and funding options, it's important to recognize the real demand. The Southwest Utah Coordinated Human Service Public Transportation Plan of 2013 provides much information to support the need. The plan's purpose was to identify the target population and strategies to meet the needs and coordinate available and potential resources. The target population includes seniors, people with disabilities, and low income individuals, many with limited mobility and special transportation needs.

First on the plan's list of six options was a fixed-route transportation system. Currently a majority of mobility-limited individuals in our county rely on family or friends to meet nearly all their transportation needs. Some feel compelled to drive even if they feel it's unsafe to do so. Services do exist to assist with

this mobility-limited population but the system is somewhat disjointed. Schedules and eligibility requirements for using services can be very confusing. Some operate during unpredictable times which creates difficulties for those planning a trip. Additionally, due to limited service area, systems are unable to meet transportation needs of the majority in the region. It's important to note that a Department of Workforce Service (DWS) representative has pointed out that many low income individuals cannot get to a job due to lack of transportation services. What cost to our community's economy results? Even if individuals can get to work via friends and family, low to moderate wages often make owning and operating a vehicle prohibitive.

Several surveys have been done to determine how to best serve this sub-set of our Washington County community. A SunTran on-board survey revealed that work was the most common destination. A significant number of respondents indicated that they were travelling to school, shopping, social, medical, and other destinations. The majority of SunTran survey respondents who utilize Dixie Care-and-Share services saw expansion of routes as the most important bus improvement for them. Expansion of the service area is seen as essential and the study recommended the development of inter-local agreements with adjacent communities before pursuing the establishment of a regional transit district or authority.

One particularly interesting and fairly consistent finding in the surveys is that current SunTran users would like transportation to expand to Walmart. This raises a question for me regarding funding. If "sponsorship" has been a source of funding in other areas studies, what opportunities are there for partnering with Walmart to help with system expansion? If, indeed, Walmart would stand to generate additional revenue by having more customers added, should they be approached about helping to make this expansion possible? The Walmart Foundation giving may exclude such arrangements but shouldn't they at least be approached (<http://foundation.walmart.com/>)? It seems we should leave no stone unturned.

The 2013 plan notes, as did the 2012 report, that leveraging federal funds is critical to doing more with less. Given that some of the federal money that was available then may not be available now, what have the roadblocks been to moving more quickly on getting some of this money? The 2013 plan also notes that more frequent communication with county commissioners and other local officials is needed. Has this been a big part of the hold up? I do know that Hurricane's Mayor Bramall is a huge proponent of public transportation and has been a force over the last year or so for stepping up the discussion. If others in our leadership community are not willing to get on board, however, Mayor Bramall cannot do it alone. Having been in the nursing home business, Mayor Bramall recognizes and has stated often, and I paraphrase: None of us knows when we may be disabled but we all know we will get old unless we face death early. Given that, how many of us may at some time in the future wish this area had planned better for effective mass transit?

#### AIR QUALITY

A good deal of the 2015-2040 Draft Regional Transportation Plan deals with air quality issues. This is a good thing, but points to the fact that as Washington County grows, if poor decisions are made, we will very likely be dealing with some very serious issues. Although the plan provides some focus on air quality, there seems to be quite a bit of contradiction between what the plan says and what DixieMPO really does.

Washington County is not regulated by the EPA or Utah Division of Air Quality (DAQ) because it's currently considered an attainment area under the Clean Air Act. However, already there are concerns by the National Parks Conservation Association about air quality and haze affecting Zion Park and summer ozone is the primary cause of pollution in our area. Formed when volatile organic compounds (VOCs) and nitrogen oxides (NOx) mix with sunlight and heat, ozone can lead to shortness of breath, chest pains and lung inflammation. With the high numbers of retired seniors already here and still flocking to our area, what health challenges – and costs! – will they face if this is not resolved by proper transportation planning? With ozone being a mix of chemicals, many coming from tailpipes, increased numbers of cars, if emissions

are not improved considerably, will exacerbate the problem. With St. George recently eliminated from AARP's list of "10 most affordable" retirement locations, perhaps the steady flow of seniors will abate, but our transportation planning should not rest on that assumption when it comes to air quality. Public transportation which would help serve the transportation needs of our seniors would also help their health by eliminating extra vehicles on our roads which cause ozone creation.

Health concerns are not the only problem we might face. If Washington County were to become a non-attainment area for pollutants, federally funded improvements to transportation systems might be restricted. Resulting additional regulatory actions would add to the cost of doing business and planning/implementing projects. The draft report indicates that the Division of Air Quality and the Department of Environmental Quality have offered help to avoid potential problems. The Dixie Transportation Advisory Committee or "DTAC" agreed to draft a protection plan and conduct a locally funded short term ozone study, but a review of many meeting minutes in 2011, 2012, 2013, 2014 and early 2015 shows no reference to such an activity. Minutes I've reviewed show that the focus continues to be on bike and walking trails and roads.

The transportation plan under review states that Dixie MPO's DTAC worked with SECOR, an air quality-engineering firm to monitor ozone levels. A study I was able to locate at [http://www.airquality.utah.gov/Public-Interest/Current-Issues/Ozone/2012\\_Utah\\_Ozone\\_Study.pdf](http://www.airquality.utah.gov/Public-Interest/Current-Issues/Ozone/2012_Utah_Ozone_Study.pdf), dated January 2013, revealed eighteen monitoring sites; one named Badger Springs was located at the foothills of Beaver Dam Wash Mountains. Ozone exceeded 75 ppb at Badger Springs on ten days, making it one of the highest ozone sites in Utah despite its remote location. Interestingly but perhaps not surprising, the February 2013 DTAC meeting minutes made no note of this study or the results.

The draft report clearly states, "...the potential for air quality problems, especially for Ozone, is real for Utah's Dixie." If true, why is not more effort being put into this? Apparently a multi-agency team is apparently being established according to the draft plan to develop a scope of work for DAQ's monitoring in Dixie. According to the DAQ's website monitoring information: "PM2.5 and PM10 monitoring at Hurricane (HC) started on January 1, 2014, in order to establish a 3-year baseline record of particulate levels in the St. George MSA." Other than this reference, the DAQ Annual Monitoring Plan for 2014 made no reference to Washington County of any significance. However, I have to say that the website is not a user-friendly website where citizens can get information easily, and the information is cryptic, to say the least, with most of it being numbers that only a person in their field would be able to decipher so perhaps I missed something. (<http://www.airmonitoring.utah.gov/network/AnnualMonitoringPlan2014.pdf>).

The current standard is 75 parts per billion (one which the SECOR study reveals was already being surpassed in 2013 at the Badger Spring/Beaver Dam Wash monitoring site), which is too weak to protect public health according to many in medical and religious communities across the nation, while political and business leaders argue that the new proposed standard in the range of 65-70 ppb would put undue demands on business and hurt economies and is too stringent. But here's an interesting thing; on March 4, 2015, Robert V. Percival spoke at the University of Utah's College of Law. His presentation was titled "Why America's Century-Old Quest for Clean Air May Usher in a New Era of Global Environmental Cooperation." He's been the principal author of the leading U.S. environmental law casebook, *Environmental Regulation: Law, Science & Policy* for more than two decades, has worldwide experience in the area of environmental law having lectured in 26 countries on six continents and currently works in China. One of Mr. Percival's main point was that although industry, trade groups and politicians argue that stricter enforcement of air standards will harm business' bottom line, past experience shows that "net benefits" result and economic growth continues. Example, cries of doom from the regulated auto industry were not realized; regulation was not the death knell for them.

Adding to the problem is that regional ozone levels found at several monitoring sites throughout the

southern Utah region – from the Four Corners area, into the Grand Canyon, Zion National Park, Washington County and Southern Nevada – show levels close to the new standard. The draft study plan states, “Efforts are being made by the DAQ and others to document these ozone transport relationships. Postponing empirical results may compromise community health standards and be against the operating values agreed to by DMPO partners.” DixieMPO should keep this in mind as you do your planning and not let political pressures drive decisions.

The plan offers eleven strategies for local government consideration and action. One references public transportation (Improve transit operations to provide more opportunities to leave vehicles at home) but it’s near the bottom of the list. The idea of auto emission checks is nowhere on the list.

## SPECIFIC PROJECTS

There are many specific projects listed in the draft report, too many to deal with here, but I will address two. One project – Bluff Street – affects many people currently and the other – Northern Corridor (aka Washington Parkway) – is a future project fraught with many obstacles and for good reason. In fact, these two projects are connected by virtue of the fact that the Northern Corridor/WP is justified as a means of relieving congestion on other main roads such as Bluff. Will that really happen is the question.

## BLUFF STREET

Bluff Street is a problem, but are the plans for dealing with it adequate or realistic? Are they based on good, sound information and data? A March 2012 letter to UDOT from local architect Richard Kohler (<http://www.kohler-architecture.com/Home.html>), also formerly involved in highway planning, challenged the idea that the Stakeholder Group meetings held to review this project for expanding the Bluff Street/Sunset Blvd intersection were useful but, rather, asserted that they were woefully inadequate. In fact, there’s even accusation that the information recorded from those meetings was “willfully distorted” in UDOT’s effort to argue their position most effectively. Three workgroup meetings were held with UDOT’s own presentations occupying a majority of the time. Additionally, documents that should have been “public” – specifically a “traffic comparisons” tabulation table document – were not accurate and apparently contained engineering design and evaluation errors. According to Mr. Kohler’s letter, this is an effort “to mislead the public by failing to disclose the ever-changing nature and uncertainty surrounding the moving target of the project’s future traffic capacity projections.”

Following 2012, Mr. Kohler and others, specifically a local businessman Gilbert Jennings who helped develop Sunset Corners, a business area at Bluff Street and Sunset Blvd, met with UDOT and others to further discuss the intersection options. Mr. Kohler, Mr. Jennings and business owners in the affected area have continued to work the issue with some good results. But, here is my concern. If UDOT, MPO and others are encouraging public involvement but perhaps don’t really even want input from someone with Mr. Kohler’s knowledgeable background, what does this say about their “public comment” efforts? As noted by Mr. Kohler, UDOT and others seem to choose to ignore traffic “fall off” that has occurred due to road projects that have already occurred and which make their earlier traffic projections suspect at this point. However, because UDOT is already so entrenched in these projects, they’ve been reluctant to pull back and re-evaluate at this point. Apparently, now, UDOT has put this project on hold for further discussion. Would this have happened had the people pushing for this change been Joe or Jane Blow rather than an influential businessman, Mr. Jennings, and Mr. Kohler, who is very persistent and knowledgeable?

Mr. Kohler’s letter and backup information support the idea of a roundabout at the Bluff Street/Sunset intersection as the most effective way of handling projected traffic at lower cost rather than the “fly over” and “jug handle” concepts proposed by UDOT. I do not specifically subscribe to his plan but have seen the effective use of roundabouts elsewhere, and if traffic can be moved at less cost, I am in favor.

Although the transportation plan under review talks about “hourly delay cost” and presents a 25-year cost

benefit analysis to justify the plan's projects, no discussion about the costs to businesses such as those in the Sunset Corners area affected by proposed intersection changes is presented. Is it a fair analysis to exclude these concerns? Also, I've seen many transportation plans offered over my fifteen years in Washington County and Bluff Street has been a topic on most of those. Why was a business center such as Sunset Corners given the go ahead for development if traffic concerns would be a challenge for them and their business visibility in the future? Were the developers given adequate information pertaining to future transportation plans to help them make their decision to build?

If UDOT and the MPO plan for excessive traffic volumes on Bluff Street (65,000 cars), well over what good engineering practice would predict according to Mr. Kohler, it would likely have a very negative impact on Bluff Street's current businesses. The investment capital that would normally be used to update and improve individual businesses along Bluff Street would disappear because the projected 65,000 cars a day can only be carried on a freeway, and freeways do not allow ready access to businesses. There's the possibility that the freeway-size road could create blight in this area.

My point in presenting this information is to question the "citizen" process. In this particular instance, as in other citizen processes I've witnessed locally, the effort seems to be to "convince" citizens of the preferred plan by the entity conducting the meeting rather than actually wanting to engage the public in meaningful discourse and sharing of ideas for planning purposes.

According to the draft plan's map showing "Traffic Congestion 2040 No-Build" scenario, Bluff Street's traffic congestion gets a "between .9-1.2" rating from I-15 to St. George Blvd. and an "above 1.2" rating from St. George Blvd to Sunset Blvd. Traffic congestion ratings range from "below .6" (best) to "above 1.2" (worst) on the plan's range scale. So, Bluff Street's ratings are at the high end in the No-Build scenario, but even after planned improvements and much money spent, Bluff Street is still not at the lowest end.

In the plan's "Traffic Congestion 2040 Build" scenario, Bluff Street's traffic congestion is "between .9-1.2" and "between .6-.9" for the areas between I-15 and Sunset Blvd. Nowhere does Bluff Street get the best rating of "below .6" so even with all the money spent on road improvements, there will be delays, and after 2040, with population growth, will future citizens be back in the same predicament we are today?

#### NORTHERN CORRIDOR (aka Washington Parkway)

This is a contentious project that would go through the Red Cliffs Desert Reserve (aka tortoise reserve). The project appears on the Dixie MPO "Project & Phasing 2015-2040 Phase One (2015-2024)" costing \$5 million just for environmental work. It then appears on the Phase Two (2025-2034) list costing \$47 million. The Red Cliffs Desert Reserve was established in the mid 90s along with the Habitat Conservation Plan (HCP) (up for renewal in 2016) to preserve the prime Mojave desert tortoise habitat area and allow development in areas outside the reserve. In 2009, an Omnibus Bill was passed by Congress that established the Red Cliffs NCA and gave direction for management, including provisions for a road. For the last several years the BLM has been reviewing and rewriting their Resource Management Plan (RMP) which is supposed to include several options for a road. Of course, the county really only desires one route, and that's the heart of the problem.

February 5, 2014 Five County Association of Governments meeting minutes provide some interesting details including information from a handout at the meeting from Utah's Senator Orrin Hatch dealing with the road. From the meeting minutes, the second paragraph in Senator Hatch's letter reads:

"Although the Law stated that there be at least one alternative and the current iteration of the draft does include one alternative, the law did not intend that the BLM include one alternative and then discard the idea of building the Northern Transportation Route (NTR). The law clearly intended that the NTR be built

and should, therefore, be included in all of the alternatives, or, at least, the preferred alternative.”

While Senator Hatch may have his take on what the law “intended” here is what is clearly stated in Section 1974 of the Law. The purpose of the NCA 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 each species that is located in the NCA and listed as a threatened or endangered species on the list of threatened species or the list of endangered species published under section 4(c)(1) of the ESP of 1973.” It's difficult to understand how a road through the heart of the reserve could live up to this although UDOT and Dixie MPO had a study conducted several years ago to help bolster their position. It seems obvious that a road through the reserve would result in more noise, more people, more garbage and – worst of all – more fire potential to decimate the tortoise population. So far the desert tortoise has not been listed as “endangered” and is still listed as “threatened.” It’s possible that the tortoise could be listed at “endangered” if someone or some group chose to do so, which might put additional restrictions on the area.

Section 1977 of the 2009 Omnibus Bill references the travel plan (part of the RMP) and the need to have the decision in "consultation with appropriate Federal agencies, State, tribal, and local government entities, and the public." According to the February 2014 meeting minutes, Dixie MPO and Washington County are very concerned about not being properly included in the BLM’s Resource Management Plan process. I hope that consultation with local government entities and the public will be more than just conferring with those in positions of power in our area since they all seem to be more concerned with moving traffic than with honoring the agreement (HCP) that created the area to protect the tortoises and other threatened and/or endangered species. In fact, it’s clearly stated in the February 2014 meeting minutes, “The County is working diligently to preserve the Northern Transportation Route to make sure that the road can be constructed sometime in the future.” However, average citizens may not be so taken with this idea.

A Spectrum poll conducted in 2009 asking citizens if a road should be built through the Reserve resulted in 30.9% voting yes, 64.4% voting no and 4.7% didn’t care. Although 447 respondents may not be a huge group, a 64.4% vote against the road in what’s viewed as a conservative paper in our area is meaningful. Most Spectrum polls don't seem to get more than a couple of hundred respondents.

As a citizen of Washington County and a believer that once an agreement is made it should be held to, I think it is very dishonorable of the county commissioners and other politicians to be pushing for a road that may essentially negate the Habitat Conservation Plan. Comments made by Washington County Commissioner Alan Gardner at the November 2009 HCAC meeting (<http://www.redcliffsdesertreserve.com/wp-content/uploads/2010/01/Minutes-HCAC-11-24-09-approved.pdf>) assert that St. George Mayor McArthur and Washington City’s mayor insisted on the preferred road route being included in the Omnibus lands bill or they would oppose the bill. This was fourteen years after they apparently agreed to the creation of the HCP.

It’s clear from the current Dixie MPO transportation plan’s population growth projections, employment location projections and previous studies that the proposed contentious Northern Corridor will not provide the congestion relief that some hope it would. It will, however, cost taxpayers and result in costly lawsuits given the details surrounding this project.

A 2011 report, Washington Parkway Cost/Benefit Study, conducted by Horrocks Engineering for DixieMPO indicated that of the six options studied for a corridor, “Option #3 provided the highest benefit relative to its cost with respect to traffic congestion relief. None of the options reduced traffic on Bluff St., St. George Blvd. and Red Cliffs Dr. to the point that congestion on these corridors was eliminated. However, Option #3 did show the largest overall trip reductions that would make them more manageable.”

Option 3 is the preferred route that appears on the 2015-2040 draft transportation plan under review. This project appears on the draft plan's Phase Two (2025-2034) list costing \$47 million. However, the 2011 Washington Parkway Cost/Benefit Study shows the preferred Option 3 costing \$56 million. So, apparently over these four years, the cost of the project has gone up? I find that difficult to believe.

As mentioned on page 1 of these comments, 2040 population projections according to a 2012 study are down 178,257 from an earlier Horrocks study and growth/employment projections focus on areas south of I-15. How reliable are the study's traffic projections at this point that warrant this road?

Plan charts are provided to support the fact that population and employment numbers are driving transportation projects, but when reviewed, the charts show that by far the majority of population growth and employment areas will be in the St. George, Washington and Hurricane areas of Washington County, south of I-15, which is nothing new given the growth already witnessed. The employment chart shows even more dramatically how future employment growth will be concentrated in these areas. There is some population growth in the Ivins, Santa Clara and Ledges area projected, but much less than the high-growth areas identified, which makes spending our money on the contentious and questionable Northern Corridor even more suspect.

As noted in the earlier section about the Bluff Street improvements, the 2040 No-Build versus the 2040 Build maps show no significant improvement with or without the Northern Corridor. With Mr. Kohler's assertions that traffic "fall off" has already occurred due to earlier projects, what additional fall off will result from all the other projects on the Dixie MPO list and eliminate the need for this road? I guess the main question I have is: Who are we building this road for and why are all taxpayers being asked to assume this cost?"

#### PUBLIC PROCESS

From the draft plan: "Moving forward, the MPO is committed to include public involvement initiatives in its decision-making efforts, to communicate public concerns to MPO voting members, and to educate the public on MPO deliberation, options, strategies, and plans of regional significance." I sincerely hope this is true. One thing kept recurring to me during my review of the draft plan: the need for increased attention to public transportation to help alleviate future congestion, maintain air quality and honor the promises made to protect our special areas while serving the needs of the most vulnerable and needy our community. In closing, here's something to think about:

*Back in the early part of the 20th Century, GM managed to eradicate streetcars from the landscape in their never-ending promotion of the motor car. Perhaps now is the time to get back on board with public transportation and give it the money needed to make it work.*

## MPO Response to Lisa Rutherford Comments

- The plan does not put enough focus on public transportation although it references the importance of public transportation for a sustainable future several times.
  - **Chapter 13 references several stand-alone public transit studies still in effect and ongoing. References to a new study planned in 2015 were added to this chapter.**
- The plan lacks specifics on traffic accidents - specifics that citizens need to understand our current situation. Figures provided don't make sense.
  - **Chapter 7 recommends several "emphasis areas" where available data supports potential safety improvements as transportation projects advance from "plan" status to "design" status. Chart description in this chapter updated.**
- Network Vehicle Delay does not provide enough information to citizens to know what improvements have been achieved with the road work already done in our area.
  - **Chapter 9 uses "Network Vehicle Delay" charts to compare total network travel time per day in year 2040 for the build v. no-build alternatives. The no-build alternative includes all roadwork improvements completed through the spring of 2015.**
- Population numbers used in this plan to justify future traffic projections do not jibe with population figures in other studies including the earlier Horrocks 2011 study.
  - **Population projections from the Utah Governor's Office of Economic Development became available after the 2011 study. This plan uses the most recent projections available.**
- Washington County major growth areas south of I-15 make expensive highway projects to the north questionable, particularly when earlier studies (Washington Parkway Cost/Benefit Study) indicate they will not relieve congestion very much on main arteries.
  - **The Washington Parkway Cost/Benefit Study indicates the project will not "eliminate" congestion, but that "Option 3 did show the largest overall trip reductions that would make (congestion) more manageable."**
- Cost/benefit information for the "build scenario" does not provide enough detail for citizens to understand if the process was objective.
  - **No response**
- The plan lacks adequate details about possible funding options for public transportation - information that is readily available in other studies and could have been included in the current draft plan in greater detail for citizens' benefit.
  - **Chapter 13 references several stand-alone public transit studies still in effect and ongoing.**
- Not enough work is being done to deal with potential air quality issues (e.g., ozone) in our county.
  - **Chapter 11 of the Long-Range Plan has been updated to reflect newly available data from the Utah State Department of Air Quality.**
- The plan fails to prove that planned road projects will achieve desired results.
  - **No response.**
- Public process may be flawed by transportation entities being more focused on achieving their plans than listening to citizens' concerns.
  - **The 2015 Dixie Transportation Expo drew over 660 visitors. Over 270 participants filled out comment surveys as summarized in the "2015 Dixie Regional Project Survey Report" below. All public comments are welcomed and valued by the MPO staff. Public comments typically span a wide range of approach and thought.**