

Comments on Draft Circ Williston EIS

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To: Mr. Kenneth R. Sikora, Jr., Environmental Program Manager, Federal Highway Administration Region 1, P.O. Box 568, Montpelier, VT 05601
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Re: Circ Draft Circ Williston Environmental Impact Statement

Date: October 29, 2007

1. FHWA and VTrans should reconsider the project purposes statement and project area in light of the exclusion of Alternative 1 from the final list of potential alternatives.

The Circ Williston DEIS did not include in the final list of alternatives the only alternative that sets out a comprehensive approach to dealing with mobility and congestion issues through the use of transportation demand management and public transit. This alternative, developed with input from CCTA (labeled Alternative 1), was included in the initial screening process. The explanation for not including this Alternative in the final list of alternatives was that:

"Alternative 1 was designed as a robust and extensive package of transit improvements and transportation demand management measures to reduce trips in the VT 2A corridor. However, the screening analysis shows that it does not meet the project purpose and need, as its congestion reduction on VT 2A is small and its crash reduction is minimal." (see page 3-21 of the Draft EIS; emphasis added)

I am disappointed that apparently because of a narrow definition of the project purpose and need -- and the fact that this Draft EIS only focuses on a narrow, less than four mile long project area centered on VT 2A (instead of on the much broader area that will be affected by a full build out of the Circ Highway) -- the only Alternative that would have taken a major step towards

reducing auto-dependency countywide and significantly increasing transit opportunities was eliminated from consideration.

Alternative 1 is the one alternative that stands out in its broad, countywide potential for reducing auto-dependency and contributing to efforts to reduce the profound effects of global warming and climate change.

Respected author and environmentalist Bill McKibben, who helped lead last year's five-day walk across Vermont (ending in Battery Park) to demand action on global warming has said that "the Circ Highway is a Global Warming Machine."

Global warming and auto-dependency is of increasing concern to Burlington residents, as well as residents of Chittenden County, and Vermonters. In Burlington, these concerns are highlighted in our adopted Municipal Development Plan, in the Legacy Plan, in policies such as the Climate Action Plan, and in the current draft of the Burlington Transportation Plan, which strongly calls for increased public transit services and transportation demand management programs and states that: "Encouraging alternative transportation modes is a key part of any effort to address global warming." Global warming does not respect municipal boundaries, and clearly calls for regional approaches.

Here is what our current Municipal Development Plan has to say:

"Most climatic scientists now agree that human-caused emissions of greenhouse gases are having a measurable impact on the earth's climate. ... [Climate change] poses a significant economic and environmental threat to our region and beyond. ...

Recommended actions ... Implement policies and planning to reduce transportation demand and to encourage more fuel-efficient and alternative fueled vehicles; Continue implementation of existing TDM programs including park and ride lots, shuttles and rideshare programs; and develop park and ride lots and shuttle services that link and connect to employment centers."

-- above paragraphs from page VIII-6 and VIII-8 of the Burlington Municipal Development Plan

The just released "Final Report and Recommendations of the Governor's Commission on Climate Change" (October 2007) states that: "The climate change crisis may represent the most important and comprehensive global challenge of our lifetime." ... "the upward curve of Vehicle Miles Traveled (VMT), ... is the most significant source of greenhouse gas production in Vermont." As a "quick tip" the Report also recommends: "Use public transportation wherever possible -- if public transit is lacking in your area; express your concerns & ideas to local officials."

Here are the key components that were part of Alternative 1 (as described on page 3-9 of the draft EIS; these components are further detailed in the Alternatives Screening Technical Report appendix to the Draft EIS):

- Park-and-ride lots
- transportation management association
- improved traditional bus service; seven new "flex-ride" bus services in Essex, Williston, the Kimball Avenue area, Jericho-Underhill, Richmond, and Waterbury;
- two bus rapid transit routes from Charlotte and Burlington to Essex Junction via Williston;
- rail service from St. Albans to Burlington via Essex Junction.

Questions related to the above comments:

The draft EIS and the technical appendices do not provide much detail (beyond the quote I included earlier) for the reasons why Alternative 1 did not fare well -- even given the Purposes and Needs in the current draft EIS.

Question 1.a -- Can you please explain what criteria you used to measure the mode shift that would occur under Alternative 1?

Question 1.b -- Can you please explain how you measured the impacts of gas price trends in evaluating Alternative 1?

Question 1.c -- Did you include in your evaluation of Alternative 1 the impacts of strong marketing and promotional strategies from CCTA to encourage use of transit (i.e., evaluate how marketing could promote increased transit use)?

Question 1.d -- What frequencies of service were included in evaluating Alternative 1, in terms of both the bus and rail components of Alternative 1?

Question 1.e -- How did you evaluate the impacts of the transit management association component of Alternative 1?

Question 1.f -- Did you evaluate the impacts of Alternative 1 outside of the immediate project area -- that is on communities such as Burlington, Charlotte, Richmond, and Hinesburg?

Question 1.g -- Did you measure the "vehicle miles traveled" reduction impacts from Alternative 1?

Question 2.a -- Was any consideration given by VTrans and/or FHWA to modifying the Purpose and Needs statement to include either a larger project area, and/or broader purposes than the focus on congestion and crash reduction just within the Circ-Williston project area?

Question 2.b -- What was the basis for your identification of the project Purpose and Needs?

Question 2.c -- Why wasn't the full Circ Highway project area included as part of the project Purpose and Needs, especially given that the Draft Circ Williston EIS includes a detailed evaluation of the transportation impacts for both building and not building the full Circ Highway, including the Colchester segments?

Question 3 -- Did you conduct any analysis of Alternative 1 outside of the context of the stated Purpose and Need in the draft EIS?

2. In the event FHWA and/or VTrans is not willing to modify the project purpose or project area, I would recommend that substantial weight in the selection of a preferred alternative be given to the lowest-cost alternative that meets the currently identified project need and purpose while having the least harmful environmental impacts.

Cost should be an important factor in selecting among the alternatives, given the extremely wide range in costs identified in the draft Environmental Impact Statement (from \$50.9 million to \$90.1 million). To the extent cost savings can be achieved on this project, more funds will be available for other needed transportation projects in Vermont and in Chittenden County.

To the extent that an alternative effectively meets the identified purposes and needs, while minimizing negative environmental impacts, the lowest cost alternative should be preferred.

In evaluating Table 18-1 ("Impacts of Alternatives Summary Matrix") on page 18-15 of the draft Environmental Impact Statement, the lowest cost alternative is Alternative 22 (\$50.9 million), which is one of the alternatives focusing on Route 2A improvements. This group of alternatives has less damaging environmental impacts (especially on wetlands) than the other alternatives.

Among the Draft EIS alternatives listed in Table 18-1, there are only three listed as effectively addressing each of the five primary traffic and transportation objectives (Alternatives 16a, 16c, and 17). By far the lowest cost of these three alternatives (by over \$15 million dollars) is Alternative 17 which at a cost of \$62.8 million calls for construction of a "Circ Boulevard," a bridge over the Winooski River, and spot improvement to VT 2A. Alternative 17 is also the third lowest cost of all ten alternatives, following only Alternative 22, and virtually at the same cost as Alternative 3 (\$62.4 million), which is one of the Route 2A improvement alternatives.

Again, given the broad range of costs set out in the draft EIS, I would urge that substantial weight be given to selecting a low cost alternative

3. In evaluating safety, the probable safety performance of all of the listed alternative should be measured.

It is essential to include in any evaluation the safety performance of not just the Route 2A related alternatives, but also the alternatives that focus on constructing a limited access highway and/or the Circ Boulevard.

Questions:

1. Did the draft EIS measure the safety performance of all alternatives -- including projected accident rates and severity of injuries?

2. Did the draft EIS include consideration of the safety performance of the already constructed segments of the Circ Highway?

4. An important measure of performance of any transportation project can be thought of as its long-term sustainability.

The Burlington Planning Commission in a Memorandum to the Burlington City Council titled "Draft EIS for the Circumferential Highway -- Williston" dated October 16, 2007, states that:

"Infrastructure investments like this [referring to the Circ alternatives] enjoy a fairly short period of time before their capacity/functionality is again stressed and additional investments may be necessary. **The Commission would strongly urge that the sustainability of the investment be included in the decision-making regarding a preferred alternative. Thus, consideration of which combination of capital investments and transportation services will serve the region most effectively over the longest period of time.** Questions such as: How long will it be effective at meeting the purpose and need? How adaptable to change or flexible to accommodate future growth is it? How can it serve the most people over time?" [emphasis as is in the Planning Commission Memorandum]

Questions:

1. To what extent, if at all, was sustainability included as a performance measure in the draft EIS' evaluation of alternatives -- including Alternative 1?

2. What specific criteria, and over what time frame, did you use to measure sustainability of the project investment?

3. Did you measure the relative "vehicle miles traveled" reduction impacts from the various alternatives. Vehicle Miles Traveled was just cited in Final Report and Recommendations of the Governor's Commission on Climate Change" (October 2007) as "the most significant source of greenhouse gas production in Vermont."

3. Is it possible to show trend lines between now and 2030 to show when (or what rate) transportation performance begins to degrade over time after the project is completed? This would be a useful measure of the relative sustainability of the investment of the various alternatives.

4. Did you consider how the various alternatives compare in terms of their long-term capacity and functionality -- that is, beyond the year 2030? Is there any data or are there any models that would allow for even a generalized assessment of capacity beyond 2030?

5. I urge that additional public comment be allowed after one of the Alternatives is selected, and/or after Alternative 1 is re-evaluated for inclusion as the preferred alternative. As a citizen, I find the length of this draft EIS and the manner in which it is set out without a preferred alternative, but rather with a series of ten alternatives, unfortunate. This has the result of stifling useful public input into the process. Again, as noted in my previous comment, I would request that after any one alternative is selected, there be another full opportunity for public comment and for review and response to those comments.