

30 April 2009

Ogden/WSU Transit Corridor Project  
c/o Elizabeth Scanlon, UTA  
669 West 200 South  
Salt Lake City, UT 84101

Re: Additional scoping comments on Ogden/WSU Transit Corridor Project,  
submitted on behalf of the Sierra Club

Dear Ms. Scanlon:

On behalf of the Sierra Club, I would like to add these comments to those that I submitted on April 6.

Since April 6 I have attended two stakeholders' workshops, on April 15 and April 29. During these workshops, the group refined the Purpose and Need statements and developed a list of evaluation criteria for comparing the many proposed alignments. Then group was then given a large table showing how each alignment was rated according to each criterion. Finally, the group was asked to vote on the various alignment alternatives. By the end of the April 29 workshop, several of the alignment alternatives had apparently been eliminated from further consideration as a result of these votes.

The Sierra Club has several concerns with the process that is being used to screen alternatives.

### **1. Special interests have dominated the discussion.**

A large amount of the discussion at the stakeholders' workshops has been dominated by the views of certain special interests:

- UDOT clearly does not want the transit project on Harrison Blvd., apparently due to concerns that it would impede the flow of automobile traffic. When pressed, UDOT has conceded that this is not a fatal flaw and that traffic impacts could be mitigated at additional cost. However, there has been no attempt to quantify this cost, or to quantitatively compare the impacts on Washington to those on Harrison.
- The Ogden City Administration strongly favors the more southern cross-town alignments, though it has not articulated a reason for this preference that is distinct from UDOT's concern over using Harrison Blvd.
- The Administration also favors an alignment that loops above the WSU campus. Although the reason for this preference was never articulated, I think everyone is aware that the administration has long been an advocate of a large and

controversial new residential and recreational development in Ogden's foothills—which this alignment would serve. However, such a development would be inconsistent with Ogden's General Plan and at this time there is no evidence that it is economically or politically feasible.

- The Ogden City Council favors the more northern cross-town alignments, apparently because these could help revitalize Ogden's East-Central neighborhood and serve the activity centers and higher population densities in this neighborhood. Another motivation of the City Council may be to draw attention to Ogden's historic buildings. (Although some advocates of historic preservation have attended the stakeholders' workshops, they have not been allowed to vote.)
- South Ogden favors the 36<sup>th</sup> Street cross-town alignment, simply because this is the only alignment that would serve any of South Ogden.
- WSU announced on April 29 that it hopes this project will replace, and not merely augment, its existing shuttle bus system. It therefore favors an alignment that would serve as much of the campus as possible. However, it appears that WSU has not yet seriously considered the impacts or feasibility of any alignments that would serve the upper campus.
- McKay-Dee Hospital favors an alignment that would serve more of its property.

Clearly it is appropriate for each of these special interests to contribute to the discussion. However, it is troubling that so much of the discussion has been dominated by the more assertive voices among the group, and that there has been no attempt to quantify, let alone resolve, the various competing concerns.

## **2. Evaluation criteria have not been effectively applied.**

In an attempt to be more objective, the consultants (with input from the stakeholders) have developed a list of 19 evaluation criteria and have crudely evaluated each of the alignments according to these criteria. Although well intentioned, this effort has had no discernible effect on the actual process of narrowing the number of alignments under consideration. There are several reasons why it has had no effect:

- The evaluation matrix, with ratings for the alignments filled in, was not emailed to the stakeholders until after 10 pm on the night before the April 29 meeting. Thus, the stakeholders had inadequate time to assimilate the information before they were asked to vote on April 29.
- The ratings in the evaluation matrix were crudely binned into only three values (++ , 0, and --), even when they were presumably based on numerical data. Without seeing the actual numbers, it is usually impossible to tell which differences are significant and which are insignificant. This is especially true of some of the most crucial criteria including population, employment, travel time, and cost.
- At least a few of the ratings in the matrix are clearly erroneous. For example, in

the Development Potential category, there is no reason why the 26<sup>th</sup> Street alignment should receive the lowest rating while 25<sup>th</sup> Street, only a block away, receives the highest rating. The presence of obvious errors like this undermines the credibility of the rest of the matrix. The details of the entire matrix need to be scrutinized before it can be used in decision making.

- The sheer number of evaluation criteria (19) makes it virtually impossible for an intelligent and objective individual to assimilate all the information and vote for the best choices. There was no attempt to eliminate redundancies among the criteria, weigh them appropriately, or combine them into higher-level categories.

For these reasons, the voting at the April 29 meeting was apparently based not on objective data, but rather on the competing qualitative arguments expressed by the various special interests.

The Sierra Club has one specific concern with the list of evaluation criteria. Only one of the 19 criteria addresses the relationship between this project and other transit routes. This item is titled “Builds and Supports Existing Transit”, and its application was “based on connectivity to existing routes and ridership”. While this information is certainly relevant, it is insufficient. What we really care about is not connectivity to the existing system of buses, but rather the relationship between this project and the rest of the transit system *as it will exist in the future*. Bus routes will surely be changed to eliminate redundancies and improve connectivity. In addition, the Regional Transportation Plan calls for another new transit investment in a corridor along Washington Blvd. It would be short-sighted to omit any consideration of these future changes in the transit system.

An additional general concern is that neither the evaluation criteria nor the ratings have been vetted by the public. Sharing this information with the public (e.g., by posting it on a web site, sending it to the press, and allowing time for responses) could result in useful comments and perspectives that have not yet been heard, and would increase the likelihood that the public would support the final outcome of this process.

Fortunately, all of these problems can be solved if the Management Committee is willing to take the time to solve them. But this must be done before any screening-out of alternatives, not after.

### **3. Voting often eliminates the best compromise.**

It is a well-known fact that the process of voting often produces polarized results, eliminating legitimate compromises. The voting that took place on April 29 was a case in point. For example, a strong case can be made that alignments 2c and 2d (following Monroe to 30<sup>th</sup>) provide a workable compromise that would serve Ogden’s east-central neighborhood while avoiding the most problematic stretch of Harrison Blvd.

Nevertheless, the voting process eliminated these alignments because the group was strongly split into two factions, and each individual was given only two votes. One

faction voted for 2a and 2b (incorporating the northern portion of Harrison), while the other faction voted for 2e and 2f (avoiding the east-central neighborhood entirely).

A better process at this early stage would be to first determine whether any alignments can be eliminated due to a complete lack of support. Alignments 2c1 and 2c2 (through Sullivan Hollow) may fall into this category. Next, the major trade-offs among alignments should be identified, quantified, and debated to see whether a consensus is possible. Adopting a voting algorithm to eliminate alternatives should be a last resort, to be used only if it becomes apparent that the factions are too entrenched to compromise. Even then, the voting must be designed to avoid splitting votes between alignments that are very similar (e.g., 2c and 2d, which differ only by one block along a four-block stretch).

#### **4. Summary**

Federal regulations implementing NEPA require that an Environmental Impact Statement “rigorously explore and objectively evaluate all reasonable alternatives”. 40 CFR 1502. As described above, the decision-making process for this project has not, so far, been rigorous or objective. The process has been dominated by special interests; the objective data have not been scrutinized by the public or assimilated by the decision makers; and the voting process was conducted prematurely, in a way that enhanced polarization rather than attempting to reach a compromise.

As stated in our earlier comments, it would be a serious mistake to exclude major alternatives through a process that is not rigorous or objective. Such a process would result in an EIS that is vulnerable to legal challenges. Even more significantly, the study could lack the credibility it needs to earn broad public support.

For these reasons, the Sierra Club strongly suggests that the Management Committee reconsider the process of screening alternatives. As we heard at the April 29 meeting, it will not be possible to submit federal application materials this season so there is no imminent deadline forcing us to rush the process.

Sincerely yours,

Dan Schroeder  
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