

6 April 2009

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

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

Dear Ms. Scanlon:

Thank you for providing this opportunity to submit formal scoping comments on the Ogden/WSU Transit Corridor Project. These comments are submitted on behalf of the Sierra Club, a national conservation organization with approximately 750,000 members. As you may know, the Sierra Club has approximately 4000 members in Utah and slightly over 500 members in the Ogden Group, which covers Weber, Box Elder, Morgan, and northern Davis Counties. About 200 of our members live in Ogden City, while many others visit Ogden for work, school, recreation, and entertainment.

We have been waiting a long time to submit these comments. Our active involvement with this project dates back to the fall of 2004, when I was asked to represent the Sierra Club as a member of the Stakeholders Working Group for the feasibility study that was then getting underway. I think it is accurate to say that I was the most active unpaid participant in that group. After the results of that study were announced in June 2005, the Sierra Club put a significant effort into educating the local community about those results. In 2007, Ogden City asked me to serve on an ad hoc Streetcar Committee that met several times over the course of the year. Over the last four years I have discussed this project in great detail with representatives of UTA, Wasatch Front Regional Council, UDOT, Ogden City, Weber County, the Ogden-Weber Chamber of Commerce, the news media, and hundreds of interested citizens who live and work in Ogden.

The mission of the Sierra Club is to explore, enjoy, and protect the planet. We are therefore strong supporters of mass transit, which gives people the mobility to explore and enjoy their surroundings while minimizing their impact on air quality and climate change. Even more importantly, mass transit enables efficient land use patterns that allow people to walk more and drive less, while enjoying the amenities of a vibrant urban environment. Revitalizing urban neighborhoods is essential not only for many local economies, but also in order to offer attractive choices to the many Americans who prefer an urban lifestyle.

In order to achieve these goals, however, a mass transit system must be well designed, cost effective, and heavily used. The comments that follow are submitted in the spirit of helping ensure that Ogden's future transit system has these properties.

Purpose and Need

The “Purpose and Need” bullet points in the document handed out at the March open house meetings are generally appropriate. However, some of these points need clarification, and at least one important consideration is missing.

To clarify the first “purpose” bullet point, we suggest the following slight modification:

- Improves the level of service and *increases* transit ridership between the Ogden Intermodal Center, the Ogden Central Business District, Weber State University, McKay-Dee Hospital, *and intermediate destinations*.

This slight revision would make it clear that the *number* of riders is an important consideration, and would recognize the fact that not all riders will be traveling between the four named locations.

We suggest modifying the second “purpose” bullet point as follows:

- Assists the City of Ogden in achieving vital economic and *land use* goals *outlined in its General Plan*.

This change would recognize the fact that while various individuals and groups may have their own goals and agendas, it is the General Plan that embodies the official goals of the city, developed with extensive citizen input and formally adopted by the City Council. The term *land use* makes explicit reference to an especially relevant chapter in the General Plan. The specific land use goals that are most relevant to this project are the creation of urban mixed-use districts, neighborhood village centers, and a distinctive and walkable downtown. The General Plan also incorporates the various community plans which give more specific guidance on future land use.

If it is felt that the General Plan gives insufficient guidance on the city’s relevant vital goals, then the City Council should be asked to adopt an amendment to the General Plan.

We suggest the following clarification of the third “purpose” bullet point:

- Is affordable, enjoys wide public support, and encourages *diverse* partnerships *among businesses and organizations along its route*.

Without this clarification, the term “local partnerships” could be misinterpreted to refer to something more specific and unintended.

On the following page of the handout, we recommend modifying the second “needed”

bullet point to read:

- Support a long-term solution to serve future population and employment growth while minimizing impacts *to other forms of transportation*.

We certainly don't want to minimize the impact to mass transit!

The fourth bullet point on this page offers an opportunity to describe more vividly the benefit of transit to urban neighborhoods:

- Create public transportation improvements that support *the revitalization of downtown and the rest of the corridor into vibrant, pedestrian-friendly neighborhoods*.

In addition to these bullet points, we suggest adding one along the following lines:

- *Complement other planned improvements to transit service in Ogden, to serve as many neighborhoods as possible over the long term.*

The idea here is that this transit corridor will almost certainly not be the only one to be improved during the coming decades. We should anticipate projects in other corridors and plan for the long term.

Alternative Alignments

The most important upcoming decision will be among the three major alignment alternatives, following (approximately) 26th Street, 30th Street, or 36th Street.

At this time, it appears to us that the 26th Street alignment would be most successful at achieving this project's goals. We base this tentative conclusion on both quantitative data and qualitative observations.

For quantitative data we can look to the 2005 feasibility study, which made a direct comparison of these three alignment variations and three others. (See Table 3 on Page 26 of the final report.) Among the three alignments now under consideration, the significant differences were as follows:

- The 26th Street alignment was predicted to have significantly higher ridership than 30th Street or 36th Street.
- The 36th Street alignment was rated much lower in "constructability" than 26th Street or 30th Street.

Thus, the 26th Street alignment appears to be favored, and there is a significant burden of proof on anyone who might favor a different alignment.

To these points we would add the following qualitative observations:

- The neighborhoods around 26th Street contain a good diversity of homes, apartment buildings, businesses, and government buildings. On the other hand, 30th Street and 36th Street are lined almost exclusively with single-family homes.
- Quite a few commercial and residential properties on and near 26th Street are currently vacant or underutilized, and are therefore good candidates for higher-density redevelopment. The neighborhoods along 30th Street and 36th Street appear to be more stable, with little potential for redevelopment.
- Both Washington Blvd. and Harrison Blvd. show potential for transit-oriented redevelopment, although auto-oriented uses are also well established on both roads, especially toward the south. Auto-oriented businesses are especially prevalent on Washington Blvd. south of 30th Street.
- Ogden High School and Mt. Ogden Middle School would be served by an alignment on Harrison Blvd.
- The WFRRC Regional Transportation Plan calls for a separate transit corridor investment consisting of a north-south line on or near Washington Blvd. In order to complement this line and serve more of the rest of the community, the WSU line should be as separate from it as possible.

We understand, however, that none of these observations are definitive and that additional data may need to be taken into account. We look forward to seeing any additional data that may be relevant to the choice of alignment, and having an opportunity to comment on that data before any decisions are made.

Alternative Modes

The second major decision will be the choice of transit mode, with options including streetcar, BRT, or improvements to ordinary bus service.

Again, our tentative position is to support the recommendation of the 2005 feasibility study, namely the streetcar option. The most persuasive result of that study was its prediction of a significantly higher ridership for the streetcar. Higher ridership is not only an explicit goal of this project, but will also help the project better attain most of its other goals. Higher ridership enables more frequent and convenient service, reduces auto congestion, and puts more pedestrians on the sidewalks where they contribute to the vibrant urban atmosphere and economic revitalization.

The obvious disadvantage to the streetcar is cost. Unfortunately, it is difficult to weigh the known construction costs against the less predictable benefits from a higher-quality transit investment. However, based on studies done in Portland and other cities, we believe that the long-term economic benefit of a streetcar system would probably outweigh its higher construction cost. When intangibles such as our urban quality of life

are taken into account, the benefit would be even greater.

The BRT option, on the other hand, carries a significant risk: Its predicted ridership may not be high enough, compared to that of ordinary bus service, to earn the community's support. That support will be necessary to justify the construction cost and to counteract the real or perceived cost to motorists from lost right-of-way and/or restricted ability to make turns. A streetcar system would have comparable right-of-way impacts to BRT, but is predicted to carry more passengers and could therefore better justify these impacts.

The "best bus" alternative (without exclusive bus lanes) is obviously the least expensive overall, but could still be the hardest to pay for because there is no available funding source for ordinary bus improvements. Both the new 1/4-cent sales tax funds and federal New Starts or Small Starts funds are restricted to "fixed guideway" projects which would include streetcar or BRT but not improvements to bus service without exclusive lanes.

Environmental Impacts

If this project is done right, its environmental impacts will be almost entirely positive. It will remove automobiles from the roads, resulting in lower emissions of both smog and greenhouse gases. By removing vehicles it will make the roads safer. By putting more pedestrians on the sidewalks, it will make the sidewalks safer and more pleasant. Its economic benefits could be tremendous, as could the benefits to the quality of life of both its passengers and the others who populate and visit the corridor.

All of these benefits will depend strongly on number of riders who use the new transit system. In order to maximize environmental benefits, therefore, we must maximize ridership.

Decision Process and Timeline

Federal regulations implementing NEPA require that an Environmental Impact Statement "rigorously explore and objectively evaluate all reasonable alternatives". 40 CFR 1502. Based on statements made by the consultants and other project participants at the public scoping meetings, the Sierra Club is concerned that the present study may not meet this requirement.

Our present understanding is that the upcoming stage of the process, which will occur over the next two or three months, is intended to screen out all but one of the major alignment variations and perhaps make other major decisions as well. We were told that this process will not involve any significant quantitative analysis or gathering of objective data on such factors as predicted ridership, travel time, cost, or right-of-way impact. Instead, the apparent intent is to make these major decisions on the basis of

purely qualitative factors, and then to dismiss all but one major alternative as “unreasonable” and therefore unworthy of rigorous analysis.

Among the qualitative factors that we heard discussed at the public open houses were UDOT’s rumored opposition to the use of Harrison Blvd., and regulations affecting impacts to historic buildings and neighborhoods. If criteria such as these are going to be used to exclude major alternatives from any further analysis, then these criteria need to be brought into the open and thoroughly vetted by the public. So far this has not been done; in fact I have seen no explicit mention of either of these factors in any of the printed materials that were distributed or displayed at the scoping meetings. If these factors are deemed important, then it is crucial that they be quantified as much as possible and then rigorously weighed against other competing factors.

More generally, it would be a serious mistake to exclude major alternatives on the basis of factors that have not been rigorously, and publicly, vetted and analyzed. 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.

We therefore urge you to reconsider the process for choosing among major alternatives, and to make this process as rigorous and transparent as possible.

Conclusion

Thank you for your attention to these comments. I would be happy to discuss this project with any members of the project team, and to participate in any other way that would be helpful to all involved.

Sincerely yours,

Dan Schroeder
Conservation Chair
Sierra Club, Ogden Group
1444 Binford Street
Ogden, UT 84401
801-393-4603
dvs@relia.net