TRI-STATE TRANSPORTATION CAMPAIGN

Mobilizing the Region

VIA EMAIL

February 4, 2010

Kevin Skeels, PE
Delaware River Joint Toll Bridge Commission
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Re: I-95/Scudder Falls Bridge Improvement Project Environmental Assessment, DRJTBC Contract C-393A, DRJTBC Capital Project No. CP0301A.

Dear Mr. Skeels,

Thank you for the opportunity to comment on the Environmental Assessment/Draft 4(f) Evaluation Document ("EA") for the I-95/Scudder Falls Bridge Improvement Project ("project"). The Tri-State Transportation Campaign ("Tri-State") is a regional policy watchdog organization working for a more environmentally sound and equitable transportation network in New Jersey, New York, and Connecticut.

In general, Tri-State acknowledges that there are several substandard design features on the bridge that require attention, as well as heavy peak hour congestion. With respect to these issues, there are aspects of the project that appear to be positive. These include the inclusion of dedicated lanes to accommodate future Route 1 Bus Rapid Transit, pedestrian and bicycle facilities, and cashless tolling. We support the inclusion of these features in the final design of the structure.

Currently, the EA does not guarantee pedestrian and bicycle access, address the impacts of tolling or fully develop an analysis of rejected alternatives or secondary impacts. Further, we are concerned that the project as contemplated will result in unintended negative impacts and fall short of the safety goals outlined in the project purpose and needs statement.

The project team should create a full Environmental Impact Statement ("EIS") to address several remaining issues and unanswered questions, as outlined below. Additionally, we call on the lead agencies to confirm the inclusion of bicycle and pedestrian access in the final bridge design.

1. The EA does not fully address secondary impacts or adequately support the selection of the preferred alternative.

We are troubled by the long term effect of building a bridge more than twice the size of the current structure. According to the traffic data provided in the EA, while traffic Level of Service (LOS) improves on the bridge itself, conditions the east and west of the project area will worsen as a direct result of the expanded bridge capacity.[1] In solving one problem, the bridge reconstruction is creating another. Increased congestion will create pressure to widening the 1-95 mainline, continuing the cycle of until the new bridge is filled with traffic. The expansion would drive ever worsening sprawl in sensitive Bucks county.

It is settled that adding road capacity doesn't solve congestion, it merely kicks it down the road by attracting more vehicles in the long term. The EA provides a succinct summary of the pattern:

> Since its initial construction, the I-95 corridor has experienced substantial growth over the years, with residential and commercial development spurred on by interstate highway access. Development pressures in the I-95 corridor have continued in recent years, due to access provided by I-95 and several regional transit lines that service Philadelphia and New York City and Newark. This transportation access has enhanced the attractiveness of the area for commuters, since the project area is within commuting distance of major metropolitan areas in Center City Philadelphia, within 20 miles, and New York-Newark, within 50 miles.[2]

Despite this, the EA concludes that no secondary impacts will result in the project area - a corridor so narrow as to render that conclusion meaningless. The EA speaks of an undefined "area" surrounding the project area, and dismisses the possibility of secondary impacts because of zoning and other restrictions.

As noted above, the traffic data cited in the EA clearly shows higher traffic volumes in the build scenario than in the no build. Couple this with the description of fast developing sprawl development, and it is far from clear that the expanded capacity will not drive more damaging development. The self-defeating capacity expansion calls into question the hefty price tag of $300 million. A smaller design that creates less pressure on adjacent roadways and surrounding land use may be a more prudent course of action given the current tight budgets for the agencies involved. The residents of the area and users of the roadway deserve better analysis through the preparation of a full EIS, rather than unsupported and conclusory statements when contemplating a project of this size and scope. The EIS should include a comprehensive cost/benefit analysis taking all features and impacts of the proposed structure into account.

We do not believe that a convincing case was made against the contra-flow lane alternative. Given the directionality of the peak period traffic (see EA p.10), the contra-flow lane should be studied further. Reasons for eliminating the alternative included the additional life-cycle cost of $12 million, safety

[1] EA, Tables IV-1 and IV-2, p.89.

[2] EA, p.183.

concerns in the transitional areas and lack of efficiency. There is no elaboration on the inefficiency of the contra-flow lane, nor a description of safety concerns. The contra-flow lane alternative will benefit from in depth study as part of a full EIS.

2. The final design must include shore-to-shore pedestrian and bicycle access.

The final design for any replacement or refurbished Scudder Falls Bridge must include pedestrian and bicycle access. Popular multi-use trails exist on both sides of the river and the bridge is in the center of a 12 mile stretch without a cross-river connection for pedestrians and bicycles. The connection provided on the Scudder Falls Bridge would benefit businesses on either side, provide greater recreational activities, and offer a sorely needed transportation alternative to driving over the bridge. Facilitating a greater mode share for bicycles and pedestrians will help meet the project goal of congestion relief on the bridge and offer the additional external benefits such as lower emissions, less noise pollution and lower health care costs.

The inclusion of pedestrian and bicycle access is supported by state and federal policy. The EA makes clear that several funding options remain on the table, however, 23 U.S.C. §217 mandates the inclusion of pedestrian and bicycle access in any bridge projects using federal funds where access can be safely provided at a "reasonable cost."[3] Similarly, NJ's recently adopted Complete Streets policy requires provisions for all users, including pedestrians and cyclists, be included in the "planning, design, construction, maintenance and operation of new and retrofit transportation facilities."[4]

The projected cost of attached to the inclusion of pedestrian and bicycle facilities is $18 million, or 6% of total project costs. Guidance at both the federal and state level contemplates "reasonable costs" being those under 20% of the total project costs.[5] The cost associated with pedestrian and bicycle facilities on the Scudder Falls Bridge is well within bounds contemplated in state and federal policy. The benefits for the community and positive impact on project goals far outweigh projected costs.

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[3] 23 U.S.C. §217(e).

[4] NJ Department of Transportation Policy number 703, available at http://www.440study.com/PDF%20Documents/Complete%20Streets%20Adopted.pdf.

[5] *See* "Design Guidance Accommodating Bicycle and Pedestrian Travel: A Recommended Approach. A US DOT Policy Statement Integrating Bicycling and Walking into Transportation Infrastructure." at http://www.fhwa.dot.gov/environment/bikeped/design.htm. Defining "excessively disproportionate" cost as "the cost of establishing bikeways or walkways would be excessively disproportionate to the need or probable use. Excessively disproportionate is defined as exceeding twenty percent of the cost of the larger transportation project." *See also*, NJ Complete Streets Policy, available at http://www.440study.com/PDF%20Documents/Complete%20Streets%20Adopted.pdf. (Exempts projects where the "cost of accommodations is excessively disproportionate to cost of project, more than twenty percent (20%) of total project cost.")

Large infrastructure projects such as this do not occur often and the new structure is designed to last for generations. This is truly a once in a lifetime opportunity to provide pedestrian and bicycle accommodations, and the opportunity should not be squandered..

3. More study is required to quantify the effect of tolling.

This past month, the DRJTBC announced that the new bridge would be a tolled facility. Tri-State supports road pricing and tolling for funding reasons as well as a measure to help reduce VMT, especially cashless tolling, which avoids potential congestion effects of traditional collection methods. We applaud the DRJTBC for the inclusion of these cashless tolls in the final design.

However, the EA's traffic analysis is silent on the effects, positive or negative, of adding tolling to the currently untolled bridge. An informed decision on the project cannot be made until the impacts of the toll are studied. A full EIS that includes a tolling impact analysis should be prepared for the project.

4. The size of the planned expansion may create new safety issues in the name of solving old safety issues.

The preferred alternative creates a nine lane bridge between the six travel lanes and three auxiliary lanes. The lanes are justified in the EA by the proximity of the interchanges on either side of the bridge. However, the configuration of the two auxiliary lanes on the northbound side appears to create a dangerous weaving condition that did not previously exist. Through vehicles entering the roadway from the Taylorsville Road interchange will be forced to cross two lanes of traffic to access the travel lanes before auxiliary lanes end. Similarly, vehicles traveling on I-95 from south of the project area will now have to cross two lanes of traffic to exit at Route 29 in N.J. – assuming the vehicle is already in the rightmost travel lane of three. Data in the EA shows that a large portion of the trips over the bridge are regional trips, meaning that drivers are using one of the two interchanges at the ends of the bridge and will have to negotiate the newly created weaving section.[6] In addition, the EA notes that 58% of crashes in the project are occur at these interchanges, 78% of accidents DRJTBC-jurisdiction-wide similarly occur at intersections.[7]

While acknowledging that the substandard acceleration lanes at the intersections present a legitimate safety hazard, the solution must not simply exchange one hazard for another. We urge further study in a full EIS of the traffic flows and accident projections given the creation of large weaving sections within the project area.

Conclusion

In conclusion, Tri-State has many concerns about the Scudder Bridge project. **We urge the lead agencies to prepare a full EIS that includes: 1) full analysis of alternatives, including the contra-**

[6] EA, p.11.

[7] EA, p.15.

flow lane, and secondary impacts caused by the capacity expansion; 2) operational and safety impacts of a new weaving section created by the auxiliary lanes; 3) the impact of tolling; and 4) supports the BRT lane and pedestrian and bicycle access.

Thank you for the opportunity to comment. Please do not hesitate to contact me with any questions.

Truly,

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