

December 1, 2009

Mr. Mark Kehrli, Division Administrator
District of Columbia Division
Federal Highway Administration
US Department of Transportation
1990 K St., NW
Suite 510
Washington, DC 20006-1103

Dear Mr. Kehrli:

The Committee of 100 on the Federal City respectfully but urgently asks the Federal Highway Administration (FHWA) to reconsider its July 2009 decision that the Skanska design for the 11th Street Bridges project in Washington, DC does not require a revised or updated Federal Environmental Impact Statement (FEIS). We ask FHWA to undertake a revision and provide an opportunity for public comment.

This request is based on three considerations:

- Official new information that undermines key project rationales,
- A proposed design that reverses fundamental assumptions in the FEIS concerning alignment and interstate connectivity, and
- Significant information deficits in the July decision that undermine its reliability.

In short, the bridge to be built that is now proposed is nothing like the bridge addressed in the FEIS, and the traffic data used to justify the bridge has been revised to the extent that it no longer serves this purpose. We are compelled to speak in an effort to avoid spending huge sums of public money on a project that appears likely to exacerbate congestion and its related impacts.

Background

This project involves spending a minimum of \$260 million to expand the 11th Street, SE Bridges, adding four lanes to the existing eight lanes for a total of twelve lanes across the river. Depending on the study used, the expansion will increase daily traffic volume in eastern Washington by 50,000 to 82,000 additional cars and trucks. DDOT and the relevant DDOT and FHWA documents claim that expanding the bridges will benefit Southeast communities by ‘separating’ freeway and local drivers onto different bridges and also will make the bridges safer. However, both the record of decision’s (ROD) response to FEIS comments and FHWA’s July, 2009 evaluation of the Skanska design-build proposal put these claims in question.

Bases for Requesting a Revised EIS with Public Comment Opportunity

New information

Previously unavailable traffic data in the ROD Response to FEIS Comments p. 43 when read in conjunction with FEIS 11th Street bridge traffic link data reveals that the project *increases* net traffic on streets and freeways alike. Basically, the local traffic increase associated with the new links exceeds the decreases on other links. This information is new and obviates numerous and key assurances that the project will *reduce* traffic on neighborhood streets compared to the no project alternative. See for examples, Response to FEIS Public Comments (p. 3 “the project will...reduce use of local streets”); Public Hearing July 26, 2006, pp. 31, 48; Response to DEIS Public Comments (p. 90).

This new information shows that the ‘separation’ argument notwithstanding, the project doesn’t separate traffic at all. Drivers on both bridges will be able to access both the freeways and neighborhood streets. The expanded bridges basically function as a 50 percent larger version of the existing ‘mixed’ configuration.

The project will increase local traffic on community streets by 10,000 to 15,000 cars and trucks a day, and will affect adjoining neighborhoods as well as those in the immediate vicinity of the bridges. Stretches of Pennsylvania Avenue, SE on both sides of the river will be filled “to capacity.” While some streets benefit on each side of the river, this is not because traffic is reduced but because traffic is redistributed from one part of the community to another, in this case to the neighborhoods adjacent to 11th Street.

In addition to the new traffic data, we are puzzled about statements that no new traffic will be generated from beyond a one-mile radius. While such statements may be intended to assure affected neighborhoods that the expansion will not attract new regional commuter trips to the corridor, the 50,000 increase in trips is significantly larger than the corresponding decreases on adjacent facilities. Where do the 50,000 additional vehicles come from? The suggestion that the increase is largely due to changes in “local” trip patterns is plausible as the now-abandoned claim that the new “local” bridge, unlike the Sousa and East Capitol bridges, will be used by DC residents, not Maryland commuters.

New lanes intended to serve Southeast residents in reality will serve vehicles traveling north and south on I-295 and accessing M St. SE, the expressway and Capitol Hill via 11th Street, SE. A July 15th letter from DDOT to FWA admits that there will be such congestion at the 11th and M Streets intersection that traffic controls will have to be implemented and drivers, frustrated by the congestion, will seek to filter through the Hill to other destinations.

Finally, the FEIS’s claims that the project will improve safety (by reducing weaving, among other means) should also be reviewed in the light of new information disclosing numerous sub-standard safety features of the modified bid design to the extent implemented in (or modified by) the Skanska design. These include: sub-standard weaving distances, sight distances, ramp spacing, ramp lengths, and others. Serious as these concerns are, they are overshadowed by the safety issues involved in adding more—and much larger—vehicles to our urban traffic mix. New information states, for example, that the bridge is to be designed to accommodate super-sized 25-axle special permit vehicles.

Reversal of key features of the FEIS

Even were there no new traffic data, a revised FEIS is needed because the Skanska design reverses two key features of the project as presented in the approved FEIS: 1) the project's alignment and 2) the connection of I-295 and I-695.

Since 2005, a central feature of the project has been the decision to re-use the existing piers and, as a necessary consequence, the existing crossing. This supposedly cast-in-stone decision constrained the Middle Anacostia Crossing (MAC) and FEIS options analyses and precluded consideration and discussion of all other alignments including the one envisioned in DC's own Comprehensive Plan to shift the regional crossing to the South Capitol Street corridor.

Notwithstanding this established and fundamental constraint, the approved design abandons the use of the existing crossing and uses a new alignment on new pilings. This means at the very least that a new National Environmental Policy Act (NEPA) alternatives analysis is required that includes considerations of alternative alignments, including those that would implement, and avoid inconsistency with, the Comprehensive Plan.

The Skanska design also reverses the FEIS's decision with respect to connecting I-295 (the Anacostia Freeway south of 11th Street) and I-695 (the 11th Street bridge). In the project as approved, I-295 flows north as it now does to the Anacostia Freeway with exits to the I-695 Bridge. In the Skanska design, the opposite concept -- having I-295 flow onto I-695 (with exits to the Anacostia Freeway)—is adopted. Whatever its appeal as a matter of interstate design, this approach reverses a key, and explicitly discussed, decision of the approved FEIS; its effect, moreover, is yet-more traffic on streets such as 11th Street, SE and M Street, SE.

As a further complication, the new design proposes that the bridges be built on standard 66" concrete pilings and that the existing piers be left standing in the Anacostia River. These visual insults on a major approach to the national capital warrant careful review in a revised EIS.

Deficiencies in the Informational Basis for the July Reevaluation

The information deficits in the July reevaluation may be inferred from FHWA's inability to provide information of its own knowledge about the bases for conclusions presented in the July, 2009 reevaluation. The information deficits are summarized below.

1. Traffic¹

¹ We also note as a general matter that there never was a broad look at the traffic patterns involved in a project not much smaller than the Woodrow Wilson Bridge. A comprehensive traffic study would have extended from the District line on the north to the Wilson Bridge on the south. The new bridges will attract traffic from all over Maryland via the Baltimore-Washington Parkway, Route 50, Pennsylvania Avenue (Route 4) Suitland Parkway, the South Capitol Street Bridge and the Wilson Bridge itself.

In evaluating the FEIS, FHWA lacked key traffic information including data from a new traffic study on ADT, PM and AM volumes for the following:

- Segments described in the FEIS Exhibit 8-A and appendices,
- Segments described in the FEIS ‘updates’ released immediately prior to the close of the public comment period, including Pennsylvania Avenue, and
- Crossings (South Capitol to NY Avenue) discussed in the response to FEIS comments accompanying the ROD but not discussed in the FEIS as published.

FHWA also lacked information stating the basis for its claim that the project does not “result in traffic changes outside the study area” (p. 40) or equivalent claims. In contrast, the ROD describes changes outside the study area. The quoted statement appears to restate the claims discussed above that the project does not change traffic beyond a one-mile radius.

2. New alignment construction --noise and vibration impacts; increased truck traffic.

FHWA lacked information on noise and vibration impacts and, in that connection, impacts on adjacent neighborhoods, wildlife and endangered species. The National Capital Planning Commission analysis of the project acknowledged that noise pollution is a significant problem without an apparent solution. FHWA also lacked information on truck volumes under the Skanska design, given that it connects I-295 and I-695.

In light of the significant information and change of design, the Committee of 100 requests that the Federal Highway Administration (FHWA) reconsider its July 2009 decision on the 11th Street Bridges project and undertake a revised or updated Federal Environmental Impact Statement (FEIS).

With best regards,

Laura Richards
President, Committee of 100 on the Federal City

George Clark
President-Elect, Committee of 100 on the Federal City

cc. Michael Hicks, FHWA
Gabe Klein, DC Department of Transportation
