Data Submitted (UTC 11): 7/6/2024 4:12:53 PM
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Organization:
Title:
Comments: I am writing to express my concerns about your Finding of no Significant Impact and Final Section 4(f) Evaluation for FLAP Grant-supported changes to the Mill Creek canyon road.

Specifically:

Your introduction states "The purpose of the project is to improve user safety, access to recreational opportunities for all users, and water quality degraded by surface erosion and poor drainage infrastructure." and "The lack of road shoulders, lack of bicycle lanes, limited sight distances, informal parking, and lack of crosswalks and signs create unsafe conditions for cyclists and pedestrians using and crossing the roadway. Improvements are needed to better accommodate pedestrians and bicyclists."

However, I believe your narrative undersells the importance of non-motorized user safety. You fail to mention that by far the most repeated concern among public comments is related to enhancing cyclist and pedestrian safety. Your response to those comments on page 126 contains nothing of substance to address those comments. You refer to a commitment to refine your plans to address those concerns. And then proceed to ignore those concerns. You have stated, without providing evidence to support your claims despite repeated requests, that an uphill bike lane will be added only as far as Elbow Fork because you believe that very few cyclists ride above that point, a belief that looking at Strava or even spending a small amount of time in the canyon will show to be false. Failing to consider that also implies that you consider the lives of cyclists and pedestrians that go above Elbow Fork to be of no significance, or at least less valuable than the speed and convenience offered to motorists.

On page 5, you state: "The design team considered different perspectives and incorporated them into the Proposed Action in a way that balances the safety and needs of multiple uses with other social, environmental, and economic considerations. As addressed in Section 2.3.1 of the EA, continuing the bicycle lane beyond Elbow Fork would result in adverse environmental impacts and excessive project costs. Therefore, we anticipate the proposed improvements would result in a net increase in safety for all." Your last statement is disingenuous and wrong - I believe you meant to say "Therefor, we don't think improving safety for non-motorized users is worthwhile."

On page 129 in your response to a comment about safety and questioning your assumptions, you state: "Your questions about accident statistics and the impact of road widths are very important and they will be thoroughly addressed as we continue to refine our plans." There is no indication in this document that suggests you actually addressed those concerns.

The document refers repeatedly to increasing the safety, without specifying for whom, of increasing the lane width, ignoring the fact that safety for motorists and emergency vehicles has never been an issue in the past and a search for records of injury accidents to motorists in the canyon returns zero results.

Your report states in multiple places that vehicle speeds will not increase as a result of this work. Yet on page 6 you state:" The proposed improvements are designed to increase the consistency, predictability, and safety of traffic flow while limiting vehicle speeds and associated noise levels. The safety benefits associated with consistent lane width, increased sight distance, constant radius curves, and consistent striping are predicted to outweigh the expected nominal increase in average vehicle speed." That is inconsistent. You are planning to increase the natural comfortable speed of motor vehicles in the canyon and recognize that doing so will increase speed in spite of your reference to no increase in speed limits (which you have repeated said correctly that will not be addressed or enforced by the agency proposing the work).

You consistently refer to traffic congestion in the canyon and being a problem. If you took the time to observe actual conditions in the canyon, you would find that only significant congestion in the canyon occurs at the end of the day on warm weather weekends at the toll booth which is outside the scope of this effort. The existing congestion in the upper section of the canyon typically results in an extra 30 to 60 seconds of travel time on these same busy weekend days for most users. That hardly appears to be a significant reason to take on the cost and disruption of this project.

In short, I think the public recognizes that public comments for this project were generally ignored and the studies supporting this project were inadequate and intended to support a pre-determined conclusion. Your poorly though-out safety considerations regarding non-motorized user safety have reached incorrect solutions which are likely to result in injury and fatality accidents - when that happens, the media and the public will be sure to mention that you were warned about that possibility and chose to ignore it.