



**SUSTAINABLE PITTSBURGH**

OUR REGION  
OUR RESOURCES  
OUR FUTURE

**Sustainability Assessment:  
Northern Sections of the Proposed Mon-Fayette Expressway**

**March 2002**

Advisory Board

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About this Sustainability Assessment of the Mon-Fayette Expressway

Sustainable Pittsburgh (SP) is a public-policy advocacy group that links economic prosperity, ecological health, and social equity by working in three areas: land use, outdoor recreation amenities, and diversity and civic engagement. SP and its supportive coalition identifies trends and leverage points for change and works to educate and affect decision-making systems.

This Sustainability Assessment of the Mon-Fayette Expressway's Northern Sections (MFE/NS) is intended to pose issues and questions to which the public should find answers when formally reviewing the Draft Environmental Impact Statement (DEIS). The DEIS is scheduled for release by the Pennsylvania Turnpike Commission (PTC) in May.

This report reflects the consensus of the SP Advisory Board, whose oversight of the editing process has been active. Some Advisory Board members and other advisors have had significant involvements in the design of the project and the planning processes being assessed in this report. Their insights have strengthened this report.

The contents of the report also reflect the work of hundreds of other people and information from hundreds of documents or articles that have been reviewed, not to mention the active participation of speakers at the public forum we convened on January 16, 2002 and a set of briefing sessions for these speakers convened in conjunction with the PTC. Much of this process's design, review of materials provided by the PTC, and the material considered in the preparation of this report were drafted in consultation with James P. DeAngelis of DeAngelis Associates.

While some worthy views or information may have been missed due to limitations of time and resources, SP accepts these limitations and supports the contents of this report and the purposes for which it is intended.

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## Sustainability Assessment Highlights

- This Assessment's intent is to raise issues to which we the public should expect to find answers in connection with the Draft Environmental Impact Statement (DEIS) to be released by the Pennsylvania Turnpike Commission in May 2002.
- SP acknowledges enhanced transportation access is needed in the Mon Valley and believes that redevelopment of brownfields and investment in our declining mill towns is key to the path toward sustainable communities.
- SP is for smart development particularly investment in older towns.
- SP assesses that different MFE/NS sections command different development scenarios and thus have varying transportation needs.
- SP recommends additional analysis be conducted as the EIS moves to final for the Northern Sections of the Mon-Fayette Expressway. Additional analysis is warranted to:
  - Update and address some apparent shortcomings in the applications of the transportation systems analysis models in the testing of the build/no-build alternatives of the MFE/NS.
  - Consider alternatives, as required by federal law, through the use of state of the art analysis to integrate updated Major Investment and Congestion Management studies with the EIS and to consider clearly the transportation, economic, environmental, land use, and community impacts associated with a genuine consideration of multi-modal alternatives (including transit and enhancements to existing roads).
  - Provide assessment of economic benefits substantiating the trade offs associated with a \$1.9 billion investment to stimulate development, reduce traffic congestion, and enhance our natural and built environment over the long term.
  - Address specific concerns raised in the Sustainability Assessment with regard to proposed Sections 2, 3, 4, and 5.
- Timing is ideal to conduct the required alternatives analysis. The Regional Transit Vision Plan of the Southwestern Pennsylvania Commission and the Port Authority and the Eastern Corridor Transit Study, as well as planning for Maglev, present opportunities to integrate planning for a genuine multi-modal alternatives on a regional basis at a scale and with design qualities that complement the urban character of the Mon-Fayette Northern Sections.
- SP advocates a "Smart Growth" approach underpinned by economic and community development strategies based on sound market analysis of development realities, community aspirations, assessments of environmental assets, and consideration of emerging evidence of ways in which transportation modes affect community livability.

## **Executive Summary**

Public investment in infrastructure (roads, sewers, water supply, etc.) is a principal determinant of Southwestern Pennsylvania's destiny to be a sustainably developed metropolitan area. On a national scale, progress is being made in integrating major transportation projects to promote both access and livable communities. Indeed landmark federal transportation legislation (ISTEA) requires that major infrastructure investments be linked to the economy, environment, land-use, human well-being, and fairness. Nevertheless, no agency in the Commonwealth is mandated to coordinate, much less prioritize, the land use, economic development and transportation linkages in our region. As such, as exemplified in the Mon-Fayette Expressway proposal, while much of the country is moving forward on new approaches to urban transportation solutions, this region is considering old approaches to new circumstances.

Sustainable Pittsburgh (SP) is a public-policy advocacy group that links economic prosperity, ecological health, and social equity by working in three areas: land use, outdoor recreation amenities, and diversity and civic engagement. SP and its supportive coalition identifies trends and leverage points for change and works to educate and affect decision-making systems. SP has conducted a Sustainability Assessment (SA) of the Northern Sections of the proposed Pennsylvania Turnpike Commission Mon-Fayette Expressway (Toll Road), designated by section numbers 1 - 6, from the existing facility's interchange at Route 51 in Large to Duquesne where it branches to Bates Street in Pittsburgh and the Parkway East in the Penn Hills/Monroeville area.

Following the principles of sustainable development, this assessment reviewed transportation, economic, community, environmental, and social advantages and disadvantages. We also reviewed the processes used to develop the toll road proposal. Our work is based on careful review of publicly available materials including those featured in two in-depth briefing sessions with representatives of the Turnpike Commission and their consultants. We also drew input from the public panel discussion sponsored by SP on January 16, 2002. Thus, this SA reflects the sentiments of a wide range of studied viewpoints and raises issues to which the public should find answers in the Draft Environmental Impact Statement (DEIS) to be released by the PTC in May 2002 and reviewed and revised during the following months.

### **Comprehensive Regional Planning & More Review of Alternatives**

For more than a decade the MFE has been promoted with significant political support through the somewhat autonomous PTC. The PTC has only one mission under Pennsylvania law -- to build and administer toll roads. It can not build other transportation facilities, highway or transit. The simple fact that PTC's legislative charter does not include options other than toll road construction may have limited its consideration of the alternatives.

This circumstance has worked against a public participation process integrated with that of other transportation agencies. For example, we note the minimal level of cooperative planning of the MFE together with transit options tied to the Port Authority system. Reinforcing this inter-agency dynamic is the fact that no elected official has gone on record as opposing the MFE/NS or advocating more multi-modal approaches in the corridor. Accordingly, the PTC is following the will of the Pennsylvania legislature, supported by local officials and a sequence of governors from both political parties.

Two consequences of this are 1) alternatives have not been considered except in a very limited sense, and 2) the criteria used in this limited consideration of alternatives were more narrowly constituted than required. Sustainable Pittsburgh believes that this is a shortcoming that is at odds with the requirements of national surface transportation legislation and related practices used elsewhere in the country. A genuine analysis of alternatives is warranted before a EIS is submitted to the Federal Highway Administration (FHWA).

Recommendation: The scope of the SPC's and the Port Authority's current Regional Transit Vision Plan and the Eastern Corridor Transit Study should be expanded to address transportation access needs in the Mon Valley from a multi-modal, local and regional planning perspective. The

scale and design of this scope should complement the urban character of the MFE/NS corridor and to the extent appropriate be linked with current planning for Maglev. The completion of the EIS should await the inclusion of this additional analysis.

### **Constrained Alternatives, Dated Findings, and Narrow Criteria**

The number one cited need for the MFE/NS has been stated to be community revitalization and economic stimulus. We note an absence of economic study relevant to this project. There is a lack of analysis of projected job growth, new business starts, character of development anticipated with and without the project, and more. Another significant set of objectives associated with the MFE/NS concerns congestion relief and improved transportation system efficiency. We observe that the evaluation criteria used in the Congestion Management Study (CMS) and the Major Investment Study (MIS) of the mid-1990's were too narrowly focused on highway impacts, have not been updated to reflect new commuting patterns, and the alternatives considered were not designed in ways that truly examined mixed modal alternatives. Apparent shortcomings include:

- the merit of the Northern Sections independent of the Southern Beltway has not been examined, bringing to question the limited congestion relief assertions made to date.
- the lack of meaningful localized information to reasonably explain how the MFE/NS would impact on the performance of the transportation system and, particularly, the arterial highways in Pittsburgh's Southside, Oakland, Greenfield, and Squirrel Hill neighborhoods as well as Mon Valley municipalities in the proposed MFE/NS corridor.
- the absence of a comparison of design year (2030) traffic forecasts against the current situation to enable people to see the extent to which the congestion, with which they are familiar, would be relieved or exacerbated with and without the MFE/NS.

Recommendation: PTC, SPC, and others should augment the EIS process with additional analysis to:

- update and broaden the Congestion Management Study and Major Investment Study to examine genuinely multi-modal alternatives with particular emphasis on 1) interrelated economic and community development, land use, and environmental impacts and 2) current day travel needs, emerging development strategies, and new patterns and the trip making.
- show the projected impact of the Mon-Fayette on economic development efforts in the Mon Valley.
- revise the transportation systems analysis for the MFE/NS by removing the Southern Beltway and assessing the impacts with and without the Northern Sections.
- show the projected impact of the Mon-Fayette on existing arterial roads using performance measures such as Level of Service at key intersections along the arterial corridors mentioned above in both the base and design years for alternatives with and without the Northern Sections.

### **Financing**

Sustainable Pittsburgh shares SPC's and FHWA's desire to make realistic plans that force priority setting based on reasonable expectations of funding and costs. While PTC has amended its proposal to SPC based on higher cost expectations after a relatively short time, we suspect that their project's costs would inevitably continue to escalate as more changes, such as "mitigation measures" are made. SPC

accepted the amended financing plan, subject to the provision that the MFE would be advanced only through financing that would not diminish the amount of state and federal transportation

funds that could otherwise be available for the region. SP is nonetheless concerned that future additional increases would come from SPC funding allocations which must be set aside for other regional projects.

Recommendation: SPC could have moved those portions of the PTC financing plan elements that are not currently in place from its *Available Resources Element* to *Future Resources Element* categories. Doing this would more accurately characterize the dearth of predictable revenue sources and represent a credible step forward by acknowledging the extraordinary funding requirements of the PTC's project.

### **Transportation Investments for Sustainable Communities**

Our sustainability model values strong communities, high quality of life, and accentuation of unique local qualities. We acknowledge the Mon Valley communities are in need of enhanced transportation access. We see economically sustainable communities as the heart of a healthy metropolitan area. Certainly, stimulating reinvestments in brownfields and steering growth to our existing municipal centers is essential.

SP strongly supports any significant brownfield development that spares greenfield development in the belief that it will help to curb sprawl and foster a more sustainable region. We also acknowledge transportation investments can be used to help ameliorate and help to break the poverty cycle in this cluster of municipalities. However, we assess the market potentials for developments of brownfields with proximity to Pittsburgh's business and institutional centers and to the Waterfront Development to be significantly more robust than the factors that are being suggested to work farther south in the corridor. We conclude there should be a more thoughtful linkage between transportation investment and the type of development that would be stimulated. One type of road doesn't fit all communities' needs or aspirations.

Recommendation: Recognizing the link between type of transportation infrastructure (mode, scale, routing) investment and the character of development it stimulates, the EIS should be augmented with additional analysis to determine economic development strategies (based on community realities and aspirations) appropriate for each MFE Northern Section matched with the most appropriate type of transportation investment.

### **Section by Section Sustainability Analysis**

Notwithstanding our overall recommendations for additional analysis to remedy the procedural shortcomings we have noted, we believe it is possible to assess the proposed MFE/NS on a section-by-section basis since we also believe that the communities north of Route 51 need public infrastructure investments in order to have better chances of becoming sustainable communities.

#### MFE Section 1:

Ending the already completed portion of the MFE at Route 51 is too abrupt. We acknowledge that MFE Section 1 from above Route 51 to Duquesne and to the USX Edgar Thompson Works (ETW) affords economic potential to several brownfield sites. However, no single transportation facility will be the area's "silver bullet." Local governments will have to find new ways to do joint work and accept collaboration rather than competition as their principle of development. Nevertheless, while noting that Section 1's alignment, in taking forest and field and adding noise and pollution will change the character of this rural corridor, we expect the DEIS to validate these impacts' magnitudes with the development trade offs.

Recommendation: We would encourage consideration in the EIS of providing direct highway access using spurs to other brownfield sites south of the Mon River such as Glassport and

McKeesport as is proposed at the Duquesne site. We also recommend that county and municipal governments in addition to various development interests act in partnership with the PTC to supplement improved access by doing needed site preparation work in a carefully prioritized way and by undertaking creative industrial marketing. We think this should begin with the Dick Corp. site acquired by the PTC at Large.

#### MFE Section 2:

There are a number of negative impacts deserving of careful consideration in the EIS regarding this section running from Section 1 to I-376 in Penn Hills/Monroeville. Industrial and multi-modal transfer sites in this section stand to benefit from increased access. Nevertheless, environmental and community impacts to the Turtle Creek area suggest very high tradeoffs even for an elevated toll road. We think that, given all of the roads and bridges that currently crowd this enclosed valley community, adding another road of the Section 2's size and prominence in the exact center of town, could be the "straw that breaks the camel's back." What is the community's long term potential? We would be eager to see a careful assessment of this community's well-being and future needs. Based on that assessment we would advocate an effort largely funded by the PTC but done in conjunction with others to put Turtle Creek on a trajectory to sustainability.

Recommendation: Implement a comprehensive multi-agency effort to assess the Turtle Creek's well-being and future needs. Renew areas within a significantly wider right of way than is contemplated so that more PTC resources could be dedicated to renewal. While the PTC should largely fund this effort, it should be done in conjunction with others to put Turtle Creek on a trajectory to sustainability. Additionally, we encourage PTC to explore with the property owners of the brownfield site and Monroeville Mall a formula through which a reasonable proportion of the value added to their holdings or operations by Section 2's direct connection to their properties are directed to Turtle Creek and, perhaps, other nearby affected municipalities.

If, however, it is determined that Section 2 should NOT be built as proposed, we would urge PTC to offer a design that would terminate the MFE with direct links to Route 30 and the Tri-Boro Expressway. Under this circumstance, we would ask that the PTC in partnership with PennDOT, SPC, and Allegheny County determine the extent to which enhancements to Route 30 and the Tri-Boro Expressway are needed to convey anticipated traffic through these communities and to the Parkway East and other destinations. Finally, we would ask that a multi-municipal development planning process be inaugurated and funded to examine the potential advantages that additional traffic might have to stimulate new investments in business and residential developments if Section 2 is not approved by FHWA.

#### MFE Sections 3-6 General:

Extending the toll road from the interchange at the current Edgar Thompson Works all the way to its Parkway East/Bates Street terminus in the city of Pittsburgh raises a number of questions and sustainability issues of concern. Concerns are based on the simple truth: the communities along these sections' corridor have a unique and distinguishing asset - river frontage and potential river access, these communities' most valuable asset. We believe that this attribute plus recent and reasonably anticipated development investments do not require the sorts of access represented in the MFE/NS. We recommend analysis of additional alternatives.

Based on the facts that we have reviewed and those that we anticipate will be contained in the DEIS, we question one of the principal congestion relief assertions about Sections 3 - 5, namely, that the MFE/NS will serve as a by-pass of the Squirrel Hill Tunnels and that traffic flow in that corridor and adjacent arterials and neighborhood streets will be significantly reduced. There are several points here.

First, what has been reported to date about traffic volume reductions has not been about reductions from the "current" situation.

Second, the changes that are important are the changes, not in volumes, but in "levels of service" and they are yet to be reported and explained for either base year or design year situations in the adjacent areas impacted by these sections of the MFE.

We understand that no evidence of this nature will be contained in the DEIS. While most, if not all, of these technical matters may be considered standards of practice that are generally followed and may even be applied using "state of the art" techniques, we wait to see in the DEIS if their inadequacies are acknowledged as having any direct effect on toll road designs.

#### Braddock, Rankin, & Swissvale (Section 3):

These communities share much in common with Hazelwood and Turtle Creek but they also share a brownfield that contains ready-to-develop space at the Carrie Furnace Site. The Allegheny County Department of Development is working diligently to plan, market, and finance development at this site and use it as a catalyst for developing the sites up river. We view these efforts favorably. However, we believe that in the intermediate term, the site will develop without a direct highway link to Pittsburgh of the scale proposed by the PTC. We agree that the Carrie Furnace site needs improved access.

Recommendation: Additional consideration of multi-modal and arterial highway upgrade options through Braddock, Rankin, and Swissvale is warranted consistent with the interest of hastening development at the Carrie Furnace site and renewing Braddock between ETW and Carrie Furnace. We see this happening through a multi-agency redevelopment program with an eye toward renewed use of the riverfront for both businesses and residences.

Further examine multi-modal remedies, such as the proposed PAT busway station in Braddock, to Route 837 through Homestead and into Pittsburgh through the South Side and Hazelwood as well as necessary improvements to Braddock Avenue through Rankin and Swissvale to the Parkway East as part of this additional analysis effort.

Further consider an interchange at Carrie Furnace and enhancing the Rankin Bridge and Braddock Avenue to better link this area to The Waterfront, Edgewood Town Centre, and the Parkway East.

#### Nine Mile Run and Duck Hollow (Section 4):

This link of the MFE diminishes the environmental and aesthetic qualities that currently exist at these locations as well as current investments to ecologically restore Nine Mile Run.

Recommendation: Additional economic analysis should be included in the EIS to determine if Section 4 can be justified as a link between the Carrie Furnace site and Bates Street. Further consideration of alternatives, probably on the South shore, seems warranted to address access objectives.

#### Hazelwood, Pittsburgh (Section 5):

The City of Pittsburgh has sponsored community-based processes to articulate the Hazelwood neighborhood's self-image and preferences for development. Many see a hillside community whose vacant lots with extraordinary views of the Mon River and the South Side are reoccupied. They see what had been industrial land renewed as mixed income residential developments with meaningful river and trail access. They see commercial developments and a pedestrian friendly business center. They see an improved and beautified Second Avenue.

We believe this vision fits with market realities and has more potential to yield a sustainable community in the long term without the MFE. We accept the City-sponsored Saratoga study that concluded the MFE would drive a development scenario in Hazelwood that would be a more industrial, larger scale in nature than the mixed-use, knowledge-based development anticipated to occur without the toll road. Social

equity issues here contribute and are linked to questioning whether the real estate tax losses would be recoverable in response to positive economic impacts of increased transportation access.

Recommendation: The emerging vision for Hazelwood's revitalization, particularly riverfront properties, favors a mixed-use, knowledge-based development scenario not dependent upon realization of the MFE. Nevertheless, additional analysis in the EIS should give thorough consideration of this unique economic vision and accordingly addressing the access objectives in Hazelwood through multi-modal or other transportation alternatives that enhance the existing system, particularly Second Avenue.

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# Sustainable Pittsburgh's Approach to Sustainability Assessment

## INTRODUCTION

Public investment in infrastructure (roads, sewers, water supply, etc.) has always been a principal determinant of the nature of a region's economic growth. Recently, however, regions have begun using sustainable development criteria in designing and evaluating infrastructure investment. These criteria focus on creating livable, economically integrated and socially equitable communities that emphasize quality of life issues.

Too often, however, decision-making on public infrastructure spending fails to account for a wide range of community impacts, taking instead a short-term view focused on narrow, legally mandated considerations. This reality is in keeping with the "letter-of-the-law" mandates under which most public agencies, authorities, and special districts are expected to operate by most elected officials. While these sorts of approaches protect against arbitrary acts, they also preclude meaningful integrated and truly comprehensive approaches. Coordinating these investments with economic, environmental, community, and real estate development is extremely complex and, for all intents and purposes, only exists when the involved agencies, usually inspired by courageous elected officials, make necessary efforts to comply with the comprehensive approach required by FHWA regulations and, what some consider, "spirit-of-the-law" approaches.

Progress has been made throughout the nation in integrating major transportation projects with the economic, environmental, community, and real estate interests of publicly accountable organizations and the citizenry through landmark national transportation legislation.\* Progress is also being made to stretch "transportation dollars" to not only improve the performance of regional transportation systems but also to enhance the well-being of the natural, built, and human environments. The U.S. Departments of Transportation, Housing & Urban Development, and Energy as well as the Environmental Protection Agency have certainly advocated these successes. These successes have, in large measure, come by making metropolitan planning organizations linchpins in the investment/coordination process as well as moderators of inevitable disagreements among state/national transportation interests and local needs and aspirations.

To foster more integrated economic, environmental, and community development as well as more informed infrastructure decisions, while envisioning a progressively more viable and vibrant regional community -- Sustainable Pittsburgh (SP) conducts Sustainability Assessments (SA) on infrastructure investments that constitute significant opportunities for Southwestern Pennsylvania. These Sustainability Assessments seek to identify and measure long term economic, environmental, and equity implications. Through them SP generates broader public understanding of what public investments can accomplish for the long-term viability of our region and its communities. Appendix A contains the topics and associated questions that SP has encouraged participants in our process to use. They constitute the criteria used in this assessment. Many of them have been inspired by a set of principals stated in the Transportation Charter contained in Appendix B.

This assessment summarizes publicly available materials including those that were featured in two in-depth briefing sessions with the PTC and at a public panel discussion sponsored by SP. The SA reflects the sentiments of a wide range of advocates and adversaries, poses questions about which its authors<sup>1</sup> would expect to see addressed in the DEIS, and -- above all -- adds substantive insights to inform the decision making process.

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\* This legislation, the Intermodal Transportation Efficiency Act of 1991 (ISTEA) firmly established this policy approach in transportation planning. The principles of ISTEA were carried forward and confirmed in the successor transportation reauthorization act, "TEA21".

<sup>1</sup> SP formed an advisory committee and retained the services of James P. DeAngelis, AICP to establish the process and assist in drafting the Sustainability Assessment. Many people and organizations contributed directly and indirectly to the resultant report.

## **BACKGROUND**

### Need for Regional Planning

In the early days of the Interstate Highway System, highways were the major, if not the only, transportation system considered by most transportation planners. Thus transportation planning was a relatively simple process of superimposing a highway right-of-way on top of a region's existing road network. This planning process for the most part ignored other methods of transportation (bus, light rail, train, etc.) and the impacts (social and economic) the highway would have on the community. Thus this process had unintended negative impacts on urban areas by disrupting residential and commercial neighborhoods and failing to provide for economic development. One of the most negative impacts of the super highways of the 50s and 60s was the flight of people and businesses from the urban cores. It is only in recent years that we have seen significant movements of suburbanites back to the cities.

Following years of this type of highway building, undertaken without regard for many of its consequences, major legislation enacted in the late 1960s set the stage for a different approach. This legislation, the National Environmental Policy Act of 1969 ("NEPA"), established the requirement to consider and describe the environmental effects of certain projects in which there was federal government involvement, financial or otherwise. The disclosure and review required by NEPA would, in all likelihood, have precluded many projects which have had major negative effects in urban areas throughout the U.S. NEPA together with the regulations which implement it define much of the process required of the TPC in its proposal to build the MFE/NS

With very limited exceptions, the era of the new urban expressway has now come to an end. Indeed, in some American cities huge efforts are being made to bury the mistakes of the past, while in other cities decisions are being made not to replace highways that have been irreparably damaged. These cities have promoted the need for an integrated transportation policy, a policy that coordinates road and mass transit design and carefully integrates the result with residential and commercial patterns. The Federal Government, major funder of highways and mass transit, has caught up with the trend and required for a decade that all highway and mass transit projects be coordinated by a single planning entity, a Metropolitan Planning organization (MPO) for each region.

In this region the Southwestern Pennsylvania Commission (SPC) is the designated Metropolitan Planning Organization. However, neither SPC, nor a majority of its constituent members, is mandated to prepare land use plans that can be implemented by comprehensive land use ordinances and comprehensive capital improvements programs. Furthermore, no regional or Commonwealth entity is mandated to coordinate, much less prioritize, the incredible array of public, nonprofit, and business initiatives that are intended to enhance the region's economic, environmental, and community development efforts. The land use, economic development and transportation linkages are simply not mandated by the Commonwealth for SPC or anyone else to do.

This planning process in Pennsylvania is in sharp contract to the intent of Federal legislation passed during the last decade (Intermodal Surface Transportation Efficiency Act of 1991 or "ISTEA") which intended that major infrastructure investments be linked to a region's economy, environment, land-use, human well-being, and fairness.

The Mon-Fayette Expressway is now estimated to cost about \$4 billion to construct (Northern section \$1.9 billion), making the project one of this region's most significant single public works project ever. If there is going to be clarity about accepting, rejecting, or modifying a capital investment of this size, elected officials and citizens are entitled to know the degree to which the Mon-Fayette Expressway Northern Segment (MFE/NS) would make Southwestern Pennsylvania and those communities along its corridors more economically, socially, environmentally, and humanly sustainable -- at an acceptable public cost.

The Pennsylvania Turnpike Commission is preparing to circulate a Draft Environmental Impact Statement (DEIS) for the northern segments (officially designated as Sections\* 1 - 6) of the Mon-Fayette

Expressway. This document is expected to be released in May and, after public comment during a 75-day review period, the Turnpike Commission can commence preparation of a final "EIS" in which it must address and respond to comments received during the comment period. The final EIS will be submitted to the Federal Highway Administration (FHWA) and the Turnpike Commission anticipates receiving a "record of decision" in 2003 for this project from the FHWA.

\*Route 51 to the Mon River Crossing (Section 1); Connector to Monroeville (Section 2); and Connector to Pittsburgh (Sections 3 - 6<sup>2</sup>).

## **PLANNING ISSUES**

The proposal to complete the Mon-Fayette Expressway's (Route 51 to Pittsburgh and Monroeville) has been subjected to the careful scrutiny of a wide array of concerned citizens and non-government organizations with public service missions. In preparing this assessment, Sustainable Pittsburgh has incorporated research, direct testimony, public discourse, and wide involvement by persons studied on the issues.

SP believes in integrated approaches to comprehensive regional planning, meaningful participatory processes, bringing state of the art analysis about all impacts to the attention of public officials, and prudent stewardship of scarce public resources including public funds, properties, and institutions. Based on these principles and our findings to date, we note areas for additional analysis in each of the following matters.

### **A. Comprehensive Regional Planning**

Unfortunately for this region, Southwestern Pennsylvania has never engaged in meaningful comprehensive planning. The result is that planning for the Mon-Fayette Expressway has occurred independently of other transportation projects in this region. This is extraordinary given that the MFE would be the largest project in this region's history. Although not the responsibility of the Turnpike Commission per se, the result is that the Mon-Fayette has not been integrated into the regional road and mass transit plan. Sustainable Pittsburgh believes that this is a shortcoming at odds with the intent of national surface transportation legislation, and related practices used elsewhere in the country as evidenced by the New Transportation Charter of the Surface Transportation Policy Project (Appendix B). Additional analysis is warranted before an EIS is submitted to FHWA. It would be timely and strategic to integrate the required alternatives analysis with the Port Authority and SPC's current Regional Transit Vision Plan process and the Eastern Corridor Transit Study and link to the extent appropriate with the current planning for Maglev to yield a genuine multi-modal alternative analysis.

Recommendation: The scope of the SPC's and the Port Authority's current Regional Transit Vision Plan and the Eastern Corridor Transit Study should be expanded to address transportation access needs in the Mon Valley from a multi-modal, local and regional planning perspective. The scale and design of this scope should complement the urban character of the MFE/NS corridor. The EIS should include this basic analysis.

### **B. Public Participation: Rules, Regulations and Resistance**

For more than a decade the MFE has been promoted with significant political support through the somewhat autonomous PTC. The PTC has only one mission under Pennsylvania law -- to build and administer toll roads. It cannot build other transportation facilities, highway or transit. The simple fact that PTC's legislative charter does not include options other than toll road construction may have limited its consideration of alternatives. This circumstance has worked against a public participation process integrated with that of other transportation agencies. For example, we note the minimal

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<sup>2</sup> Section 6, "The Southern Alignment," is not considered in the SP SA for reasons that are explained later in this report.

level of cooperative planning of the MFE together with transit options tied to the Port Authority system. Reinforcing this inter-agency dynamic is the fact that no elected official has gone on record as opposing the MFE/NS or advocating multi-modal approaches in the corridor. Accordingly, the PTC is following the will of the Pennsylvania legislature, supported by local officials and a sequence of governors from both political parties. One consequence of this is that alternatives have not been considered except in a very limited sense, and the criteria used to evaluate those have been more narrowly constituted than required.

Public participation has also suffered in the face of the confrontational posture of some of the project's adversaries and proponents. We note aggressive efforts by both detractors and proponents to the MFE (such as that taken against the University of Pittsburgh's Environmental Law Clinic) have had a chilling effect on public discourse among members of the academic community, the public, as well as professionals employed by public, private, and nonprofit organizations involved in infrastructure, community, and economic development. Now should be the time for reason to prevail. Public debate and discussion should ensue, free of coercion.

### **C. Alternatives Analysis: Constrained Alternatives, Dated Findings and Narrow Criteria**

We observe that the evaluation criteria used in the Congestion Management Study (CMS) and the Major Investment Study (MIS) of the mid-1990's were too narrowly focused on highway impacts, have not been updated to reflect new commuting patterns, and did not consider alternatives in ways that truly examined mixed modal alternatives.

Many of the MIS and CMS requirements that were "met" during the mid 1990s were new at the time they were employed. But by today's standards adherence to these requirements would probably be judged deficient. More specifically, the measures of effectiveness that were used were almost exclusively related to transportation indicators such as delay, level of service, Vehicle Miles Traveled (VMT), congestion, accessibility of people and trucks, demand management factors, and operations management. Measures were lacking regarding economic or community development, land use, and environmental impacts. The factors that were included are important but they are not all the factors that should have been considered.

Sufficient time has elapsed between the completion of these studies and the forthcoming DEIS that enough circumstances have changed in the trip-making environment and the development pattern to invalidate the MIS/CMS findings. In short, we suggest that (i) these findings are stale, (ii) they were not used in the manner intended by the FHWA and FTA, and (iii) the PTC must more fully consider alternatives in its DEIS.

Moreover, we understand that much of the earlier MIS/CMS work was done using SPC's Cycle V forecasts while most of the more recent DEIS work has used their more current Cycle VI forecasts. There are potentially significant differences in the effected corridors between these forecasts<sup>3</sup>. If the forecasts changed in this time frame, probably the current conditions on which they are calibrated did too.

Additionally, we understand that the alternatives that were considered in the MIS/CMS were constrained by various factors that worked against simply integrated or packaged multi-modal approaches. A genuine consideration of alternatives could have blended potential solutions that met the needs of commerce, discretionary personal travel, and routine daily travel directed at key employment centers and conducive to transit solutions. Indeed, we understand that there was one LRT alternative that was rejected in 1994 and six or seven alternatives that were assessed by 1996; half of these involved toll road options. One of these became the MFE/NS project.

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<sup>3</sup> The VMT forecasts in six of the seven corridors for which we have facts have declined by orders of magnitude ranging from -12.1% to -2.1%; the VMT in the I-376 corridor from the Monroeville interchange with the Turnpike to the Ft. Pitt Bridge is reported to have increased by 6.1% from Cycle V to VI.

Finally, further analysis is needed to determine projected job growth, new business starts, character of development anticipated with and without the project, etc. Market-based economic forecasts, not conducted we understand as part of either the MIS, CMS, or the DEIS, are needed to substantiate the MFE's promise as a driver of economic development. Throughout our review, suggestions were made

that such economic impact analysis is outside of the federal requirements. However, federal requirements are clear on this subject. Economic or social effects, in addition to environmental effects, are to be considered when an EIS is prepared<sup>4</sup>.

To reinforce these points and to demonstrate our respect for the ISTEA/TEA21 regulations we sought and received well informed insights regarding the clear intent of FHWA/FTA in seeking MIS, CMS, and DEIS pertinent information on which to make decisions. Simply put, these three studies may be integrated. If integrated, that process is to occur contemporaneously or in sequence, not with a separation of several years. They are intended to be comprehensive justifications for capital improvements investments and the mitigation of their potentially negative impacts. The analysis that underpins this work is expected to be of high quality and in keeping with prevailing standards of professional practice. Most importantly, "factors such as direct and indirect costs of alternatives, mobility and accessibility improvements, and the impacts on social, economic, environmental, safety, operating efficiencies, land-use, economic development, financing, and energy consumption" must be considered and clearly available for public review and official scrutiny in formal decision-making processes<sup>5</sup>.

Recommendation: The EIS should be augmented with additional analysis to:

- update and broaden the Congestion Management Study and Major Investment Study to examine genuinely mixed modal alternatives with particular emphasis on 1) interrelated economic and community development, land use, and environmental impacts and 2) current day travel needs, emerging development strategies, and new patterns and the trip making - - the consideration of alternatives is the heart of the EIS process<sup>6</sup>
- show the projected impact of the Mon-Fayette on economic development efforts in the Mon Valley

#### **D. Inclusion of the Southern Beltway (SB)**

##### The Basis for Concern

Transportation systems analysis involves extensively gathered travel survey facts summarized and used to calibrate statistically valid models that forecast travel demand and assigned trips to highway and transit networks. These iterative processes take travel behavior, modal choices, and route selection rules into account. As these models have evolved they have been knit together with regional economic and demographic forecasting efforts. The models are intended to be used to help assess travel implications of major improvements/investment in the overall network and its various parts. So, the basic process

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<sup>4</sup> The Regulations of the Council on Environmental Quality (CEQ) uses the phrase, "economic or social and natural or physical environmental effects are interrelated," to demonstrate not just that these factors must be considered but that they are to be considered as "interrelated." 40 CFR § 1508.14. The CEQ is responsible for promulgating the regulations implementing the National Environmental Policy Act of 1969 (NEPA). Other federal agencies issue regulations for implementing CEQ's regulations on projects for which they have responsibility. In the case of the PTC proposal, FHWA is the agency that is relevant.

<sup>5</sup> These points are contained in FHWA-PD-95-031 "A Guide to Metropolitan Planning and ISTEA." It is our understanding that this still constitutes the standards that are to be employed in processes of this nature.

<sup>6</sup> Regulations of the Council on Environmental Quality 40 CFR § 1502.14

would be to analyze the existing situation, identify where problems exist or opportunities to make the community better seem to be, and test alternative investments to determine which, if any, are worth the investment. To make a fair test every alternative must be measured in the same way. Following this logic, we expected to find MFE/NS indicators that clearly showed what the base year performance of the system was. We thought these would be compared to at least two alternatives: 1) the MFE built in its entirety from West Virginia to Pittsburgh and Monroeville and 2) the entire MFE without the Northern Sections. We could then see how the performance of the network would be improved with and without the NS<sup>7</sup>. However this is not the case.

The \$4 billion project proposed by the Turnpike Commission includes the Mon-Fayette Expressway from Route 51 to both Monroeville and Pittsburgh and the Southern Beltway, a toll road connecting the Expressway to the Pittsburgh International Airport. The transportation systems analysis done for the Mon-Fayette included the Southern Beltway in the build/no-build alternatives used to analyze the Expressway Northern Section. Thus, the actual alternatives that were tested were:

- 1) Build the entire Mon-Fayette Expressway with the Southern Beltway and
- 2) Build nothing

The Southern Beltway should have been excluded from this analysis, or included as an alternative dimension to the analysis, which would have allowed a reasonable assessment of the impacts of Northern Sections with and without the Southern Beltway<sup>8</sup>.

The technical decision to prepare the systems analysis of the Mon-Fayette, including the Southern Beltway, was based on the finding that the lengths of trips that were assigned to both the Mon-Fayette Expressway and the Southern Beltway were relatively short. Therefore they were assumed to have impacts on proximate arterials that would be local and very much the same as if the Expressway was tested with and without the Southern Beltway. This rationale is a double bladed sword. If the trip length finding is correct, the Mon-Fayette Expressway is not performing the function of a "turnpike" but that of a local road that would seem hard to justify as a toll facility. If the trip length finding, which seems intuitively incorrect, is false, the simulation's calibrations are probably in error and findings about design year transportation impacts are probably not reliable.

Recommendation: The transportation systems analysis for the Mon-Fayette should be revised to remove the Southern Beltway and include this road as an additional alternate. In addition, Sustainable Pittsburgh recommends that the Southern Beltway be studied independently from the Mon-Fayette not only for traffic impact but in terms of long-range regional land use, development planning, and transportation systems efficiency and effectiveness. Sustainable Pittsburgh is concerned that the Southern Beltway will stimulate sprawl; however, it has yet to be determined if this sprawl will be composed of developments that would be made in communities with surplus infrastructure or service capacities. Furthermore, it remains to be seen if any significant regional environmental assets would be put in jeopardy by the development that might be associated with the highway.

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<sup>7</sup> These expectations were based on earlier work done by SPC and others and included an appreciation of the fact that since much of this analysis needed to include consideration of future, design year conditions that it would be appropriate for other anticipated improvements that had nothing directly to do with the MFE would need to be included in the analysis since, in and of themselves, they should have a positive impact on the system.

<sup>8</sup> As if this isn't complicated enough, the fact of the matter is that the on-going and now concurrent discussions of the MagLev project to link Pittsburgh, Monroeville, and Greensburg together in a way that could intersect with and probably impact the MFE/NS, have not been included in the DEIS. Having no explicit consideration of the MagLev while assuming that the Southern Beltway would exist just exacerbates the analytical process' shortcomings.

## E. Impact on Existing Road System

Another shortcoming we observe is the apparent lack of information and analysis concerning how the Mon-Fayette would impact existing arterial roads in its proximity, such as Carson Street through the South Side; the Boulevard of the Allies through Oakland and Squirrel Hill; City of Pittsburgh's Forbes, Fifth, and Penn Avenue corridors and; probably, others such as S. Braddock Avenue north of I-376 and Murray Avenue in Squirrel Hill and, of course, Bates Street. This information gap can result in misunderstandings and a lack of awareness by public officials and community leaders regarding the potential impact of the road on their communities.

Recommendation: The EIS should be augmented with additional analysis showing the projected impact of the Mon-Fayette on existing arterial roads, such as Carson Street through the South Side; the Boulevard of the Allies through Oakland and Squirrel Hill; City of Pittsburgh's Forbes, Fifth, and Penn Avenue corridors and; probably, others such as S. Braddock Avenue north of I-376 and Murray Avenue in Squirrel Hill and, of course, Bates Street. These studies should use performance measures such as Level of Service at key intersections along the arterial corridors mentioned above in both the base and design years for alternatives with and without the Northern Sections.

## F. Financing the MFE/NS

Clearly the price of the Mon-Fayette has been escalating (rising more than \$700 million in the last 18 months). As a result of the projected increases, the Turnpike Commission petitioned the Southwest Planning Commission to amend its fiscally restrained 2025 Transportation Plan to account for these increases, which may continue to escalate as more changes, such as "mitigation measures" are made. While PTC has amended its proposal to SPC based on higher cost expectations after a relatively short time, we suspect that their project's costs would inevitably continue to escalate as more changes, such as "mitigation measures" are made. SPC accepted the amended financing plan, subject to the provision that the MFE would be advanced only through financing that would not diminish the amount of state and federal transportation funds that could otherwise be available for the region. Sustainable Pittsburgh is nonetheless concerned that future additional increases would well impact SPC funding allocations which must be set aside for other regional projects. And, we share SPC's and FHWA's obligation to make realistic plans that force priority setting based on reasonable expectations of funding and costs.

Recommendation: SPC could have acted to move those portions of the PTC financing plan elements that are not currently in place from its ARE to FRE categories. Doing this would more accurately characterize the dearth of predictable revenue sources and represent a credible step forward by acknowledging the extraordinary funding requirements of the PTC's project.

*(Projects in the Available Resources Element (ARE) are funded by predictable revenue sources -- the federal and state revenue stream anticipated by the region, as well as special, dedicated funding sources. The ARE distinguishes between those two types of funding. The Turnpike projects are in the ARE, entirely funded by special sources outside the regular revenue stream. The Turnpike Commission's financial plan is incorporated in the 2025 Plan, substantiating the sources of funding for these projects.*

*The Future Resources Element (FRE) is another list of transportation projects, for which funding sources are not yet secure. These projects can not move into the ARE for implementation until there was an assurance of funding -- from new sources, by displacing other projects in the ARE, or by cost savings on other projects. The Mon-Fayette Expressway and Southern Beltway projects are not currently in this category, because SPC accepted as viable the financial plan presented by the Turnpike Commission.)*

## Summary of Planning Shortcomings

SP believes the shortcomings noted in the applications of the transportation systems analysis models (the time that has passed since the earlier alternatives analysis was done, the intent of FHWA regulations, and the narrowness of the earlier analysis) in the testing of the build/no-build alternatives of the MFE/NS warrants conduct of additional analysis. Additional study should bring state of the art analysis about all impacts associated with genuine consideration of multi-modal alternatives (including transit and consideration of enhancements to existing roads) to the attention of public officials, and prudent stewardship of scarce public resources. The current Regional Transit Vision Plan of SPC and the Port Authority and the Eastern Corridor Transit Study as well as planning for Maglev present opportunities to integrate planning on a regional basis.

## **SECTION BY SECTION SUSTAINABILITY ASSESSMENT**

In spite of the concerns about the context in which and the process that has been used to date in the MFE/NS project, SP believes the essence of this Sustainability Assessment is to focus on the long term potentials and impacts of the proposal that is being prepared for presentation to FHWA by the Turnpike Commission for a "record of decision" based on the DEIS.

### **Economic Stimulus: Differing Priorities for Brownfield Re-Development and Community Vitality**

Building the MFE has been viewed and supported by essentially every elected and appointed government official in this corridor as this area's catalyst for reinvestment and prosperity. SP sees economically sustainable communities as the heart of a healthy metropolitan area. Certainly, stimulating reinvestments in brownfields and steering growth to our existing municipal centers is essential in achieving these aspirations. SP strongly supports any significant brownfield development that spares greenfield development in the belief that it will help to curb sprawl and foster a more sustainable region. We also acknowledge transportation investments can be used to help ameliorate and help to break the poverty cycle in this cluster of municipalities whose residents include a disproportionately high share of people living below the poverty level. However, as community needs and aspirations differ so do the most appropriate types and scale of transportation infrastructure and options. Our sustainability model values strong communities, high quality of life, and accentuation of unique local qualities.

During our review we heard anecdotal examples of business resurgence in those parts of the Mon Valley currently being served by already built or soon to be opened sections of the MFE south of Route 51. These examples are offered as promise for future economic stimulus to the north. A key point however are the assertions that independent of the Northern Pittsburgh branch, the MFE south of Route 51 is serving, and when completed to West Virginia, will further serve the substantial needs of the mid-Mon Valley, a collection of communities and abandoned industrial sites (brownfields) that have declined with the demise of the durable manufacturing industries, allied businesses, and associated population loss.

We note that much of this success is attributed to the strengthening of these mid-Mon River communities' links to the Eastern and Western markets via Route 70, which is now connected to the MFE. The proposed section North of the Route 51 is not viewed as an economic driver in this southern portion. This suggests the success of the southern portions do not depend on the northern. Further contributing to this independence, we assess the market potentials for developments of brownfields with proximity to Pittsburgh's business and institutional centers (the Golden Triangle and Oakland) and to the Waterfront Development to be significantly more robust than the factors that are being suggested to work farther South. This suggests differing transportation needs.

Indeed, we heard conflicting testimony with regard to real estate developers' preferences for transportation access. Some claimed traditional heavy truck access is imperative while others claim that accommodating truckers was less important than facilitating commuters for more labor-intensive economic development activities. Still others asserted that, if destinations were desirable enough, drivers

would tolerate both congestion and parking difficulties to be customers, as The Waterfront is demonstrating under the Homestead High Level Bridge. What seems like contradictory testimony is not.

Each of these comments is based on assumptions about the type of uses that would exist at particular locations along the MFE/NS. For example, in the past, PennDOT sponsored in-depth interviews with selected business managers in the service and manufacturing industries the result of which demonstrated that advance technology businesses viewed transportation facilities and services differently than non-advanced technology businesses. The relevant finding was that advance technology managers viewed transportation and site location factors more in terms of quality of life and labor force attributes while non-advanced technology managers saw transportation in a more traditional way<sup>9</sup>. Since some participants in our review classified the MFE/NS as a "1950s solution to a 'new economy' opportunity," we sought more insights about development potentials at specific sites. We conclude there should be a more thoughtful linkage between transportation investment and the type of development that would be stimulated. And, we assess that different MFE/NS sections command different development and thus have varying transportation needs. One type of road doesn't fit all communities' needs or aspirations.

**Recommendation:** Recognizing the link between type of transportation infrastructure (mode, scale, routing) investment and the character of development it stimulates, the EIS should be augmented with analysis to determine economic development strategies (based on community realities and aspirations) appropriate for each segment of the Expressway matched with the most appropriate type of transportation investment.

## **Section By Section**

Aside from all systems analysis and the design parameters and the design details, aside from all of the financing and political dimensions associated with it, the Mon-Fayette Expressway is a limited access toll highway intended to relieve traffic congestion and enhance development opportunities in the Mon Valley, particularly on those sites that have been abandoned by durable goods manufacturers during the last generation. The road should enhance the environment and the communities through which it passes. Accordingly, the proposal is assessed on a section by section basis.

The MFE currently ends at Route 51. This Sustainability Assessment's findings and recommendations are organized into three parts: MFE Section 1, MFE Section 2, and MFE Sections 3-6.

### **MFE Section 1**

Notwithstanding our overall recommendations for additional analysis (system analysis, economic, alternatives/multi-modal) we agree that the communities North of Route 51 need meaningful public infrastructure investments to have better chances of becoming sustainable communities. However, no single transportation facility will be the area's "silver bullet," local governments and their authorities must find new ways to do joint work and accept collaboration rather than competition as their principle of development.

Ending the already completed portion of the MFE at Route 51 is too abrupt. Clearly, the consequences on the local road system of ending the MFE at Route 51 would be severe; the PTC will certainly demonstrate how severe the traffic implications in the design year (2030) would be in its DEIS.

In our review, which admittedly focused more on the sections north of the Mon River, we heard no compelling environmental, community disruption, or equity issues with the Section 1 proposal that did not seem to have been reasonably resolved through PTC's work. However, while noting that Section 1's alignment in taking of forest and field and adding noise and pollution will change the character of this rural corridor, we expect the DEIS to validate these impacts' magnitudes with the development trade offs.

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<sup>9</sup> Transportation Access and the Location of Advance Technology Firms in Pennsylvania prepared for PennDOT by the University of Pittsburgh Center for Social and Urban Research 1986.

Nevertheless, we acknowledge the MFE Section 1 from above Route 51 to Duquesne and, to the USX Edgar Thompson Works affords economic potential to several brownfield sites (improved access would be provided directly to the Duquesne brownfield - 200 acre former USX Works and indirectly to brownfields and more actively used redevelopment sites in McKeesport, Glassport, and Dravosburg).

Recommendation: We would encourage consideration in the EIS of providing direct highway access using spurs to other brownfield sites south of the Mon River such as Glassport and McKeesport as is proposed at the Duquesne site. We also recommend that county and municipal governments in addition to various development interests act in partnership with the PTC to supplement improved access by doing needed site preparation work in a carefully prioritized way and by undertaking creative industrial marketing. We think this should begin with the Dick Corp. site acquired by the PTC at Large.

## **MFE Section 2**

With regard to MFE/NS Section 2, running MFE/NS Section 1 to I-376/Parkway East in Penn Hills/Monroeville, we note a number of negative impacts deserving of careful consideration. We offer some recommendations.

This section of the MFE is proposed to make a traffic connection to the Parkway East and to provide direct access to major arterials (Route 30 and the Tri-Boro Expressway), the Edgar Thompson Works, Monroeville Mall, and an abandoned USX site in Penn Hills. These latter two connections have been recently negotiated changes and they seem to have resulted in more support for the MFE/NS from local officials.

In order to perform these functions the PTC has created an extraordinary interchange as it enters the Turtle Creek Valley at Keystone Commons under the classic Westinghouse Bridge, selected an alignment (several options have been considered) that is now slated to pass over the heart of Turtle Creek's business district, and makes connections at its northern terminus with I-376, Monroeville Mall, and an abandoned "brownfield" USX site. Given the topography of the valley, the apparent receptivity of municipal officials and property owners, and the tightness of its mouth (Keystone Commons, in particular) the design we have seen seems functional from a strict traffic handling perspective.

We acknowledge the potential value of enhanced access represented by continuing the MFE into Turtle Creek, where we believe significant truck traffic associated with the Edgar Thompson Works and several multi-modal transfer facilities would be served, and then on to interchanges with the Parkway, directly into Monroeville Mall, and a brownfield site that has few appealing attributes. Nevertheless, environmental and community impacts to this area suggest very high tradeoffs. A couple observations and suggestions:

First, we understand that the recently proposed direct connection to Monroeville Mall is not anticipated to materially increase the property's value or profitability, and by reference, add new real estate tax revenues to local governments or school districts. We understand that this design change was done at municipal officials' request to alleviate traffic congestion that would have been caused by Section 2's originally proposed interchange at CompUSA. In other words we are told Section 2 adds no value but can be designed to mitigate problems that it will create. This raises questions which the DEIS should address.

Second, the damage that we believe will be done to the business center of Turtle Creek and, perhaps to the creek itself, seems a high price to pay for an elevated toll road whose Northern interchanges will do relatively little to enhance property values or alleviate current traffic congestion on the Parkway<sup>10</sup>.

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<sup>10</sup> The by-pass function is discussed in a later section of this assessment.

The concern we have about the MFE/NS Section 2's effect on Turtle Creek goes beyond the expressed interests of Turtle Creek's elected representatives whom we understand have been negotiating with the PTC to mitigate the impacts of the design. Simply put, we are not sure that those portions of Turtle Creek -- particularly those that are located around the center of town, by the four churches and Penn Plaza -- have promise as a "sustainable community" with the MFE. We think that, given all of the roads and bridges that currently crowd this enclosed valley community, adding another road of Section 2's size and prominence in the exact center of town, could be the "straw that breaks the camel's back." Most of the qualities that we would seek in a living environment would be absent.

Should this section be built, there needs to be a comprehensive effort to renew the areas within a significantly wider right of way than is contemplated. We appreciate and understand the most current alignment that is being negotiated with Turtle Creek officials is to "cover" part of Penn Plaza with the elevated highway, but the fact that an elevated highway will traverse the center of town which already accommodates the Tri-Boro Expressway and convergences of streets and bridge ramps that virtually preclude pedestrian friendliness, requires a major redevelopment effort or the abandonment of any pretense that this is a sustainable community.

What is the community's long term potential? We would be eager to see a careful assessment of this community's well-being and future needs. Based on that assessment we would advocate an effort largely funded by the PTC but done in conjunction with others to put Turtle Creek on a trajectory to sustainability.

In this regard we understand that PTC may be constrained in providing direct support for community based development that is not directly linked to property acquisition and relocation. But we also know that creative approaches to capturing the value added by public infrastructure investments have been used in Pennsylvania. In this specific case we would encourage PTC to explore with the property owners of the brownfield site and Monroeville Mall<sup>11</sup> a formula through which a reasonable proportion of the value added to their holdings or operations by the MFE/NS are directed to Turtle Creek and, perhaps, other nearby affected municipalities.

Recommendation: Implement a comprehensive multi-agency effort to assess the Turtle Creek's well-being and future needs. Renew areas within a significantly wider right of way than is contemplated so that more PTC resources could be dedicated to renewal. While the PTC should largely fund this effort, it should be done in conjunction with others to put Turtle Creek on a trajectory to sustainability. Additionally, we encourage PTC to explore with the property owners of the brownfield site and Monroeville Mall a formula through which a reasonable proportion of the value added to their holdings or operations by Section 2's direct connection to their properties are directed to Turtle Creek and, perhaps, other nearby affected municipalities.

If, however, it is determined that Section 2 should not be built as proposed, we would urge PTC to offer a design that would terminate the MFE with direct links to Route 30 and the Tri-Boro Expressway. Under this circumstance, we would ask that the PTC in partnership with PennDOT, SPC, and Allegheny County determine the extent to which enhancements to Route 30 and the Tri-Boro Expressway are needed to convey anticipated traffic through these communities and to the Parkway East and other destinations. Finally, we would ask that a multi-municipal development planning process be inaugurated and funded to examine the potential advantages that additional traffic might have to stimulate new investments in business and residential developments if Section 2 is not approved by FHWA.

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<sup>11</sup> As noted before, we acknowledge that added value is not being anticipated at Monroeville Mall but respectfully disagree with that conjecture.

## **MFE Sections 3 - 6: Congestion Relief?**

Review of MFE Sections 3 - 6<sup>12</sup> extending the toll road from the interchange at the current Edgar Thompson Works all the way to its Parkway East/Bates Street terminus in the City of Pittsburgh raises a number of questions and sustainability issues of concern.

Our concerns are based on a number of interconnected factors that spring from simple truth: the communities along these sections' corridor have a unique and distinguishing asset - river frontage and potential river access, these communities' most valuable asset. We believe, as many have testified, that this attribute plus recent and reasonably anticipated development investments do not require the singular sort of access represented in the MFE/NS. And, again we recommend further analysis of alternatives.

We present our assessment, first, in terms of congestion relief and then, more specifically, in terms of economic, environmental, and community assessments of the Carrie Furnace/Braddock sites (Section 3), and the Nine Mile Run (Section 4), and Hazelwood (Section 5).

### Congestion Relief: Bypassing the Squirrel Hill Tunnels

Based on the facts that we have reviewed and those that we anticipate will be contained in the DEIS, we question one of the principal congestion relief assertions about Sections 3 - 5, namely, that the MFE/NS will serve as a by-pass of the Squirrel Hill Tunnels and that traffic flow in that corridor and adjacent arterials and neighborhood streets will be significantly reduced.

These MFE/NS sections will not constitute a bypass that will significantly increase the level of service at the Squirrel Hill Tunnels; the queuing at The Tunnels will continue to be significant.

A transportation network is complex. Drivers make route choices on their most frequent, daily trips based on experience and knowledge. Sometimes they even have information such as traffic congestion signs or media reports. The only reason that a driver destined for the other side of the Squirrel Hill Tunnel would use the longer, tolled MFE connections between Penn Hills and Pittsburgh would be if the driver perceived or was told there was significant enough traffic congestion at the Squirrel Hill Tunnels to make the diversion.

So, for this connection to work as a "bypass," the Squirrel Hill Tunnels will have to remain congested. Furthermore, since the "bypass" is not free -- there's a toll, the congestion will have to be significant enough to warrant paying for the time saved as well as the added distance traveled.

We heard convincing technical testimony that tolls "dampened" this sort of diversion by 30% to 40%. How significantly will the "level of service" at the Squirrel Hill Tunnels be changed in the future? How much will it be changed with or without the MFE's Penn Hills to Pittsburgh connection? The answer we heard and expect will be reinforced by information in the DEIS is "not much."

We think the easiest explanation is that there will be a "ripple effect" if drivers have an opportunity to divert from the Parkway to avoid The Tunnels. This means that other drivers who do not currently use the Parkway and Tunnels will use that route as others divert. This has been described as a ripple from North of the Parkway that fills the "void" left by the diversions to the South of the Parkway. Furthermore, given the apparent growth North of the Allegheny River relative to the Eastern suburbs, it is likely that the "ripple" will be "filled" by relatively higher levels of traffic growth to the North. Consequently, we do not find that traffic congestion at the peak period at the Tunnels will be significantly mitigated by the proposed MFE/NS "bypass"<sup>13</sup>.

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<sup>12</sup> We have not considered Section 6 in our Sustainability Assessment since we understand it will not be presented in the DEIS as a preferred alignment to Sections 3 - 5. If at some point that situation changes or opportunities such as the moving of CSX tracks become part of the DEIS process, we will reconsider our comments on these MFE sections.

## Congestion Relief on Neighborhood Streets

The claims of reduced traffic volumes on neighborhood streets are not what they may seem. The traffic volume reduction findings that have been promulgated are for the design year, 2030, and distinguish between volumes that are forecasted to be on major arterials and expressways with or without the Mon Fayette Expressway and Southern Beltway. As noted earlier this analytic deficiency diminishes the credibility of the traffic volume reduction assertions.

Furthermore, there is no reporting of existing "base year" conditions in the neighborhood streets. Since there is an overall projection that overall travel will increase between the base year and design year by about 30%, it is likely that in many cases the reported volume reductions are not reductions from existing conditions but from conditions that are projected to exist in 30 years. The Vehicle Miles Traveled in five of seven selected state highway corridors for which the PTC provided information actually increases above the current situation even if the MFE/NS were built as proposed.

Furthermore, the projected 2030 design year volumes tell only a part of the story. There may be capacity improvements<sup>14</sup> to major arterials and expressways that would be made independent of the MFE's being built or not, that would improve traffic flow. Until we know what the "level of service"<sup>15</sup> is on these neighborhood streets, we cannot know how the MFE/NS would truly impact these streets. There has been no information provided that supports a finding that neighborhood streets will perform at higher levels of service with the MFE/NS than without it.

There are several points here. First, what has been reported to date about traffic volume reductions has not been about reductions from the "current" situation. Second, the changes that are important are the changes, not in volumes, but in "levels of service" and they are yet to be reported and explained for either base year or design year situations in the areas impacted by these sections of the MFE. We understand that no evidence of this nature will be contained in the DEIS<sup>16</sup>.

While most, if not all, of these technical matters may be considered standards of practice that are generally followed and may even be applied using "state of the art" techniques, we wait to see in the DEIS if their inadequacies are acknowledged as having any direct effect on toll road designs. Maybe this is acceptable when the project is relatively small, but the MFE/NS is at least a \$1.9 billion project and one of its clear objectives has been to reduce congestion and strengthen local economies as opposed to

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<sup>13</sup> As noted earlier in this assessment, the Southern Beltway has been included in the network traffic analysis. We question the value of the findings for the MFE/NS in general and particularly for its claimed impact on the Parkway East corridor and associated arterials. With the Southern Beltway functioning as a "bypass" of downtown Pittsburgh for trips with origins or destinations to the West of Greentree Hill and East of the Squirrel Hill Tunnels, the MFE/NS might offer some advantages. But the traffic analysis has been interpreted by PTC consultants to suggest that these types of trips are a relatively small proportions of the trips to be diverted and that it is likely that most of the "diverted" trips have relatively short trip lengths. This has significant implications which should be confirmed when the DEIS is released and analyzed.

<sup>14</sup> The effective capacity of a street can be increased by adding lanes or implementing traffic management actions such as more sophisticated signalization on Fifth Avenue in Oakland or by providing transit service that lures private vehicle trips off neighborhood streets.

<sup>15</sup> "Levels of Service" are determined empirically using derived standards that rate road segments and intersections on a scale from A to E with A meaning "free flowing" conditions. Basically, "levels of service" compare a segment's or intersection's traffic volume to its capacity. Speed and traffic density are factors that are considered or computed as part of this process.

<sup>16</sup> There is also a third important point about "reduced traffic volumes." The process of forecasting traffic demand and assigning it to simulated computer networks has been reported to overstate the volumes and not to take into account the very different patterns of working that are already evident in Oakland's world class institutions of learning and health care, not to mention the decentralization of many activities that were performed at these places up until the early 1990s when advanced technologies really started to impact our lives. Furthermore, the forecasting procedures used to compare the impacts with and without the MFE/NS, assumed that the MFE would have no effect on development patterns or, more precisely, trip end densities. So while the volumes are already overstated, over-design is further exacerbated during the design phases when engineers traditionally add redundancy to the estimates handed them as "safety factors."

bypassing older communities by fostering sprawl. Furthermore, elected officials with constituents in these places, as well as most of Oakland's institutional leaders, believe the MFE/NS will alleviate congestion in their communities. We'll look to the DEIS for the complete story.

### Congestion Relief at a Portal to Oakland -- The Bates Street / Parkway Interchange

Common sense really needs to prevail in the consideration of the proposed intersections at Second Avenue and Bates Street as well as at the interchange with the Parkway over Bates Street. It is clear from the work being done under Mayor Murphy's leadership that this traffic situation is essentially impossible to resolve. Even the PTC analysis shows deteriorated levels of service at Bates and Boulevard of the Allies with the MFE/NS even with mitigation measures.

The reason requires no more than common sense. Even though the proposed MFE/NS links from Penn Hills to Pittsburgh do not function as a "bypass" of the Squirrel Hill Tunnels, at least an added lane (maybe two) of traffic would be added during the peak periods to the Parkway.

How would an extra west bound lane (or two) of vehicles be accommodated during the morning peak period between the interchange over Bates Street and the Fort Duquesne Bridge and/or the Fort Pitt Bridge & Tunnel?

How many of these vehicles would be destined for downtown destinations?

What sorts of added delays would be encountered by vehicles entering westbound at the Squirrel Hill entrance ramps during the morning peak period?

With or without MFE/NS vehicles will encounter delays along the Parkway East at the Squirrel Hill Tunnels, as they do now. The delays, if we accept the general assumption that travel will increase by perhaps 30% during the mandated design period, will probably get worse. There will probably be longer queues and longer peak periods than today. At some point drivers will find other routes or, if they have the option, will change modes. It just doesn't make sense to move this congestion problem or to create an even worse problem at a second location by creating the Oakland Portal.

### **Economic Development and Community Well-Being (Sections 3, 4, and 5)**

Certainly many of our concerns about Sections 3 - 5 are based on traffic and congestion relief arguments but the most persuasive reasons for suggesting additional analysis for these sections concern economic development, community well-being, and the mitigation of resident poverty associated with the communities in each section.

#### Braddock, Rankin, & Swissvale (Section 3)

These communities share much in common with Hazelwood and Turtle Creek but they also share a brownfield that contains ready-to-develop space at the Carrie Furnace Site. The Allegheny County Department of Development is working diligently to plan, market, and finance development at this site and use it as a catalyst for developing the sites up river. We view these efforts favorably.

This site is especially interesting because it has the Rankin Bridge connection that provides access to The Waterfront development across the river and a hot-metal bridge that could be used for some vehicular and pedestrian movements between these sites. There will likely be community effort to encourage the PTC to reconsider locating its MFE interchange<sup>17</sup> at the Rankin Bridge rather than at Sixth Street. Doing this would be more in keeping with the County's concept of developing the site and linking it to surrounding places.

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<sup>17</sup> This interchange alternative was apparently dismissed by the PTC early in the design process. We understand that its reasons will not be included in the DEIS.

Allegheny County Development Department is working on a strategy for developing the Carrie Furnace site as part of a development strategy that "moves" up the river from that location towards the Edgar Thompson Works (ETW). We believe this strategy has potential to succeed, most importantly, because County government is behind the effort. However, we believe that in the intermediate term, the site will develop without a direct highway link to Pittsburgh of the scale proposed by the PTC. We agree that the Carrie Furnace site needs improved highway access and that its location downstream but under the Rankin Bridge creates a design challenge that will require the best thinking of designers from many disciplines. We believe that between the County development team, the PTC, SPC, and PAT such a design can emerge and thus additional consideration of multi-modal and upgrade options to existing roads is warranted to hasten development at the Carrie Furnace site and renewing Braddock between ETW and Carrie Furnace; through a multi-agency redevelopment program with an eye toward renewed use of the riverfront for both businesses and residences.

In addition to supporting Allegheny County's economic development approach we also see promise in the development of a Port Authority busway station and further analysis of multi-modal remedies to Route 837 through Homestead and into Pittsburgh through the South Side and Hazelwood as well as necessary improvements to Braddock Avenue through Rankin and Swissvale to the Parkway East as part of this additional analysis effort. With the proper design this could also be a catalyst for renewal of these communities -- albeit a long-term matter.

Another reason for interest in further consideration of alternatives for enhanced transportation access in this section is concerns for social equity. We believe transportation investments can be used to help ameliorate and help to break the poverty cycle in this cluster of municipalities whose residents include a disproportionately high share of people living below the poverty level.

Reinforcing this is testimony from leaders in the Woodland Hill School District who see raising local revenues through increased property tax revenues as a key to helping to further upgrade the quality of education. These added revenues would, in part, come along with new jobs that would employ local residents who might not otherwise have access to jobs. An interchange at Carrie Furnace and enhancing the Rankin Bridge and Braddock Avenue could be the development key and are worthy of further assessment.

Finally, we have received data regarding the value of properties that would most likely be taken if its proposed alignment became the final alignment. The combined assessed property value in these communities of this segment is \$9 million. This is a substantial amount of property to take off the tax roles (generates over \$200,000 in tax revenues) of the municipal governments and school districts unless it can be demonstrated that the present value of the lost taxes can be recovered by an increase in tax revenues from proximate properties that would be enhanced by greater transportation access. The Allegheny County Department of Development is working on strategies to revitalize the Carrie Furnace site and bring vitality back to these neighborhoods as spawned by enhanced transportation access with connections to the Rankin Bridge. A key question to track is whether the real estate tax losses associated with Section 3 constitute a loss that would be recoverable in response to positive economic impacts of increased transportation access.

Recommendation:

- Additional consideration of multi-modal and arterial upgrade options through Braddock, Rankin, and Swissvale (Section 3) is warranted consistent with the interest of hastening development at the Carrie Furnace site and renewing Braddock between ETW and Carrie Furnace; through a multi-agency redevelopment program with an eye toward renewed use of the riverfront for both businesses and residences.

- Further examine multi-modal remedies, such as the proposed PAT busway station in Braddock, to Route 837 through Homestead and into Pittsburgh through the South Side and Hazelwood as well as necessary improvements to Braddock Avenue through Rankin and Swissvale to the Parkway East as part of this additional analysis effort.
- Further consider an interchange at Carrie Furnace and enhancing the Rankin Bridge and Braddock Avenue to better link this area to The Waterfront, Edgewood Town Centre, and the Parkway East.

#### Nine Mile Run and Duck Hollow (Section 4)

Despite PTC's considerable work with residents, developers, and city officials to redesign the elevated highway along the Mon River between Carrie Furnace and the Glenwood Bridge (by doing such things as bifurcating the structures to preserve the river views for Summerset's future residents and mitigating the impacts on Duck Hollow), this link of the MFE does not enhance the environmental or aesthetic qualities that currently exist at Nine Mile Run and Duck Hollow. Several knowledgeable residents and scientists cite impacts on the natural environment that would not be recoverable.

Indeed, the MFE/NS diminishes these qualities and works against efforts to provide access to the river and restore ecological values such as represented by the Army Corps of Engineers investment in ecological restoration of Nine Mile Run. The MFE/NS is contrary to growing recognition of and investment in rivers as a precious asset and amenity. This is reinforced by the majority of Duck Hollow property owners that have petitioned the PTC to acquire their homes if they build Section 4, even as an elevated highway. Their point is that they are better off not living under the MFE/NS. Any alignment along the riverbank will require mitigation measures that will only reduce impacts to someone's judgment of an "acceptable" level but also to preserve the investment being made in the ecological restoration of the Nine Mile Run stream. Either way, this unique environment will not be enhanced.

Recommendation: Additional economic analysis should be included in the EIS to determine if Section 4 can be justified as a link between the Carrie Furnace site and Bates Street. Further consideration of alternatives, probably on the South shore, seems warranted to address access objectives

#### Hazelwood, Pittsburgh (Section 5)

The City of Pittsburgh has sponsored and posted the findings on its web site of various community-based processes to articulate the Hazelwood neighborhood's self-image and preferences for development. Groups of students and faculty from at least three graduate classes have studied Hazelwood's economic development needs, design options, and community aspirations.

Most of these efforts have addressed the issue of Hazelwood's well-being with or without the MFE. In addition a professional consultant team has worked with the community to articulate its aspirations for the community in general and the key development site in particular. Furthermore, Pittsburgh's Mayor, Tom Murphy, has recently worked with the community to define a set of conditions that would be desirable if the MFE were built through Hazelwood. What emerges is a neighborhood with serious economic and social problems that is resolved to make itself right in the long term. The community seems intent on using whatever resources it can to remake itself.

For some property owners the MFE is a coveted prize. "Take my property, pay me its market value," is a frequent comment. Business tenants and resident renters hope for relocation assistance and compensation. Yes, the MFE is welcomed today, as the proposed "Second Avenue By-Pass" was a generation and a half ago. What people came to realize then -- and may realize with regard to the MFE -- is that the roads essentially served drivers whose only interests were to by-pass (or go-under) Hazelwood on their ways someplace else.

There are those in Hazelwood who see a different future. They see -- in the longer term -- a hillside community whose vacant lots with extraordinary views of the Mon River and the South Side are reoccupied. They see what had been industrial land renewed as mixed income residential developments with meaningful river and trail access. They see commercial developments and a pedestrian friendly business center. And they see an improved and beautified Second Avenue. Some see this happening without the MFE, made possible by emerging market opportunities that make Hazelwood ripe for investment. For them it's a domino effect moving up the Mon from Station Square and the Southside and down the Mon from the Waterfront. Hazelwood is next.

We believe this vision fits with market realities and has more potential to yield a sustainable community in the long term without the Mon-Fayette. We accept the City-sponsored Saratoga Study that concluded the MFE would drive a development scenario in Hazelwood that would be a more industrial, larger scale in nature than the mixed-use, knowledge-based development anticipated to occur without the toll road. Like others, we see sustainable development happening in Hazelwood without the MFE. Nevertheless, the additional analysis we recommend should give thorough analysis to this unique economic vision and accordingly evaluate transportation systems alternatives here and as part of a larger multi-modal network.

Finally, we have received data from the community regarding the value of 177 properties that would most likely be taken if the proposed alignment is built. The combined value is \$16 million in real property generating almost \$450,000 in taxes (adjacent properties in the shadow of the proposed road will lose value as well, and we note the Mayor's proposal for an additional quarter-mile buffer zone along the proposed road would affect an increasing number of properties). This is a substantial amount of property to take off the tax roles of the City and school district unless it can be demonstrated that the present value of the lost taxes can be recovered by an increase in tax revenues from proximate properties that would be enhanced directly by Section 5. Additional analysis should shed light in this area.

Recommendation: The emerging vision for Hazelwood's revitalization, particularly riverfront properties, favors a mixed-use, knowledge-based development scenario not dependent upon realization of the MFE. Nevertheless, additional analysis should give thorough analysis in the EIS to this unique economic vision and accordingly addressing the access objectives in Hazelwood through multi-modal or other transportation alternatives that enhance the existing system, particularly Second Avenue.

A Concluding Comment

In this Sustainability Assessment we have attempted to take a long-term view of the Mon-Fayette Expressway's Northern Section's potential benefits and costs to the region, its transportation system, and the communities through which it is proposed to pass. Our recommendations for additional analysis are respectfully offered as in the interest of sustainable communities.

Accordingly, we believe that the added time and expense associated with further analysis are warranted. The following scorecard summarizes our sustainability assessment of each MFE/NS Section versus each of the four general criteria that we used.

MFE / NS Segment Descriptions	PTC Section Number	Sustainability Assessment Criteria			
		Economy	Equity	Environment	
		Transportation System & Operations	Economic & Business Opportunity	Community Well-Being & Fairness	Natural & Built Environment
Route 51 to Mon River	1	+	+	+	-
Monroeville Connector through Turtle Creek	2	0	+	-	0
Pittsburgh Connector through Braddock, Rankin, Swissvale	3	0	+	-	0
	4	-	0	-	-
	5	-	-	-	-

**Appendix A:  
Issues to be Addressed in Sustainable Pittsburgh's Sustainability Assessment of Northern  
Sections of Mon-Fayette Expressway**

**Transportation System And Its Operations**

- To what degree does the MFE project relieve traffic congestion, improve the levels of service, and create other user benefits on the existing or proposed road system within its immediate location, nearby communities, and the region?
- To what degree does the project support multi-modal and inter-modal transportation for personal movements (such as walking, biking, and public transit) and for commodity movements/transfers (barge, rail, pipeline, and truck terminals) as opposed to strictly auto-vehicular transportation?

**Economic & Business Opportunity**

- To what degree does the project confer a significant, long-term, net economic benefit to its users and to non-users, who live, work, recreate, or do personal business within its immediate location (i.e., a proposed corridor for a transportation project), nearby communities, and the region?
- To what degree does the MFE project create new economic development benefits (such as jobs, higher wages, new industries, etc...) within its immediate location and nearby communities, as distinguished from transferring these benefits from another location within the region?
- To what degree does the MFE project leverage (or confer benefits that could be used to leverage) investment from non-local public (state, federal) or private sources? To what degree will existing businesses and public redevelopment efforts be enhanced by the project?
- To what degree does the project integrated into the community's existing infrastructure and its current or potential economic niche?

**Community Well-Being & Fairness**

- To what degree does the project foster investments in existing urban centers and/or abandoned industrial "brownfield" sites?
- To what degree does the project avoid contributing to the potential for future urban sprawl?
- To what degree does the project enhance local amenities and aesthetics?
- To what degree does the project benefit all socio-economic classes of residents and property owners equally?
- To what degree does the project improve public health and safety of all socio-economic classes of residents and property owners equally?

**Natural & Built Environment**

- To what degree does the project protect and enhance the use of productive agricultural land and other environmental assets, such as streams and natural reserves?
- To what degree does the project protect and enhance critical biological areas, such as wetlands, wildlife habitats, and bio-diversity areas?
- To what degree does the project ameliorate air and water pollution and solid waste generation?

**Political, Administrative, Legal, & Financial**

- To what degree has the development of the project involved the participation of the local citizens and earned the support of their elected officials?

- To what degree does the project comply with or exceed existing local, state, and federal environmental regulations and guidelines?
- To what degree does the project comply with comprehensive development plans, land use guidelines or ordinances, and community based planning efforts?
- To what degree does the financing of the project place other significant projects in its proximity, nearby communities, or the region in stronger positions to attract needed resources?
- To what degree does the stream of revenues associated with the project meet the financial obligations anticipated in the PTC's long-term financing?

## **Appendix B: New Transportation Charter**

Sustainable Pittsburgh subscribes to the view about transportation investments espoused by the national Surface Transportation Policy Project's Alliance for a New Transportation Charter:

### ***Enhance Public Health, Safety, and Security***

Our transportation system should provide a secure travel environment, protect all users, use all available methods to reduce deaths and injuries from crashes, promote cleaner air and water quality, provide access to essential destinations, encourage healthy physical activity, and have the capability to maintain operations during emergencies.

### ***Promote Social Equity and Livable Communities***

The transportation system should be socially equitable and strengthen civil rights; enabling all people to gain access to good jobs, education and training, and needed services. Where possible, personal transportation expenses should be minimized in ways that support wealth creation. Integrated with land use planning, transportation should also enhance the quality, livability and character of communities and support revitalization without displacement. The transportation system should allow every American to participate fully in society whether or not they own a car and regardless of age, ability, ethnicity, or income.

### ***Sustain Economic Prosperity***

The transportation system should provide for the efficient and reliable delivery and distribution of goods and services to all markets, serve employer needs for recruitment and retention of a high-quality workforce, and be redundant, resilient, reliable and resistant to service and system disruptions. In addition, transportation investments should support local and regional economic objectives and recognize efficient activity centers as the drivers of economic prosperity and sustainable growth.

### ***Improve Energy Use and Environmental Protection***

Transportation investments, services and incentives should meet our travel needs, promote economic prosperity and environmental justice, preserve and protect open space, scenic resources and agricultural land, protect and enhance the integrity of natural resource systems and wild places and improve air and water quality. Such efforts can promote resource efficiency and energy conservation, while reducing reliance on foreign oil and offering solutions to climate change.

It is SP's finding that many of these principles can be found in the MFE/NS project; however, there are some overall concerns as well as some more specific concerns that underpin our overall findings, conclusions, and recommendations; they are noted in the body of the sustainability assessment.