



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

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September 6, 2019

Mr. Sam Zimbabwe  
Director  
Seattle Department of Transportation  
Seattle Municipal Tower  
P.O. Box 34996  
700 Fifth Avenue, Suite 3800  
Seattle, WA 98124-4996

**Subject: Seattle Department of Transportation  
Madison Street Bus Rapid Transit Project  
NEPA Environmental Re-Evaluation  
Grant No.: WA-2019-049; CIG grant TBD**

Dear Mr. Zimbabwe:

The Federal Transit Administration (FTA) has received National Environmental Policy Act (NEPA) environmental re-evaluation documentation from Seattle Department of Transportation (SDOT) on design modifications for the proposed Madison Street Bus Rapid Transit (BRT) Project (Project) in Seattle, Washington. The re-evaluation documentation was initially submitted on March 8, 2019. Additional documentation was submitted between May 3, 2019 and July 22, 2019. FTA approved the NEPA Documented Categorical Exclusion (DCE) for the Project on December 27, 2017.

Under FTA environmental regulations, changed conditions since the DCE and the design refinements proposed by SDOT make it necessary to re-evaluate the earlier NEPA determination (See 23 Code of Federal Regulations (CFR) Part 771.129(c)).

*(c) After approval of the ROD, FONSI, or CE designation, the applicant shall consult with the Administration prior to requesting any major approvals or grants to establish whether or not the approved environmental document or CE designation remains valid for the requested Administration action. These consultations will be documented when determined necessary by the Administration.*

The documentation submitted by SDOT outlines the changed conditions since the DCE and describes the details of the proposed design modifications included in the Project. Changes to the Project design compared to those described in the 2017 DCE include the following:

**Fleet Change** – Originally, electric trolley buses (ETBs) were proposed for the Madison BRT route. The supplier was unable to provide functional ETBs within the Project schedule; therefore, in conjunction with King County Metro, the City has decided to use diesel-hybrid buses.

**Change in Overhead Contact System (OCS) Poles** - Originally, 174 new and 86 replacement poles were required to power the OCS. The change to diesel buses eliminates the need to expand the OCS. However, modifications are necessary to maintain the existing OCS for operation of the existing ETB routes and to maintain flexibility in operations. Thus, the Project has reduced the need for OCS poles to approximately 10 new and 40 replacement poles along the alignment.

**Change in OCS Wires** - Originally, 1.2 miles of new OCS wires were proposed to support the ETBs. The Project no longer requires the addition of new OCS wire for the BRT service; however, the changes in channelization on Madison between 11th Avenue and 13th Avenue require modifications to existing OCS wire.

**Change in Power Source** - A Traction-Powered System Substation (TPSS) was originally proposed on the corner of Madison Street and E. John Street to support the new OCS. Because the new OCS was eliminated by switching to diesel-hybrid buses, the TPSS is no longer required and will not be constructed.

**Schedule Change** - Construction has been delayed two (2) years from 2018 to 2020 due to funding constraints and additional time needed to identify an alternative project fleet. Subsequently, service start has also been delayed two years from 2020 to 2022.

**1st Avenue Station Location Change** - Madison BRT was to share the 1st Avenue station with the Center City Connector (CCC) streetcar. It was assumed that this station would be completed by the CCC project before the Madison BRT was operational. Due to delays in the CCC schedule, Madison BRT will now be completed first. The current Madison BRT design will construct a station curb side on 1st Avenue in a similar location as the initially proposed center loading platform. If and when the CCC project is constructed, the bus route would use Western Avenue as a detour route with a temporary stop on Western Avenue between Spring Street and Madison Street.

**MLK JR. Way Station Location Change** - The Madison BRT easternmost station was to be located at MLK Jr. Way. The stop has been moved to 27th Avenue at Metro's request so that RapidRide customers can easily transfer to the Route 11, which currently stops at 27th Avenue and serves Madison Park.

**Stormwater Changes** – As stated in the 2017 DCE, the project will meet the 2016 Seattle Stormwater Code which includes flow control, water quality, and on-site stormwater requirements. Seattle Public Utilities (SPU) has since confirmed that their existing conveyance system and detention facility at Washington Park has capacity to provide flow control for runoff from Basin 5B. The project will also use the fee-in-lieu option for alternative compliance for Basin 5A flow control, and as such, the planned detention facilities in Basin 5 have been

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eliminated from the Project. Replaced pavement quantities have increased in Sub-basin 3B, requiring an additional four-foot diameter, 150-foot long detention pipe located in Pine Street, at Madison Street and 16th Avenue. One proposed detention tank will be moved from Madison Street at 10th Avenue to within 10th Avenue just north of Madison Avenue. The detention pipe in Basin 4 has been shifted from being located on Madison Street between 13th Avenue and 14th Avenue, to Madison Street between 12th Avenue and 13th Avenue.

In addition, SDOT has adjusted traffic signal operations and modified the design of several intersections.

Changes in anticipated impacts from the Project compared to those described in the DCE include the following:

- Changes in peak-period vehicle travel times. The analysis shows that all intersections are expected to continue to operate at acceptable service levels. No additional mitigation measures are required.
- Reduced land use impacts, real estate acquisitions and visual impacts.
- Although the change in fleet vehicles would result in an increase in vehicle emissions, the net benefit of the project would still result in lower emissions than under current conditions.
- No change to endangered species or their critical habitat. The Project would have no effect on species protected by the Endangered Species Act.
- FTA determined, and the Washington State Historic Preservation Officer (SHPO) concurred on July 30, 2019, that the current Project as proposed will have no adverse effect on historic properties.

Based on a review of the re-evaluation documentation provided by SDOT, FTA finds that the changes described are not considered substantial and will not result in significant environmental impacts that were not evaluated in the December 27, 2017 DCE. No additional environmental review is required.

Please contact John Witmer at 206-220-7964 and [john.witmer@dot.gov](mailto:john.witmer@dot.gov) if you have any questions.

Sincerely,

Linda M. Gehrke  
Regional Administrator

cc: Mark Mazzola, SDOT  
Joshua Shippy, SDOT