

I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6)

Finding of No Significant Impact



DEDICATION

The I-405 Project Team dedicates this FONSI to Ross Fenton, P.E. Ross recently retired from the I-405 Program, and we thank him for the 22 years of engineering expertise, mentoring, and leadership that he provided as the lead project engineer for numerous successful projects associated with the I-405 Corridor Program. While he may no longer work on the I-405 Program, we carry all of the positive additions he brought to our team with us each day as we deliver these transportation projects for the state of Washington.



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July 2018

**I-405, Downtown Bellevue Vicinity Express Toll Lanes
Project (MP 11.9 to 14.6)
King County, Washington**

Finding of No Significant Impact

*By the U.S. Department of Transportation
Federal Highway Administration*

This Finding of No Significant Impact (FONSI) is based on the Environmental Assessment (EA) (incorporated by reference) and other documents and attachments, as itemized in this FONSI. Having carefully reviewed the analysis and conclusions in the EA and its supporting documents, FHWA finds pursuant to 23 CFR 771.121 that there are no likely significant adverse impacts on the environment associated with the construction or operation of the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project.

July 12, 2018
Date of Approval

Daniel M. Mathis
Daniel M. Mathis, P.E.
Division Administrator
Federal Highway Administration, Washington Division

Copies of the FONSI can be purchased upon request for \$21.86 from Allison Hanson, WSDOT I-405 Project Office, 600 108th Avenue NE, Suite 405, Bellevue, WA 98004; telephone (425) 450-2703, and are also available for viewing or downloading at this web page: www.wsdot.wa.gov/projects/i405/rentontobellevue.

The EA is incorporated by reference into the FONSI. The EA and FONSI can also be viewed for free at the following locations:

WSDOT I-405 Project Office
600 108th Avenue NE, Suite 405
Bellevue, WA 98004

Bellevue College Library
3000 Landerholm Circle SE
Bellevue, WA 98007

Bellevue Regional Library
1111 110th Avenue NE
Bellevue, WA 98004

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ATTACHMENTS

The following attachments are included in the USB flash drive included on the back cover of this document.

- Attachment 1. Comments with Responses
- Attachment 2. Errata to the EA
- Attachment 3. Notice of Adoption of EA under SEPA with Publication Listing
- Attachment 4. FONSI Distribution List
- Attachment 5. Correspondence with the Muckleshoot Indian Tribe Fisheries Division

1.0 INTRODUCTION

This document explains the determination by the Federal Highway Administration (FHWA) that the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) (“the Project”) proposed by the Washington State Department of Transportation (WSDOT) in Bellevue, Washington, is not likely to have a significant adverse impact on the environment.

This Finding of No Significant Impact (FONSI) is made based on the information in the Environmental Assessment (EA) and considers comments received on the EA. The FONSI has been prepared by FHWA and WSDOT to comply with the National Environmental Policy Act of 1969 (42 U.S.C § 4321) (NEPA), FHWA’s Procedures for Considering Environmental Impacts (64 Fed. Reg. 28545, May 6, 1999), and other related laws.

Where is the Project located?

The Project extends along I-405 approximately 2.7 miles from just north of the I-90 interchange (MP 11.9) to north of the NE 6th Street interchange (MP 14.6), as shown in Exhibit 1.

Why is the Project needed?

Our region needs the Project to improve mobility and reduce traffic congestion in ways that are reliable and improve safety performance. I-405 is one of the most congested routes in the state, particularly during peak travel times.

What is the history of the Project?

In 1998, WSDOT joined with FHWA, Federal Transit Administration (FTA), Central Puget Sound Regional Transit Authority (Sound Transit), King County, and local governments to develop strategies for reducing traffic congestion and improving mobility in the I-405 corridor. In fall of 2002, the combined efforts of these entities culminated in the *I-405 Corridor Program Final Environmental Impact Statement (EIS)* and a *Record of Decision (ROD)*. The ROD identified a Selected Alternative that would allow for the future consideration

Exhibit 1. Project Area



of managed lane operations on I-405. The EIS and ROD did not specify how the lanes would be managed.

In January 2010, WSDOT completed the *I-405/SR 167 Eastside Corridor Tolling Study*, which proposed a tolling strategy for managed lanes in the I-405/State Route 167 (SR 167) corridor. The I-405/SR 167 Executive Advisory Group endorsed a 40-mile express toll lane (ETL) system between Auburn and Lynnwood based on that study.

The Project is one of several projects now being advanced as part of a phased implementation of the Selected Alternative for the I-405 Corridor Program. The 2015 Connecting Washington funding package passed by the state legislature provides funding for constructing the Project.

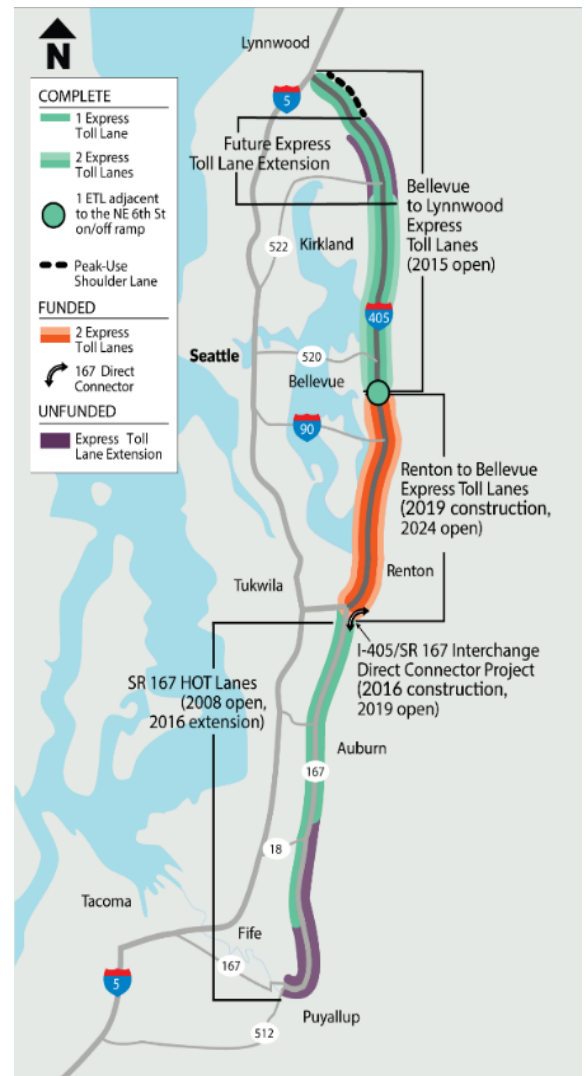
FHWA and WSDOT issued an Environmental Assessment (EA) on April 2, 2018, for the Project. The EA analyzed and documented whether the Project would have significant effects on the environment.

Construction for the Project is anticipated to begin in 2019 and would be completed in 2024.

What other improvements are being considered on I-405?

The “I-405 Corridor Program” is a broad term for more than 150 unique, coordinated projects to relieve congestion and improve mobility for motorists, transit users, and freight users along the 30-mile, I-405 corridor. Additional funded improvements south of the Project going through environmental review include the I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project (MP 0.0 to 11.9), which extends from the I-5/I-405 interchange in Tukwila to just north of the I-90/ I-405 interchange in Bellevue. The I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project (MP 0.0 to 11.9) and this Project are anticipated to be constructed at the same time. When completed, both projects would connect to other ETLs on the north and south to create a 40-mile toll system on SR 167 and I-405 between Auburn and Lynnwood as shown in Exhibit 2.

Exhibit 2. I-405 ETL Projects – Funded, Completed and in Progress



In addition, as part of the Sound Transit 3 funding package, Sound Transit plans to provide bus rapid transit service on the State Route 518 (SR 518) and I-405 corridors between Burien and Lynnwood by 2024. Sound Transit will be making transit related improvements in these corridors as needed to implement a bus rapid transit system. Some of these improvements would be separate projects funded by Sound Transit that would go through a separate environmental review process. Other improvements on I-405, such as the express toll lanes (ETLs) proposed with this Project, would support the implementation of bus rapid transit in the SR 518 and I-405 corridors.

2.0 DESCRIPTION OF PROPOSED ACTION

The Project was developed using current design practices and by engaging the public, agencies, and tribes.

WSDOT's purpose for the Project is to:

- Provide a reliable trip choice for I-405 users
- Increase vehicle capacity and person throughput
- Improve reliability for transit
- Reduce Project-wide congestion
- Improve safety performance

To accomplish this, WSDOT proposed roadway, structural, and trail improvements in the I-405 corridor from just north of the I-90 interchange (MP 11.9) to north of the NE 6th Street interchange (MP 14.6), along with widening the I-405 northbound off-ramp to SR 520 in Bellevue.

What are the Project improvements?

The Project would add one new lane in each direction (except between MP 13.5 north to MP 13.7 where the Project would tie-in with the existing express toll lane system) and convert the one existing high-occupancy vehicle (HOV) lane to create a dual express toll lane (ETL) system. When combined with other I-405 projects, the Project would create a continuous ETL system from I-5 in Lynnwood to SR 167 in Renton. Chapter 3 of the EA, Project Description, presents a detailed description of the Build Alternative.

Improvements by Milepost

The Project proposes the following improvements, as shown in Exhibit 3, sheets 1 and 2:

- **Northbound I-405, I-90 to NE 6th Street (MP 11.9 to 13.7)** Develop approximately 1.6 miles of new lane in the northbound direction by widening or restriping I-405 from MP 11.9 to 13.5. In this same section of I-405, convert the existing HOV lane to an ETL. The new lane coupled with the existing HOV lane would create a dual ETL. Between MP 13.5 and 13.7, convert the existing HOV lane to an ETL. The ETL would connect to the existing ETLs from downtown Bellevue to Lynnwood. Westward expansion of I-405 is proposed south of SE 8th Street, and eastward expansion is proposed north of SE 8th Street.
- **Southbound I-405, I-90 to NE 6th Street (MP 11.9 to 13.7)** – From MP 11.9 to 12.5, reconfigure the existing outside HOV lane to the inner roadway and convert both of the existing HOV lanes to ETLs. From MP 12.5 to 13.5, develop a new lane by widening or restriping. This new lane coupled with the existing HOV lane would result in a dual ETL south of NE 4th Street. Between MP 13.5 and 13.7, convert the existing HOV lane to an

ETL. The ETL would connect to the existing ETLs from downtown Bellevue to Lynnwood. Where new pavement is needed, eastward expansion is proposed.

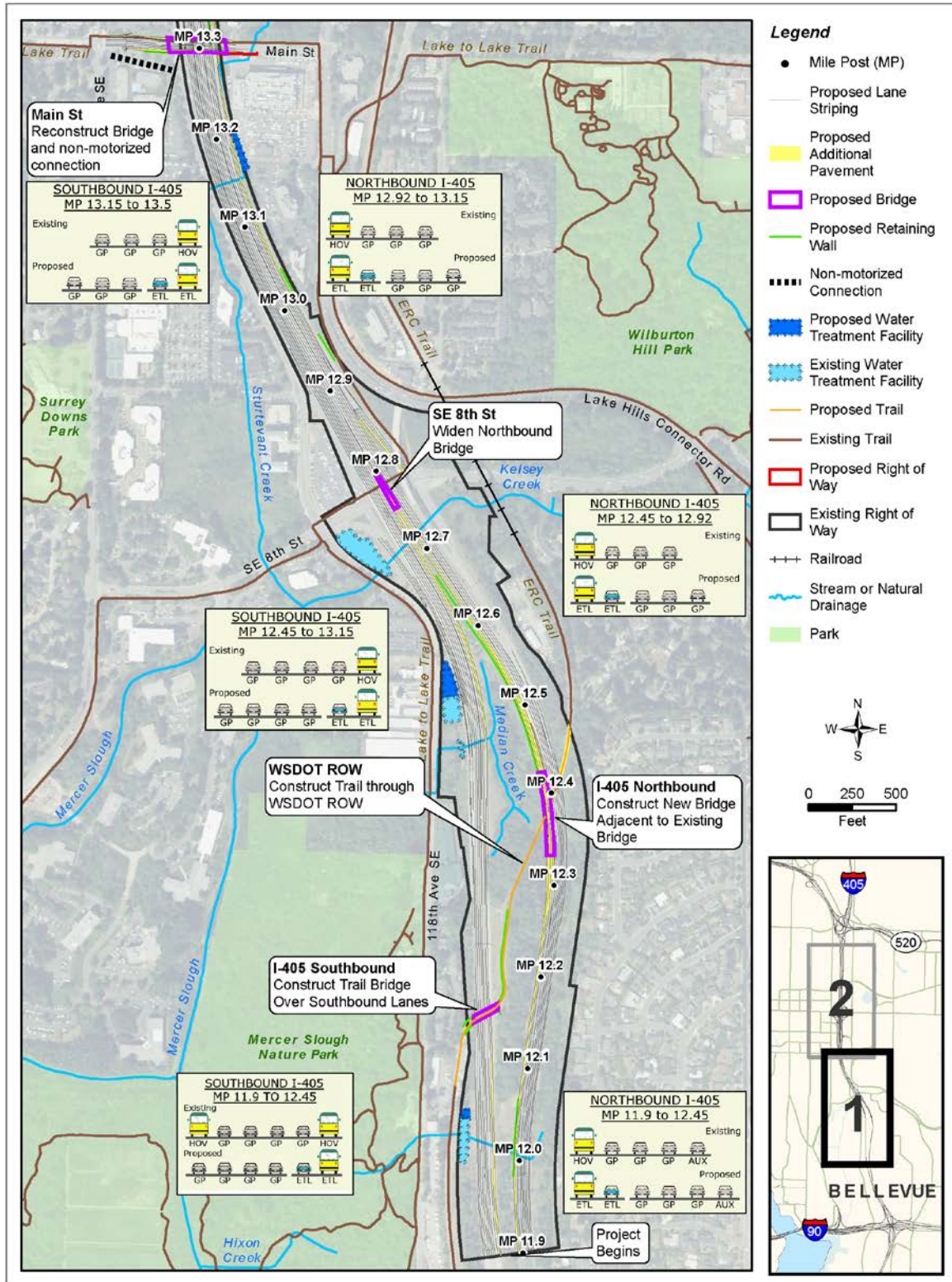
- **I-405 Eastside Rail Corridor Overpass (MP 12.4)** – Build a new northbound I-405 bridge structure adjacent to the existing I-405 structure over the Eastside Rail Corridor Regional Trail. The new structure would carry the two ETLs and the general purpose (GP) lanes would remain on the existing structure.
- **Eastside Rail Corridor Regional Trail (MP 12.09 to 12.49)** – Construct a new bridge for nonmotorized travel over southbound I-405 near MP 12.15. Build a section of nonmotorized trail to connect with the Eastside Rail Corridor Regional Trail.
- **SE 8th Street Interchange (MP 12.78)** – Widen the northbound I-405 overpass over SE 8th Street.
- **Main Street Overpass (MP 13.31)** – Reconstruct the Main Street bridge over I-405.
- **Northbound I-405 to SR 520 Ramp (MP 14.6)** – Widen the existing northbound off-ramp to SR 520 from two lanes to three lanes for approximately 600 feet beginning where the NE 10th Street on-ramp merges onto the I-405 ramp.

Stormwater and Other Improvements

- **Stormwater** – Build new flow control and runoff treatment facilities to treat runoff from new impervious surfaces, as well as additional retrofits to runoff treatment where feasible, to improve water quality
- **Other Improvements** – Provide pavement markings, drainage improvements, permanent signing, illumination, intelligent transportation systems, barriers, and tolling gantries.
- **Property Acquisitions** – Acquire portions of five commercial and public properties to accommodate the Project.

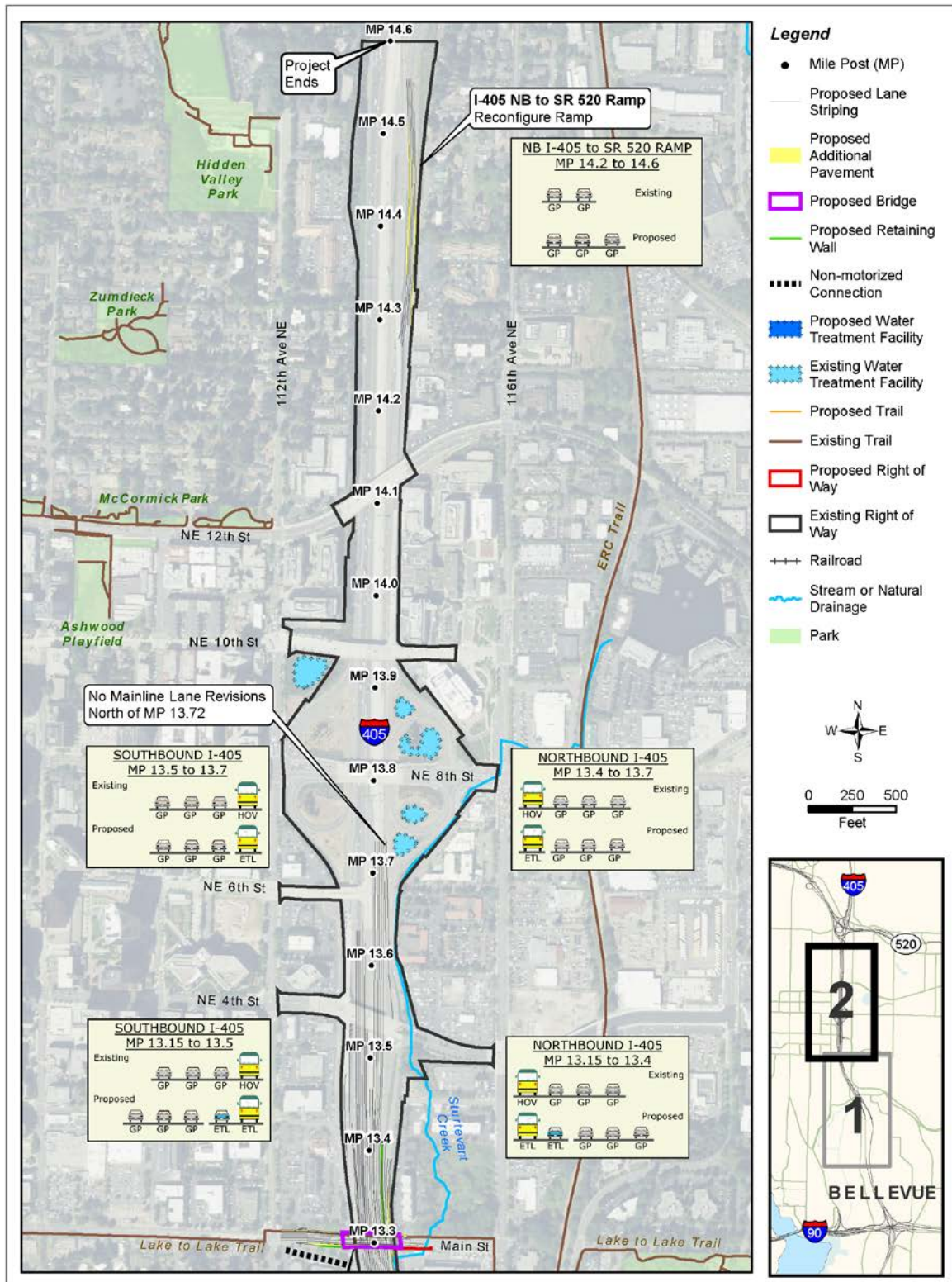
I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 FINDING OF NO SIGNIFICANT IMPACT

Exhibit 3. Project Improvements, Sheet 1 of 2



I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 FINDING OF NO SIGNIFICANT IMPACT

Exhibit 3. Project Improvements, Sheet 2 of 2



What are express toll lanes?

ETLs are express travel lanes that are managed through a variable user fee to regulate their use and thereby maintain reliable express travel speeds. ETLs preserve trip reliability for transit and HOV users, and provide a new option for other motorists to pay a toll to receive an express trip when lane capacity is available.

What avoidance and minimization measures are proposed?

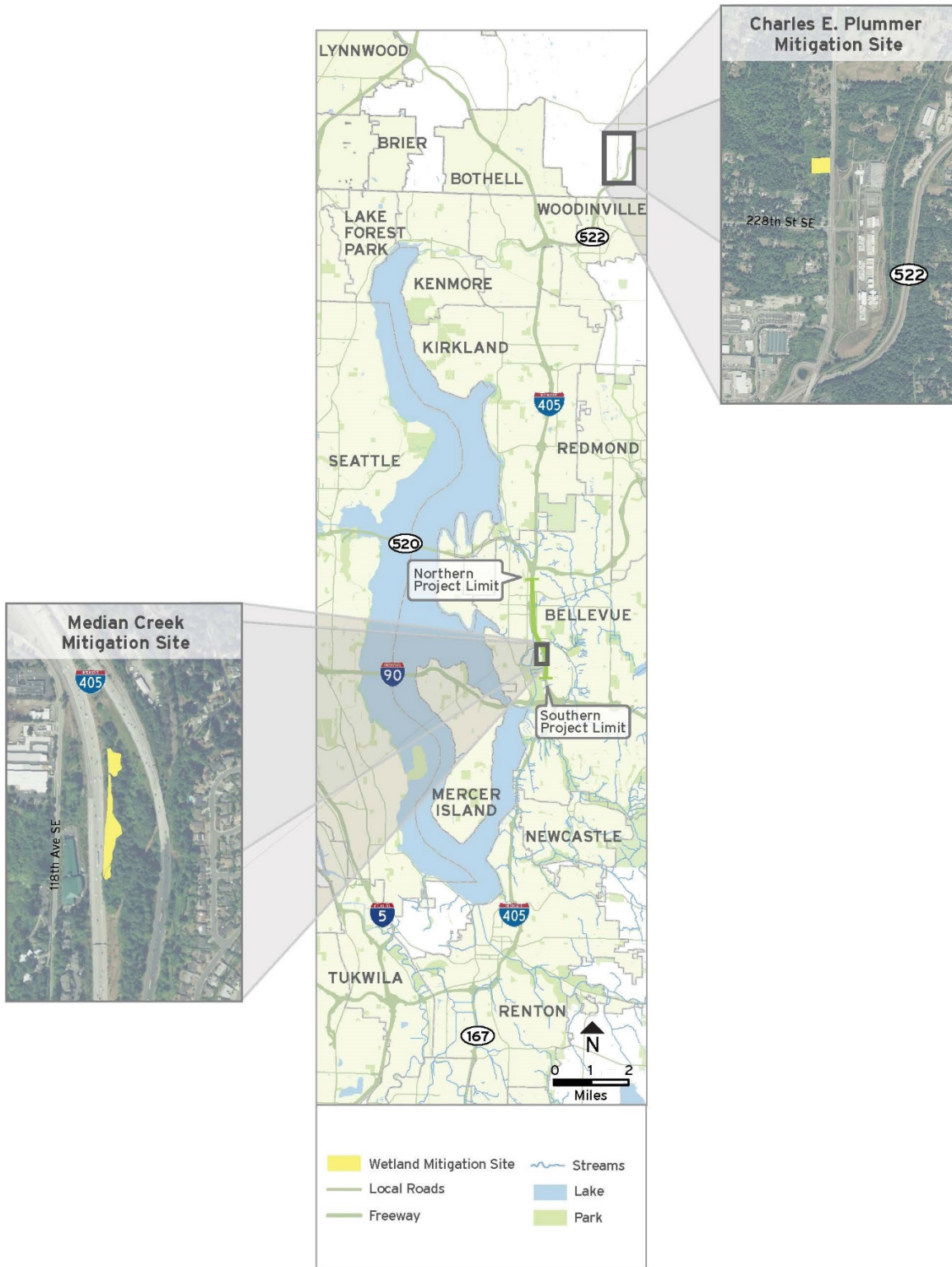
WSDOT will use established design and construction practices that will avoid or minimize effects on the various environmental resources during both the construction and operation phases of the Project. WSDOT will use Best Management Practices (BMPs), WSDOT Standard Specifications, and design elements to avoid or minimize potential effects on the environment from the Project, as described in Section 5 Mitigation Commitments.

WSDOT has been incorporating Context Sensitive Solutions (CSS) and practical solutions into the design process on I-405. Practical solutions are a performance-based approach to transportation decision-making and the CSS planning principles considered, and support design principles that maintain character aesthetics. The goal of the practical solutions approach is to optimize each project to deliver needed improvements while minimizing impacts on the environment, traveling public, and corridor neighbors.

Wetland Mitigation Sites

The Project would permanently affect 0.35 acre of wetland and 0.083 acre of wetland buffer. These effects were minimized through measures taken during design including locating Project features away from wetland areas. Wetlands would be mitigated at WSDOT's existing Charles E. Plummer mitigation site and wetland buffers would be mitigated at the Median Creek site within WSDOT right of way within the City of Bellevue, as illustrated in Exhibit 4.

Exhibit 4. Wetland Mitigation Sites



3.0 COORDINATION AND OPPORTUNITIES TO COMMENT

Focused outreach to agencies, stakeholders, Tribes, and the public was integral to planning and development of the Project Build Alternative. Outreach started in 1998 when WSDOT, FHWA, King County Metro Transit, and local jurisdictions came together to address congestion and improve mobility in the I-405 corridor. Outreach has continued in a variety of forms including public open houses; targeted meetings regarding noise and other issues of public interest; print and online media including the Project website; briefings with community and neighborhood organizations, local jurisdictions, and other interested groups.

To supplement these efforts, WSDOT conducted additional outreach focused on engaging environmental justice populations and persons with limited-English proficiency. Themes that emerged from the community engagement include general concerns about equity and tolling effects, concerns about tolling costs and the *Good To Go!* system, lack of awareness regarding free GP lane options, concerns over commute times, desire to explore low-income subsidies, matching people for carpools, and concerns over system-wide impacts during construction.

Detailed information on community outreach is included in Chapter 2 (Alternatives Considered) of the EA. The EA and FONSI can be viewed at the following libraries:

- Bellevue College Library
- Bellevue Regional Library

and are available to the public on WSDOT's Project website at:

www.wsdot.wa.gov/projects/i405/rentontobellevue

Interagency and Tribal Coordination

Governmental agencies have played major roles in the development of the I-405 Corridor Program EIS. Specific to the Project, WSDOT has involved numerous local, state, and federal agencies. WSDOT holds regular meetings with various jurisdictions in the study area, such as the City of Bellevue and King County. In addition, WSDOT works with the Washington State Department of Archaeology and Historic Preservation (DAHP), U.S. Army Corps of Engineers (USACE), National Marine Fisheries Service (NMFS), U. S. Fish and Wildlife Service (USFWS), Washington State Department of Ecology (Ecology), Washington Department of Fish and Wildlife (WDFW), and other local agencies to avoid and minimize impacts from the Project and obtain permits and approvals needed to construct the Project.

WSDOT participated in government-to-government consultation with the following four federally recognized tribes since the beginning of the I-405 Corridor Program: Muckleshoot Indian Tribe, Snoqualmie Tribe, Tulalip Tribes, and the Confederated Tribes and Bands of the Yakama Nation. WSDOT also consulted with the Duwamish Tribe (non-federally recognized) as an interested party.

Consultation with tribes continues, as WSDOT involves tribal governments in each stage of the environmental analysis. Tribal representatives have been given opportunities to review and comment on the Area of Potential Effects (APE) and draft survey reports for cultural resources,

and participate in meetings with WSDOT to discuss any concerns of tribal members, particularly cultural and natural resource elements such as fish passage.

Agency and Tribal correspondence is included in Attachment L of the EA.

Comments and Responses on the EA

The EA for the Project was published on April 2, 2018 and made available to the public for review and comment pursuant to Section 42 U.S.C. 4332 (2) (c) and 23 CFR Part 771. Public, agency and tribal comments and responses are included in Attachment 1 of the FONSI.

WSDOT held a public hearing on April 17, 2018, following publication of the EA. The public was notified of the opportunity to attend the public hearing about the EA, through a mailing of roughly 2,800 postcards in English and Spanish, sent to residents and property owners within 750 feet of I-405 near the Project limits (I-90 in Bellevue to the south and SR-520 to the north). The EA hearing took place at the Bellevue City Hall in Bellevue, Washington.

The public hearing provided a forum to describe the Project and present and receive comments on the EA. Attendees were able to provide oral comments and written comments. WSDOT requested that verbal comments be provided to a court reporter, written comments be provided on comment forms, or follow-up written comments be emailed, postmarked or received at the I-405 project office by May 2, 2018. The public hearing included informational materials (fact sheets and display boards) on the Project and findings from the EA analyses. Representatives from the I-405 Program were available to answer questions.

The Notice of Availability of the EA, which included information about the EA hearing and public comment period, was advertised in the *Seattle Times* and the *Bellevue Reporter* on April 6, 2018. Display advertisements were placed in the following print newspapers on the dates shown:

- Bellevue Reporter issue of April 6, 2018
- Seattle Times issue of April 9, 2018
- Korea Daily (Korean) issue of April 4, 2018
- La Raza (Spanish) issue of April 6, 2018
- Seattle Viet Times (Vietnamese) issue of April 6, 2018
- Seattle Chinese News (Chinese) issue of April 6, 2018

Additionally, an advertisement was placed on *Bellevuereporter.com* from April 3 to April 17, 2018. The EA public hearing notice and a link to the EA documents were also placed on the WSDOT website at:

<https://www.wsdot.wa.gov/projects/i405/rentontobellevue/downtown-bellevue-environmental-assessment>

WSDOT sent an email April 2, 2018 containing information about the public hearing and comment period and links to download the EA and discipline reports from the WSDOT website. This email was sent to federal agencies, tribal government, state agencies, local and

regional governments, Sound Transit, Bellevue area business and transportation organizations, neighborhood leads for the Project area, and regional public service agencies and organizations.

WSDOT also notified the public of the availability of the EA and subsequent hearing in the Thursday, April 5 and Friday April 13, 2018 edition of the Eastside Transportation News, which reaches 3,526 listserv subscribers.

The EA was placed in the following libraries:

- Bellevue College Library
- Bellevue Regional Library

Twenty-six people signed in for the hearing on April 17, 2018 public hearing. There were a few other attendees that chose not to sign in. During the comment period, from April 2, 2018 to May 2, 2018, we received 64 emails, six letters and nine comment forms. Three individuals provided verbal comments to a court reporter at the hearing itself. WSDOT and FHWA reviewed and considered all comments in the development of the FONSI. The comments focused primarily on issues related to tolling, traffic and safety, local street diversions, general-purpose lane capacity, noise, environmental justice, and ETL performance. The comments received and responses are included in Attachment 5 of this FONSI.

4.0 ENVIRONMENTAL FINDINGS

National Environmental Policy Act Finding

FHWA served as lead agency under the National Environmental Policy Act (NEPA) for the Project. WSDOT prepared the EA in compliance with NEPA, 42 United States Code (USC) Section 4332 et seq. and with FHWA's regulations, 23 Code of Federal Regulations (CFR) Part 771 and the State Environmental Policy Act (SEPA). The EA discusses the potential impacts of the project on the environment so that FHWA can determine whether significant adverse impacts (Council on Environmental Quality [CEQ] 15.08.27) are probable. If such a determination were made, an environmental impact statement (EIS) would need to be prepared.

WSDOT has incorporated environmental considerations into its study of the Project and has conducted evaluations of the Project's potential environmental impacts. Based on the information and analysis presented in the EA, FHWA found that the Project's construction and operation will not cause any significant adverse environmental impacts that will not be mitigated.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds under 23 CFR 771.121 that the Project, with the mitigation to which WSDOT has committed, will have no significant adverse impact on the environment. The record provides sufficient evidence and analysis for determining that an EIS is not required.

Air Quality Conformity Statement

Air quality was evaluated for the Project and the I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project (MP 0.0 to 11.9) includes the I-405 freeway and arterials that would be affected by the projects within the west-central Puget Sound region. The study area is within a region designated as a carbon monoxide (CO) and ozone maintenance area. Projects located in maintenance areas must comply with the project-level and regional conformity criteria described in the EPA Conformity Rule (40 CFR 93) and with WAC Chapter 173-420.

The Project complies with all National Ambient Air Quality Standards (NAAQS). The Project will not cause or increase any exceedance of the NAAQS, and it meets project-level conformity requirements per 40 CFR 93.123. No significant adverse unavoidable impacts related to air quality are predicted because of the Project.

In 1978, the central Puget Sound region was classified as a nonattainment area by EPA for carbon monoxide (CO). In 1996, having met the federal standards for several years, the region was redesignated by the EPA as "in attainment" with an approved maintenance plan for CO. On October 11, 2016, the area reached the end of the 20-year maintenance period for CO. Therefore, a CO hot-spot modeling and regional conformity analysis are no longer required. Likewise, transportation conformity is no longer required in the Puget Sound area for the revoked 1-hour ozone standard.

Although transportation conformity is not required for the Projects, EPA recommends using the same emissions model (MOVES2014a, the latest version of MOVES) for NEPA purposes to

predict pollutant emissions for criteria, mobile source air toxins (MSATs), and greenhouse gas (GHG) pollutants. The results demonstrate that there would be no appreciable difference in emissions between the Project and the No Build Alternative. **After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project meets all applicable requirements of the Clean Air Act.**

Floodplain Finding

Floodplain areas have been identified by the Federal Emergency Management Agency (FEMA) for Mercer Slough and lower Kelsey Creek. The Project would not physically encroach on any existing 100-year floodplain designated as a Special Flood Hazard Area and would not affect downstream or upstream flood levels.

The Project will not affect floodplains located away from the study area because the only floodplains downstream are those associated with Mercer Slough and Lake Washington. Because the elevation of Mercer Slough and Lake Washington are controlled entirely by operation of the Hiram M. Chittenden Locks, floodplains of these water bodies would be unaffected by changes in discharge from the study area.

Since the Project will not require any construction, staging, or other activity in floodplain areas, construction and operation would not affect floodplains.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project meets all applicable Floodplain requirements.

Surface Water and Water Quality Finding

The Project will add 2.7 acres of new impervious surface to the existing 104.4 acres of highway pavement. The Project improvements would not encroach into surface water, but the Project would add new impervious surface areas, increasing stormwater runoff volume and flow rates.

The Project will include adequate detention (flow control) facilities to prevent increases in peak flows and velocities or downstream flooding because of the greater impervious areas. WSDOT has designed stormwater detention and treatment facilities that will minimize effects on stormwater discharge flows and water quality, and treat an equivalent highway pavement area to address the 2.7 acres of new impervious surface area following the *WSDOT Highway Runoff Manual (2016)*.

Overall, the Project would reduce pollutant loading relative to existing conditions. There would be minor increases in some threshold discharge areas (TDAs), but other TDAs would more than compensate for those increases. No Critical Aquifer Recharge Areas (CARAs) were identified in the study area.

WSDOT will retrofit existing stormwater facilities to treat an additional 3 acres of highway pavement in the study area to further mitigate effects on water resources. As a result, the quality of the stormwater discharged will have a slightly increased amount of dissolved copper, but all other assessed pollutants (total suspended solids, total copper, and total and dissolved zinc) will decrease.

The Project would improve the way highway runoff that is collected, as well as stormwater management along I-405. Discharges to Mercer Slough are exempt from flow control requirements. The water would be treated for enhanced water quality before being discharged to streams. Where drainage is to a tributary to Mercer Slough, WSDOT would construct a stormwater management system that does provide flow control. For these reasons, the unavoidable changes in volume of runoff are considered negligible to the water resources in the study area.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project will have no significant adverse impacts on surface water flows or water quality.

Endangered Species Act Finding

WSDOT prepared a Biological Assessment (BA) for the Project in compliance with Section 7 of the Endangered Species Act. The BA assessed the potential effects on the listed species shown in Exhibit 5. On March 22, 2016, NMFS concurred with the finding that the Project is *not likely to adversely affect* the Puget Sound Chinook salmon and Puget Sound steelhead trout (NMFS Tracking No. WCR-2016-4189). No consultation with USFWS was required as the project was determined to have *no effect* on bull trout or any terrestrial species.

Exhibit 5. Effects Determinations

Name	Effect Determination
Aquatic Species	
Puget Sound ESU Chinook Salmon	Not likely to adversely affect
Puget Sound Steelhead Trout	Not likely to adversely affect
Puget Sound/Coastal DPS Bull Trout/ <i>Salvelinus confluentus</i>	No effect
Terrestrial Species	
Canada Lynx / <i>Lynx canadensis</i>	No effect
Golden Paintbrush/ <i>Castilleja levisecta</i>	No effect
Marbled murrelet/ <i>Brachyramphus marmoratus</i>	No effect
Streaked horned lark/ <i>Eremophila alpestris strigata</i>	No effect
Yellow-Billed Cuckoo/ <i>Coccyzus americanus</i>	No effect

Documentation of the ESA consultation can be found in the EA in Attachment L, Agency and Tribal Correspondence.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project is not likely to adversely affect ESA species.

Magnuson-Stevens Act

WSDOT analyzed essential fish habitat (EFH) for species regulated under a federal Fisheries Management Plan under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The only group of species with EFH in the action area for the Biological Opinion are Pacific salmon (includes Chinook, coho, and pink salmon). EFH in the action area includes Sturtevant Creek and Kelsey Creek. The analysis concluded that there would be no adverse effect on Pacific salmon EFH. Therefore, conservation recommendations pursuant to Magnuson-Stevens Act Section 305(b)(4)(A) are not necessary.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project satisfies the requirements of the MSA.

Farmland Finding

Suitable soils and active farming do not occur within the Project area. Therefore, the Farmlands Protection Policy Act of 1981 (7 USC 4201-4209) and other applicable state and federal farmlands protection policies, orders, and guidance do not apply to the Project.

Wetland Finding

The Project will permanently affect 0.35 acre of wetlands in the study area. Three wetlands would be permanently affected: wetlands 12.45M, 13.0R and 13.25R. In addition, the Project would permanently affect approximately 0.083 acre of wetland buffer associated with wetland 12.45M. The permanent effects on 0.35 acre of wetlands and 0.083 acre of wetland buffer cannot be avoided due to the current roadway design. The Project effects on wetlands and their buffers would compromise their ability to provide water quality, hydrologic, and habitat functions. The affected wetlands are of low (Category IV) or moderate (Category III) function.

To compensate for the permanent effects on wetlands and their buffers resulting from the Project, WSDOT will use on-site and off-site mitigation. Wetlands would be mitigated at WSDOT's existing Charles E. Plummer mitigation site and wetland buffers would be mitigated at the Median Creek site within the City of Bellevue as shown on Exhibit 4.

FHWA finds that there is no practicable alternative to the proposed new construction within wetlands. The Project includes all practicable measures to reduce impacts to wetlands that may result from the Project.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project, with the mitigation that is required herein, will have no significant adverse impact on wetlands.

Section 106 Finding

WSDOT conducted a cultural resources survey of the area of potential effects (APE) in compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA). The

Section 106 consultation documentation can be found in Attachment L of the EA, Agency and Tribal Correspondence.

No archaeological resources were identified within the APE. One built environment resource, an abandoned segment of the Northern Pacific Railway Lake Washington Beltline, was identified in the APE. This resource has been previously determined eligible for listing in the National Register of Historic Places (NRHP). Project activities would not affect this resource.

On March 24, 2016, WSDOT, on behalf of FHWA, determined that this Project undertaking would have No Adverse Effect on historic properties, given that project activities would not affect the abandoned segment of the Northern Pacific Railway Lake Washington Beltline. On April 21, 2016, DAHP concurred with the determination that the abandoned segment represents a contributing element to the NHRP-eligible Burlington Northern Santa Fe (BNSF) rail line (determined to be eligible in 2007). Since construction associated with the Project would neither approach nor affect the abandoned segment of the Northern Pacific Railway Lake Washington Beltline, DAHP concurred with the determination that the Project would have No Adverse Effect on historic properties.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project will have No Adverse Effect on historic properties.

Section 4(f) Finding

The existence of potential U.S. Department of Transportation (DOT) Act of 1966 Section 4(f) resources was evaluated as part of the EA. There are three publicly owned parks and two trails within the study area. No other Section 4(f) resources are present. The Project would not permanently or temporarily require land from any of the three parks, and would not permanently require land from either of the two trails in the study area.

The Eastside Rail Corridor Regional Trail is not currently developed or in use as a trail within the study area. The Project, however, would construct a portion of the trail located within WSDOT right-of-way, including a new bridge over southbound I-405 lanes. Because the Project would complete a portion of the Eastside Rail Corridor Regional Trail it also meets the exception per 23 CFR 774.13 (g) for projects that enhance a Section 4 (f) resource and, therefore, do not constitute a Section 4(f) use. Construction activities at trail crossings could result in a temporary detour around the construction work zones. The temporary detour would meet the exemption listed in 23 CFR 774.13(d) for Section 4(f) approval.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the Project will not use or impact any historical resource, park, or recreational resource protected by Section 4(f) of the DOT Act of 1966.

Section 6(f) Finding

The existence of Land and Water Conservation Funds Act of 1965 Section 6(f) properties was evaluated as part of the EA. The Mercer Slough Nature Park is a Section 6(f) resource because a portion of the park was developed with funding from the Land and Water Conservation Fund

Act. The Project would not permanently or temporarily require land from the Mercer Slough Nature Park.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the proposed project will not cause a conversion of any property protected by Section 6(f) of the Land and Water Conservation Funds Act of 1965 at Mercer Slough Nature Park.

Environmental Justice (EJ) Finding

Data from the EJScreen, a website developed and maintained by the U.S. Environmental Protection Agency, as well as Census and 5-Year (2011–2015) American Community Survey (ACS) through the U.S. Census Bureau indicates that approximately 47 percent of the population in the study area census block groups are minorities and approximately 9 percent of the population are low-income. Demographic data from the Washington State Office of Superintendent of Public Instruction on students enrolled in elementary schools in each study area for the most recent school year available echoed these findings.

Targeted public outreach to EJ communities included seven interviews with social service providers who serve environmental justice populations in the study area. Display ads that included information on how to review and comment on the EA, and details about the EA hearing were translated into Spanish, Korean, Chinese, and Vietnamese, and the postcards included a Spanish translation.

An EJ analysis of the proposed project was conducted and included a review of all potential effects including tolling, noise, air quality, etc. and did not find any disproportionately high and adverse effects on EJ populations. Although use of express toll lanes (ETLs) and the cost of the toll would have a disproportionate effect on EJ populations, the effects would not be high and adverse because they would be offset by improved peak travel times in most locations, reliability, and travel conditions in both the GP lanes and the ETLs. The Project would not change the number of GP lanes or reduce GP capacity. As of 2009, low-income individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts.

Project design and mitigation measures will assure that high and adverse impacts will not occur or will be minimized. Upon completion of the Project, mobility improvements along I-405 for passenger vehicles and public transit will benefit all I-405 users, including EJ populations.

After considering the EA, its supporting documents, and the EA comments and responses, FHWA finds that the construction and operation of the Project will not have a disproportionately high and adverse effect on environmental justice populations. For more detailed information on the EJ analysis, see the EA and the Environmental Justice Discipline Report.

Noise Finding

The noise analysis followed WSDOT's Noise Policy and used the FHWA noise abatement criteria (NAC) to evaluate traffic noise impacts. Traffic noise levels are predicted at sensitive

receivers based on projected future traffic operations using FHWA Traffic Noise Model version 2.5.

WSDOT evaluated the noise study area for the presence of receivers sensitive to traffic noise. Noise levels were modeled for 40 receivers representing noise exposure at 117 residential units, four hotels, one hotel pool, and one hospital.

WSDOT compared the predicted peak-hour noise levels to the FHWA Noise Abatement Criteria (NAC) to determine if there would be future noise effects with the Project. Under existing conditions in 2016, the noise analysis revealed that traffic noise currently approaches or exceeds the FHWA NAC impact level of 66 equivalent sound pressure level in A-weighted decibels (dBA Leq) at one hotel and a hospital.

The analysis of future 2045 modeled No Build conditions predicts an increase of 1 dBA in noise levels at the hotel and hospital. With the Project, noise levels are expected to be the same as with the 2045 No Build at the hospital and are expected to increase by 1 dBA compared to 2016 existing conditions. At the hotel, noise levels are expected to stay the same as 2016 existing conditions, which is 1 dBA less than the No Build.

Since there are no outdoor uses at the hotel or the hospital, interior noise levels were considered. The interior noise levels of both properties were below the impact level for consideration of noise abatement.

Construction would create temporary noise. Noise levels during construction would depend on the type, amount, and location of construction activities, and WSDOT would acquire temporary noise variances as needed.

After reviewing the EA and supporting documents, including comments and responses made to those comments, FHWA finds that the per the WSDOT Noise Policy, noise levels were below the impact level for consideration of noise abatement; therefore, noise abatement was not found to be feasible or reasonable for the Project.

5.0 LIST OF COMMITMENTS IDENTIFIED IN THE EA

This section describes project mitigation commitments. The mitigation measures are organized by elements of the environment, as presented in the EA. These commitments were included in the EA as Chapter 6, Measures to Avoid or Minimize Effects.

These commitments have been adopted as part of FHWA's final decision on the proposed project. They are listed to "assist with agency planning and decision-making" and to "aid an agency's compliance with NEPA when no Environmental Impact Statement is necessary" [40 CFR 1501.3(b) and 1508.9(a) (2)].

The following sections describe the established design and construction practices that WSDOT will include to avoid or minimize impacts to the various environmental resources during both the construction and operation phases of the project.

What Measures will be taken to Avoid or Minimize Effects during Construction?

Air Quality

Per WSDOT's *Environmental Manual* M31-11, the construction contractor will be contractually obligated to control fugitive dust in accordance with the October 1999 Memorandum of Agreement between WSDOT and Puget Sound Clean Air Agency regarding control of fugitive dust from construction projects (WSDOT 2016e).

The following measures could be used to control dispersion of dust (PM₁₀ and PM_{2.5}), transmission of particulate matter, and emissions of CO, nitrogen oxides (NO_x), and VOCs during construction:

- WSDOT will encourage contractors to use newer construction equipment and maintain all equipment in good mechanical condition to minimize exhaust emissions.
- WSDOT will stage construction between other I-405 transportation projects to minimize congestion that contributes to regional emissions of pollutants during construction.
- WSDOT will encourage contractors to reduce construction truck idling.
- Where possible, WSDOT will locate construction equipment and staging areas away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and sensitive populations such as the elderly and the young.
- WSDOT will spray exposed soil with water or other suppressant as needed to minimize emissions of PM₁₀ and reduce deposition of particulate matter.
- WSDOT will cover all loads in trucks transporting materials, wet materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck bed) to minimize PM₁₀ and deposition of particulates during transportation.

- WSDOT will provide wheel washers, as needed, to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways.
- WSDOT will remove particulate matter deposited on paved roads, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust.
- WSDOT will cover and stabilize project-site dirt, gravel, and debris piles, as needed, to minimize dust and wind-blown debris.
- WSDOT will restrict the speed of construction vehicles when operating in areas of exposed earth.
- WSDOT will route and schedule construction trucks to reduce delays to traffic during peak travel times to minimize air quality impacts caused by a reduction in traffic speeds.

Geology and Soils

Seismicity

- WSDOT will meet American Association of State Highway and Transportation Officials (AASHTO) design standards and implement design methods that will make project elements stable under the design AASHTO event and limit susceptibility to collapse under an unlikely larger event.

Liquefaction-Prone Areas

- WSDOT will identify areas where liquefaction-prone soils may be located. For structures underlain by liquefaction-prone soils, WSDOT will evaluate the potential effects on the structure from liquefaction. If liquefaction risks are determined unacceptable, then WSDOT will use appropriate measures to reduce long-term liquefaction and lateral spreading risks. Such measures might include soil densification, such as stone columns, vibratory compaction, compaction grouting, and dynamic compaction. Liquefaction potential along the Project alignment is assessed as low.

Soft Ground Areas

- WSDOT will take appropriate measures to assess and reduce potential settlement problems associated with existing utilities or structures in areas underlain by soft, compressible soil. If deemed necessary, structures could be underpinned and utilities relocated or made more flexible. In cases where settlement exceeds WSDOT tolerance and the settlement is allowed, any repairs will be made, as needed, after the settlement is complete. Where soft ground areas are identified, WSDOT will conduct preconstruction surveys and monitor construction settlements. Soft ground areas are not likely to be encountered along the Project alignment.
- WSDOT will assess the settlement potential for structures and embankments underlain by soft, compressible soil. If the potential settlement is unacceptable, WSDOT will design the structures and embankments to accommodate or avoid the settlement, such as deep foundations for structures or surcharge fills for embankments.

- WSDOT will develop the means and methods to avoid or minimize settlement resulting from construction vibration in areas underlain by soft or loose soils.

Slope Stability and Landslide Areas

- WSDOT will develop appropriate construction procedures to maintain or enhance slope stability in areas underlain by landslides or with landslide-prone geology. The design through these areas will include suitable wall types, such as soldier piles with tiebacks, possibly supplemented with enhanced drainage, such as improved surface drainage or horizontal drains. This analysis has not identified any landslide hazard areas within the Project alignment.
- WSDOT will drain suspected or observed seepage to reduce the risk of landslide and surface sloughing through the use of gravel drainage blankets, French drains, horizontal drains, placement of a surface rock facing, or other methods.

Dewatering

- WSDOT will use properly designed, installed, and operated dewatering systems because dewatering for utility trenches can induce ground settlement in areas of soft compressible soils. This might include sheet pile cut-off shoring, recharge wells, a settlement and groundwater level monitoring system, and other procedures. We understand that complete elimination of settlement in proximity to excavations can be difficult, particularly if loose granular soils are densified by installing sheet piles.
- WSDOT will control dewatering discharge to avoid effects. If dewatering occurs in contaminated ground, discharge into storm drains or adjacent surface drainages could affect water quality. This condition is normally mitigated by disposing of the discharge in a sanitary sewer or performing on-site treatment.

Erosion

- WSDOT will prepare and implement a Temporary Erosion and Sediment Control (TESC) plan to minimize erosion and protect water quality.
- If any BMP or other operation does not function as intended, WSDOT will take additional action to minimize erosion, maintain water quality, and achieve the intended environmental performance.

Earthworks

- WSDOT will control dust by using a water truck or other dust-control measures (see measures for air quality). WSDOT will also control soil tracked onto nearby surface streets from truck tires. WSDOT will place and maintain stockpiles properly to avoid erosion or slope stability problems. Proper traffic control and construction management procedures will be implemented to reduce truck-related construction effects. Erosion control of stockpiles will be included in the TESC plan.

Groundwater Quality

- WSDOT will avoid drawdown of nearby wells during construction. These effects can be avoided by using recharge wells and/or cut-off walls, if necessary. WSDOT will

implement good construction management, safety precautions, and safety enforcements to avoid construction-related traffic accidents, which could damage and disrupt these wells.

- WSDOT will locate areas where permanent drainage will be required by site conditions for cut slopes. If local private groundwater users or down-gradient wetlands and spring water right holders could become affected by drawdown of the groundwater table from these drain systems, these effects will be avoided on a site-specific basis by designing the permanent drainage system to recharge or replenish the down-gradient water table.

Visual Quality

- WSDOT will minimize project-related light and glare to the maximum extent possible using color-corrected halide lights, operating lights, and light-emitting diode (LED) signs at the lowest wattage possible; directing work lights away from neighboring properties; and using screens to prevent light from spilling outside of the work area.
- WSDOT will restore all staging and access areas to preconstruction conditions or better by restoring natural contours, rehabilitating soils, and planting native vegetation in accordance with WSDOT's *Roadside Manual* (2016d).
- WSDOT will work in concert with an International Society of Arboriculture-certified arborist to trim or remove trees, as needed during construction of new noise or retaining walls and carefully perform pruning to avoid harming trees and hindering future growth. In accordance with WSDOT policy, staging and laydown areas will be located where there is no vegetation, undesirable vegetation (such as Himalayan blackberries), or vegetation, such as grassed road shoulders, that is easy to restore.

Hazardous Materials

- WSDOT's contractor will prepare an Spill Prevention Control and Countermeasures (SPCC) plan that provides specific guidance for managing contaminated media that may be encountered within the right-of-way.
- If WSDOT encounters an underground storage tank (UST) within the right-of-way, WSDOT will assume cleanup liability for the appropriate decommissioning and removal of the UST.
- WSDOT's contractor will dispose of all construction waste material, such as concrete and other potentially harmful materials at approved sites.

Public Services and Utilities

- WSDOT will prepare and implement a Traffic Management Plan (TMP).
- WSDOT will post signs to show detour routes if periods of closures are needed.
- WSDOT will coordinate with school districts before construction.
- WSDOT will coordinate with all emergency services prior to or during construction.
- WSDOT will coordinate with utility providers to identify conflicts and resolve them prior to or during construction.

Transportation

- WSDOT will prepare a TMP before making any changes to the traffic flow. We will advise the public, school districts, and emergency service providers of the changes ahead of time through a public information process.
- Prior to and during construction, WSDOT will implement strategies to manage the demand on transportation infrastructure. These transportation demand management strategies, such as support for the use of carpools, vanpools, and public transportation programs, will form an important part of the construction management program and will be aimed at increasing public awareness of their travel options in the corridor.
- Existing capacity will be maintained during construction activities to the extent possible. Lane or roadway closures will be minimized and schedule to occur when there is the least effect on traffic within the Project corridor, such as overnight and weekend time periods.
- Pedestrian and bicycle circulation will be maintained as much as possible during construction. For any road, bicycle lane, and/or sidewalk closure, clearly marked detours will be provided.

Socioeconomics

- WSDOT will prepare and implement a TMP. If local streets must be temporarily closed during construction, detour routes will be provided and clearly marked with signs.
- WSDOT will coordinate with the school districts before construction. The TMP will be implemented and coordinated with all emergency services organizations prior to any construction activity.
- WSDOT will maintain access to businesses throughout the construction period.
- Because it can be difficult to determine whether a business is open, or how to access the site during the construction period, WSDOT will make provisions for posting appropriate signs to communicate the necessary information to potential customers.
- WSDOT will keep daytime street closures to a minimum.
- In situations where it is necessary to acquire property, WSDOT will conform to the requirements set forth in accordance with the *Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970*, as amended and implemented by FHWA under 49 CFR 24, and according to Chapter 468-100 Washington Administrative Code (WAC) Uniform Relocation and Assistance and Real Property Acquisition. This will ensure just compensation for all properties and minimize any effect on the current owners and residents. Relocation resources are available, without discrimination, to all eligible residents and businesses.

Environmental Justice

- WSDOT will continue to conduct targeted outreach to minority, low-income, and persons of limited-English proficiency in the study area and I-405 travelshed before and during construction. This includes the following:

- Translate project materials about construction effects if requested.
- Work with transit providers on Project materials about transit re-routes and temporary closures of transit stops.
- Distribute project materials—especially prior to construction-related closures that would affect motorists and transit riders—through social service agencies, Crossroads Mini-City Hall, community-based organizations, libraries, community groups, and schools.

Water Resources

WSDOT's current Highway Runoff Manual (2016a) requires that the contractor apply for a National Pollutant Discharge Elimination System (NPDES) construction permit. This permit requires development of the following:

- TESC plan
- SPCC plan
- Compliance with specific State of Washington water quality standards

The TESC will include BMPs to address the issues of source control, flow control, and treatment. BMPs will be site-specific and include the following:

- Install check dams in drainage ditches to reduce velocity and allow fine sediment to settle.
- Install inlet protection filters to keep sediment from entering storm drains.
- Protect steep slopes.
- Stabilize open grading after a specified period if outside active work areas.

The SPCC plan will include measures to protect groundwater during construction. These measures will be developed based on the specific contractor activities at the site and will include the following:

- Develop staging areas for equipment repair and maintenance away from all drainage courses.
- Protect groundwater with the use of standard BMPs.
- Provide secondary containment for fuel and chemical storage, fueling operations for construction vehicles, and equipment.
- Locate spill response equipment at regular and specified intervals along the Project alignment.
- Verify that imported fill meets Model Toxic Control Act Method A or B soil cleanup standards (WAC 173-340-740) for unrestricted use.

Ecosystems

- WSDOT will protect, preserve, and enhance wetlands in the study area during the planning, construction, and operation of transportation facilities and projects consistent

with DOT Order 5660. 1A; Executive Order 11990; and Governor's Executive Orders Executive Order 89-10 and Executive Order 90-94.

- WSDOT will use fencing to clearly mark wetlands in the construction areas that are to be avoided.
- WSDOT will implement avoidance measures to reduce temporal losses of wetland functions. Project-level design and environmental review has included avoidance, minimization, restoration, and compensation of wetlands.
- WSDOT will prepare and implement a revegetation plan. If WSDOT must permanently remove vegetation for roadway construction, it will be replaced with native vegetation within or near the study area.
- WSDOT will adhere to project conditions identified in the BA and agency concurrence letters.
- WSDOT will implement construction BMPs (such as silt fencing or sedimentation ponds) to avoid disturbing sensitive natural areas.

What measures will be taken to avoid or minimize effects during operation?

Geology and Soils

Seismicity

- WSDOT has procedures in place to inspect critical highway elements following a major seismic event. These procedures will be implemented for the Project as necessary.

Soft Ground

- WSDOT will conduct long-term monitoring of embankments or walls constructed on soft ground to ensure that they are not experiencing unacceptable settlement.

Slope Stability and Landslides

- WSDOT will conduct long-term maintenance of surface and subsurface drainage in areas of landslide risk. If installed, horizontal drains will be periodically inspected and maintained because these types of drains tend to clog with time. If identified as a need during the design geotechnical investigation, long-term monitoring of slopes and walls may be appropriate in selected areas.

Measures for Visual Quality

- WSDOT will apply CSS treatments to all new structures, light poles, sign bridges, retaining walls, noise walls, and landscape areas to as shown in the *I-405 Urban Design Criteria* (WSDOT 2016b).
- WSDOT will limit artificial outdoor lighting to achieve safety and security requirements while limiting the amount of light spill onto adjacent properties or open spaces. Highway and pedestrian lights will be of the type and color shown in the *I-405 Urban Design Criteria* (WSDOT 2016b).

- Project designers will site the LED signs that announce the current toll rate to minimize the spillover of light onto adjacent properties. Noise walls, existing vegetation, and elevation change will prevent residential neighbors from seeing the illuminated signs at night. LED signs in the commercial areas of Bellevue will blend with other light sources in the area.
- WSDOT will widen the highway and site new bridges away from the right-of-way line, wherever possible, to minimize visual impacts on neighbors during construction and operation of the facility. Where the Project removes structures or pavement, areas will be restored to match the surrounding context as shown in the *I-405 Urban Design Criteria* (WSDOT 2016b).

Water Resources

Surface Water

- WSDOT has designed stormwater detention and treatment facilities that will minimize effects on stormwater discharge flows and water quality. The stormwater facilities will treat an equivalent highway pavement area to address the 2.7 acres of new impervious surface area following the *WSDOT Highway Runoff Manual* (2016).
- WSDOT will retrofit existing stormwater facilities to treat an additional 3 acres of highway pavement in the study area to further mitigate effects on water resources. As a result, the quality of the stormwater discharged will have a slightly increased amount of dissolved copper, but all other assessed pollutants (total suspended solids, total copper, and total and dissolved zinc) will decrease.
- Stormwater ponds will provide flow control, except where the Project discharges directly to Mercer Slough.

Ecosystems

- WSDOT will revegetate areas where vegetation removal will occur, if possible (except for areas of new impervious surface).
- WSDOT and our contractors will make efforts to retain woody debris removed from the project footprint for use in restoration in the immediate vicinity. WSDOT's will not include the application of any chemical weed control agents (herbicides) in its ongoing maintenance of stormwater treatment and detention facilities.
- WSDOT will provide compensatory mitigation at on- and off-site locations.

Environmental Justice

Although there is no need for additional mitigation, WSDOT will continue to conduct targeted outreach to engage minority populations, low-income populations, and persons with limited-English proficiency in the study area and I-405 travelshed. Ongoing public involvement activities when the Project is complete will include the following measures:

- Maintaining ongoing communications with community-based organizations and social service providers throughout design of the Project, and scheduling briefings with them at corridor improvement milestones.

- Distributing Project materials through social service agencies, community-based organizations, libraries, community groups, and schools and host booths at community events in the study area.
- Planning and implementing a public information campaign in multiple languages to explain ETLs, how to obtain a *Good To Go!* pass, and how to set up an account, with the goal of increasing the proportion of passholders who identify as minority, have low incomes, or are persons with limited-English proficiency.
- Including information about how to use the ETLs in Spanish and other languages, if requested, as part of the public information campaign, such as how to enter and exit the lanes, how to determine the cost, and how to obtain a free *Good To Go!* pass for carpools.
- Conducting outreach about the Project and ETLs at community fairs and festivals, including events at Bellevue's Crossroads Mini-City Hall, in one of the Eastside's most ethnically and linguistically diverse neighborhoods.
- Conducting media outreach, specifically with ethnic media outlets serving the study area.

To reduce possible barriers to obtaining and maintaining a *Good To Go!* account for persons who have low-incomes or who do not have access to credit or debit cards:

- WSDOT will continue to offer the option for low-income persons who are eligible for public benefits to use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts.
- WSDOT is working to expand the network of retail locations where people can buy *Good To Go!* passes with cash, making it easier for people to purchase a pass without a bank account

ATTACHMENT 1 – COMMENTS WITH RESPONSES

In this attachment, we present all comments received during the public comment period and our response to each comment.

Introduction

The Environmental Assessment (EA) for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) was published on April 2, 2018 and made available to the public for review and comment for a period of 30-days, from April 2, 2018 through May 2, 2018. The Washington State Department of Transportation (WSDOT) held a public hearing on April 17, 2018, following issuance of the EA on April 2, 2018. The EA hearing took place at the Bellevue City Hall in Bellevue, Washington.

We invited the public to comment on the EA via:

- Submitting a comment via letter
- Submitting a comment form at the public hearing
- Providing an oral comment via the court reporter at the public hearing
- Submitting a comment via email

During the comment period, from April 2, 2018 to May 2, 2018, we received 64 emails; six letters; and there were nine comment forms, and two oral comments from the April 17, 2018 EA hearing. We reviewed and considered all comments in the development of the Finding of No Significant Impact (FONSI).

Responses to Global Themes

We summarized comments into 12 themes, based on common topics and issues. Global responses were developed for each of the themes, to best summarize project information.

Global Response 1: How do ETLs benefit users on I-405?

The primary purpose of the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) is to provide a reliable trip choice for Interstate 405 (I-405) users, increase vehicle capacity and person throughput, improve reliability for transit, reduce Project-wide congestion, and improve safety performance.

Washington State is proposing to integrate tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements.

Before the I-405 Bellevue to Lynnwood express toll lanes (ETLs) opened, the previous high-occupancy vehicle (HOV) lanes on I-405 were not a reliable option for carpoolers because they were frequently as congested as the general purpose (GP) lanes. Carpools and transit were often stuck in the same congestion as cars in the GP lanes, receiving little to no benefit from the carpool lanes.

ETLs bring reliability to drivers and transit riders. Today, WSDOT's analysis shows that the untolled GP lanes in most places between Bellevue and Lynnwood are moving faster than they did before the ETLs opened.

Overall, the number of people moving through the Bellevue to Lynnwood corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. ETLs have improved reliability for transit. As a result, transit on I-405 is saving up to 11 minutes and ridership has increased 9 percent. ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began. See the I-405 ETL performance reports on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>.

WSDOT anticipates that the Project will have similar results as Bellevue to Lynnwood regarding person throughput, vehicle volumes, transit reliability and travel times. More information can be found in Section 4.1 of the EA and in Section 5 of the Transportation Discipline Report.

Global Response 2: How is revenue used from tolling on I-405?

Revenue collected from the express toll lanes (ETLs) is used to operate and maintain the roadway and fund additional needs within the I-405 corridor. Two-thirds of the money from each toll helps fund improvements for I-405, such as the northbound peak-use shoulder lane on I-405 between Canyon Park and Lynnwood. The remaining third of the revenue generated by the ETLs covers operating costs. This includes WSDOT's customer service centers, phone lines, enforcement, and online support. This work is currently performed by a private vendor based in Texas that employs 120 people in the Puget Sound region working for *Good To Go!* WSDOT selected the vendor to perform this specialized work through a nationwide, competitive Request for Proposal process.

Global Response 3: (How do ETLs affect reliability and safety performance on I-405?)

The Puget Sound region is experiencing unprecedented growth, including the communities around I-405, causing some of the worst congestion in the state. Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements.

The express toll lanes (ETLs) bring reliability to drivers and transit riders. Today, WSDOT's analysis shows that the untolled general purpose (GP) lanes in most places between Bellevue and Lynnwood are moving faster than they did before ETLs opened.

Overall, the number of people moving through the Bellevue to Lynnwood corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The ETLs have improved reliability for transit. As a result, transit on I-405 is saving up to 11 minutes and ridership has increased 9 percent. ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began (see the I-405 ETL performance reports on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>). In addition, WSDOT has found

no change in corridor safety performance as a result of introducing tolling on the corridor. Please see pages 4-9 through 4-11 and Exhibit 4-4 of the Transportation Discipline Report for information on existing safety performance in the study area for the Project.

The Project would improve safety performance in the study area by reducing congestion, and in turn, congestion-related crashes. The buffer-separated ETL would also reduce friction between the ETL and GP lanes as an added benefit (see page 4-22 of the Environmental Assessment). WSDOT is working to educate drivers and improve safety performance.

Global Response 4: Will tolling create diversion onto local streets?

The traffic analysis indicates this new capacity would move some trips off of local roads and onto I-405. We do not anticipate any diversion to local streets once the Interstate 405 (I-405) express toll lane (ETL) capacity is added. For the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project), WSDOT found that when compared to current conditions, neighborhoods would benefit from the added capacity provided by the ETLs through reduced peak hour congestion along I-405 and improved travel times, thus, allowing more travelers to use the freeway instead of diverting onto local streets (please see page 4-28 of the EA).

WSDOT previously analyzed the operation of the Project. We worked with local cities to monitor traffic on major local streets, and for the past 2 years, traffic on roads near the ETLs has stayed fairly consistent. Despite the increase in housing and jobs in this area, parallel routes like State Route (SR) 202, 100th Avenue NE, 148th Avenue NE, and SR 527 are all moving faster around I-405 than they did 2 years ago. This corresponds with a very slight drop in traffic volumes on these routes, and a big increase in the number of people traveling on I-405.

When combined with other I-405 projects, the Project would create a continuous ETL system from Interstate 5 (I-5) in Lynnwood to SR 167 in Renton. The Project would not change the number of untolled general purpose (GP) lanes or reduce GP capacity. See Section 5, Project Effects, of the Transportation Discipline Report, for more details.

Global Response 5: Will general purpose capacity remain on I-405 and will it be untolled?

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes or reduce GP capacity. The Project and other express toll lane (ETL) projects are part of the I-405 Master Plan, which is a multimodal plan to manage congestion on the corridor. The vision of the Master Plan includes GP lanes, managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT's ability to manage lanes to provide a reliable trip for users of the corridor. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, which includes additional GP lanes as well as other improvements, it has made substantial investments in GP lanes to address key chokepoints as well as implement the first phase of ETLs from Bellevue to Lynnwood. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund other improvements consistent with the Master Plan.

When combined with other I-405 projects, the Project would create a continuous ETL system from I-5 in Lynnwood to SR 167 in Renton. The proposed Tukwila to I-90 Express Toll Lanes Project, which is intended to be constructed at the same time as the Project, would add southbound untolled GP lanes from I-90 to 112th Avenue NE, between NE 44th Street and NE 30th Street, and make I-405 to I-90 ramp improvements. As a result of these capacity improvements, traffic congestion would greatly improve in this area.

The ETLs move more vehicles and people when traffic is at its worst compared to GP lanes. When drivers choose to leave the untolled GP lanes to use the ETLs instead, they free up space for the other drivers around them. As a result, the untolled GP lanes in most places between Bellevue and Lynnwood are moving faster today than they did before the ETLs opened. The ETLs are open to all users from 7 p.m. to 5 a.m. on weekdays and at all other times and major holidays.

Global Response 6: Will the HOV requirement change from 2+ to 3+ during peak periods?

In 2011, the Washington State Legislature directed WSDOT to consult with a committee of local- and state-elected officials and transit agency representatives to develop recommendations for the I-405 express toll lane (ETL) carpool policy. That group recommended a 3+ carpool free peak/2+ carpool free off-peak policy, which was then adopted by the Washington State Transportation Commission (WSTC). This report, the I-405/SR 167 Corridor Funding and Phasing Report, was released in 2013, and is available for download on the WSDOT website, along with the supporting traffic and revenue studies at <https://www.wsdot.wa.gov/Tolling/EastsideCorridor/Report.htm>.

The high-occupancy vehicle (HOV) 2+ occupancy requirement would not be entirely removed with the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project). WSTC establishes the toll rates for state toll facilities in Washington. It is assumed the new ETLs would operate the same as the existing ETLs that are to the north of the Project (Bellevue to Lynnwood) as follows:

- HOV 2+ would travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass.
- During the peak time, HOV 3+ would travel for free from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. with a *Good To Go!* pass.
- At all times, transit, HOV 3+, and motorcycles would travel for free with a *Good To Go!* pass.

Please refer to the graphic on page 3-6 of the Environmental Assessment for more information on the hours of operation and occupancy requirements of the ETLs.

At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass.

Global Response 7: How Is tolling on I-405 governed?

Tolling in Washington State is governed by the provisions of Revised Code of Washington (RCW) 47.56. “It is the intent of the legislature to improve mobility for people and goods by maximizing the effectiveness of the freeway system. An express toll lanes network is one approach for managing the use of freeway high occupancy vehicle lanes and, at the same time, generating funds to improve the Interstate 405 and state route number 167 corridor.” RCW 47.56.880

The Washington State Legislature approved the I-405 Renton to Bellevue Express Toll Lanes Project in the 2015 Connecting Washington funding package with the assumption that toll revenue would fund part of the project. The I-405 Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would implement one part of that larger project. WSDOT has evaluated the effects of tolling as part of this Environmental Assessment and found that the addition of express toll lanes (ETLs) would improve I-405 speed and reliability for drivers who choose to use them and improve traffic across all lanes in most areas. It would ultimately be up the Legislature to provide toll authorization for this and future segments of I-405.

WSDOT reports annually to the Federal Highway Administration (FHWA) on whether existing ETLs are meeting federal performance requirements of 45 miles per hour, 90 percent of the time during the peak hours.

The I-405 Bellevue to Lynnwood Project is not meeting the performance criteria in the southbound single-lane section due to a lack of capacity, however, the system is moving more vehicles and people through the system and meeting the revenue generation goal. WSDOT is required to and has submitted a remediation plan to FHWA outlining how we plan to improve performance. For more information, see the I-405 ETL performance reports located on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>.

Global Response 8: Why is WSDOT building express toll lanes on I-405?

The Puget Sound region is experiencing unprecedented growth including the communities around I-405 causing some of the worst congestion in the state. In 2002, WSDOT developed a multimodal vision for the corridor to move more people and manage congestion along I-405, which was to be completed by 2020. This vision included managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT’s ability to manage lanes to provide a reliable trip for I-405 users. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, which includes additional untolled general purpose (GP) lanes as well as other improvements, it has made substantial investments in untolled general purpose lanes to address key chokepoints, and has implemented the first phase of express toll lanes (ETLs) from Bellevue to Lynnwood to provide drivers a choice when they need it as well as to give transit a reliable trip. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund other improvements consistent with the Master Plan.

The ETLs move more vehicles and people when traffic is at its worst compared to the untolled GP lanes. When drivers choose to leave the untolled GP lanes to use the ETLs instead, they free up space for the other drivers around them. As a result, the untolled GP lanes in most places between Bellevue and Lynnwood are moving faster today than they did before the ETLs opened.

Having a toll option moves more vehicles and people overall than just adding another GP lane, which would quickly become another stop-and-go lane. ETLs give drivers the choice to pay a toll for a reliable trip when they need it. They also bring back predictability and speed for carpoolers and transit users, who use the lanes toll-free, by keeping traffic moving reliably.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The ETLs have improved reliability for transit on I-405 by saving up to 11 minutes and increasing ridership by 9 percent. The ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began.

Please see the I-405 ETL performance reports on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>.

Global Response 9: How will I be affected by noise with this project?

WSDOT recognizes the noise impact from highways, and we reduce it as we are able to by following the Federal Highway Administration (FHWA) noise mitigation regulations per 23 CFR 772.

There would be two separate sources of noise generated from the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) and each one is addressed a little differently.

For permanent (operational) noise, WSDOT complies with all FHWA regulations and WSDOT's Noise Policy that both govern mitigation for highway operational noise. We follow these regulations to ensure an equitable and scientifically grounded approach to building noise barriers for properties that may experience operational noise impacts from our projects. Adding the single lane to the existing highway for the Project would increase noise levels by 1 or 2 decibels, which is not an audible change in noise.

WSDOT follows a three-step sequential process to determine whether an area would qualify for noise abatement:

1. Whether a location has noise levels of 66 A-weighted decibels (dBA) or higher modeled for the year 2045 to warrant further consideration of a noise wall.
2. Whether it is feasible to construct the noise wall (whether the proposed noise wall would provide a substantial reduction in noise and other constructability issues).
3. Whether it is reasonable to construct the proposed noise wall (based on the cost to construct the noise wall per residence affected and the density of homes in the area).

A location that does not demonstrate all three steps listed above would not warrant a noise barrier for noise abatement. A noise impact analysis was conducted as part of the

Environmental Assessment. Results of the analysis are summarized in Exhibit 4-1 of the Noise Discipline Report. There were no noise walls that met all of the FHWA requirements to be recommended for construction of this Project.

The second noise source that would occur as a result of the Project is construction noise. This noise would be temporary and would only occur during the construction phase of the Project. To avoid creating long traffic backups WSDOT conducts most of its construction at night; therefore, local cities and counties require WSDOT to provide mitigation to avoid waking up residents when temporary noise variances are issued. These mitigation strategies depend on the equipment and activities but could include minimizing backing vehicles, minimizing idling vehicles, and for stationary equipment might include a temporary noise shield. Please see page 6-3 of the Noise Discipline Report for more information.

Global Response 10: How will low-income and minority populations be affected by tolling?

WSDOT and FHWA examined the effects of the cost of the tolls and electronic toll collection systems on low-income and minority persons, and persons with limited English proficiency, known collectively as environmental justice populations. Any toll that charges all users the same amount, regardless of income, disproportionately affects low-income users. These effects would be offset by improved peak travel times in most locations, reliability and travel conditions in both the untolled general purpose (GP) lanes and the ETLs (please see Section 4.1 of the Environmental Assessment for more information). The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled GP lanes or reduce general purpose capacity. WSDOT has outlined several measures to reduce the impact of the tolls on low-income users as described on page 6-7 of the Environmental Assessment.

Before WSDOT opened the ETLs, we conducted multiple focus groups of a diverse set of drivers who use I-405 or the SR 167 high-occupancy toll (HOT) lanes. These focus groups showed participants across all income ranges to be supportive of HOT lanes, stating their support of choices to return home faster or spend more time with family or friends.

The ETL system has benefits for people of all income levels. For example, people on buses and qualifying carpools do not pay tolls but have gained a faster commute. Community Transit says that since the ETL system launched, bus passengers have saved an average of 7 minutes during peak times. On some routes, commute times have improved by 16 minutes on the bus.

More recent surveys of *Good To Go!* customers who have used the ETLs also found high satisfaction with the value of the ETLs across all income levels, with no statistical correlation between income and satisfaction.

Currently, the Washington State Transportation Commission (WSTC) is responsible for establishing toll rates and exemptions for state toll facilities in Washington. While tolling is used to improve traffic flows, WSTC recognizes tolling carries a financial impact for those drivers who choose travel in the tolled lanes. Whenever called upon to revise toll rates, WSTC carefully reviews traffic and revenue projections, listens to members of affected communities, and seeks

to ensure customers are treated fairly. See also the WSTC website at <http://www.wstc.wa.gov/HighwayTolling/default.htm>.

Global Response 11: Are current taxes for roads considered in tolling?

Original investments through the gas tax are not keeping pace with current demands and needs, and gas tax revenues are declining because of fuel efficiency increases (<https://www.wsdot.wa.gov/publications/fulltext/state-of-transportation/appendixes/state-fuel-tax.htm>).

In the 2015 Connecting Washington funding package, the Washington State Legislature directed WSDOT to continue widening the I-405 corridor between Renton and Bellevue, with the assumption that toll revenue would fund part of that improvement. Revenue from the ETLs is required to be reinvested into the I-405 corridor to fund needed improvements. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Global Response 12: Is the public supportive of tolling?

The I-405 express toll lanes (ETLs) between Bellevue and Lynnwood opened to traffic in September 2015. Initially, public support for the lanes was very low. When we asked people what they thought of the ETLs in January 2016, three months after they opened, 77 percent of people told us they did not support the project. Over the past year, WSDOT has seen a significant positive shift in public opinion. WSDOT conducted three public opinion surveys to determine how drivers feel about the lanes. One focused on drivers who used the I-405 corridor in the past year (most of which had never used the ETLs), a second focused on people who used the ETLs in 2017, and a third that reached businesses whose employees used the I-405 ETLs or State Route (SR) 167 high-occupancy toll (HOT) lanes in the past year. In each of the three survey groups, about 60 percent of respondents said they liked having the option to use the ETLs. Similar percentages said they supported extending the ETLs between Renton and Bellevue. These results are consistent with what other agencies are finding with toll projects across the country – that support grows with greater usage of the lanes. For more information about the recent surveys, visit <https://www.wsdot.wa.gov/tolling/405/i-405-express-toll-lanes-public-opinion-surveys>.

Index to Comments and Responses

Each individual email, letter, comment form, and hearing transcript page is presented in its entirety in the order shown in the following indices. Comment numbers have been added to the margins of each email, letter, comment form, and hearing transcript page to delineate individual comments. Our responses to the numbered comments follow each of the comment sets.

Index to Comment Letters (LC)

Comment ID	Name	Type	Date
LC1	Bellevue Chamber of Commerce	Private Organization	May 2, 2018
LC2	Bellevue Downtown Association	Private Organization	May 2, 2018
LC3	Kemper Development Company	Private Business	May 2, 2018
LC4	City of Bellevue	City	May 2, 2018
LC5	Environmental Protection Agency	Federal Agency	May 2, 2018
LC6	Muckleshoot Indian Tribe, Fisheries Division	Tribe	June 1, 2018

Index to Comment Forms (CF)

Comment ID	Name	Type	Date
CF1	Peggy Albin	Private Individual	April 17, 2018
CF2	Michael Appleby	Private Individual	April 17, 2018
CF3	John Gregov	Private Individual	April 17, 2018
CF4	S Howery	Private Individual	April 17, 2018
CF5	Jeff and Helen Lykken	Private Individual	April 17, 2018
CF6	Laura Melgard	Private Individual	April 17, 2018
CF7	Barbara Sauerbrey	Private Individual	April 17, 2018
CF8	Astrid Zuppinger	Private Individual	April 17, 2018
CF9	Astrid Zuppinger	Private Individual	April 17, 2018

Index to Court Reporter Comments (CR)

Comment ID	Name	Type	Date
CR1	Roy and Annete Eisenbach	Private Individual	April 17, 2018
CR2	Astrid Zuppinger	Private Individual	April 17, 2018

Index to Email Comments (E)

Comment ID	Name	Type	Date
E1	Doug Brown	Private Individual	April 3, 2018

Comment ID	Name	Type	Date
E2	Tim Ma	Private Individual	April 2, 2018
E3	Joseph Smyth	Private Individual	April 5, 2018
E4	Barbara Brachtl	Private Individual	April 5, 2018
E5	Ken Whelan	Private Individual	April 5, 2018
E6	Jeff Lykken	Private Organization	April 7, 2018
E7	Vladimir Chmelev	Private Individual	April 7, 2018
E8	Bill Finkbeiner	Private Individual	April 10, 2018
E9	Joni Scott	Private Individual	April 11, 2018
E10	Kyle Schouviller	Private Individual	April 11, 2018
E11	Damon Strom	Private Individual	April 11, 2018
E12	Bruce Brown	Private Individual	April 11, 2018
E13	Allison Goodman	Private Individual	April 13, 2018
E14	Michele Sackman	Private Individual	April 11, 2018
E15	The Wholmans	Private Individual	April 11, 2018
E16	David Babington	Private Individual	April 11, 2018
E17	Jim and Rita Franzel	Private Individual	April 11, 2018
E18	Barbara Bisjak	Private Individual	April 11, 2018
E19	Chris Graham	Private Individual	April 11, 2018
E20	Sue Israel	Private Individual	April 11, 2018
E21	Michael Dunican	Private Individual	April 11, 2018
E22	Mick Hodges	Private Individual	April 11, 2018
E23	Wayne and Karen Swan	Private Individual	April 11, 2018
E24	Lynnette Lotterer	Private Individual	April 11, 2018
E25	Kathryn Hanna	Private Individual	April 11, 2018
E26	Doug Wright	Private Individual	April 11, 2018
E27	Nesiha Love	Private Individual	April 11, 2018
E28	Derrick Fargo	Private Individual	April 11, 2018
E29	Paul D. Talbott	Private Individual	April 11, 2018
E30	P. Gerald Marra	Private Individual	April 12, 2018
E31	Mike Miller	Private Individual	April 12, 2018
E32	Roger Heimdahl	Private Individual	April 12, 2018
E33	Renay Bennett	Private Individual	April 12, 2018
E34	Roy Hurlbut	Private Individual	April 12, 2018
E35	Daniel Burnstein	Private Individual	April 13, 2018
E36	Pamela Turner	Private Individual	April 14, 2018
E37	Anita Skoog	Private Individual	April 14, 2018

Comment ID	Name	Type	Date
E38	Andrea	Private Individual	April 15, 2018
E39	Amy Shoukry	Private Individual	April 16, 2018
E40	Jeff Freeman	Private Individual	April 16, 2018
E41	Dyana Stevens	Private Individual	April 16, 2018
E42	Angela Pederzani	Private Individual	April 16, 2018
E43	Linda Bosshart	Private Individual	April 16, 2018
E44	Sean Walsh	Private Individual	April 16, 2018
E45	Janell Wildermuth	Private Individual	April 16, 2018
E46	Kris Otnes	Private Individual	April 17, 2018
E47	Tomas Vetrovsky	Private Individual	April 18, 2018
E48	Carolyn Vache	Private Individual	April 18, 2018
E49	Susan Nelson	Private Individual	April 18, 2018
E50	Babette Bechtold	Private Individual	April 18, 2018
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E52	Kari Scully	Private Individual	April 20, 2018
E53	Linda Logie	Private Individual	April 22, 2018
E54	Zhang	Private Individual	April 25, 2018
E55	Jim Hanson	Private Individual	April 26, 2018
E56	Lisa McConnel	Private Individual	April 26, 2018
E57	Marsha and Jim Hebert	Private Individual	April 26, 2018
E58	John Janssen	Private Individual	April 27, 2018
E59	Rick Goethals	Private Individual	April 28, 2018
E60	Bill and Jeanie McBee	Private Individual	April 28, 2018
E61	Sarah Fletcher	Private Individual	April 30, 2018
E62	Dorinda Otto	Private Individual	April 30, 2018
E63	T. Vanlienden, Bellevue	Private Individual	May 1, 2018
E64	Marie Chorlton	Private Individual	May 2, 2018

Comments Received via Letter (LC)

Comment LC1 – Bellevue Chamber of Commerce, May 2, 2018



May 2, 2018

Re: I-405 Downtown Bellevue Vicinity Project (EA)

Allison Hanson, I-405 Program Environmental Manager
Washington State Department of Transportation
600 Bellevue Way NE, Suite 405
Bellevue, WA 98004

Dear Ms. Hanson,

The Bellevue Chamber of Commerce thanks the Department of Transportation for this opportunity to provide public comment regarding the I-405 Downtown Bellevue Vicinity Project Environmental Assessment. Chamber members served on the original I-405 Corridor Program Steering Committee and implementation of the I-405 Master Plan Vision, has been our top public policy priority, since the federal Record of Decision was issued in 2002.

Upon review of the Environmental Assessment, as issued on April 2, 2018, we concur with the Determination of Non-Significance under the State Environmental Policy Act (SEPA). We strongly support implementation of the following currently funded treatments:

- A third lane at the I-405 northbound ramp to SR 520;
- An additional express toll lane in each direction, overpass improvements at Main Street;
- Overpass and bridge improvements at Main Street and SE 8th Street
- A new bike-pedestrian bridge, near the site of the former Wilburton Tunnel.

Nonetheless, we note with concern the following conclusion, as contained in *Key Findings of the Environmental Assessment*.

“However, for the northbound afternoon commute, 2045 travel times in the general-purpose lanes would increase by about nine minutes with the project. That is because, if the project is built, southbound I-405 operations improve, allowing more vehicles to enter I-405 from I-90 and SR 520...”

The EA continues by noting that “Other unfunded Master Plan improvements are expected to provide future benefits that will improve travel times.” While beyond the scope of the current project EA, the Chamber urges analysis of the following additional treatments for the Downtown Bellevue Vicinity, as a part of a combined EA with Tukwila to I-90 Project:

- Direct connector ramps from SR 520 HOV lanes to I-405 ETL’s, and I-90 HOV to I-405 ETL’s;
- Braided ramps from westbound SR 520 to southbound I-405, and SB I-405 to NE 10th Street;
- On-ramp from 116th Avenue NE/Lake Hills Connector to southbound I-405;
- SR 520/124th Ave NE interchange completion;
- Northeast Sixth Street extension from I-405 to 120th NE;
- A new interchange at NE 2nd, or NE 2nd extension with Lake Hills Connector SB on-ramp.

LC1.1

LC1.2



Moreover, we strongly urge WSDOT to perform additional environmental analysis regarding possible alternative roadway configurations, such as conversion of one ETL in each direction to GP operations without tolls, and the impact of reinstating the 2+ HOV threshold in all managed lanes, following completion of both the Downtown Bellevue Vicinity and Tukwila to I-90 Projects.

We request this analysis, so members of the public may have an additional set of performance characteristics to consider, alongside the No Build and Build (ETL) Alternatives. Our objective is to maximize person trips and travel time savings, for all modes and across all sections of the roadway, not only through Downtown Bellevue, but the entire length of the I-405/SR 167 Corridor.

Thanks again for considering our views and please consider us an ally, as the state seeks resources for additional treatments anticipated by the adopted I-405 Corridor Master Plan.

Sincerely,

Betty Capestany
President & CEO

Jim Hill
Board Chair

LC1.3

Comment LC1.1

The Bellevue Chamber of Commerce thanks the Department of Transportation for this opportunity to provide public comment regarding the I-405 Downtown Bellevue Vicinity Project Environmental Assessment. Chamber members served on the original I-405 Corridor Program Steering Committee and implementation of the I-405 Master Plan Vision, has been our top public policy priority, since the federal Record of Decision was issued in 2002.

Upon review of the Environmental Assessment, as issued on April 2, 2018, we concur with the Determination of Non-Significance under the State Environmental Policy Act (SEPA). We strongly support implementation of the following currently funded treatments:

- A third lane at the I-405 northbound ramp to SR 520;

- An additional express toll lane in each direction, overpass improvements at Main Street;
- Overpass and bridge improvements at Main Street and SE 8th Street
- A new bike-pedestrian bridge, near the site of the former Wilburton Tunnel.

Response LC1.1

Thank you for your comment and ongoing support as we continue delivering the I-405 Master Plan.

Comment LC1.2

Nonetheless, we note with concern the following conclusion, as contained in Key Findings of the Environmental Assessment.

“However, for the northbound afternoon commute, 2045 travel times in the general-purpose lanes would increase by about nine minutes with the project. That is because, if the project is built, southbound I-405 operations improve, allowing more vehicles to enter I-405 from I-90 and SR 520...”

The EA continues by noting that “Other unfunded Master Plan improvements are expected to provide future benefits that will improve travel times.” While beyond the scope of the current project EA, the Chamber urges analysis of the following additional treatments for the Downtown Bellevue Vicinity, as a part of a combined EA with Tukwila to I-90 Project:

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- Braided ramps from westbound SR 520 to southbound I-405, and SB I-405 to NE 10th Street;
- On-ramp from 116th Avenue NE/Lake Hills Connector to southbound I-405;
- SR 520/124th Ave NE interchange completion;
- Northeast Sixth Street extension from I-405 to 120th NE;
- A new interchange at NE 2nd, or NE 2nd extension with Lake Hills Connector SB on-ramp.

Response LC1.2

Express toll lanes (ETLs) bring reliability to drivers and transit riders. Today, WSDOT’s analysis shows that the untolled general purpose (GP) lanes in most places between Bellevue and Lynnwood are moving faster than they did before the ETLs opened. Having a toll option moves more vehicles and people overall than just adding another GP lane, which would quickly become another stop-and-go lane. ETLs give drivers the choice to pay a toll for a reliable trip when they need it. They also bring back predictability and speed for carpoolers and transit users, who use the lanes toll free, by keeping traffic moving reliably.

While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, which includes additional GP lanes as well as other improvements, it has made substantial investments in GP lanes to address key chokepoints as well as implement the first phase of ETLs from Bellevue to Lynnwood. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund other improvements consistent with the Master Plan. The additional analysis requested in this letter would occur in conjunction with the future funding.

Comment LC1.3

Moreover, we strongly urge WSDOT to perform additional environmental analysis regarding possible alternative roadway configurations, such as conversion of one ETL in each direction to GP operations without tolls, and the impact of reinstating the 2+ HOV threshold in all managed lanes, following completion of both the Downtown Bellevue Vicinity and Tukwila to I-90 Projects.

We request this analysis, so members of the public may have an additional set of performance characteristics to consider, alongside the No Build and Build (ETL) Alternatives. Our objective is to maximize person trips and travel time savings, for all modes and across all sections of the roadway, not only through Downtown Bellevue, but the entire length of the I-405/SR 167 Corridor.

Thanks again for considering our views and please consider us an ally, as the state seeks resources for additional treatments anticipated by the adopted I-405 Corridor Master Plan.

Response LC1.3

In 2011, the Washington State Legislature directed WSDOT to consult with a committee of local- and state-elected officials and transit agency representatives to develop recommendations for the I-405 express toll lane (ETL) carpool policy. That group recommended a 3+ carpool free peak/2+ carpool free off-peak policy, which was then adopted by the Washington State Transportation Commission (WSTC). This report, the I-405/SR 167 Corridor Funding and Phasing Report, was released in 2013, and is available for download on the WSDOT website, along with the supporting traffic and revenue studies at <https://www.wsdot.wa.gov/Tolling/EastsideCorridor/Report.htm>.

The Washington State Legislature approved the I-405 Renton to Bellevue Express Toll Lanes Project in the 2015 Connecting Washington funding package with the assumption that toll revenue would fund part of the project. WSDOT believes the analysis contained in the EA is sufficient for the current project-level decision making. The I-405 Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would implement one part of that larger project. WSDOT has evaluated the effects of tolling as part of this Environmental Assessment and found that the addition of express toll lanes (ETLs) would improve I-405 speed and reliability for drivers who choose to use them and improve traffic across all lanes in most areas. It would ultimately be up to the Legislature to provide toll authorization for this and future segments of I-405.

See also Global Response 6.

Comment LC2 – Bellevue Downtown Association, May 2, 2018



Bellevue
Downtown
Association

May 2, 2018

I-405 Program Team
Attn: Allison Hanson, I-405 Program Environmental Manager
Washington State Department of Transportation
600 108th Avenue NE, Suite 405
Bellevue, Washington 98004

RE: I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environment Assessment

On behalf of the Bellevue Downtown Association (BDA), we appreciate the opportunity to comment on the Environmental Assessment for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project. WSDOT Program Administrator Kim Henry briefed our Transportation Committee on April 23, 2018.

The BDA remains strongly in support of advancing implementation of the I-405 Master Plan. Bellevue's economy, quality of life, and capacity to welcome future growth are all tied in large part to corridor improvements for all trips.

We acknowledge additional capacity improvements are required for I-405 beyond the scope of this project. As one step in addressing capacity needs, the EA reports on the mobility improvements in the traffic projections, as well as plans to reestablish the east-west connection across I-405 consistent with the Eastside Rail Corridor Trail project. The Downtown Bellevue-area project specifically provides major relief for the severe bottleneck in the southbound evening peak direction.

We request the following set of actions as part of further environmental review and project reporting:

1. Coordination of transportation and impacted utility projects between WSDOT, Sound Transit (I-405 Bus Rapid Transit and East Link), the City of Bellevue, and Puget Sound Energy.
2. Outlined benefits, costs and impacts associated with adding a half diamond interchange at Main Street in Bellevue.
3. Plans for maintaining Downtown arterial and corridor capacity during the Main Street bridge rebuild.
4. Strategies for noise impact mitigation during construction.
5. Corridor construction mitigation plans, both on lane capacity and enhanced multimodal service. We also encourage WSDOT to explore incentives to offset mobility impacts.
6. Strong coordination on TDM strategies with TransManage, Bellevue's Transportation Management Association, and the City of Bellevue's Choose Your Way Bellevue program to boost non-drive-alone travel in the corridor during and after construction.
7. Integration of Wilburton Commercial Area zoning options and trip generation ranges in the review and reporting of I-405 traffic projections.

LC2.01

LC2.02

p 425.453.1223 / 425.646.6634

bellevuedowntown.com

400 108th Ave NE, Suite 110 Bellevue, WA 98004

The success of the I-405 Master Plan, and resulting mobility benefits for the region, require completion of all its outlined improvement projects. We support accelerating the improvements whenever possible, and encourage working with the State Legislature and Congress to identify funding to complete the Master Plan projects.

LC2.03

The BDA will remain closely engaged with the I-405 project implementation and the subsequent environmental assessment of the I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project. Additionally, we look forward to responses and reporting to the points above and a successful opening in 2024.

Sincerely,



Susan Stead
Parker, Smith & Feek

BDA Transportation Committee Co-Chairs



Amy Carlson
Jacobs Engineering Group



Patrick Bannon
Bellevue Downtown Association

BDA President

Comment LC2.01

On behalf of the Bellevue Downtown Association (BDA), we appreciate the opportunity to comment on the Environmental Assessment for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project. WSDOT Program Administrator Kim Henry briefed our Transportation Committee on April 23, 2018.

The BDA remains strongly in support of advancing implementation of the I-405 Master Plan. Bellevue's economy, quality of life, and capacity to welcome future growth are all tied in large part to corridor improvements for all trips.

We acknowledge additional capacity improvements are required for I-405 beyond the scope of this project. As one step in addressing capacity needs, the EA reports on the mobility improvements in the traffic projections, as well as plans to reestablish the east-west connection across I-405 consistent with the Eastside Rail Corridor Trail project. The Downtown Bellevue-area project specifically provides major relief for the severe bottleneck in the southbound evening peak direction.

Response LC2.01

Thank you for your comment and ongoing support as we continue to work with the legislature on future funding to delivering the I-405 Master Plan.

Comment LC2.02

We request the following set of actions as part of further environmental review and project reporting:

1. Coordination of transportation and impacted utility projects between WSDOT, Sound Transit (I- 405 Bus Rapid Transit and East Link), the City of Bellevue, and Puget Sound Energy.
2. Outlined benefits, costs and impacts associated with adding a half diamond interchange at Main Street in Bellevue.
3. Plans for maintaining Downtown arterial and corridor capacity during the Main Street bridge rebuild.
4. Strategies for noise impact mitigation during construction.
5. Corridor construction mitigation plans, both on lane capacity and enhanced multimodal service. We also encourage WSDOT to explore incentives to offset mobility impacts.
6. Strong coordination on TDM strategies with TransManage, Bellevue's Transportation Management Association, and the City of Bellevue's Choose Your Way Bellevue program to boost non-drive-alone travel in the corridor during and after construction.
7. Integration of Wilburton Commercial Area zoning options and trip generation ranges in the review and reporting of I-405 traffic projections.

Response LC2.02

WSDOT is committed to continuing coordination with Sound Transit (I-405 Bus Rapid Transit and East Link), the City of Bellevue, and Puget Sound Energy.

A half diamond interchange at Main Street is outside the scope of this project; however, this concept has been evaluated with City of Bellevue and remains part of our unfunded Master Plan. The current project designs are compatible with this future project.

We expect the Main Street bridge overpass in Bellevue to be constructed in phases, with an anticipated closing of up to two lanes for over a year. WSDOT would maintain traffic flow in both directions during construction to the extent possible. The design builder may have a different delivery method that better meets the goal of minimizing traffic impacts to the public during construction.

I-405 lane closures occur at night when traffic demand is lower to not impact peak capacity travel times.

WSDOT understands noise is a concern to those communities that live adjacent to their roadways and continues to look for ways to reduce noise impacts. In addition to complying with local noise regulations, measures to minimize construction noise will be incorporated, where practicable, into construction plans and specifications including the use of ambient back-up alarms when commercially available for trucks, which adjust the beeping based on the noise in the area at the time, and therefore, are quieter when the surrounding area is

quieter. Additionally, new trucks have liners in the beds to reduce noise and hydraulic lifts to prevent tailgates from banging. When able locating stationary equipment away from receiving properties helps to decrease noise. (Please see page 6-3 of the Noise Discipline Report for more information).

WSDOT will work with the City of Bellevue to minimize transportation impacts during construction. Specifics will be developed in consultation with the design-builder and City of Bellevue. WSDOT will continue to work with TDM groups, including TransManage, to encourage non-SOV trips during and after construction.

Traffic projections used for this reporting are consistent with Puget Sound Regional Council (PSRC) and City of Bellevue population and employment forecasts.

Comment LC2.03

The success of the I-405 Master Plan, and resulting mobility benefits for the region, require completion of all its outlined improvement projects. We support accelerating the improvements whenever possible, and encourage working with the State Legislature and Congress to identify funding to complete the Master Plan projects.

The BDA will remain closely engaged with the I-405 project implementation and the subsequent environmental assessment of the I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project. Additionally, we look forward to responses and reporting to the points above and a successful opening in 2024.

Response LC2.03

While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, it has made substantial investments to include general purpose (GP) lanes to address key chokepoints as well as implement the first phase of express toll lanes (ETLs) from Bellevue to Lynnwood. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund other improvements consistent with the Master Plan.

We appreciate our long-standing partnerships and look forward to continued coordination with the Bellevue Downtown Association, city staff, and neighborhoods.

Comment LC3 – Kemper Development Company, May 2, 2018



Ms. Allison Hanson
I-405 Program Environmental Manager
Washington State Department of Transportation
600 108th Avenue NE, Suite 405
Bellevue, WA 98004

May 2, 2018

Ref: I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment

Dear Ms. Hanson,

Thank you for the opportunity to comment on the Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment. We believe it is appropriate for the Washington State Department of Transportation (WSDOT) to progress on expansion of the Interstate 405 corridor as laid out in the original I-405 Master Plan’s Record of Decision in 2002. However, three main deficiencies stand out:

1. There should be various alternatives studied, including an all general-purpose alternative, not just a “No Build” and “Tolls;”
2. The growth in travel served is too small. Since 1976, I-405 traffic volumes have increased an average of 2.5% per year. Yet this EA envisions a growth of less than 0.2% per year. PSRC projects regional travel growth of about 20% through 2040. The EA considers 10% or less through 2045 for I-405, one of only two major north-south corridors;
3. Congestion is the problem and the ETL program hardly improves travel times.

As the WSDOT continues to discuss expansion and operation of I-405, we recommend that any potential roadway configuration works to serve more travel and maximize travel time savings. Traffic congestion continues to build along the entire I-405 Corridor and hope the WSDOT continues to work with the design builder to consider additional measures relieve congestion throughout the study area.

Most importantly, we are concerned that the EA did not analyze or consider any alternative roadway configuration than a No Build and a Build (ETL) Alternative. This is especially concerning as the state legislature has not formally authorized the Washington State Transportation Commission to toll the facility. This has resulted in very little public input and vetting of potential options. To get a better understanding of how alternatives compare and how they differ from the original I-405 Record of Decision in 2002, the WSDOT should add the following analyses as part of a Supplemental EIS:

- The “Build Alternative” but with potential congestion-relieving improvements contained the Master Plan, including but limited to: NE 2nd overpass with access ramps (and potential half-diamond at Main Street to and from the South as a substitute), collector-distributor lanes as approved in the I-405 2002 Master Plan Preferred Alternative, and a NE 10th Street access ramp from I-405.

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LC3.01
LC3.02
LC3.03
LC3.04
LC3.05

- A non-ETL alternative, consisting of one additional general-purpose lane in each direction, with the HOV lane remaining at 2+ designation (along with a 4-foot buffer) as prescribed in the 2002 ROD.

LC3.05
(cont)

A Supplemental EIS may provide a more holistic look at operations along the entire corridor, instead of a patchwork of Environmental Assessments, of which, a total of three will have been completed between Lynnwood and Tukwila under the current plan.

LC3.06

Traffic growth along key parts of the corridor may be inconsistent with historical growth patterns. For example, the EA states average daily traffic volumes between I-5 and SR 167 will grow at a compound annual growth rate of about 0.16% between the opening year (2025) and 2045. Other parts of the corridor show similar trends: between SR 169 and SR 900, ADT is expected to grow at 0.38% annually between 2025 and 2045 and volumes between I-90 and SE 8th Street are projected to grow just 0.33% per year. Since the opening of the ETLs from Bellevue to Lynnwood, has WSDOT seen similar growth rates of ADT on key points in that corridor?

LC3.07

The project provides questionable congestion relief benefits. Travel times under the Build alternative would be worse than today's levels in the following instances, even averaged over a 3-hour peak period:

- Southbound AM I-90 to I-5 – General Purpose and HOV/ETL
- Southbound PM I-90 to I-5 – General Purpose
- Northbound AM I-90 to 520 – General Purpose
- Northbound PM I-90 to 520 – General Purpose

LC3.08

Due to the increases in congestion, the WSDOT should consider alternatives that do not worsen congestion over today's levels, including the potential for additional GP and auxiliary lane capacity, beyond the approximately 1.5 miles of auxiliary lanes already outlined in the EA. In addition, the WSDOT should provide peak hour travel times to analyze freeway operations when the most demand is placed on the road network.

LC3.09

LC3.10

Other comments:

- Information not provided: The EA mentions a 40-year Traffic and Revenue Forecast completed by Stantec, yet that forecast was not provided. Does WSDOT intend to release that forecast with the Final EA? If not, would this forecast be publicly available?
 - Since the model was ran without a toll cap, how many days per month did the Forecast predict tolls would exceed \$10?
 - Did the Traffic and Revenue Study assume "pay as you go" or a bonded toll revenue?
- It is understood that the "constrained" traffic model run assigns trips to adjacent arterial streets once capacity has been reached. Has the WSDOT run an "unconstrained" traffic model run, and if so, what are the results to average speeds and travel times along I-405 from I-5 to SR 520?

LC3.11

LC3.12

- Has the WSDOT considered construction of the NE 2nd Street overpass as mitigation for impacts stemming from the construction of the Main Street overpass, which the EA states would require the “closing of up to two lanes for over a year”?
- Impact on arterials: As designed in the EA, the current southbound lane configuration on I-405 would be reconfigured at the I-90 interchange by eliminating the right-hand HOV lane between SE 8th Street and the Westbound I-90 Direct Access ramp. How would this affect Southbound Bellevue Way to I-90 operations? Does the traffic model indicate an increase in vehicle volumes on Bellevue Way as vehicles divert from I-405?
- Impact on freeway network: Has WSDOT measured future conditions under the “build” scenario on other major highways? For example, how would average travel times between Downtown Bellevue and Mercer Island and Downtown Bellevue and Seattle change in each of the horizon years provided?

LC3.13

LC3.14

LC3.15

We appreciate the opportunity to comment.

Respectfully Submitted,

Bob Pishue, Transportation Director
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 Email: bob.pishue@kemperdc.com

Comment LC3.01

Thank you for the opportunity to comment on the Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment. We believe it is appropriate for the Washington State Department of Transportation (WSDOT) to progress on expansion of the Interstate 405 corridor as laid out in the original I-405 Master Plan’s Record of Decision in 2002. However, three main deficiencies stand out:

1. There should be various alternatives studied, including an all general-purpose alternative, not just a “No Build” and “Tolls;”

Response LC3.01

Please see Chapter 2 of the EA. A number of alternatives have already been studied leading up to a recommendation to implement the system of managed lanes identified in this Project.

The I-405 Record of Decision in 2002 acknowledged the potential for future managed lanes as part of the selected alternative: “This design allows for future consideration of expanded managed lanes operations on I-405, which could include managing up to two lanes in each direction. Expansion of managed lane operations beyond the single HOV lane proposed in the Final Environmental Impact Statement (FEIS) would be subject to further environmental analysis beyond the scope of the I-405 Corridor Program FEIS.”

Based on this direction, WSDOT worked with the I-405/SR 167 Executive Advisory Group and conducted studies of different lane management options and configurations.

In 2009 the Legislature directed WSDOT to study the merit of express toll lanes on I-405. To conduct the Eastside Corridor tolling study, WSDOT used a committee process similar to the I-405 Master Plan committee process used in 2002. The purpose of the committees was to share information with and seek input from local elected officials and agency staff. WSDOT established the Executive Advisory Group (EAG) which is comprised of legislators, mayors, city and county council members; and representatives from the Washington State Transportation Commission, the Puget Sound Regional Council (PSRC), and local transit agencies. To solicit technical input, WSDOT established the Interagency Working Group (IWG) composed of technical and policy staff from corridor cities, and staff from federal, state, and local agencies. This work resulted in the Eastside Corridor Tolling Study, which evaluated five options to implement express toll lanes on I-405. The I-405/SR 167 Executive Advisory Group endorsed option four, which included a 40-mile express toll lane system from Puyallup to Lynnwood.

In 2010, the Secretary of Transportation directed WSDOT to convene a National Expert Review Panel to evaluate the findings of the 2009 Eastside Corridor Tolling Study. The Expert Review Panel reported out their findings to the I-405/SR 167 Executive Advisory Group, resulting in the publishing of the I-405/SR 167 Expert Review Panel Report. The report concluded that the proposed express toll lane concept was a viable and appropriate strategy for improving mobility on the I-405/ SR 167 Corridor.

As part of this process, WSDOT offered the public a variety of opportunities to learn about the tolling study, as well as give input. Between June and December 2009, thousands of people participated in the Eastside Corridor express toll lane discussion. WSDOT held open houses and community briefings at locations throughout the corridor and participated in information booths at regional summer festivals. To gain further public input, we also encouraged people to e-mail comments or fill out an online comment form. We also conducted four focus groups, an online survey, and a statistically-valid phone survey.

The full text of the reports and other supporting documents leading up to the Legislature’s 2011 authorization of express toll lanes are available on the WSDOT website:
<https://www.wsdot.wa.gov/Tolling/EastsideCorridor/Report.htm>.

In the 2015 Connecting Washington funding package, the Washington State Legislature directed WSDOT to continue widening the I-405 corridor between Renton to Bellevue, with the assumption that toll revenue would fund part of that improvement. Revenue from the ETL’s is required to be reinvested into the I-405 corridor to fund needed improvements.

Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled.

Comment LC3.02

2. The growth in travel served is too small. Since 1976, I-405 traffic volumes have increased an average of 2.5% per year. Yet this EA envisions a growth of less than 0.2% per year. PSRC projects regional travel growth of about 20% through 2040. The EA considers 10% or less through 2045 for I-405, one of only two major north-south corridors;

Response LC3.02

The project team used the Puget Sound Regional Council (PSRC) travel demand forecast model to develop future year traffic projections (see Section 3 of the Transportation Discipline Report). This model predicts traffic volumes and travel patterns based on adopted land use plans and the expected transportation network within the region. We refined the PSRC model to include detailed network resolution for the I-405 and State Route (SR) 167 corridors, as well as portions of SR 520, I-90, and Interstate 5 (I-5). We incorporated supplemental data from other cities' travel demand models from cities located along the study area.

We used the VISSIM model to analyze freeway operations for the 2025 and 2045 No Build. Exhibit 5-1 in the Transportation Discipline Report reflects projected traffic volume throughput, not demand and shows graphically the peak 3-hour, directional traffic volumes along I-405 from the model. Appendix G, 3-Hour Vehicle and Person Throughput, provides this information in tabular format.

Comment LC3.03

3. Congestion is the problem and the ETL program hardly improves travel times.

As the WSDOT continues to discuss expansion and operation of I-405, we recommend that any potential roadway configuration works to serve more travel and maximize travel time savings. Traffic congestion continues to build along the entire I-405 Corridor and hope the WSDOT continues to work with the design builder to consider additional measures relieve congestion throughout the study area.

Response LC3.03

Overall, greater traffic volumes would travel through the Downtown Bellevue Vicinity area and most would travel at speeds similar or higher than the No Build due to the express toll lane (ETLs) and increased capacity. Vehicles would operate at higher speeds in the ETL's and would have a more reliable trip than the No Build high-occupancy vehicle (HOV) lanes.

In the year 2025, with this project most trips during the AM and PM peak periods would be the same or better than the 2025 No Build conditions in both directions of travel. The one exception is 2025 northbound AM peak trips, these trips would increase by about 1 minute in the general purpose (GP) lanes. The other exception is in 2045 in the PM peak period,

northbound I-405 travel times would increase by 9 minutes between I-90 and SR 520 compared to the No Build Alternative.

In 2025, PM peak on Southbound I-405 there is a 11.2 minutes savings when comparing Build to existing and 24.3 minutes savings when comparing No Build to Build. See Global Response 1.

Comment LC3.04

Most importantly, we are concerned that the EA did not analyze or consider any alternative roadway configuration than a No Build and a Build (ETL) Alternative. This is especially concerning as the state legislature has not formally authorized the Washington State Transportation Commission to toll the facility. This has resulted in very little public input and vetting of potential options.

Response LC3.04

WSDOT believes the analysis contained in the EA is sufficient for the current project-level decision-making. See also Response LC3.01.

WSDOT has offered the public a variety of opportunities to learn about the tolling study, as well as give input. Between June and December 2009, thousands of people participated in the Eastside Corridor express toll lane (ETL) discussion. WSDOT held open houses and community briefings at locations throughout the corridor and participated in information booths at regional summer festivals. To gain further public input, we also encouraged people to e-mail comments or fill out an online comment form. We also conducted four focus groups, an online survey, and a statistically-valid phone survey. Specific data points include:

- WSDOT mailed 220,000 postcards to Eastside Corridor households to advertise the online survey and open houses.
- Thousands of people learned about the study and input opportunities through WSDOT's e-mail listserv.
- Almost 150 people attended one of five open houses held along the 50-mile Eastside Corridor.
- Hundreds of people spoke to Eastside Corridor staff at 10 different summer fairs.
- Over 1,300 people submitted written comments or sent emails to the Eastside Corridor study.
- More than 2,500 people took our Web-based survey.
- 1,000 people participated in a random-sample telephone survey.
- WSDOT conducted four different focus groups of Eastside Corridor users.
- WSDOT briefed over 30 different Eastside Corridor civic, business, and community groups.

The full text of the reports and other supporting documents leading up to the Legislature's 2011 authorization of express toll lanes are available on the WSDOT website:
<https://www.wsdot.wa.gov/Tolling/EastsideCorridor/Report.htm>.

Chapter 2 of the EA also describes how the public has been involved for the Project.

Comment LC3.05

To get a better understanding of how alternatives compare and how they differ from the original I-405 Record of Decision in 2002, the WSDOT should add the following analyses as part of a Supplemental EIS:

- The "Build Alternative" but with potential congestion-relieving improvements contained the Master Plan, including but limited to: NE 2nd overpass with access ramps (and potential half-diamond at Main Street to and from the South as a substitute), collector-distributor lanes as approved in the I-405 2002 Master Plan Preferred Alternative, and a NE 10th Street access ramp from I-405.
- A non-ETL alternative, consisting of one additional general-purpose lane in each direction, with the HOV lane remaining at 2+ designation (along with a 4-foot buffer) as prescribed in the 2002 ROD.

Response LC3.05

See Response LC3.01.

The I-405 Downtown Bellevue project includes Connecting Washington funded elements and does not cover unfunded Master Plan elements such as an interchange at NE 2nd and NE 10th Streets. The vision of the Master Plan includes an additional general purpose lane. WSDOT is committed to building out the full plan as funding becomes available and is working with the Washington State Legislature to fund other improvements consistent with the Master Plan.

See Global Response 6.

Comment LC3.06

A Supplemental EIS may provide a more holistic look at operations along the entire corridor, instead of a patchwork of Environmental Assessments, of which, a total of three will have been completed between Lynnwood and Tukwila under the current plan.

Response LC3.06

An Environmental Impact Statement (EIS)/programmatic planning process for the entire 30-mile I-405 corridor was completed in 2002 by WSDOT. The Federal Highway Administration and Federal Transit Administration prepared the Record of Decision in October 2002. Project-level environmental reviews (such as Environmental Assessments) are required for individual construction projects within the corridor as noted in the Final EIS for the I-405 Master Plan and consistent with the National Environmental Policy Act and Washington State Environmental Policy Act regulations.

The FONSI is based on the EA and provides sufficient evidence and analysis for determining that an environmental impact statement (EIS) is not required.

Comment LC3.07

Traffic growth along key parts of the corridor may be inconsistent with historical growth patterns. For example, the EA states average daily traffic volumes between I-5 and SR 167 will grow at a compound annual growth rate of about 0.16% between the opening year (2025) and 2045. Other parts of the corridor show similar trends: between SR 169 and SR 900, ADT is expected to grow at 0.38% annually between 2025 and 2045 and volumes between I-90 and SE 8th Street are projected to grow just 0.33% per year. Since the opening of the ETLs from Bellevue to Lynnwood, has WSDOT seen similar growth rates of ADT on key points in that corridor?

Response LC3.07

Traffic volume growth projections are based on official Puget Sound Regional Council forecasts. The largest growth in daily traffic volumes is projected to be at opening of the new system when capacity is added. This is similar to the daily traffic growth seen after opening the Bellevue to Lynnwood Express Toll Lane (ETL) system. Beyond this initial jump, daily traffic growth is projected to occur at a lower rate.

Comment LC3.08

The project provides questionable congestion relief benefits. Travel times under the Build alternative would be worse than today's levels in the following instances, even averaged over a 3-hour peak period:

- Southbound AM I-90 to I-5 – General Purpose and HOV/ETL
- Southbound PM I-90 to I-5 – General Purpose
- Northbound AM I-90 to 520 – General Purpose
- Northbound PM I-90 to 520 – General Purpose

Response LC3.08

See Response LC3.03.

See the following comparison of Existing, 2025 No Build and 2025 Build scenarios from Chapter 5 of the Transportation Discipline Report for the specific commutes you referenced:

Southbound AM I-90 to I-5

General Purpose

- 2016 (Existing) 12.7 minutes
- 2025 No Build 14 minutes
- 2025 Build 12 minutes

HOV/ETL-

- 2016 (Existing) 11.7 minutes
- 2025 No Build 12 minutes
- 2025 Build 11.5 minutes

Southbound PM I-90 to I-5

General Purpose

- 2016 (Existing) 16.8 minutes
- 2025 No Build 21.8 minutes
- 2025 Build 14.1 minutes

Northbound AM I-90 to 520

General Purpose

- 2016 (Existing) 4.1 minutes
- 2025 No Build 5.8 minutes
- 2025 Build 6.7 minutes

Northbound PM I-90 to 520

General Purpose

- 2016 (Existing) 2.4 minutes
- 2025 No Build 2.4 minutes
- 2025 Build 2.4 minutes

When analyzing the entire trip distance between I-5 and SR 520 in 2025 GP lanes have substantial benefits when comparing today’s conditions to the No Build and Build conditions. For instance, in the AM peak on Northbound I-405, there is a 10.4-minute savings comparing Build to existing and 16.6 minutes comparing No Build to Build. In the PM peak on Southbound I-405 there is a 11.2 minutes savings when comparing Build to existing and 24.3 minutes savings when comparing No Build to Build. See Chapter 5, Exhibit 5-2 of the Transportation Discipline Report.

Comment LC3.09

Due to the increases in congestion, the WSDOT should consider alternatives that do not worsen congestion over today’s levels, including the potential for additional GP and auxiliary lane capacity, beyond the approximately 1.5 miles of auxiliary lanes already outlined in the EA.

Response LC3.09

See Global Response 5 and Response LC3.01.

Comment LC3.10

In addition, the WSDOT should provide peak hour travel times to analyze freeway operations when the most demand is placed on the road network.

Response LC3.10

WSDOT used a three-hour timeframe for analysis. The peak commute last more than an individual hour, and the three-hour metric provides a more complete picture of the commute period.

Comment LC3.11

Other comments:

- Information not provided: The EA mentions a 40-year Traffic and Revenue Forecast completed by Stantec, yet that forecast was not provided. Does WSDOT intend to release that forecast with the Final EA? If not, would this forecast be publicly available?
 - Since the model was ran without a toll cap, how many days per month did the Forecast predict tolls would exceed \$10?
 - Did the Traffic and Revenue Study assume “pay as you go” or a bonded toll revenue?

Response LC3.11

Traffic and revenue projections were referenced in Appendix D of the Transportation Discipline Report. The data was developed to provide forecasts of future express toll lane (ETL) and general purpose (GP) lane volumes used in the traffic analysis. A copy of the Traffic and Revenue Forecast data has been sent to you.

The 2025 traffic and revenue forecast did not predict average daily tolls above \$10 in the Renton to Bellevue area at opening. Future 2045 forecasts did show average daily tolls exceeding \$10 during a typical weekday commute as population and employment growth occurs, as well as inflation.

The Traffic and Revenue Forecast does not include any bonding or pay as you go analysis. Traffic and revenue projections were developed to provide forecasts of future ETL and GP lane volumes used in the traffic operational analysis.

Comment LC3.12

- It is understood that the “constrained” traffic model run assigns trips to adjacent arterial streets once capacity has been reached. Has the WSDOT run an “unconstrained” traffic model run, and if so, what are the results to average speeds and travel times along I-405 from I-5 to SR 520?

Response LC3.12

We did not run an unconstrained traffic model. In accordance with standard best practices, our models reflect the real constraints of the transportation network currently in place and planned for the future.

Comment LC3.13

- Has the WSDOT considered construction of the NE 2nd Street overpass as mitigation for impacts stemming from the construction of the Main Street overpass, which the EA states would require the “closing of up to two lanes for over a year”?

Response LC3.13

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) proposes to construct the Main Street bridge overpass in Bellevue in phases, with an anticipated closing of up to two lanes for over a year. WSDOT would maintain traffic flow in both directions during construction to the extent possible. The design builder may have a different delivery method that better meets the goal of minimizing traffic impacts to the public during construction.

There is currently no funding to build the 2nd Street overpass; however, it is part of the I-405 Master Plan. WSDOT is committed to building out the full plan as funding becomes available.

Comment LC3.14

Impact on arterials: As designed in the EA, the current southbound lane configuration on I-405 would be reconfigured at the I-90 interchange by eliminating the right-hand HOV lane between SE 8th Street and the Westbound I-90 Direct Access ramp. How would this affect Southbound Bellevue Way to I-90 operations? Does the traffic model indicate an increase in vehicle volumes on Bellevue Way as vehicles divert from I-405?

Response LC3.14

The proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would be constructed along with the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would include additional mainline capacity improvements and southbound I-90 ramp improvements. The right-side high-occupancy vehicle (HOV) exit to I-90 will remain in place, however it will be accessed 950 feet north of I-90. The current right-side HOV lane has very low use, approximately 300 vehicles per hour in the peak whereas the new ETL is anticipated to serve over 1,500 vehicles per hour at this location. Together the operational and capacity improvements of these projects will greatly improve traffic conditions in this section that you are referring to. Please see the Transportation Discipline Report (pages 5-20 to 5-46).

We do not project any diversion of vehicles onto Bellevue Way because of this increased throughput and use on southbound I-405 and, therefore, do not anticipate impacts to the southbound Bellevue Way to I-90 operations.

Comment LC3.15

Impact on freeway network: Has WSDOT measured future conditions under the “build” scenario on other major highways? For example, how would average travel times between Downtown Bellevue and Mercer Island and Downtown Bellevue and Seattle change in each of the horizon years provided?

We appreciate the opportunity to comment.

Response LC3.15

The travel time changes associated with this Project occur on I-405 and are presented in Section 5 of Transportation Discipline Report. The traffic modeling included sections of I-90 and SR 520 in the vicinity of the Project area and found no significant negative effects on travel times.

Comment LC4 – City of Bellevue, May 2, 2018



Post Office Box 90012 • Bellevue, Washington • 98009 9012

May 2, 2018

Ms. Allison Hanson
WSDOT I-405 Project Office
600 – 108th Avenue NE, Suite 405
Bellevue WA 98004

RE: I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6)
Environmental Assessment

Dear Ms. Hanson:

The City of Bellevue is pleased that WSDOT is advancing planning, design, and construction of the I-405 Express Toll Lanes Project, based upon state legislative direction, as we strongly support this project. It has been a high priority for our City Council for many years, is supported in our Council's 2018 State Legislative Agenda, and is referred to in Council's 2018-2020 priorities. It is Bellevue's goal to continue being a strong advocate and partner for transportation solutions of regional interest along I-405, I-90 and SR-520.

LC4.01

We appreciate WSDOT's efforts over the past several years to collaboratively develop design concepts for the I-405 Express Toll Lanes Project. We also appreciate the outreach WSDOT has conducted with the many neighborhoods within Bellevue to address questions and concerns.

Thank you for this opportunity to comment on the scope of the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment (EA). Many of our comments should be familiar to you, as we have consistently conveyed our specific concerns and requirements for the project. The following highlights some of the concerns for the project relative to the Downtown Bellevue Vicinity.

NE 6th Street Interchange

The EA states that completion of the express toll lanes will make the NE 6th Street interchange more attractive for trips. These trips will reach city streets through the traffic signal at 112th Avenue NE. The Transportation Discipline Report notes on page 5-41 that future build conditions could lead to opening day operations that exceed capacity at this location despite minor improvements that would dynamically change lane utilization by time of day.

LC4.02

Our greatest concern is the potential impact to transit operations, including the forthcoming ST3 investment in I-405 Bus Rapid Transit. Bellevue is working hard to develop programs that support transit and shared mobility solutions to reduce SOV trips. Consideration should be given to further improvements that would create adequate capacity for both the future projected SOV and HOV usage of this ramp. We would not want operations at this critical intersection to degrade non-SOV services.

The designs for the express toll lane project should also be compatible with the Council-adopted vision for the Grand Connection. The Grand Connection will pass over I-405 and connect the Wilburton neighborhood and Eastside Rail Corridor with Downtown Bellevue and the Meydenbauer Bay Park.

LC4.03

NE 4th Street Interchange

PM peak Level of Service (LOS) does not necessarily capture the capacity problems that occur daily at this location. Queuing in the eastbound direction for accessing the northbound I-405 on-ramp results in significant backup and other problems on the NE 4th Street corridor and in Downtown Bellevue. The operation of this interchange should be further evaluated to consider solutions that make better use of the SOV and HOV split lanes across this structure. On a separate note, the ADA accessibility through this interchange should also be reviewed and updated accordingly.

LC4.04

Main Street Bridge

As noted in the report, the Main Street Bridge is a key connection between the Wilburton neighborhood and Old Bellevue and part of the Lake-to-Lake Trail and Greenway. The trail and greenway promotes pedestrian and bicycle travel between Lake Sammamish and Lake Washington. The south side of the Main Street Bridge should include a vegetative buffer between the multiple use trail and travel lanes to help preserve the character of the greenway. The City is also revising its transportation design standards to include bike buffers which should be reflected on the north side of the bridge.

LC4.05

The Main Street Bridge is also adjacent to two hotel properties to the south that anticipate redevelopment. Additionally, Sound Transit is constructing a light rail station on the southwest corner of the 112th Avenue NE intersection. WSDOT is encouraged to continue coordination with the City to avoid construction issues and ensure mobility in this area. This includes developing a solution to sight distance issues with the slip-ramp off Main Street down to the frontage road along 114th Avenue NE.

LC4.06

SE 8th Street Interchange

Lake Hills Boulevard passes through this interchange. WSDOT should continue working with the City to address mobility and safety for pedestrians and bicycles passing through the interchange. Consideration should also be given to the 114th Avenue SE intersection and how operations may change once the full vision of the I-405 Master Plan is implemented.

LC4.07

LC4.08

Wilburton Gap

The regional trail development along the Eastside Rail Corridor will be a celebrated feature for pedestrian and bicycle travel through Bellevue. WSDOT is encouraged to continue coordination of the design with both the City and King County. A key feature will be the re-establishment of the Wilburton Gap over I-405. The bridge deck should include significant vegetation to help soften the adverse effects of the bridge on the existing natural harmony of this area.

LC4.09

Coal Creek Interchange

Queuing at this interchange causes significant problems in the AM and PM peaks up and down the I-405 corridor. For example, the northbound queue in the AM peak can stretch all the way to Newcastle. The roundabout solution is intriguing; however, a detailed traffic analysis and simulation is required before the City can take any stance on the proposal. Impacts to the roundabout operations from the on-ramp and off-ramp queues should be documented and compared to a similar solution using traffic signals.

LC4.10

Avoidance, Minimization, and Mitigation of Impacts

Page 5-42 of the Transportation Discipline Report discusses impacts of ramp queuing on arterials and states that none of the ramps exceed storage capacity. We would like to see more detail on how this conclusion was reached, as our experience with daily conditions has been to the contrary. Examples include the on- and off-ramps at NE 4th Street, SE 8th Street and Coal Creek Parkway. The design should also address ADA deficiencies along the I-405 corridor.

LC4.11

Construction of the I-405 Express Toll Lanes Project will result in temporary vehicle, pedestrian and bicycle detours around work zones. Details of the detour routes will be confirmed through the Right-of-way Use Permit process to ensure mobility is maintained. This includes coordination with other ongoing construction such as the East Link Project by Sound Transit.

LC4.12

I-405 passes by several sensitive areas and adjacent neighborhoods. Previous environmental analysis identified potential noise impacts to Woodridge and other neighborhoods along the I-405 corridor. The City will continue to engage with WSDOT with the expectation that potential impacts will be comprehensively evaluated with an eye towards avoidance, minimization, and mitigation.

LC4.13

In closing, I want to reiterate that the City of Bellevue is very supportive of the I-405 Express Toll Lanes Project and will continue to partner with WSDOT on this and other projects on I-405, I-90 and SR-520 that increase accessibility to and from Bellevue and the greater Eastside.

LC4.14

Sincerely,



David Berg, P.E.
Director, Transportation Department

- cc: Bellevue City Councilmembers
- Brad Miyake, City Manager
- Mac Cummins, Planning and Community Development Director
- Patrick Foran, Parks and Community Services Director
- Navdeep Ota, Utilities Director

Comment LC4.01

The City of Bellevue is pleased that WSDOT is advancing planning, design, and construction of the I-405 Express Toll Lanes Project, based upon state legislative direction,

as we strongly support this project. It has been a high priority for our City Council for many years, is supported in our Council's 2018 State Legislative Agenda, and is referred to in Council's 2018-2020 priorities. It is Bellevue's goal to continue being a strong advocate and partner for transportation solutions of regional interest along 1-405, 1-90 and SR-520.

We appreciate WSDOT's efforts over the past several years to collaboratively develop design concepts for the 1-405 Express Toll Lanes Project. We also appreciate the outreach WSDOT has conducted with the many neighborhoods within Bellevue to address questions and concerns.

Thank you for this opportunity to comment on the scope of the 1-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment (EA). Many of our comments should be familiar to you, as we have consistently conveyed our specific concerns and requirements for the project. The following highlights some of the concerns for the project relative to the Downtown Bellevue Vicinity.

Response LC4.01

We appreciate the long-standing partnership with the City of Bellevue and look forward to continued coordination with city staff, businesses, and neighborhoods.

Comment LC4.02

NE 6th Street Interchange

The EA states that completion of the express toll lanes will make the NE 6th Street interchange more attractive for trips. These trips will reach city streets through the traffic signal at 112th Avenue NE. The Transportation Discipline Report notes on page 5-41 that future build conditions could lead to opening day operations that exceed capacity at this location despite minor improvements that would dynamically change lane utilization by time of day.

Our greatest concern is the potential impact to transit operations, including the forthcoming ST3 investment in 1-405 Bus Rapid Transit. Bellevue is working hard to develop programs that support transit and shared mobility solutions to reduce SOV trips. Consideration should be given to further improvements that would create adequate capacity for both the future projected SOV and HOV usage of this ramp. We would not want operations at this critical intersection to degrade non-SOV services.

Response LC4.02

We agree that the 6th street facility operations are important to I-405 Bus Rapid Transit (BRT), Transit, and other trips. The I-405 express toll lanes use dynamic price tolling which is based on real-time traffic conditions. Every few minutes, the traffic management computer system updates toll rates based on how many cars are in the lanes and how fast they are going. When traffic is flowing smoothly the price is low to encourage cars to use the system. When the lanes and associated direct access ramps start to fill up and slow down, the price goes up to keep traffic flowing efficiently. The goal is to use the laws of supply and demand to keep traffic moving.

See page 5-41 of the Traffic Discipline Report for additional information.

WSDOT is proposing channelization changes at the NE 6th Street/112th Avenue NE intersection in order to increase capacity.

WSDOT will monitor operations after opening and work with Bellevue and the transit agencies.

Comment LC4.03

The designs for the express toll lane project should also be compatible with the Council-adopted vision for the Grand Connection. The Grand Connection will pass over I-405 and connect the Wilburton neighborhood and Eastside Rail Corridor with Downtown Bellevue and the Meydenbauer Bay Park.

Response LC4.03

The Project will not preclude the Grand Connection.

Comment LC4.04**NE 4th Street Interchange**

PM peak Level of Service (LOS) does not necessarily capture the capacity problems that occur daily at this location. Queuing in the eastbound direction for accessing the northbound I-405 on-ramp results in significant backup and other problems on the NE 4th Street corridor and in Downtown Bellevue. The operation of this interchange should be further evaluated to consider solutions that make better use of the SOV and HOV split lanes across this structure. On a separate note, the ADA accessibility through this interchange should also be reviewed and updated accordingly.

Response LC4.04

We agree that Level of Service and delay does not fully reflect queuing issues that occur at this interchange on a daily basis. With the Downtown Bellevue Vicinity ETL project, this interchange is expected to operate better than No Build as the NE 6th Street ramp will attract demand from this interchange.

WSDOT will continue to work with the City on the NE 4th Street interchange, including evaluation of Americans with Disabilities Act (ADA) upgrades.

Comment LC4.05**Main Street Bridge**

As noted in the report, the Main Street Bridge is a key connection between the Wilburton neighborhood and Old Bellevue and part of the Lake-to-Lake Trail and Greenway. The trail and greenway promotes pedestrian and bicycle travel between Lake Sammamish and Lake Washington. The south side of the Main Street Bridge should include a vegetative buffer between the multiple use trail and travel lanes to help preserve the character of the

greenway. The City is also revising its transportation design standards to include bike buffers which should be reflected on the north side of the bridge.

Response LC4.05

WSDOT will continue to work with the City regarding the vegetative buffer and bike lane on the Main Street structure.

Comment LC4.06

The Main Street Bridge is also adjacent to two hotel properties to the south that anticipate redevelopment. Additionally, Sound Transit is constructing a light rail station on the southwest corner of the 112th Avenue NE intersection. WSDOT is encouraged to continue coordination with the City to avoid construction issues and ensure mobility in this area. This includes developing a solution to sight distance issues with the slip-ramp off Main Street down to the frontage road along 114th Avenue NE.

Response LC4.06

WSDOT will continue to work with the City in this area, including options for the slip ramp design. Coordination with adjacent projects and development is ongoing to minimize construction impacts.

Comment LC4.07

SE 8th Street Interchange

Lake Hills Boulevard passes through this interchange. WSDOT should continue working with the City to address mobility and safety for pedestrians and bicycles passing through the interchange. Consideration should also be given to the 114th Avenue SE intersection and how operations may change once the full vision of the 1-405 Master Plan is implemented.

Response LC4.07

WSDOT will continue to work with the City on the SE 8th Street interchange, including evaluation of Americans with Disabilities Act (ADA) upgrades at the NB ramp terminal intersection. WSDOT's design will not preclude implementation of additional design treatments for bikes and pedestrians in this area.

Comment LC4.08

Consideration should also be given to the 114th Avenue SE intersection and how operations may change once the full vision of the 1-405 Master Plan is implemented.

Response LC4.08

Future Master Plan projects impacting 114th Avenue SE operations will be analyzed as necessary when the projects are funded.

Comment LC4.09

Wilburton Gap

The regional trail development along the Eastside Rail Corridor will be a celebrated feature for pedestrian and bicycle travel through Bellevue. WSDOT is encouraged to continue coordination of the design with both the City and King County. A key feature will be the re-establishment of the Wilburton Gap over 1-405. The bridge deck should include significant vegetation to help soften the adverse effects of the bridge on the existing natural harmony of this area.

Response LC4.09

The current design for the Wilburton Gap bridge includes a vegetative area alongside the trail. See Exhibits 5-4 and 5-5 in the Visual Impact Assessment Discipline Report which illustrate existing conditions and the Wilburton Gap after construction.

Comment LC4.10

Coal Creek Interchange

Queuing at this interchange causes significant problems in the AM and PM peaks up and down the 1-405 corridor. For example, the northbound queue in the AM peak can stretch all the way to Newcastle. The roundabout solution is intriguing; however, a detailed traffic analysis and simulation is required before the City can take any stance on the proposal. Impacts to the roundabout operations from the on-ramp and off-ramp queues should be documented and compared to a similar solution using traffic signals.

Response LC4.10

The local intersection operations show significant improvements over the No Build condition (see pages 5-40 and 5-41 in the Transportation Discipline Report). We will continue to work with the City of Bellevue on traffic specific issues including simulation.

Comment LC4.11

Avoidance, Minimization, and Mitigation of Impacts

Page 5-42 of the Transportation Discipline Report discusses impacts of ramp queuing on arterials and states that none of the ramps exceed storage capacity. We would like to see more detail on how this conclusion was reached, as our experience with daily conditions has been to the contrary.

Examples include the on- and off-ramps at NE 4th Street, SE 8th Street and Coal Creek Parkway. The design should also address ADA deficiencies along the 1-405 corridor.

Response LC4.11

Page 5-42 of the Transportation Discipline Report discusses future operations once the project is complete. Appendix E of the Transportation Discipline Report, provides the results of the local intersection analysis, with both Synchro and Sidra results presented under the 2025 and 2045 Build conditions. We will continue to work with the City of Bellevue on traffic specific issues including ramp operations.

WSDOT will continue to work with the City to evaluate Americans with Disabilities Act (ADA) upgrades within project impact areas.

Comment LC4.12

Construction of the 1-405 Express Toll Lanes Project will result in temporary vehicle, pedestrian and bicycle detours around work zones. Details of the detour routes will be confirmed through the Right-of-way Use Permit process to ensure mobility is maintained. This includes coordination with other ongoing construction such as the East Link Project by Sound Transit.

Response LC4.12

Comment noted. WSDOT will coordinate with the local agencies and other projects to prepare a Traffic Management Plan prior to making any changes to the traffic flow or lane closures. Local agencies, the public, school districts, emergency service providers, and transit agencies will be informed of the changes in advance through the media, the Projects' website, and an email listserv. Pedestrian and bicycle circulation will be maintained as much as possible during construction. For any road, bicycle lane, and/or sidewalk closure, clearly marked detours will be provided.

Comment LC4.13

1-405 passes by several sensitive areas and adjacent neighborhoods. Previous environmental analysis identified potential noise impacts to Woodridge and other neighborhoods along the 1-405 corridor.

Response LC4.13

See Global Response 9.

WSDOT analyzed noise in the Woodridge community in 1991, 2006, and as part of this Project. As part of this Project, the existing noise walls were evaluated to determine if they are maintaining noise levels below the noise abatement criteria and they are performing as expected.

WSDOT conducted a preliminary evaluation to determine if it would be structurally feasible to increase the height of the existing noise walls that were built during the 1990s. The existing noise walls were designed to the correct design code in place at the time of construction. However, they do not meet the current design standards and adding any additional height to the noise walls would not be possible.

Comment LC4.14

The City will continue to engage with WSDOT with the expectation that potential impacts will be comprehensively evaluated with an eye towards avoidance, minimization, and mitigation.

In closing, I want to reiterate that the City of Bellevue is very supportive of the 1-405 Express Toll Lanes Project and will continue to partner with WSDOT on this and other

projects on 1-405, 1-90 and SR-520 that increase accessibility to and from Bellevue and the greater Eastside.

Response LC4.14

As WSDOT continues through final design we will look for opportunities to avoid and minimize impacts.

We appreciate the long-standing partnership with the City of Bellevue and look forward to continued coordination with city staff, businesses, and neighborhoods.

Comment LC5 – Environmental Protection Agency, Region 10, May 2, 2018



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

May 2, 2018

Ms. Lindsey L. Handel, P.E.
Federal Highway Administration
711 South Capitol Way, Suite 501
Olympia, Washington 98501

Ms. Allison Hanson, I-405 Project Team
Washington State Department of Transportation
600 108th Avenue NE, Suite 405
Bellevue, Washington 98004

Dear Ms. Handel and Ms. Hanson:

The U.S. Environmental Protection Agency has reviewed the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) Environmental Assessment (EPA Region 10 project number 18-0023-FHW). The EPA comments below are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Sections 1500-1508), and Section 309 of the Clean Air Act.

LC5.01

As part of the I-405 Corridor Program, the proposed project is 2.7 miles in length and would make roadway, structural, trail, and transit improvements. A key feature would be the addition of one lane in each direction via widening or restriping to create a dual express toll lane system. When combined with other I-405 projects, this project would result in a continuous Express Toll Lane system from I-5 in Lynnwood to State Route 167. The westward expansion of I-405 is proposed south of SE 8th Street, and eastward expansion is proposed north of SE 8th Street.

Community impacts

As stated in the EA, there are residential areas, which would be affected by the project, as I-405 is located in an urbanized area such that there is little room for expansion without impacting existing development, including residential areas. We recommend the EA discuss additional information regarding the effects of the proposed project on established residential neighborhoods, including:

LC5.02

- Locations of and methods for roadway expansion to accommodate the Express Toll Lanes;
- Existing and future noise impacts and mitigation; and,
- The near roadway effects of and mitigation for vehicular air pollution.

Roadway widening: The project description in the EA states that westward expansion of I-405 occurs south of SE 8th Street; eastward expansion occurs north of SE 8th Street. We note on page 4-34, the EA states that most of the widening would be achieved through restriping instead of roadway expansion, and that widening would occur within the I-405 median south of SE 8th Street. In addition, north of SE 8th Street, road widening would occur along the east side of I-405 and would require five partial property acquisitions from commercial and public properties. We recommend the EA clarify and disclose the potential impacts of the proposed project to decision makers and the public, as it is currently unclear

LC5.03

whether the expansion south of SE 8th Street would result in a widened freeway in closer proximity to residential areas.

LC5.03
(cont)

We support all efforts to accommodate the Express Toll Lanes within existing roadway footprint, without the need for outward expansion. For the areas where the roadway must expand eastward, we recommend the EA clarify the extent of eastward expansion and its proximity to and effects on residential areas, such as increased exposure to noise and air pollution.

LC5.04

Noise impacts and mitigation: The EA states that one hotel and one hospital are within the 400-foot zone of increased noise from the proposed project but currently does not provide the existing and future project-build noise levels affecting residential areas and other sensitive receptors. The EPA, therefore, recommends the EA clearly identify and discuss the information suggested below, as well as other appropriate noise-related analyses, to better inform agency decision makers and the public regarding potential future noise impacts from I-405 and the need for mitigation:

- Development that currently exists within 400 feet of the project area roadway;¹
- Sensitive receptors within or near the project area noise effect zone;
- Existing (baseline) noise levels within 400 feet of the project area roadway, and sensitive receptor measurement points beyond the zone of increased noise;
- The project-build increase in noise levels within and near the zone of increased noise;
- Additional noise metrics that, along with the dBA Leq measurements, will characterize the maximum and minimum range of current and future noise levels, their approximate timing and daily duration at specific sensitive receptor monitoring sites (such as, residential areas, learning environments, medical facilities, churches, parks, outdoor playgrounds, daycare and senior centers), the types of activities that noise could impact (such as, speaking, sleeping, hearing), and health effects associated with the noise levels that are and would be experienced;²
- Locations where noise walls or other noise mitigation currently exist or would be provided as part of this project and their effectiveness for reducing impacts; and,
- A summary of any noise complaints (location, frequency, nature of effects) received from the public.

LC5.05

Air quality: We note it is important for the EA to acknowledge and disclose the health risks and effects associated with criteria air pollutants and mobile source air toxics and, to the extent possible, for the project to provide for mitigation of the effects of near roadway air pollution.³ We recommend that the project incorporate mitigation measures to reduce exposure to near roadway air pollution⁴ in affected residential areas, outdoor recreation areas, such as, trails, parks, ball fields and other playgrounds, and other sensitive receptor locations.

LC5.06

¹ The EA, page 4-8, states that using the FHWA-approved noise screening analysis, it was determined that traffic noise levels drop below impact levels at 400 feet from the edge of pavement, so the noise analysis covered 400 feet on both sides of I-405 to determine the potential noise impacts on sensitive land uses. The FHWA Noise Abatement Criteria impact level used is 66 equivalent sound pressure level in A-weighted decibels.

LC5.05
(notes)

² The only noise metric used in the EA is dBA Leq, which is the equivalent continuous sound level that over a given time period has the same total energy as the fluctuating noise.

³ <https://www.epa.gov/air-research/research-near-roadway-and-other-near-source-air-pollution>

⁴ <https://www.epa.gov/air-research/recommendations-constructing-roadside-vegetation-barriers-improve-near-road-air-quality>

LC5.06
(notes)

Other recommendations

Hazardous materials: The EA identifies seven sites in the project area (p. 4-12) as having Recognized Environmental Conditions of contamination. Because project construction could increase the risk of hazardous materials releases to wetlands, groundwater, public drinking water systems, and surface waters, we recommend the revised EA identify and describe the effectiveness of the measures that would be required to protect against spills, releases, and alterations of contaminant migration.

LC5.07

Construction mitigation measures: To prevent pollution, we recommend using water, rather than other suppressants, to control dust during project construction.

LC5.08

Socioeconomics and environmental justice—mitigation for tolls: The Washington State Department of Transportation indicates (p. 6-7) low income individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their *Good to Go!* accounts. This option is considered to offset some of the disproportionate effect to low income users of the roadway. As the use of EBT cards for tolls will reduce the funds available for food and other necessities for economically disadvantaged populations, we recommend the FHWA and WSDOT also consider options for reducing tolls for low income and senior users.

LC5.09

Ecosystems:

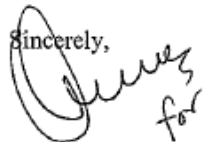
- We recommend examining the project area for opportunities to improve bridge structures, culverts, or other roadway openings/permeability features that would improve ecological connectivity for hydrology, fish passage, and safe wildlife movement; and,
- We commend WSDOT for eliminating the use of herbicide at stormwater treatment and detention facilities (p. 6-12). We encourage the WSDOT seek additional ways to eliminate or reduce use of herbicides in project construction, operations, and ongoing maintenance.

LC5.10

LC5.11

We appreciate the opportunity to offer comment on the Bellevue Express Toll Lanes Project. If you have questions or would like to discuss these recommendations, please contact Elaine Somers of my staff at 206-553-2966 or at somers.elaine@epa.gov, or contact me at 206-553-1841 or at nogi.jill@epa.gov.

LC5.12

Sincerely,


Jill A. Nogi, Manager
Environmental Review and Sediment Management Unit

Comment LC5.01

The U.S. Environmental Protection Agency has reviewed the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) Environmental Assessment (EPA Region 10 project number 18-0023-FHW). The EPA comments below are provided pursuant

to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Sections 1500- 1508), and Section 309 of the Clean Air Act.

As part of the I-405 Corridor Program, the proposed project is 2.7 miles in length and would make roadway, structural, trail, and transit improvements. A key feature would be the addition of one lane in each direction via widening or restriping to create a dual express toll lane system. When combined with other I-405 projects, this project would result in a continuous Express Toll Lane system from I-5 in Lynnwood to State Route 167. The westward expansion of I-405 is proposed south of SE 8th Street, and eastward expansion is proposed north of SE 8th Street.

Response LC5.01

WSDOT appreciates the U.S Environmental Protection Agency’s review of the environmental documentation for this Project.

Comment LC5.02

Community impacts

As stated in the EA, there are residential areas, which would be affected by the project, as I-405 is located in an urbanized area such that there is little room for expansion without impacting existing development, including residential areas. We recommend the EA discuss additional information regarding the effects of the proposed project on established residential neighborhoods, including:

- Locations of and methods for roadway expansion to accommodate the Express Toll Lanes;
- Existing and future noise impacts and mitigation; and,
- The near roadway effects of and mitigation for vehicular air pollution.

Response LC5.02

WSDOT believes the analysis contained in the EA is sufficient for the current project-level decision-making. The EA and its supporting documents provide information on the direct, indirect and cumulative effects of the Project. Below is a summary of the effects on established residential neighborhoods.

Regarding locations, the project will generally use the inside or “median” side of I-405 for construction where available. Exhibit 3-1 shows the existing and proposed right of way. The proposed additional pavement is shown in yellow. WSDOT has avoided the need to acquire full properties and has identified only minor partial property acquisitions that would result in no displacements (see page 4-34 of the EA).

The methods for roadway expansion is discussed to the extent it is known. It is important to note that this project will be constructed under a design-build contract. A design-build contract provides the contractors flexibility to offer innovative and cost-effective alternatives to deliver the project while complying with all WSDOT design standards, performance measures, and activities to avoid or minimize effects to the environment.

A detailed noise impact analysis was conducted as part of the Environmental Assessment. Results of the analysis are summarized in Exhibit 4-1 of the Noise Discipline Report. WSDOT recognizes the noise impact from highways, and we reduce it as we are able to by following the Federal Highway Administration (FHWA) noise mitigation regulations and WSDOT's Noise Policy. There were no noise walls that met all of the FHWA requirements to be recommended for construction as part of this Project.

The EA describes the health effects of criteria pollutant and mobile source air toxics (MSAT) emissions in the Air Quality Discipline Report on pages 3-1 to 3-3. Please see our detailed response below regarding air quality.

Comment LC5.03

Roadway widening: The project description in the EA states that westward expansion of I-405 occurs south of SE 8th Street; eastward expansion occurs north of SE 8th Street. We note on page 4-34, the EA states that most of the widening would be achieved through restriping instead of roadway expansion, and that widening would occur within the I-405 median south of SE 8th Street. In addition, north of SE 8th Street, road widening would occur along the east side of I-405 and would require five partial property acquisitions from commercial and public properties. We recommend the EA clarify and disclose the potential impacts of the proposed project to decision makers and the public, as it is currently unclear whether the expansion south of SE 8th Street would result in a widened freeway in closer proximity to residential areas.

Response LC5.03

South of SE 8th Street, all widening will occur within the WSDOT median. The freeway will not be in closer proximity to any residences in this area. As indicated on page 4-34 of the EA, widening to create a dual ETL on I-405 would not affect the adjacent neighborhood's appearance, character, and livability. Most of the widening would be achieved through restriping instead of roadway expansion. Widening would occur within the I-405 median south of SE 8th Street. North of SE 8th Street, widening would occur along the east side of I-405 and would require five partial property acquisitions from privately owned commercial and publicly owned properties. No displacements are anticipated for these land acquisitions.

This information has been shared with the public. See also Chapter 2 of the EA for more information on how the public has been involved.

Comment LC5.04

See Response LC5.03. We support all efforts to accommodate the Express Toll Lanes within existing roadway footprint, without the need for outward expansion. For the areas where the roadway must expand eastward, we recommend the EA clarify the extent of eastward expansion and its proximity to and effects on residential areas, such as increased exposure to noise and air pollution.

Response LC5.04

Exhibit 3-1, Sheet 2 of 3 shows the area where widening would occur eastward. As shown widening would occur within existing right of way that is adjacent to commercial land uses, not residential.

Comment LC5.05

Noise impacts and mitigation: The EA states that one hotel and one hospital are within the 400-foot zone of increased noise from the proposed project but currently does not provide the existing and future project-build noise levels affecting residential areas and other sensitive receptors. The EPA, therefore, recommends the EA clearly identify and discuss the information suggested below, as well as other appropriate noise-related analyses, to better inform agency decision makers and the public regarding potential future noise impacts from I-405 and the need for mitigation:

- Development that currently exists within 400 feet of the project area roadway;¹
- Sensitive receptors within or near the project area noise effect zone;
- Existing (baseline) noise levels within 400 feet of the project area roadway, and sensitive receptor measurement points beyond the zone of increased noise;
- The project-build increase in noise levels within and near the zone of increased noise;
- Additional noise metrics that, along with the dBA Leq measurements, will characterize the maximum and minimum range of current and future noise levels, their approximate timing and daily duration at specific sensitive receptor monitoring sites (such as, residential areas, learning environments, medical facilities, churches, parks, outdoor playgrounds, daycare and senior centers), the types of activities that noise could impact (such as, speaking, sleeping, hearing), and health effects associated with the noise levels that are and would be experienced;²
- Locations where noise walls or other noise mitigation currently exist or would be provided as part of this project and their effectiveness for reducing impacts; and,
- A summary of any noise complaints (location, frequency, nature of effects) received from the public.

¹The EA, page 4-8, states that using the FHWA-approved noise screening analysis, it was determined that traffic noise levels drop below impact levels at 400 feet from the edge of pavement, so the noise analysis covered 400 feet on both sides of I-405 to determine the potential noise impacts on sensitive land uses. The FHWA Noise Abatement Criteria impact level used is 66 equivalent sound pressure level in A-weighted decibels.

²The only noise metric used in the EA is dBA Leq, which is the equivalent continuous sound level that over a given time period has the same total energy as the fluctuating noise.

Response LC5.05

WSDOT complies with all FHWA regulations and WSDOT's Noise Policy that both govern mitigation for highway operational noise. We follow these regulations to ensure an equitable

and scientifically grounded approach to building noise barriers for properties that may experience operational noise impacts from our projects. Adding the single lane to the existing highway for the Project would increase noise levels by 1 or 2 decibels, which is not an audible change in noise. WSDOT follows a three-step sequential process to determine whether an area would qualify for noise abatement:

1. Whether a location has noise levels of 66 A-weighted decibels (dBA) or higher modeled for the year 2045 to warrant further consideration of a noise wall.
2. Whether it is feasible to construct the noise wall (whether the proposed noise wall would provide a substantial reduction in noise and other constructability issues).
3. Whether it is reasonable to construct the proposed noise wall (based on the cost to construct the noise wall per residence affected and the density of homes in the area).

A location that does not demonstrate all three steps listed above would not warrant a noise barrier for noise abatement. A noise impact analysis was conducted as part of the Environmental Assessment. Results of the analysis are summarized in Exhibit 4-1 of the Noise Discipline Report. There were no noise walls that met the feasibility and reasonableness criteria to be recommended for construction of this Project.

The second noise source that would occur as a result of the Project is construction noise. This noise would be temporary and would only occur during the construction phase of the Project. To avoid creating long traffic backups WSDOT conducts most of its construction at night; therefore, local cities and counties require WSDOT to provide mitigation to avoid waking up residents when temporary noise variances are issued. These mitigation strategies depend on the equipment and activities but could include minimizing backing vehicles, minimizing idling vehicles, and for stationary equipment might include a temporary noise shield. Please see page 6-3 of the Noise Discipline Report for more information.

WSDOT evaluated all existing noise sensitive land uses within the noise study area identified in the EA. This includes residences, hospitals, parks, churches, day care, campgrounds, cemeteries, libraries, schools, playgrounds, auditoriums, trails, recreation areas and Section 4(f) sites on both sides of the highway. WSDOT also evaluated any undeveloped land which has an approved building permit by the date of signing of this Finding of No Significant Impact (FONSI).

WSDOT collects noise measurements at representative noise sensitive sites within the noise study area (400 feet for this project) to ensure that we have an accurate noise model. Existing (2016) and Future Build (2045) peak hour traffic volumes are input into the model along with additional modeled noise receptors to predict existing and future noise impacts (see Exhibit 4-1 of the EA).

WSDOT has adopted the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) which has only one metric as an output, the hourly LAeq in dBA units. This measure is to determine exceedance of the noise impact threshold which is also an hourly LAeq of 66 dBA. The TNM is not sophisticated enough to output other metrics or noise levels during different times of the day in the future. WSDOT is required to evaluate all noise sensitive

land uses included in Exhibit 7 of our Noise Policies and Procedures (2011) which represent areas where people speak, sleep and learn).

WSDOT is required by federal law to evaluate noise abatement (e.g., noise barriers) where noise impacts are identified in outdoor use areas, or if no outdoor use areas exist then interior noise levels are evaluated using a different threshold. No noise impacts that qualified for noise abatement were identified as a result of the project. WSDOT did evaluate the effectiveness of existing noise barriers and if impacts exist behind existing barriers raising the height of the barrier is evaluated using the same criteria.

Finally, regarding noise complaints, WSDOT is not required to summarize noise complaints for a particular area within the project footprint and there may be privacy issues associated with publishing these in our reports. However, we do address all noise complaints which may include a written response, collecting additional noise measurements, additional noise analysis and meeting with the person or community during our public outreach phase.

Comment LC5.06

Air quality: We note it is important for the EA to acknowledge and disclose the health risks and effects associated with criteria air pollutants and mobile source air toxics and, to the extent possible, for the project to provide for mitigation of the effects of near roadway air pollution³ We recommend that the project incorporate mitigation measures to reduce exposure to near roadway air pollution⁴ in affected residential areas, outdoor recreation areas, such as, trails, parks, ball fields and other playgrounds, and other sensitive receptor locations.

³ <https://www.epa.gov/air-research/research-near-roadway-and-other-near-source-air-pollution>

⁴ <https://www.epa.gov/air-research/recommendations-constructing-roadside-vegetation-barriers-improve-near-road-air-quality>

Response LC5.06

The Puget Sound Clean Air Agency and the Washington State Department of Ecology are responsible for air quality monitoring in the Puget Sound region. The Puget Sound area is in “attainment” for all criteria pollutants. This means that the area meets the standards for all pollutants that have a numerical standard set by the Environmental Protection Agency (EPA).

Mobile source air toxics (MSAT) are a subset of air toxics that are related to vehicle operations. EPA has not set numerical standards for air toxics but does regulate vehicle manufacturers. Federal regulations require new vehicle emissions to be much cleaner than older vehicles. In addition, Washington has adopted California vehicle emission standards that are stricter than federal standards.

The EA describes the health effects of criteria pollutant and MSAT emissions in the Air Quality Discipline Report on pages 3-1 to 3-3.

WSDOT implements all required mitigation. The air quality analysis for this project shows that the project will not cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS); therefore, no mitigation is required.

The most effective mitigation for highway-related air pollution is to reduce emissions from individual vehicles, which is being addressed through vehicle emission standards. This approach benefits entire communities, rather than selected areas. These standards require new vehicles to be much cleaner than older vehicles. As drivers switch from older vehicles to newer ones, emissions from our roadways are dropping rapidly.

The air quality analysis for this project shows that between 2016 and the opening of the project, in 2025, criteria and MSAT emissions affected by the Project would decrease by about 50 to 80 percent, depending on the pollutant. By 2045, emission levels will drop about 60 to 90 percent over 2016 levels. These emission decreases are expected to lower pollutant concentrations in the near-road environment, as well.

The air quality analysis also shows that, in 2025, emissions in the study area will be about the same with and without the project (Air Quality Discipline Report, pages 6-1 and 6-2). By 2045, the emissions with the project are expected to be slightly lower than without the project because of improved driving conditions and reduced idling during congested periods.

Regarding the recommendations for roadside vegetation, WSDOT is reviewing areas to determine locations where vegetation could be enhanced. For example, areas that are primarily covered with blackberry that are not anticipated to be disturbed, where they could be restored with native trees and shrubs.

Comment LC5.07

Other recommendations

Hazardous materials: The EA identifies seven sites in the project area (p. 4-12) as having Recognized Environmental Conditions of contamination. Because project construction could increase the risk of hazardous materials releases to wetlands, groundwater, public drinking water systems, and surface waters, we recommend the revised EA identify and describe the effectiveness of the measures that would be required to protect against spills, releases, and alterations of contaminant migration.

Response LC5.07

Chapter 6 of the EA identifies measures to reduce the potential for hazardous materials from being released to the environment during construction. These measures include developing a Spill Prevention, Control, and Countermeasure (SPCC) Plan that will include Project-specific hazardous material management plans for handling, transportation, and disposal of known and unanticipated contamination. The SPCC Plan will reflect actual site conditions and practices. Preventing a spill is the primary goal; however, the Contractor is expected to be prepared to minimize the impacts of a spill through immediate and appropriate response actions. The required elements of the SPCC plan includes:

1. Responsible Personnel
2. Spill Reporting
3. Project and Site Information
4. Potential Spill Sources
5. Preexisting Contamination
6. Spill Prevention and Response Training
7. Spill Prevention
8. Spill Response
9. Project Site Map
10. Spill Response Forms

Comment LC5.08

Construction mitigation measures: To prevent pollution, we recommend using water, rather than other suppressants, to control dust during project construction.

Response LC5.08

The Project will require the contractor to evaluate their means and methods for construction and prepare a fugitive dust control plan. Fugitive dust will be controlled in accordance with the WSDOT Environmental Manual and the Memorandum of Agreement between the Puget Sound Clean Air Agency and WSDOT.

Comment LC5.09

Socioeconomics and environmental justice- mitigation for tolls: The Washington State Department of Transportation indicates (p. 6-7) low income individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their Good to Go! accounts. This option is considered to offset some of the disproportionate effect to low income users of the roadway. As the use of EBT cards for tolls will reduce the funds available for food and other necessities for economically disadvantaged populations, we recommend the FHWA and WSDOT also consider options for reducing tolls for low income and senior users.

Response LC5.09

As explained in the EA, the Washington State Transportation Commission (WSTC) is responsible for establishing toll rates and exemptions for state toll facilities in Washington. While tolling is used to improve traffic flows, WSTC recognizes tolling carries a financial impact for those drivers who choose travel in the tolled lanes. Whenever called upon to revise toll rates, WSTC carefully reviews traffic and revenue projections, listens to members of affected communities, and seeks to ensure customers are treated fairly. See also the WSTC website at <http://www.wstc.wa.gov/HighwayTolling/default.htm>.

Comment LC5.10Ecosystems:

- We recommend examining the project area for opportunities to improve bridge structures, culverts, or other roadway openings/permeability features that would improve ecological connectivity for hydrology, fish passage, and safe wildlife movement; and,

Response LC5.10

WSDOT has a strong commitment to habitat connectivity (see website <http://www.wsdot.wa.gov/environment/environmental-technical/environmental-disciplines/fish-wildlife>). The Project maximizes the use of existing pavement and adds new stormwater treatment for new and existing lanes. WSDOT will upgrade stormwater facilities to treat the increased highway runoff. The Project will reduce pollutants and improve water quality for local wetlands and streams.

The Project is being designed to limit effects on local ecosystems as much as possible. The Project would result in permanent loss of less than half an acre of wetlands and about two acres of vegetation adjacent to the existing roadway. These effects may reduce habitat available to local species; however, because the Project area is highly urbanized, WSDOT does not expect any fragmentation or loss of connectivity of habitat. The analysis also concludes that there would be no adverse effects on Pacific salmon habitat. WSDOT will provide on-site and off-site mitigation for wetlands affected by the Project.

Comment LC5.11

- We commend WSDOT for eliminating the use of herbicide at stormwater treatment and detention facilities (p. 6-12). We encourage the WSDOT seek additional ways to eliminate or reduce use of herbicides in project construction, operations, and ongoing maintenance.

Response LC5.11

Comment noted.

Comment LC5.12

We appreciate the opportunity to offer comment on the Bellevue Express Toll Lanes Project. If you have questions or would like to discuss these recommendations, please contact Elaine Somers of my staff at 206-553-2966 or at somers.elaine@epa.gov, or contact me at 206-553-1841 or at nogi.jill@epa.gov.

Response LC5.12

Comment noted.

Comment LC6 – Muckleshoot Indian Tribe Fisheries Division Habitat Program, June 1, 2018



MUCKLESHOOT INDIAN TRIBE
Fisheries Division

39015 - 172nd Avenue SE • Auburn, Washington 98092-9763
Phone: (253) 939-3311 • Fax: (253) 931-0752



June 1, 2018

Ms. Megan White
Director Environmental Services Office
Washington State Department of Transportation
P.O. Box 47331
Olympia, WA 98504

Ms. Lindsey Handel
Urban Transportation Engineer
Federal Highways Administration
711 South Capitol Way, Suite 501
Olympia, WA 98501

RE: I-405, I-90 to NE 6th project (Downtown Bellevue ETL project) Environmental Assessment

Dear Ms. White and Ms. Handel:

Our Habitat Program staff have reviewed the NEPA Environmental Assessment and appendices for the I-405, I-90 to NE 6th project (Downtown Bellevue ETL). We appreciate FHWA's willingness to extend the NEPA comment period so that we could review these materials and fully evaluate potential impacts to fisheries resources. We offer the following comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources.

LC6.01

Consultation and coordination

For this project, neither WSDOT nor FHWA adequately provided sufficient consultation with the Tribe's Fisheries Division. WSDOT's consultation requirements state that WSDOT provides "early and on-going consultation opportunities to each affected tribal department during the NEPA review stage of WSDOT projects." As noted in our April 25, 2018 letter, we did not receive timely direct notification of the EA or its associated SEPA documents and should have. Instead, we literally found the documents online while researching other information. The Muckleshoot Indian Tribe Fisheries Division (MITFD) should have received a preliminary EA/Draft EA and given an opportunity to consult. On page 3-9, WSDOT's 2008 Tribal Consultant Manual states:

LC6.02

"You should consult on the Preliminary EA / Draft EA including completed discipline reports."

Early coordination with us on technical reports should have also occurred, including an opportunity to review the relevant ecosystems and water resources technical reports developed for the EA in advance. Also on page 3-9 of WSDOT's 2008 Tribal Consultation Manual, it states:

"You should send a list of environmental discipline reports or technical memos you expect to prepare for the project to the natural and cultural resource staff at the affected tribes. This will help you determine if the tribe is interested in providing information or expertise in the development of any these reports."

We were not given the opportunity to consult with WSDOT or FHWA on any preliminary EA, including discipline reports.

LC6.02
(cont)

Environmental Assessment and Project Concerns

1. Deferment of Fish Barrier Culverts

Per the EA, there are three existing fish passage barrier culverts in the project area on Trail, Hixon/Median, and Sturtevant Creeks. The EA states: *“Although, the fish barrier culverts would not be improved as part of this Project, they will not be precluded from future replacement and will be addressed as part of the I-405 Master Plan.”*

LC6.03

The Muckleshoot Indian Tribe Fisheries Division should have been involved in this decision-making process. This decision is not consistent with the State’s Executive Order on Tribal Consultation 1025.00 which defines consultation as *“respectful, effective communication in a cooperative process that works towards a consensus, before a decision is made or action is taken.”* We have no record of being consulted on the decision to forgo fixing these culverts as part of this project. With this letter, we request the data and analysis used to make the determination that there is *“no channel habitat connection downstream of the Median Creek and Trail Creek culvert crossings”*.

LC6.04

Another concern is the lack of a replacement plan for the existing Main Street culvert on Sturtevant Creek upstream of the I-405 culvert. This culvert is identified as a barrier per WDFW. With this project, WSDOT is replacing the Main Street Bridge and approaches over I-405 in proximity to this culvert, this culvert should be replaced with a fish passable culvert as part of this project. Otherwise, the replaced roadway and associated utilities may preclude the future culvert replacement.

LC6.05

2. Wetland Impacts and mitigation concerns

The Project would permanently affect 0.35 acre of wetlands in the study area. Three wetlands would be permanently affected: wetlands 12.45M, 13.0R and 13.25R. In addition, the Project would permanently affect approximately 0.08 acre of wetland buffer associated with wetland 12.45M.

LC6.06

The EA notes that the combined effect of this and the I-405 Tukwila to I-90 project (MP 0.0 to 11.9) would increase the runoff volume to the Mercer Slough wetland complex and the potential for the combined effects of these two projects to change the wetland hydrologic period of inundation, which could adversely affect wetland wildlife and habitat. The EA also notes that WSDOT’s calculation shows that the cumulative effect would be within Ecology’s guidelines for maintaining the Mercer Slough wetland complex hydrology. Please provide us with the calculations to demonstrate compliance with Ecology’s guidelines for this wetland and Ecology’s concurrence.

LC6.07

Per the EA, WSDOT intends to compensate wetland and buffer impacts by using on-site and off-site mitigation. Wetlands would be mitigated at WSDOT’s existing Charles E. Plummer mitigation site and wetland buffers would be mitigated at the Median Creek site within the City of Bellevue. We are concerned that the wetland impacts are being mitigation outside of the Lake Washington/Cedar subbasin.

The mitigation should occur in the impacted subbasin, not the Sammamish subbasin where the Charles E. Plummer Mitigation site (Little Bear Creek) is located.

It should be noted, too, that the March 22, 2016, Biological Opinion from NMFS concluded the Project is not likely to adversely affect the Puget Sound Chinook salmon and Puget Sound steelhead trout based on mitigation occurring at the Kelsey Creek wetland site. The current mitigation proposal is inconsistent with this BiOP and should be modified accordingly. ESA consultation may also need to be reinitiated.

LC6.07
(cont)

3. Artificial Lighting potential impacts

The EA fails to discuss the potential for artificial lighting impacts to nearby streams and salmon in these streams. Additional information is needed to demonstrate that lighting impacts are avoided and minimized with this project.

LC6.08

4. Wood management

On page 6-12, the EA states "*WSDOT will leave large woody debris found in any landslide material in riparian areas and retain it for future restoration use or donate it to a local watershed group if there is a need for the material.*" Please explain what this statement means.

LC6.09

EA Attachment G: Water Resources Discipline Report

Figure 3-4 in WR shows a new detention vault will be built on or near Sturtevant Creek. Please explain how this facility will be built and function such that it will be possible to replace the existing fish passage barrier on Sturtevant Creek where it is conveyed under I-405.

LC6.10

With these comments, we request the opportunity to consult directly with FHWA on this project. FHWA staff should call me at 253-876-3116 to set up the requested direct consultation meeting.

LC6.11

Sincerely,



Karen Walter
Watersheds and Land Use Team Leader

Cc: Sandra Manning, USACOE, Seattle District
Mike Grady, NMFS

Comment LC6.01

Dear Ms. White and Ms. Handel:

Our Habitat Program staff have reviewed the NEPA Environmental Assessment and appendices for the I- 405, I-90 to NE 6th project (Downtown Bellevue ETL). We appreciate FHWA's willingness to extend the NEPA comment period so that we could review these materials and fully evaluate potential impacts to fisheries resources. We offer the following

comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources.

Response LC6.01

Thank you for your comments, and we appreciate your time. The Federal Highway Administration (FHWA) and WSDOT will continue to consult with the Muckleshoot Indian Tribe and work on improving communications. WSDOT and FHWA are committed to continuing and improving coordination with the Muckleshoot Indian Tribe. See also Attachment 5 for other correspondence.

Comment LC6.02

Consultation and coordination

For this project, neither WSDOT nor FHWA adequately provided sufficient consultation with the Tribe's Fisheries Division. WSDOT's consultation requirements state that WSDOT provides "early and on-going consultation opportunities to each affected tribal department during the NEPA review stage of WSDOT projects." As noted in our April 25, 2018 letter, we did not receive timely direct notification of the EA or its associated SEPA documents and should have. Instead, we literally found the documents online while researching other information. The Muckleshoot Indian Tribe Fisheries Division (MITFD) should have received a preliminary EA/Draft EA and given an opportunity to consult. On page 3-9, WSDOT's 2008 Tribal Consultant Manual states:

"You should consult on the Preliminary EA I Draft EA including completed discipline reports."

Early coordination with us on technical reports should have also occurred, including an opportunity to review the relevant ecosystems and water resources technical reports developed for the EA in advance. Also on page 3-9 of WSDOT's 2008 Tribal Consultation Manual, it states:

"You should send a list of environmental discipline reports or technical memos you expect to prepare for the project to the natural and cultural resource staff at the affected tribes. This will help you determine if the tribe is interested in providing information or expertise in the development of any these reports."

We were not given the opportunity to consult with WSDOT or FHWA on any preliminary EA, including discipline reports.

Response LC6.02

We regret that you did not receive a hard copy of the EA, and we apologize for that. The Federal Highway Administration (FHWA) met with you on June 21, 2018, to hear your concerns and look for ways to improve our consultation on this and future projects. At that meeting, we presented more information on the culverts within the Project limits and also provided more information on how our I-405 NEPA documents line up with the permit applications. Finally, we appreciate your input, and WSDOT plans to update its 2008 Model process.

Comment LC6.03Environmental Assessment and Project Concerns

1. Deferment of Fish Barrier Culverts

Per the EA, there are three existing fish passage barrier culverts in the project area on Trail, Hixon/Median, and Sturtevant Creeks. The EA states: "Although, the fish barrier culverts would not be improved as part of this Project, they will not be precluded from future replacement and will be addressed as part of the 1-405 Master Plan."

The Muckleshoot Indian Tribe Fisheries Division should have been involved in this decision-making process. This decision is not consistent with the State's Executive Order on Tribal Consultation 1025.00 which defines consultation as "respectful, effective communication in a cooperative process that works towards a consensus, before a decision is made or action is taken. " We have no record of being consulted on the decision to forgo fixing these culverts as part of this project.

Response LC6.03

The I-405 team met with the Mukleshoot Indian Tribe Fisheries Division (MITFD) on December 8, 2015, and reviewed the culverts within this Project area and discussed how this project would not preclude fish passage corrections in the future phases.

WSDOT appreciates the MITFD comments on the permits for this Project; we have made every effort to respond to your requests for information that we have received regarding the project to date.

Respectful, effective communication and cooperation are critical. We will do our best to fully engage with MITFD.

Comment LC6.04

With this letter, we request the data and analysis used to make the determination that there is "no channel habitat connection downstream of the Median Creek and Trail Creek culvert crossings".

Response LC6.04

Thank you for calling this to our attention. We made an error in including this statement. Median and Trail Creeks are both type F waters, and downstream habitat connections to the Mercer Slough wetland complex are assumed present. An Errata item is included as part of this FONSI.

Comment LC6.05

Another concern is the lack of a replacement plan for the existing Main Street culvert on Sturtevant Creek upstream of the 1-405 culvert. This culvert is identified as a barrier per WDFW. With this project, WSDOT is replacing the Main Street Bridge and approaches over 1-405 in proximity to this culvert, this culvert should be replaced with a fish passable culvert

as part of this project. Otherwise, the replaced roadway and associated utilities may preclude the future culvert replacement.

Response LC6.05

WSDOT understands your concern. Fish-passage barriers that could not be designed and constructed with reasonable confidence that they would not be affected by the anticipated additional lanes and reconfiguration of ramps during future projects will be replaced in a later project. The I-405 Master Plan projects in this area require extensive widening and construction work, and therefore, would allow for the appropriate design with better understanding on the proposed improvements for the Sturtevant culverts, when additional ROW acquisition funds are allocated. None of the work proposed in this project will preclude future actions to restore fish passage.

Comment LC6.06

2. Wetland Impacts and mitigation concerns

The Project would permanently affect 0.35 acre of wetlands in the study area. Three wetlands would be permanently affected: wetlands 12.45M, 13.0R and 13.25R. In addition, the Project would permanently affect approximately 0.08 acre of wetland buffer associated with wetland 12.45M.

The EA notes that the combined effect of this and the I-405 Tukwila to I-90 project (MP 0.0 to 11.9) would increase the runoff volume to the Mercer Slough wetland complex and the potential for the combined effects of these two projects to change the wetland hydrologic period of inundation, which could adversely affect wetland wildlife and habitat. The EA also notes that WSDOT's calculation shows that the cumulative effect would be within Ecology's guidelines for maintaining the Mercer Slough wetland complex hydrology. Please provide us with the calculations to demonstrate compliance with Ecology's guidelines for this wetland and Ecology's concurrence.

Response LC6.06

The Western Washington Hydrology Model analysis looks at wetland hydrologic volumes of runoff. This analysis is a WSDOT Highway Runoff Manual design criteria that has been accepted as equivalent to the state guidelines by the Washington State Department of Ecology.

The analysis looks at the change from three I-405 projects in this basin:

- The I-405, 112th Avenue SE to SE 8th Street Widening (MP 9.3 to 13.2) completed in 2009
- The proposed I-405, Tukwila to I-90 Vicinity ETL Project (MP 0.0 to 11.9) (for permitting, known as the Renton to Bellevue Stage I and Tukwila to Renton Stage 3 Projects)
- The proposed I-405, Downtown Bellevue Vicinity ETL Project (MP 11.9 to 14.6) (for permitting, known as the I-405, I-90 to NE 6th Street Project)

The past and proposed I-405 Corridor Program changes in wetland hydrology meet the Ecology approved WSDOT HRM Minimum Requirement 6 "Wetland Protection" criteria.

Comment LC6.07

Per the EA, WSDOT intends to compensate wetland and buffer impacts by using on-site and off-site mitigation. Wetlands would be mitigated at WSDOT's existing Charles E. Plummer mitigation site and wetland buffers would be mitigated at the Median Creek site within the City of Bellevue. We are concerned that the wetland impacts are being mitigation outside of the Lake Washington/Cedar subbasin. The mitigation should occur in the impacted subbasin, not the Sammamish subbasin where the Charles E. Plummer Mitigation site (Little Bear Creek) is located.

It should be noted, too, that the March 22, 2016, Biological Opinion from NMFS concluded the Project is not likely to adversely affect the Puget Sound Chinook salmon and Puget Sound steelhead trout based on mitigation occurring at the Kelsey Creek wetland site. The current mitigation proposal is inconsistent with this BiOP and should be modified accordingly. ESA consultation may also need to be reinitiated.

Response LC6.07

According to U.S. Geological Survey Hydrologic Units, the Project impacts occur in the Lower Sammamish River Watershed, and the Charles E. Plummer Mitigation Site is situated in the Middle Sammamish River Watershed. Both watersheds are within the Lake Washington Subbasin, and Water Resource Inventory Area (WRIA) 8.

The Endangered Species Act (ESA) consultation process began well in advance of the permitting process for the project, and final decisions had not been made on the location of wetland mitigation. In light of the discrepancy between the ESA concurrence Letter and the EA, we have coordinated with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS). We agreed that the change was minor and WSDOT will submit a project update to NMFS. The change will not require reinitiation of consultation.

Comment LC6.08**3. Artificial Lighting potential impacts**

The EA fails to discuss the potential for artificial lighting impacts to nearby streams and salmon in these streams. Additional information is needed to demonstrate that lighting impacts are avoided and minimized with this project.

Response LC6.08

WSDOT is not aware of any locations within the Project area where illumination will be altered near fish-bearing streams. Kelsey Creek is over 240 feet from the nearest WSDOT luminaire, which is a directional luminaire, providing focused light down on the southbound lanes, facing away from the creek.

Comment LC6.09**4. Wood management**

On page 6-12, the EA states "WSDOT will leave large woody debris found in any landslide material in riparian areas and retain it for future restoration use or donate it to a local watershed group if there is a need for the material. " Please explain what this statement means.

Response LC6.09

Thank you for bringing this to our attention. We made an error in including this statement. The Errata of this FONSI indicate that it has been deleted from the EA.

WSDOT and our contractors will make efforts to retain woody debris removed from the Project footprint for use in restoration in the immediate vicinity.

Comment LC6.10

EA Attachment G: Water Resources Discipline Report

Figure 3-4 in WR shows a new detention vault will be built on or near Sturtevant Creek. Please explain how this facility will be built and function such that it will be possible to replace the existing fish passage barrier on Sturtevant Creek where it is conveyed under I-405.

Response LC6.10

The new detention vault is small and can be placed within the existing roadway embankment to the west of the creek conveyance system. WSDOT recognizes that this vault may need to be abandoned when Sturtevant Creek is made fish passible. The existence of this vault would not preclude future correction of this barrier.

Comment LC6.11

With these comments, we request the opportunity to consult directly with FHWA on this project. FHWA staff should call me at 253-876-3116 to set up the requested direct consultation meeting.

Response LC6.11

A meeting with the Federal Highway Administration and the Mukleshoot Indian Tribe Fisheries Division occurred on June 21, 2018.

Comments Received via Comment Forms (CF)

Comment CF1 – Peggy Albin, Private Individual, April 17, 2018



Washington State
Department of Transportation

I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment: Comment Form

Comments will be accepted until May 2, 2018. Written and oral comments will be given equal weight and all comments received or postmarked by May 2, 2018 will be considered by WSDOT/FHWA in preparing the final NEPA documentation.

Name: Peggy Albin
Address: 12151 SE. 21st St.
Email: pegalbin @ live.com
Phone: 425-641-4972

Comments:

As a resident of the Woodridge community directly east of NB 405 between SE 8th & I-90, we are very concerned about additional/increased noise levels generated by 405 traffic. We hope you will monitor & test decibel levels in our neighborhood to maintain a good quality of life. Please publish all results of your noise testing & provide adequate sound abatement. (higher walls, etc.) as needed.
Thank you, Peggy Albin

CF1

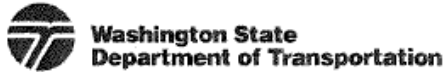
Comment CF1

As a resident of the Woodridge community directly east of NB 405 between SE 8th and I-90, we are very concerned about additional/increased noise levels generated by 405 traffic. We hope you will monitor and test decibel levels in our neighborhood to maintain a good quality of life. Please publish all results of your noise testing and provide adequate sound abatement (higher walls, etc.) as needed. Thank you.

Response CF1

We understand your concern. We met several times with people in your area. WSDOT collected noise measurements and performed noise modeling to determine if the receivers behind the existing walls at the Woodridge community maintain future (2045) noise levels below the 66 A-weighted decibels (dBA) noise abatement criteria. The existing noise wall was predicted to maintain noise levels below the abatement criteria with 2045 traffic. See Noise Discipline Report pages 5-5 through 5-12 for results.

Comment CF2 – Michael Appleby, Private Individual, April 17, 2018



**I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
Environmental Assessment: Comment Form**

Comments will be accepted until May 2, 2018. Written and oral comments will be given equal weight and all comments received or postmarked by May 2, 2018 will be considered by WSDOT/FHWA in preparing the final NEPA documentation.

Name: Michael Appleby
Address: 16653 SE 69th Way Bellevue
Email: michael@my-appleby.com
Phone: 206-595-4961

Comments:

Tolling is a regressive tax and should be
stopped on 405 and not extended!
Pushing 2 person carpools out of the
express lanes will discourage carpooling
adding more cars.

The report published for N-405 stated
that speed metrics weren't met and
they should have been stopped.

Stop and do NOT extend tolling
on 405!

CF2

Comment CF2

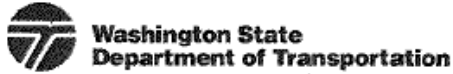
Tolling is a regressive tax and should be stopped on 405 and not extended! Pushing 2-person carpools out of the express lanes will discourage carpooling adding more cars. The

report published for N-405 stated that speed metrics weren't met and they should have been stopped. Stop and do NOT extend tolling on 405!

Response CF2

See Global Responses 6 and 7.

Comment CF3 – John Gregov, Private Individual, April 17, 2018



**I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
Environmental Assessment: Comment Form**

Comments will be accepted until May 2, 2018. Written and oral comments will be given equal weight and all comments received or postmarked by May 2, 2018 will be considered by WSDOT/FHWA in preparing the final NEPA documentation.

Name: JOHN GREGOV
Address: 22 CASCADE KEY
Email: JOHN@GREGOV.NET
Phone: 206-930-0947

Comments:

THE RAILS TO TRAILS IS DIRECTLY EFFECTING
THE COMMUNITY OF NEWPORT SHORES.
SPECIFICALLY WE ARE LOOKING TO SEE IF THE
PROPOSAL OF FENCES ALONG THE TRAIL CAN
BE ELEVATED TO 7'. THERE IS A SAFETY
AND PRIVACY CONCERN ALONG ALL THE
HOUSES THAT DIRECTLY BOUND TO THIS FENCE/
TRAIL LINE JUST NEXT TO THE I-405 COAL
CREEK S. ON RAMP. HOUSES DIRECTLY EFFECTED
INCLUDES ALL HOUSES FROM THE TRAIN BRIDGE
(OLD) CROSSING ALONG LAKE WASH BLDG
SOUTH TO DEATER KEY. WE WOULD BE
INTERESTED IN HELPING PAY FOR ADDITIONAL
FENCES ALONG THIS AREA.
THANKS.

CF3

Comment CF3

The Rails to Trails is directly effecting the community of Newport Shores. Specifically, we are looking to see if the proposed 4' fence along the trail can be elevated to 7'. There is a safety and privacy concern along all the houses that directly rear to this fence/trail line just next to the I-405 Coal Creek S on-ramp. Houses directly effected include all houses from the train bridge (old) crossing along Lake Wash Blvd south to Decater Key. We would be interested in helping pay for additional fence along this area. Thanks.

Response CF3

Thank you for voicing your concern. WSDOT is working with King County on the construction of portions of the Eastside Rail Corridor (ERC) Regional Trail. Specifically, in the downtown Bellevue Vicinity this includes construction of the trail within WSDOT right of way at the Wilburton Gap area. Within the limits of the proposed Tukwila to I-90 project WSDOT includes a 2.5-mile segment of the ERC Regional Trail, including a portion near Newport Shores.

The location and type of fencing included on King County trails is guided by policy that applies to the county's entire 175-mile system of regional trails. We understand King County's typical trail design details include a black, vinyl-coated, chain-link fence in areas of the trail with steeper slopes. WSDOT will continue to coordinate with King County and will adhere to King County's design standards for the ERC.

Comment CF4 – S Howery, Private Individual, April 17, 2018



**I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
Environmental Assessment: Comment Form**

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Name: S Howery
Address: Kirkland
Email: _____
Phone: _____

Comments:

CF4

The express toll lanes are great. I appreciate having the option for a more consistent trip. I look forward to the complete system for trips to the airport.
The information shared @ the hearing was insightful. The inclusion of the 2.5 mile section of trail was welcome news.

Comment CF4

The express toll lanes are great. I appreciate having the option for a more consistent trip. I look forward to the complete system for trips to the airport.

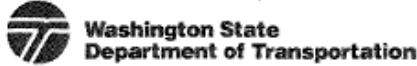
The information shared at the hearing was insightful. The inclusion of the 2.5-mile section of trail was welcome news.

Response CF4

Thank you for your comments.

Comment CF5 – Jeff and Helen Lykken, Private Individual, April 17, 2018

NO Toll on I-405!



We need general purpose lanes!

I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
Environmental Assessment: Comment Form

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Name: Jeff Lykken, Helen Lykken
Address: 1116 N 31st Renton 98051
Email: jalykken@
Phone: (206) 234-3122

StopI405tolls.org

Comments:

— We need the general purpose lanes we were originally promised! Leaving I-405 with only 2 general purpose lanes is WRONG and just plain stupid. The toll lanes were forced upon the public with deception, propaganda and straight up lies! It is awful that the Texas company discourages general purpose lanes, that way the congestion continues and the toll revenue comes in what a joke! I live in Kennewick and if we let this project go through it will create a traffic catastrophe with thousands of additional cars clogging through our neighborhoods. We cannot let that happen! We were promised 2 additional general purpose lanes Not extortion tolls!

CF5

Real Lanes for Real People!
~~Tolls~~

Received

APR 18 2018

Subject: I 405 comments on toll lanes

NWR Design Build Program
I405/SR167 Projects

I wanted to leave a few comments in regard to the widening project on I405. We all know traffic from Renton to Bellevue is terrible, and something needs to be done. We need the expansion. Back in 2002 when the original Master Plan for I 405 was developed, I was happy to hear that improvements were finally coming with 2 additional general purpose lanes in each direction, a fantastic plan. Back in 2007, WSDOT even came to Kenndale elementary and told the public who attended that we were finally going to get some relief as WSDOT promised that we would get 2 additional general purpose lanes in each direction. Then behind close doors WSDOT without public knowledge and public support, WSDOT came up with this tolling concept which is a joke. Many of us tried to get a hearing to stop the toll lane project, but Judy Clibborn continued to block the hearing, I can only imagine the kickbacks from the Texas company lol. The toll lane concept was forced onto the public with deception, propaganda and straight out lies. The extortion toll lanes have been a complete failure as they have made congestion much, much worse and everyone knows this. They have been one of the biggest mistakes in transportation history and one of the biggest rip-offs of the public in recent memory. It is awful that the Texas company discourages adding general purpose lanes, that way the congestion continues and the toll revenue continues to come in. In the Bothell area alone, they have sent so much diversion traffic that there are now cars in neighborhoods and streets where there was never issue before. Where I live in Kenndale (Renton) we already have a huge diversion problem already as Lake Washington blvd is solid of cars every morning as people are avoiding the freeway which ONLY HAS 2 GENERAL PURPOSE LANES!! A JOKE. Leaving I405 from Renton to Bellevue with only 2 general purpose lanes in each direction is WRONG and just plain stupid! If this toll lane project goes through it will create a traffic catastrophe as thousands of additional cars will cut through our neighborhoods. We cannot let that happen. Why should we have to pay up to \$10 for a facility that we already paid for. WSDOT has already lied to the public already, do you think they will stop at a \$10 toll from Renton to Bellevue? No, don't be surprised if they decide to raise it up to \$40 like they are doing on the east coast tollways. Renton was promised 2 additional general purpose lanes years ago, NOT EXTORSION TOLLS. We need general purpose lanes and I am pretty sure by 2024 this toll lane concept will be a distant memory, as a result of public outrage. The sad part is many people in my neighborhood still think the I405 widening will be the general purpose lanes we were originally promised. If the public were able to vote on this, it would go down in flames. NO TOLL ON I405!

STOP405TOLLS.ORG

Jeff A Lykken

Kenndale

Jeff Lykken
1116 N 31st
Renton WA 98056



Comment CF5

No toll on I-405! We need general purpose lanes!

We need the general purpose lanes we were originally promised! Leaving I-405 with only 2 general purpose lanes is WRONG and just plain stupid. The toll lanes were forced upon the public with deception, propaganda and straight out lies! It is awful that the Texas company discourages general purpose lanes, that way the congestion continues and the toll revenue comes in what a joke! I live in Kenndale and if we let this project go through it will create a traffic catastrophe with thousands of additional cars cutting through our neighborhoods. We cannot let that happen! We were promised 2 additional general purpose lanes. Not extortion tolls! Real lanes for real people!

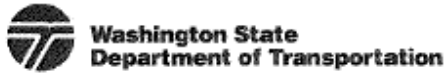
Response CF5

WSDOT concurs that this section of I-405 is one of the most congested areas in the state. In addition, the Puget Sound region is experiencing unprecedented growth including the communities around I-405 adding to the demands on the system. WSDOT has continued to work with the Washington State Legislature and public voters to fund improvements in this area.

See Global Response 5.

Comments in the letter attached to the Comment Form are a duplicate of Comment E6. Please see Response E6.

Comment CF6 – Laura Melgard, Private Individual, April 17, 2018



**I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
Environmental Assessment: Comment Form**

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Name: Laura Melgard
Address: 41637 Lake Wa Blvd S.E. Bellevue
Email: Lmelgard@hotmail.com
Phone: 425 785-0220
98006

Comments:

The 405 Toll expansion should not be authorized until funding can be met to meet the concerns of the citizens.

The 405 expansion will emit dangerous toxins from vehicles. There needs to be berms, landscape mitigation and Barrier Walls to help reduce these toxins. The Eastside Trail System will be too close to the freeways and in fact will be a threat to human health for those using it.

Please refer to your Environmental Policy Act and protect the health and communities of the citizens.

CF6

Comment CF6

The 405 Toll expansion should not be authorized until funding can be met to meet the concerns of the citizens.

The 405 expansion will emit dangerous toxins from vehicles. There needs to be berms, landscape mitigation and barrier walls to help reduce these toxins. The Eastside Trail System will be too close to the freeways and in fact will be a threat to human health for those using it. Please refer to your Environmental Policy Act and protect the health and communities of the citizens.

Response CF6

WSDOT considered community impacts and concerns. The environmental documents explain the project's direct impacts and what measures we are able to take to reduce those impacts. The EA describes the health effects of criteria pollutant and MSAT emissions in the Air Quality Discipline Report on pages 3-1 to 3-3. The air quality analysis for this project shows that the project will not cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS) and, therefore, no mitigation is required.

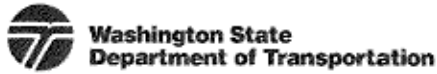
The most effective mitigation for highway-related air pollution is to reduce emissions from individual vehicles, which is being addressed through vehicle emission standards. This approach benefits entire communities, rather than selected areas. These standards require new vehicles to be much cleaner than older vehicles. As drivers switch from older vehicles to newer ones, emissions from our roadways are dropping rapidly. From 2016 to 2025, pollutant emissions from vehicles are expected to drop significantly. Carbon monoxide (CO) emissions are projected to drop by 47 percent. Project modeling shows emissions of all other pollutants dropping by larger percentages (see Air Quality Discipline Report).

Pollutant concentration levels decrease with distance from the roadway. Although the roadway will be closer to some homes, because there will be significantly less pollution coming off the roadway, pollutant concentrations at nearby homes are expected to decrease, even with the Project.

Our modeling found that there will be minimal differences in emissions in 2025 between building the project and not building the project. In 2025, CO emissions are estimated to be one percent higher with the project than without the project but still significantly lower than today's levels. Emissions of all other pollutants modeled will be the same or lower with the project because of improved driving conditions and reduced idling during congested periods. By 2045 pollutant emissions are expected to drop by 65 to 98 percent compared to 2016, and the emissions of all pollutants will be the same or lower with the project because of improved driving conditions and reduced idling during congested periods.

Regarding landscaping, WSDOT is reviewing areas to determine locations where vegetation could be enhanced. For example, areas that are primarily covered with blackberry that are not anticipated to be disturbed, could be restored with native trees and shrubs.

Comment CF7 – Barbara Sauerbrey, Private Individual, April 17, 2018



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Name: BARBARA SAUERBREY
Address: 1527-121ST AVE. S.E., BELLEVUE 98006
Email: jojo.vr@comcast.net
Phone: 425-747-0324

Comments:

CF7

IT IS TIME TO REALIZE THAT THE NOISE TESTING (ONCE) WAS INADEQUATE - DID NOT REFLECT WEATHER, TIME OF DAY, DATE, AND SHOULD HAVE BEEN AT VARIOUS TIMES OF DAY AND WEATHER CONDITIONS.

LOOKS LIKE WE MAY HAVE TO PAY TO HAVE INDEPENDENT, PROFESSIONAL TESTING DONE!

Comment CF7

It is time to realize that the noise testing (once) was inadequate—did not reflect weather, time of day, date, and should have been at various times of day and weather conditions.

Looks like we may have to pay to have independent, professional testing done!

Response CF7

The day and time of measurements are noted in the Noise Discipline Report, Exhibit 3-4.

WSDOT uses the Federal Highway Traffic Noise Model (TNM) to predict the future noise levels of communities along our highways. The TNM does not include inputs for wet pavement. For this reason, noise measurements are collected during dry conditions to validate the model. In addition, measurements are collected when traffic is moving at or near the posted speed, typically between 10 a.m. and 2 p.m. These are the peak noise hours of the day. The field measurements are used to confirm the model is accurate. The future predicted noise levels generated from the model are used to determine whether there are noise impacts.

Impacts are measured during the 1-hour period when the worst-case noise levels are expected to occur. This may or may not be the “peak hour” of traffic volumes. That is, higher traffic volumes can lead to higher congestion and lower operating speeds. Since higher operating speeds lead to higher noise emissions from motor vehicles, the worst-case noise levels may occur in hours with lower volumes and higher speeds. These noise levels are a conservative estimate of future noise levels that would more than compensate for noise measurements on wet pavement.

Comment CF8 – Astrid Zuppinger, Private Individual, April 17, 2018



Washington State
Department of Transportation

**I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
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Name: Astrid Zuppinger
Address: 2525 121st Ave SE
Email: Astridod@comcast.net
Phone: 425-999-2802

Comments:

CF8.01 | Please Do not touch Retaining wall in front of my home.

CF8.02 | Please find a different Method of alarm - Beeping Noise while building on highway. The constant Beeping while or during Construction is Noise pollution & Creates Haroc with Sleep as well as with the Natural Environment.

— Please Be prepared to put me up in a hotel Merritt - when you start construction - South & North from my home.

— My Rest & Sleep are important to my Health.

Comment CF8.01

Please do not touch retaining wall in front of my home.

Response CF8.01

The retaining wall directly adjacent to this home would not be affected by the Project. South of this home, the existing concrete barrier would be shifted about 2 feet to the east.

Comment CF8.02

Please find a different method of alarm—beeping noise—while building on highway. The constant beeping while construction is noise pollution and creates havoc with sleep as well as with the natural environment.

Please be prepared to put me up in a hotel Marriott when you start construction south and north of my home.

My rest and sleep are important to my health.

Response CF8.02

The beeping noise as noted is a safety measure to alert workers that a truck is backing up. Back-up alarms “beeping” is improving as new trucks are built. Today’s trucks have ambient alarms, which adjust the beeping based on the noise in the area at the time, and therefore are quieter when the surrounding area is quieter. When commercially available older construction equipment is retrofitted with the ambient alarms. Additionally, new trucks have liners in the beds to reduce noise and hydraulic lifts to prevent tailgates from banging. These measures will not eliminate construction noise impacts, but should reduce them.

The Project will implement mitigation measures for temporary noise impacts associated with construction activities in accordance with the local noise regulations. WSDOT will work with neighbors on available mitigation measures, which include providing ear plugs, white noise machines and in some circumstances when warranted hotel stays. A hotel stay will be determined on a case-by-case basis and will consider the unique construction circumstances.

WSDOT will work with the contractor to collect and disseminate construction information to the public via the Project website, WSDOT’s 511 Travel Alert System, Highway Advisory Radio (HAR), and Variable Message Signs (VMS) regarding planned and current construction activities such as location, estimated duration of activity, type of work being performed and associated noise related to the type of works.

Comment CF9 – Astrid Zuppinger, Private Individual, April 17, 2018



Washington State
Department of Transportation

**I-405, Downtown Bellevue Vicinity Express Toll Lanes Project
Environmental Assessment: Comment Form**

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Name: Astrid Zuppinger
Address: 2525 121st Ave SE
Email: astridrd@comcast.net
Phone: 425-999-2802

Comments:

CF9.01 | Please Do Not touch Retaining wall on front of my home.

CF9.02 | Please find a different Method of alarm. - Bleeping Noise - constant when Building on the highway is noise pollution & creates havoc with sleep as well as with the Natural Environment.

CF9.02 | If you are NOT sure what I mean by this please contact me. - Also please be prepared to put me up in a hotel - Marriott - when you start your changing the retaining wall south of my road & start widening highway North of my home. My Rest & Sleep are important

Comment CF9.01

Please do not touch retaining wall in front of my home.

Response CF9.01

See Response CF8.01.

Comment CF9.02

Please find a different method of alarm—beeping noise—constant with building on the highway is noise pollution and creates havoc with sleep as well as with the natural environment.

If you are not sure what I mean by this please contact me.

Also please be prepared to put me up in a hotel Marriott when you start your changing the retaining wall south of my home and start widening highway north of my home. My rest and sleep are important.

Response CF9.02

See Response CF8.02.

Comments Recieved via Court Reporter (CR)

Comment CR1 – Roy and Annete Eisenbach, Private Individual, April 17, 2018

1 BELLEVUE, WASHINGTON; TUESDAY, APRIL 17, 2018
2 -- oo 0 oo --
3
4 ROY EISENBACH: My name is Roy Eisenbach,
5 first name is R-O-Y, last name is E-I-S-E-N-B-A-C-H. I
6 live in Woodridge. The address is 12110 Southeast 16th
7 Place, Bellevue, Washington, 98005.
8 Our home phone number is (425) 746-9712. My email
9 addresses are royeisenbach@comcast.net as well as
10 roy.a.eisenbach@boeing.com.
11 My family was involved in the first study that was
12 done when 405 was originally widened to accommodate a
13 carpool lane.
14 At that time the Department of Transportation was
15 very well aware of the noise as well as the view issues
16 for the Woodridge community. Part of the reason that the
17 wall was not built above 20 feet is to retain the views.
18 However, the wall was not built per spec, and we had
19 acoustic engineers that lived in the neighborhood that
20 participated in the study that helped the Department of
21 Transportation take measurements, time of day, barometric
22 pressures, location, elevation, longitude, latitude as
23 well as what the actual dba reading was.
24 Those studies helped Washington at least try to
25 develop a plan to put a noise barrier up that would be

1 effective and try to limit the noise. The wall does
2 help, but it's still not effective enough to keep the dba
3 levels down to a 55 maximum, which Bellevue city
4 maintains for residential neighborhoods.

5 ANNETE EISENBACH: And our house is Bellevue,
6 the city of Bellevue.

7 ROY EISENBACH: The issue that we have now is
8 that they're going to be widening the road. As they
9 widen the road we're going to have more traffic, and
10 there will be more noise.

11 The wall does not keep the traffic down now, at
12 least to a 55 dba limit. They need to do something to
13 the wall in order to obstruct the noise so the noise does
14 not transmit up through the various altitudes of the
15 Woodridge community as well as planning some other kind
16 of shrub or should I say plant life on the hills to
17 retain the bank.

18 ANNETE EISENBACH: That's not trees.

19 ROY EISENBACH: That are not trees that do
20 not put limbs to breeze onto I-405 or make a mess of our
21 neighbors' yards.

22 They need to put plant life on the hills that do not
23 obstruct views and do not create debris that falls on the
24 road creating road hazards for the traffic as well as
25 making a mess in the Woodridge residents' yards.

1 Now, from what I've heard from talking with the
2 people out here in the study, basically they're
3 maintaining that it is what it is. We're not going to
4 improve the wall. We're not going to take down the
5 trees.
6 I'm here to say that the Woodridge residents
7 actually had a petition on both the trees and the noise.
8 Many of the Woodridge residents have signed that
9 petition.
10 What is the Department of Transportation going to
11 do, and what's it going to take? Legal action? What's
12 it going to take to make the Department of Transportation
13 bring the road noise down and the view back?

Comment CR1.1

My family was involved in the first study that was done when 405 was originally widened to accommodate a carpool lane.

At that time the Department of Transportation was very well aware of the noise as well as the view issues for the Woodridge community. Part of the reason that the wall was not built above 20 feet is to retain the views.

However, the wall was not built per spec, and we had acoustic engineers that lived in the neighborhood that participated in the study that helped the Department of Transportation take measurements, time of day, barometric pressures, location, elevation, longitude, latitude as well as what the actual dba reading was.

Those studies helped Washington at least try to develop a plan to put a noise barrier up that would be effective and try to limit the noise. The wall does help, but it's still not effective enough to keep the dba levels down to a 55 maximum, which Bellevue city maintains for residential neighborhoods.

And our house is Bellevue, the city of Bellevue.

Response CR1.1

The City of Bellevue Noise Code (9.18.030) describes the maximum permissible sound levels at the property line of a residence of 55 dBA from a residential source. However, under section 9.18.020 (A)(7) sounds created by motor vehicles are exempt from 9.18.030 as long as they are not making excessive noise by squealing tires, modified exhaust systems, loud car stereos, etc. WSDOT has adopted the federal standard under 23 Code of Federal Regulations (CFR) 772 and WSDOT Noise Policies and Procedures (2011) where the threshold of sound levels approach or exceed 67 Leq A-weighted decibels (dBA). WSDOT defines 'approach' as 1 decibel (dB), which in Washington state sets a noise impact threshold of 66 Leq dBA. Any

community at or above this threshold WSDOT is required to evaluate noise abatement which must meet two additional criteria to be considered for construction.

According to our analysis for this project the existing noise wall for the Woodridge community is maintaining noise levels below impact the WSDOT criteria for noise impacts.

See Global Response 9. Please see the Noise Discipline Report for more information.

Comment CR1.2

The issue that we have now is that they're going to be widening the road. As they widen the road we're going to have more traffic, and there will be more noise.

The wall does not keep the traffic down now, at least to a 55 dba limit. They need to do something to the wall in order to obstruct the noise so the noise does not transmit up through the various altitudes of the Woodridge community as well as planning some other kind of shrub or should I say plant life on the hills to retain the bank.

That's not trees.

That are not trees that do not put limbs to breeze onto I-405 or make a mess of our neighbors' yards.

They need to put plant life on the hills that do not obstruct views and do not create debris that falls on the road creating road hazards for the traffic as well as making a mess in the Woodridge residents' yards.

Response CR1.2

The Project would widen the median of I-405 in this area. This would result in a 0 to 1 decibel (dB) increase in the existing noise environment which is imperceptible to the human ear. See Response to CR1.1.

WSDOT understands noise is a concern to those communities that live adjacent to their roadways and continues to look for ways to reduce noise impacts. In an effort to do so we are investigating the feasibility of paving methods that may help reduce noise impacts. We will continue to analyze if that may be a feasible option for sections of I-405 near the Woodridge neighborhood.

Comment CR1.3

Now, from what I've heard from talking with the people out here in the study, basically they're maintaining that it is what it is. We're not going to improve the wall. We're not going to take down the trees. I'm here to say that the Woodridge residents actually had a petition on both the trees and the noise.

Many of the Woodridge residents have signed that petition.

What is the Department of Transportation going to do, and what's it going to take? Legal action? What's it going to take to make the Department of Transportation bring the road noise down and the view back?

Response CR1.3

See Response CR1.1.

WSDOT analyzed noise in the Woodridge community in 1991, 2006, and as part of this project and in each case WSDOT met with the community to discuss noise issues. In this noise analysis the existing noise walls were evaluated to determine if they are maintaining noise levels below the noise abatement criteria and they are performing as expected.

WSDOT did a preliminary evaluation to determine if it would be structurally feasible to increase the height of the existing noise walls that were built during the 1990s. The existing noise walls were designed to the correct design code in place at the time of construction. However, they do not meet the current design standards and adding any additional height to the noise walls would not be possible.

WSDOT is continuing to study methods to reduce roadway noise. WSDOT is investigating the use of grooved pavement in this area, to understand its feasibility and effectiveness in reducing noise. WSDOT will continue to communicate its finding with the Woodridge community.

We understand that trees may be blocking your views, however, it is WSDOT's policy to remove trees only when that tree presents a current danger to public safety.

Comment CR2 – Astrid Zuppinger, Private Individual, April 17, 2018

14 ASTRID ZUPPINGER: My name is Astrid,
15 A-S-T-R-I-D, last name is Zuppinger, Z-U-P-P-I-N-G-E-R.
16 My contact number is (425) 999-2802.
17 Once they start replacing or putting up the barrier
18 walls south of me and start expanding the highway north
19 of me, I will need to be put up in a hotel in order to
20 get my rest so that my health is not disrupted.
21 The beeping noise of the trucks and the beeping has
22 to be constant. The frequency is very disruptive to the
23 nervous system, and nobody can sleep under those
24 conditions.
25 I understand that you have to have that for safety

1 purposes on a highway, so for my safety purpose you will
2 need to put me up in a hotel during the times where you
3 are working on the highway.

4 You put me up in the past for a couple of nights,
5 but depending on how long you're going to be on the
6 highway north and south of me, it's going to have to be
7 an extensive, longer time.

8 I am located in Woodridge. My house number is 2525
9 121st Avenue Southeast. Please do not take the retaining
10 wall away in front of my home. That will cost you a lot
11 of money, and that will create more disruption with the
12 water system.

13 There's a 30 foot drainage pipe 500 feet from my
14 home, and that should not be disrupted. Also, please
15 keep in mind that the electric magnetic fields that come
16 off of the tolls you placed in certain areas affects the
17 brains in the people driving the cars.

18

Comment CR2.1

Once they start replacing or putting up the barrier walls south of me and start expanding the highway north of me, I will need to be put up in a hotel in order to get my rest so that my health is not disrupted.

The beeping noise of the trucks and the beeping has to be constant. The frequency is very disruptive to the nervous system, and nobody can sleep under those conditions.

I understand that you have to have that for safety purposes on a highway, so for my safety purpose you will need to put me up in a hotel during the times where you are working on the highway.

You put me up in the past for a couple of nights, but depending on how long you're going to be on the highway north and south of me, it's going to have to be an extensive, longer time.

Response CR2.1

See Response CF8.02.

Comment CR2.2

I am located in Woodridge. My house number is 2525 121st Avenue Southeast. Please do not take the retaining wall away in front of my home. That will cost you a lot of money, and that will create more disruption with the water system.

Response CR2.2

See comment CF8.01.

Comment CR2.3

There's a 30-foot drainage pipe 500 feet from my home, and that should not be disrupted. Also, please keep in mind that the electric magnetic fields that come off of the tolls you placed in certain areas affects the brains in the people driving the cars.

Response CR2.3

The drainage pipe will not be modified,

Our tolling equipment uses a wireless system known as radio frequency identification (RFID). RFID consists of two elements: tags and readers. In this case, the tags are the *Good To Go!* passes installed in vehicles. The tags use radio waves to “talk” to our readers, which are mounted on the gantries you drive under on the corridor.

From the microchips that help locate lost pets to the technology that allows us to track packages, RFID is used quite commonly. Due to the prevalence of RFID in our everyday lives, the Federal Communications Commission and the Food and Drug Administration have studied the technology for any safety risks. Rigorous safety and operational standards must be met or exceeded in order to utilize RFID technology for commercial applications.

The particular RFID reader we use is the Sirit Identity 5204, which meets or exceeds all safety standards. For instance, the International Safety Standard for Information Technology Equipment requires a comprehensive testing and certification process, and limits the bandwidth and radio frequency power allowed.

This model also has performance features that further improve its safety. One such feature is the extended read range, which allows us to mount it farther away from the road, making it even safer than similar models. Furthermore, the antennas were selected and tuned so that they operate in a narrow frequency bandwidth, which has minimal impact on drivers. Their attenuation is adjusted to focus on a single lane, and to not interfere with other signals.

Safety is our number one priority. We’re continually testing our equipment and making any necessary changes to ensure our operations meet or exceed WSDOT’s standards, as well as those of any federal or industrial agencies.

Comments Received via Email (E)

Comment E1 – Doug Brown, Private Individual, April 3, 2018 (E1)

From: Brown, Doug [Doug.Brown@astronics.com]
Sent: Tuesday, April 03, 2018 5:42 PM
To: I405comments@wsdot.wa.gov
Subject: Downtown Bellevue EA comment

Dear Sirs,

I am a Renton resident and I commute to and from my office in Kirkland each day. As such, I have to deal with 405 traffic every day. I agree with adding another lane between Bellevue and Tukwila, but it should be a GENERAL PURPOSE LANE, not an additional HOV/toll lane. There is no need for two HOV/Toll lanes on 405. I-405 has needed additional general purpose lanes for years. Adding another HOV lane is just a means for you to raise additional revenue without improving traffic. The current toll lanes north of Bellevue have been a disaster and have not met their targets for improving traffic. From what I have experienced, the twin toll lanes have actually made traffic worse in the general purpose lanes.

E1.1

E1.2

E1.3

To repeat, add another general purpose lane, not an additional HOV lane.

Doug

[AstronicsAES_blue]
Douglas Brown, M.S.E.
Chief Engineer - Software

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12950 Willows Road NE 1 Kirkland, WA 98034 USA

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[cid:image003.png@01D3272C.012B1000]<<https://twitter.com/AstronicsCorp>>
[cid:image004.png@01D3272C.012B1000]<<https://www.facebook.com/Astronics-AES-110756772320958/>>
[cid:image005.png@01D3272C.012B1000]
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Comment E1.1

I am a Renton resident and I commute to and from my office in Kirkland each day. As such, I have to deal with 405 traffic every day. I agree with adding another lane between Bellevue and Tukwila, but it should be a GENERAL PURPOSE LANE, not an additional HOV/toll

lane. There is no need for two HOV/Toll lanes on 405. I-405 has needed additional general purpose lanes for years.

Response E1.1

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. Additionally, the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which is intended to be constructed at the same time as the Project, would add southbound untolled GP lanes from I-90 to 112th Avenue NE, NE 44th Street and NE 30th Street and southbound I-405 to eastbound I-90 ramp improvements. As a result of improvements plus the new express toll lane (ETL) capacity improvements, traffic congestion would greatly improve in this area.

The addition of new ETLs would improve I-405 speed and reliability for drivers who choose to use them and transit reliability for Sound Transit's Bus Rapid Transit (BRT) system. Having a free flow option moves more vehicles and people overall than just adding another untolled GP lane, which would quickly become another stop-and-go lane. Overall, the I-405 Renton to Bellevue Widening and Express Toll Lanes construction contract is expected to improve traffic, including the untolled GP lanes, across all lanes in most areas. The current funded project is focused on new ETLs, but the long-term I-405 Master Plan includes completing one additional untolled GP lane in each direction between Bellevue and Renton. This project is currently unfunded and its timeline is unclear. WSDOT is committed to building out the full plan as funding becomes available.

Comment E1.2

Adding another HOV lane is just a means for you to raise additional revenue without improving traffic.

Response E1.2

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility and generate revenue for future improvements.

Revenue collected from the new ETL is used to operate and maintain the roadway and fund additional needs within the I-405 corridor. Two-thirds of the money from each toll helps fund improvements for I-405, such as the northbound peak-use shoulder lane between Canyon Park and Lynnwood. The remaining third of the revenue generated by the new ETL covers operating costs. This includes our customer service centers, phone line, enforcement and online support. This work is done by Electronic Transaction Consultants, a private vendor based in Texas which employs 120 people in the Puget Sound region working for *Good To Go!* selected through a WSDOT procurement process.

See also Response E1.3.

Comment E1.3

The current toll lanes north of Bellevue have been a disaster and have not met their targets for improving traffic. From what I have experienced, the twin toll lanes have actually made

traffic worse in the general purpose lanes. To repeat, add another general purpose lane, not an additional HOV lane.

Response E1.3

Before the Bellevue to Lynnwood express toll lanes (ETLs) opened, the previous HOV lanes on I-405 were not a reliable option for carpoolers because they were frequently as congested as the untolled general purpose (GP) lanes. Carpools were often stuck in the same congestion as folks in the regular lanes, receiving little to no benefit from the carpool lanes.

The new ETLs provide drivers with a choice when they need it and give transit a reliable trip. ETLs bring reliability to drivers and transit riders. Today, WSDOT analysis shows that untolled GP lanes in most places between Bellevue and Lynnwood are moving faster than they did before the ETLs opened and we expect the same performance in the Renton to Bellevue area.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The new ETLs are also providing benefits for drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began.

Comment E2 – Tim Ma, Private Individual, April 4, 2018

From: Tim Ma [tmm128@hotmail.com]
Sent: Wednesday, April 04, 2018 3:48 PM
To: I405comments@wsdot.wa.gov
Subject:

To whom it may concern:

We need light rail plans that connect the east side all along i405. This includes connecting all the way to Seatac. This in addition to adding park and rides at key points in cities from Bothell, Kirkland, Bellevue, to Renton. There will be no other way to truly reduce congestion without an efficient mass transit option. A temporary stage between light rail mass transit is adding express buses up and down i405 with enough frequency at peak hours.

Sincerely,
30 year Bellevue resident

Sent from Mail <<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows 10

E2.0

Comment E2.0

We need light rail plans that connect the east side all along i405. This includes connecting all the way to Seatac. This in addition to adding park and rides at key points in cities from Bothell, Kirkland, Bellevue, to Renton. There will be no other way to truly reduce congestion

without an efficient mass transit option. A temporary stage between light rail mass transit is adding express buses up and down i405 with enough frequency at peak hours.

Response E2.0

The current funded project does not include light rail. Light rail projects are currently under construction by Sound Transit in several locations. For this project, WSDOT is working with Sound Transit to implement Bus Rapid Transit (BRT) on I-405 from Lynnwood to Burien by 2024. The I-405 Master Plan (www.wsdot.wa.gov/Projects/i405/corridor/feis), which was developed in partnership with corridor residents, businesses, elected officials, and local governments in 2002, selected BRT as the preferred high-capacity transit system for the east side of Lake Washington.

For more information, visit Sound Transit’s website: <https://www.soundtransit.org/projects-and-plans/bus-rapid-transit-i-405>.

Comment E3 – Joseph Smyth, Private Individual, April 5, 2018

From: Joseph Smyth [jmikesmyth@outlook.com]
Sent: Thursday, April 05, 2018 2:36 PM
To: I405comments@wsdot.wa.gov
Subject: Car pool

Keep the car pool requirement to 2 people. Making it 3+ will just dump more traffic into the G.P. lanes and slow down the entire freeway. | E3.1

The HOT lane should be used for general purposes and the follow-on program should add the HOT lane. | E3.2

Mike Smyth
Bellevue, WA 98008

Comment E3.1

Keep the car pool requirement to 2 people. Making it 3+ will just dump more traffic into the G.P. lanes and slow down the entire freeway.

Response E3.1

See Global Response 6.

Comment E3.2

The HOT lane should be used for general purposes and the follow-on program should add the HOT lane.

Response E3.2

The 2015 Connecting Washington funding legislatively requests WSDOT continue widening the I-405 corridor between Renton and Bellevue, including the implementation of new express toll lanes (ETLs) and rebuilding impacted interchanges.

The Puget Sound region is experiencing unprecedented growth including the communities around I-405 causing some of the worst congestion in the state. In 2002, WSDOT developed a multimodal vision for the corridor to move more people and manage congestion along I-405, which was to be completed by 2020. This vision included managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT's ability to manage lanes to provide a reliable trip for I-405 users. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, which includes additional untolled general purpose (GP) lanes and other improvements, it has made substantial investments in untolled GP lanes to address key chokepoints, and has implemented the first phase of ETLs from Bellevue to Lynnwood. The ETLs provide drivers a choice when they need it and give transit a reliable trip. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund the Master Plan.

The follow-on program or I-405 Master Plan would add another untolled GP lane and direct access interchanges at several locations. At this time, the funding to complete the master plan has not been allocated.

Comment E4 – Barbara Brachtl, Private Individual, April 5, 2018

From: Barbara Brachtl [bjbrachtl@hotmail.com]
Sent: Thursday, April 05, 2018 9:41 PM
To: I405comments@wsdot.wa.gov
Subject: Toll lanes

It really saddens me to see any extension of toll lanes. We're relieving congestion on the backs of people who can't afford the tolls. I believe this is morally wrong. Barbara Brachtl

E4.0

Sent from Mail<<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows 10

Comment E4.0

It really saddens me to see any extension of toll lanes. We're relieving congestion on the backs of people who can't afford the tolls. I believe this is morally wrong.

Response E4.0

See Global Response 10.

Comment E5 – Ken Whelan, Private Individual, April 5, 2018

From: Ken Whelan [kenwhelan3@gmail.com]

Sent: Thursday, April 05, 2018 6:49 PM

To: I405comments@wsdot.wa.gov

Subject: We need a exit ramp from the HOV lanes on I405 to the I90 HOV lanes to prevent any crossover!!!

As we have needed for YEARS, We need a exit ramp from the HOV lanes on I405 to the I90 HOV lanes to prevent any crossover!!!

Let's fix it RIGHT!

--

Take care.

Ken Whelan

kenwhelan3@gmail.com<<mailto:kenwhelan3@gmail.com>>

206 351 8177

"If you think you can or think you can't, you are right!"

oiu twbd

E5.0

Comment E5.0

As we have needed for YEARS, We need a exit ramp from the HOV lanes on I405 to the I90 HOV lanes to prevent any crossover!!! Let's fix it RIGHT!

Response E5.0

Although the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not address your concern, another near-term project, the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, would construct additional untolled general purpose (GP) capacity improvements on the southbound I-405 ramp to eastbound I-90. The public comment period for that project is likely to occur in June/July 2018. In addition, the I-405 Master Plan includes high-occupancy vehicle (HOV) direct access ramps in all four quadrants of the I-405/I-90 interchange. WSDOT continues to identify these improvements as high priority and is working with the Legislature to fund the I-405 Master Plan.

Comment E6 – Jeff Lykken, stop405tolls.org April 7, 2018

From: Jeff Lykken [jalykken@hotmail.com]
Sent: Saturday, April 07, 2018 1:01 PM
To: I405comments@wsdot.wa.gov
Subject: I 405 comments on toll lanes

To whom it may concern

I wanted to leave a few comments in regard to the widening project on I405. First of all I wanted to make it clear that traffic from Renton to Bellevue is terrible. We need the expansion. Back in 2002 when the original Master Plan for I 405 was developed, I was happy to hear that improvements were finally coming with 2 additional general purpose lanes in each direction, a fantastic plan. Back in 2007, WSDOT even came to Kennydale elementary and told the public who attended that we were finally going to get some relief as WSDOT promised that we would get 2 additional general purpose lanes in each direction. Then behind close doors WSDOT without public knowledge and public support, WSDOT came up with this tolling concept which is a joke. Many of us tried to get a hearing to stop the toll lane project, but Judy Clibborn continued to block the hearing, I can only imagine the kickbacks from the Texas company. The toll lane concept was forced onto the public with deception, propaganda and straight out lies. The extortion toll lanes have been a complete failure as they have made congestion much, much worse and everyone knows this. They have been one of the biggest mistakes in transportation history and one of the biggest rip-offs of the public in recent memory. On the northern part of I405, they have sent so much diversion traffic that there are now cars in neighborhoods and streets where there was never issue before. Where I live in Kennydale (Renton) we already have a huge diversion problem already as Lake Washington blvd is solid of cars every morning as people are avoiding the freeway which ONLY HAS 2 GENERAL PURPOSE LANES!! A JOKE. Leaving I405 from Renton to Bellevue with only 2 general purpose lanes in each direction is WRONG and just plain stupid! If this toll lane project goes through it will create a traffic catastrophe as thousands of additional cars will cut through our neighborhoods. We are NOT going to let that happen. Why should we have to pay up to \$10 for a facility that we already paid for. WSDOT has already lied to the public already, do you think they will stop at a \$10 toll from Renton to Bellevue? No, don't be surprised if they decide to raise it up to \$40 like they are doing on the east coast tollways. Renton was promised 2 additional general purpose lanes years ago, NOT EXTORSION TOLLS. We need general purpose lanes and we are pretty sure by 2024 this toll lane concept will be a distant memory, as a result of public outrage. The sad part is many people in my neighborhood still think the I405 widening will be the general purpose lanes we were originally promised. If the public were able to vote on this, it would go down in flames. NO TOLL ON I405!

E6.01

E6.02

E6.03

E6.04

E6.05

E6.07

E6.08

E6.09

E6.10

E6.11

STOP405TOLLS.ORG

Jeff A Lykken

Kennydale

Comment E6.01

To whom it may concern

I wanted to leave a few comments in regard to the widening project on I405. First of all I wanted to make it clear that traffic from Renton to Bellevue is terrible. We need the expansion. Back in 2002 when the original Master Plan for I 405 was developed, I was happy to hear that improvements were finally coming with 2 additional general purpose lanes in each direction, a fantastic plan. Back in 2007, WSDOT even came to Kennydale elementary

and told the public who attended that we were finally going to get some relief as WSDOT promised that we would get 2 additional general purpose lanes in each direction.

Response E6.01

WSDOT concurs that this section of I-405 is one of the most congested areas in the state. In addition, the Puget Sound region is experiencing unprecedented growth including the communities around I-405 adding to the demands on the system. WSDOT has continued to work with the Washington State Legislature and public voters to fund improvements in this area.

See Global Response 5.

Comment E6.02

Then behind close doors WSDOT without public knowledge and public support, WSDOT came up with this tolling concept which is a joke. Many of us tried to get a hearing to stop the toll lane project, but Judy Clibborn continued to block the hearing, I can only imagine the kickbacks from the Texas company.

Response E6.02

In January 2010, after a series of studies, WSDOT completed the I-405/SR 167 Eastside Corridor Tolling Study, which proposed a tolling strategy for managed lanes in the I-405/SR 167 corridor. The I-405/SR 167 Executive Advisory Group composed of elected officials and transportation agencies from the corridor endorsed a 40-mile express toll lane (ETL) system between Auburn and Lynnwood based on that study.

Extensive public involvement with communities along the I-405 corridor continues today through regular open houses, hearings, neighborhood meetings, city council and civic group briefings, and other correspondence. We always welcome feedback and comments from the public. For the latest contact information for our project team members, visit WSDOT's I-405 program website at <https://www.wsdot.wa.gov/Projects/I405/default.htm>.

Comment E6.03

The toll lane concept was forced onto the public with deception, propaganda and straight out lies. The extortion toll lanes have been a complete failure as they have made congestion much, much worse and everyone knows this. They have been one of the biggest mistakes in transportation history and one of the biggest rip-offs of the public in recent memory.

Response E6.03

See Global Response 1.

Comment E6.04

On the northern part of I405, they have sent so much diversion traffic that there are now cars in neighborhoods and streets where there was never issue before. Where I live in Kenedydale (Renton) we already have a huge diversion problem already as Lake Washington blvd is

solid of cars every morning as people are avoiding the freeway which ONLY HAS 2 GENERAL PURPOSE LANES!! A JOKE.

Response E6.04

See Global Response 4.

Comment E6.05

Leaving I405 from Renton to Bellevue with only 2 general purpose lanes in each direction is WRONG and just plain stupid!

Response E6.05

See Response E6.01.

Comment E6.06

If this toll lane project goes through it will create a traffic catastrophe as thousands of additional cars will cut through our neighborhoods. We are NOT going to let that happen.

Response E6.06

See Global Response 4.

Comment E6.07

Why should we have to pay up to \$10 for a facility that we already paid for. WSDOT has already lied to the public already, do you think they will stop at a \$10 toll from Renton to Bellevue? No, don't be surprised if they decide to raise it up to \$40 like they are doing on the east coast tollways.

Response E6.07

The lanes on I-405 have been built with federal and state gas taxes over the years. Currently, the Washington State Transportation Commission (WSTC) is responsible for establishing toll rates and exemptions for state toll facilities in Washington. While tolling is used to improve traffic flows, WSTC recognizes tolling carries a financial impact for those drivers who choose travel in the tolled lanes. Whenever called upon to revise toll rates, WSTC carefully reviews traffic and revenue projections, listens to members of affected communities, and seeks to ensure customers are treated fairly. See also the WSTC website at <http://www.wstc.wa.gov/HighwayTolling/default.htm>.

Comment E6.08

Renton was promised 2 additional general purpose lanes years ago, NOT EXTORSION TOLLS.

Response E6.08

See Response 6.01.

Comment E6.09

We need general purpose lanes and we are pretty sure by 2024 this toll lane concept will be a distant memory, as a result of public outrage.

Response E6.09

See Response E6.01.

Comment E6.10

The sad part is many people in my neighborhood still think the I405 widening will be the general purpose lanes we were originally promised.

Response E6.10

See Response E6.01 and Global Response 5.

The current, funded project is focused on express toll lanes (ETLs), but the long-term I-405 Master Plan includes completing one additional untolled general purpose (GP) lane in each direction between Bellevue and Renton. This project is currently unfunded and its timeline is unclear. WSDOT is committed to building out the full plan as funding becomes available.

Comment E6.11

If the public were able to vote on this, it would go down in flames. NO TOLL

Response E6.11

See Global Response 12.

Comment E7 – Vladimir Chmelev, Private Individual, April 9, 2018

From: Vladimir Chmelev [vch@comcast.net]
Sent: Monday, April 09, 2018 6:05 PM
To: I405comments@wsdot.wa.gov
Subject: Downtown Bellevue EA comment

This project is complete BS, designed to create as much conjunction for regular drivers, as possible. Main goal is to increase tax revenue.

E7.1

Double express line is total disaster and will slow regular traffic through the I-405 corridor significantly, like it creates in north path now.

E7.2

Targeting low income people first and create privilege for wealthy drivers.

I'm voting strongly against it.

E7.3

Shame on you , WSDOT ...

Hope will move out of here then.

Vladimir Chmelev
Renton

Comment E7.1

This project is complete BS, designed to create as much conjunction for regular drivers, as possible. Main goal is to increase tax revenue.

Response E7.1

See Global Responses 1 and 2.

Comment E7.2

Double express line is total disaster and will slow regular traffic through the I-405 corridor significantly, like it creates in north path now.

Response E7.2

See Global Response 1.

Comment E7.3

Targeting low income people first and create privilege for wealthy drivers. I'm voting strongly against it.

Response E7.3

See Global Response 10.

Comment E8 – Bill Finkbeiner, Private Individual, April 10, 2018

From: Bill Finkbeiner [billfinkbeiner@msn.com]
Sent: Tuesday, April 10, 2018 2:10 PM
To: I405comments@wsdot.wa.gov
Subject: support for ERC work in I-405 improvements in Bellevue

I just want to thank WSDOT for including the work on the ERC in their scope and also to thank them for frontloading the timing of these projects so that it will coincide with the planned construction of the Wilburton Trestle in 2020 and provide a replacement for the Lake Washington Trail prior to its removal. | E8.0

I am in strong support of this project.

Bill Finkbeiner

Comment E8.0

I just want to thank WSDOT for including the work on the ERC in their scope and also to thank them for frontloading the timing of these projects so that it will coincide with the planned construction of the Wilburton Trestle in 2020 and provide a replacement for the Lake Washington Trail prior to its removal. I am in strong support of this project.

Response E8.0

Comment noted.

Comment E9 – Joni Scott, Private Individual, April 11, 2018

From: Joni Scott [travelkidz@yahoo.com]
Sent: Wednesday, April 11, 2018 8:29 AM
To: I405comments@wsdot.wa.gov
Subject: 405 Tolls

Good Morning,

I am a resident of King County and live in Bothell where there are tolls on the 405. I am also a HomeHealth nurse who has to drive that corridor at times and have patients who need to get to their medical appointments along the 405.

I do all that I can to stay off the 405 because the traffic is worse. In the last two years, there have been 18 new apartment buildings in Bothell which will only increase that traffic. The elderly are having such a hard time making ends meet and now they will have to pay these tolls. A lot of my patients tell me that they just don't go to their appointments even though I try and tell them a different way because they are afraid they would get lost because the 405 is the only way they know. On top of this, not one elderly person I've asked, "When is it OK to get in the toll lane?" can they answer correctly. I know it's when there's a broken white line, but they don't. It's just too confusing, they get worried and accidents happen because there's just too much to think about. People can't afford it, they are canceling medical appointments, they are too afraid of getting lost if they go a different way and the entrance and exit markings to the toll are confusing.

So these problems will be the same problems in Renton. Please reconsider adding this toll.

Have a nice day!

Joni Scott

Sent from my iPhone

E9.0

Comment E9.0

Good Morning,

I am a resident of King County and live in Bothell where there are tolls on the 405. I am also a HomeHealth nurse who has to drive that corridor at times and have patients who need to get to their medical appointments along the 405.

I do all that I can to stay off the 405 because the traffic is worse. In the last two years, there have been 18 new apartment buildings in Bothell which will only increase that traffic. The elderly are having such a hard time making ends meet and now they will have to pay these tolls. A lot of my patients tell me that they just don't go to their appointments even though I try and tell them a different way because they are afraid they would get lost because the 405 is the only way they know. On top of this, not one elderly person I've asked, "When is it OK to get in the toll lane?" can they answer correctly. I know it's when there's a broken white line, but they don't. It's just too confusing, they get worried and accidents happen because there's just too much to think about. People can't afford it, they are

canceling medical appointments, they are too afraid of getting lost if they go a different way and the entrance and exit markings to the toll are confusing.

So these problems will be the same problems in Renton. Please reconsider adding this toll.

Response E9.0

WSDOT is working to improve drivers' understanding of the express toll lanes (ETLs). We are committed to public outreach and education as we deliver the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project). We have outlined several measures to reduce the impact of the tolls on low-income users, including the elderly, as described on page 6-7 of the Environmental Assessment.

WSDOT provides resources to help drivers better understand how to use the new ETLs, including instructional videos available on our YouTube channel at <https://www.wsdot.wa.gov/Tolling/405/usingthelanes.htm>.

The Project would not change the number of untolled general purpose (GP) lanes. ETLs bring reliability to drivers and transit riders. Today, WSDOT's analysis shows that untolled GP lanes in most places between Bellevue and Lynnwood are moving faster than they did before the ETLs opened. We expect to see the same results for both the Project and the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project. For more information, please see Section 5 of the Transportation Discipline Report.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The new ETLs have improved reliability for transit on I-405 by saving up to 11 minutes and increasing ridership by 9 percent. The new ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began.

Comment 10 – Kyle Schouviller , Private Individual, April 11, 2018 (E10)

From: Kyle Schouviller [kyle0654@hotmail.com]
Sent: Wednesday, April 11, 2018 11:35 AM
To: I405comments@wsdot.wa.gov
Subject: Comment on proposed toll lanes on South I405

Hello,

I was surprised and disappointed to hear of the plan to add not additional general purpose lanes to I405, but instead additional toll lanes (and changing the HOV lane to a toll lane). I405 south of I90 is already a mess, and this will only make it worse, as it made traffic worse on 405 north of I90. I have to commute between Newcastle and Redmond every day, and there is always a slowdown as soon as traffic hits I90. I had hoped one day this would be addressed, perhaps by changing the double weave lane just after I90, or by adding an additional general purpose lane. A toll lane will do nothing but slow down traffic even further, as 2+ carpools are kicked out of the carpool lane (which is never full right now, and actually helps with traffic) and merging traffic backs up normal lanes (as it has done ever since tolling starting on northern 405).

Please, please, please, reconsider. An additional general purpose lane would reduce congestion so much. A toll lane would only increase congestion.

Kyle Schouviller

Newcastle, WA

E10.1

E10.2

E10.3

Comment E10.1

Hello,

I was surprised and disappointed to hear of the plan to add not additional general purpose lanes to I405, but instead additional toll lanes (and changing the HOV lane to a toll lane).

Response E10.1

See Global Response 5.

Comment E10.2

I405 south of I90 is already a mess, and this will only make it worse, as it made traffic worse on 405 north of I90. I have to commute between Newcastle and Redmond every day, and there is always a slowdown as soon as traffic hits I90. I had hoped one day this would be addressed, perhaps by changing the double weave lane just after I90, or by adding an additional general purpose lane

Response E10.2

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) and those to the north and south of I-90 are part of the I-405 Master Plan to address corridor-wide problems. Managing congestion is the highest priority and WSDOT is working with the Legislature to fully fund the I-405 Master Plan. The Project would add a new ETL in each direction through this area, which would improve overall operations. The Washington State Legislature has also funded the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would add a new Express Toll Lane (ETL) in each direction, an additional southbound untolled general purpose (GP) lane from I-90 to 112th Avenue NE and southbound I-405 to eastbound I-90 ramp improvements. As a result of these capacity improvements, traffic congestion would greatly improve in this area. Please see Section 4.1 of the Transportation Discipline Report for more details.

Comment E10.3

A toll lane will do nothing but slow down traffic even further, as 2+ carpools are kicked out of the carpool lane (which is never full right now, and actually helps with traffic) and merging traffic backs up normal lanes (as it has done ever since tolling starting on northern 405).

Please, please, please, reconsider. An additional general purpose lane would reduce congestion so much. A toll lane would only increase congestion.

Response E10.3

See Global Responses 6 and 5.

Comment E11 – Damon Strom, Private Individual, April 11, 2018

From: Damon Strom [Damon.Strom@churchome.org]
Sent: Wednesday, April 11, 2018 6:36 PM
To: I405comments@wsdot.wa.gov
Subject: Feedback on I-405 Toll Lane Proposal

My name is Damon Strom and I am emailing regarding the proposed changes to the existing HOV lanes on I-405. I am against turning the HOV lane into a toll lane or adding a second toll lane. The toll lanes provide revenue to the state/county/city which isn't a bad thing but in doing so, this method rewards the wealthy who can afford tolls and increases traffic congestion for those who cannot. This is why I am staunchly against expanding toll lanes on I-405.

Sincerely,

-Damon

E11.0

Comment E11.0

My name is Damon Strom and I am emailing regarding the proposed changes to the existing HOV lanes on I-405. I am against turning the HOV lane into a toll lane or adding a second toll lane. The toll lanes provide revenue to the state/county/city which isn't a bad thing but in doing so, this method rewards the wealthy who can afford tolls and increases traffic congestion for those who cannot. This is why I am staunchly against expanding toll lanes on I-405.

Response E11.0

See Global Response 10.

Comment E12 – Bruce Brown, Private Individual, April 11, 2018

From: Bruce Brown [brownb329@aol.com]
Sent: Wednesday, April 11, 2018 7:44 PM
To: I405comments@wsdot.wa.gov
Subject: Frustrating Idea

Tolling from Bellevue to Renton is nothing but a greedy irresponsible act for charging for same lanes that have been in service for years. E12.0
Bruce Brown

Sent from my iPhone

Comment E12.0

Tolling from Bellevue to Renton is nothing but a greedy irresponsible act for charging for same lanes that have been in service for years.

Response E12.0

See Global Response 11.

Comment E13 – Allison Goodman, Private individual, April 11, 2018

From: Allison Goodman [agoodman@ediscoveryinc.com]
Sent: Wednesday, April 11, 2018 8:15 AM
To: I405comments@wsdot.wa.gov
Subject: HOT Lanes

I would like to see the studies that support the decision to create 3+ HOV lanes and entirely remove the 2+ HOV lanes.

E13.1

From a purely anecdotal perspective it doesn't seem to work. I know many people that used to carpool when they could use the 2+ HOV lanes that now have to drive separately. Coordinating schedules with 3 people is just too difficult.

E13.2

And it seems to be particularly wrong when 2 HOV lanes are created and are both 3+. Why can't one be 3+ and one be 2+? If the idea is that you want the lanes to keep moving which doesn't happen as well with only 2 people per car you'd still have one lane where that would be the case.

E13.3

Again, please provide me with copies of the studies that support this decision.

--

Allison Goodman
Certified Computer Examiner
eDiscovery Inc.
12828 Northrup Way, Suite 120
Bellevue, WA 98005-1935
425-373-3349 (Office)
206-226-9311 (Cell)

Comment E13.1

I would like to see the studies that support the decision to create 3+ HOV lanes and entirely remove the 2+ HOV lanes.

Response E13.1

See Global Response 6.

Comment E13.2

From a purely anecdotal perspective it doesn't seem to work. I know many people that used to carpool when they could use the 2+ HOV lanes that now have to drive separately. Coordinating schedules with 3 people is just too difficult.

Response E13.2

See Global Response 6. Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The express toll lanes (ETLs) have improved

reliability for transit on I-405 by saving up to 11 minutes and increasing ridership by 9 percent. The new ETLs are also benefitting drivers in the untolled general purpose (GP) lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began. Please see the I-405 ETL performance reports on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>.

Comment E13.3

And it seems to be particularly wrong when 2 HOV lanes are created and are both 3+. Why can't one be 3+ and one be 2+? If the idea is that you want the lanes to keep moving which doesn't happen as well with only 2 people per car you'd still have one lane where that would be the case.

Again, please provide me with copies of the studies that support this decision.

Response E13.3

Unfortunately, the technology does not exist to operate the dual express toll lane (ETL) system with different high-occupancy vehicle (HOV) occupancy requirements in each lane. The proposed new ETL system would provide consistency for carpool requirements.

Comment E14 – Michele Sackman, Private Individual, April 11, 2018

From: Michele Sackman [msackman22@gmail.com]
Sent: Wednesday, April 11, 2018 2:28 PM
To: I405comments@wsdot.wa.gov
Subject: NO 405 Tolls

There should absolutely be no tolls between Bellevue and Renton or anywhere else. In fact, the tolls north of Bellevue on 405 need to be removed, as well. They are being assessed illegally at this time, due to the two conditions that law requires them to operate are not both being satisfied. So that is a huge problem right there.

E14.0

E14.1

Citizens and taxpayers are getting very tired of greedy politicians and bureaucrats who act as though we do not own these roads and should not be able to drive on them without paying huge fees in addition. Also, I understand that only a small percentage of the tolls are going to the government, anyway. The vast majority are going to the company running the tolling mechanism. that's ridiculous

E14.2

E14.3

Comment E14.0

There should absolutely be no tolls between Bellevue and Renton or anywhere else.

Response E14.0

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E14.1

In fact, the tolls north of Bellevue on 405 need to be removed, as well. They are being assessed illegally at this time, due to the two conditions that law requires them to operate are not both being satisfied. So that is a huge problem right there.

Response E14.1

See Global Response 7.

Comment E14.2

Citizens and taxpayers are getting very tired of greedy politicians and bureaucrats who act as though we do not own these roads and should not be able to drive on them without paying huge fees in addition.

Response E14.2

See Global Response 11.

Comment E14.3

Also, I understand that only a small percentage of the tolls are going to the government, anyway. The vast majority are going to the company running the tolling mechanism. that's ridiculous

Response E14.3

See Global Response 2.

Comment E15 – The Wohlmans, Private Individual, April 11, 2018

From: The Wohlmans [wohlmandjtt@comcast.net]
Sent: Wednesday, April 11, 2018 10:38 AM
To: I405comments@wsdot.wa.gov
Subject: No on more toll roads!

E15.0

Comment E15.0

No on more toll roads!

Response E15.0

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E16 – David Babington, Private Individual, April 11, 2018

From: DAVID BABINGTON [dave.babington@comcast.net]
Sent: Wednesday, April 11, 2018 1:17 PM
To: I405comments@wsdot.wa.gov
Subject: Proposed Extension of 405 Tolls to Renton

For those of us who live in King County it feels as if there is a new tax every week! Please due not add to our tax burden by extending highway tolls.

Thank you,

Dave Babington

17101 199th PL NE

Woodinville WA 98077

E16.0

Comment E16.0

For those of us who live in King County it feels as if there is a new tax every week! Please due not add to our tax burden by extending highway tolls.

Response E16.0

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. The toll lanes offer a choice to drivers to pay a toll for a reliable trip when they need it.

Comment E17 – Jim and Rita Franzel, Private Individuals, April 11, 2018

From: Jim and Rita Franzel [JRFRANZEL@msn.com]
Sent: Wednesday, April 11, 2018 8:36 AM
To: I405comments@wsdot.wa.gov
Subject: public comment for expanding i405 toll lanes

I'm absolutely opposed to expanding the toll lanes on i405 - in fact, you should follow the existing law and remove the existing toll lanes - as you currently aren't meeting the two requirements that allowed you to impose this awful system on us. They have been a costly disaster and do not function well at all. Please follow the law and remove these toll lanes immediately and stop planning to expand the toll system.

I
E17.1
E17.2
E17.3

I live in edmonds and my daughter lives in bellevue. I can't begin to tell you how many times i've sat in the three untolled lanes and watched a handful of cars zoom along on the nearly empty toll lanes. I payed for these lanes to be built with gas taxes and federal taxes and now I can't use them except on weekends. jim franzel edmonds

Comment E17.1

I'm absolutely opposed to expanding the toll lanes on i405.

Response E17.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to fund new facilities and manage traffic throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E17.2

- in fact, you should follow the existing law and remove the existing toll lanes - as you currently aren't meeting the two requirements that allowed you to impose this awful system

on us. They have been a costly disaster and do not function well at all. Please follow the law and remove these toll lanes immediately and stop planning to expand the toll system.

Response E17.2

See Global Response 7.

Comment E17.3

I live in edmonds and my daughter lives in bellevue. I can't begin to tell you how many times i've sat in the three untolled lanes and watched a handful of cars zoom along on the nearly empty toll lanes. I payed for these lanes to be built with gas taxes and federal taxes and now I can't use them except on weekends. jim franzel edmonds

Response E17.3

See Global Response 11.

Tolling is a strategic tool to help manage congestion and provide a reliable trip for I-405 users by moving more vehicles and people when traffic is at its worst. Several key components to effectively managing these lanes during peak travel times include dynamic pricing and changing occupancy requirements to reflect demand levels for the new express toll lanes (ETL) at different times of the day.

The I-405 ETLs use dynamic price tolling to provide faster, more predictable trips to transit, carpoolers and toll-paying vehicles. Toll rates for the I-405 new ETL are based on real-time traffic conditions. Every few minutes, the traffic management computer system updates toll rates based on how many cars are in the lanes and how fast they are going. The goal is to use the laws of supply and demand to keep traffic moving. When traffic is flowing smoothly and there is plenty of room in the new ETL, the price is low to encourage cars to get in. When the lanes start to fill up and slow down, the price goes up to discourage too many cars from getting in so that the lanes can keep flowing efficiently.

The existing ETLs between Bellevue and Lynnwood initially opened as a tolled facility operating 24-hours a day, 7-days a week. A few months after opening, the hours of operation were adjusted to 5 a.m. to 7 p.m. on weekdays when demand for lanes is greatest. In addition, the occupancy requirement of 2+ or 3+ varies during the day to help maximize use of the lanes while keeping them moving:

- HOV 2+ travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass.
- During the peak time, HOV 3+ travel for free from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. with a *Good To Go!* pass.
- At all times, transit, HOV 3+, and motorcycles travel for free with a *Good To Go!* pass.
- At all other times and major holidays, the lanes are free and open to all without a *Good To Go!* pass.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on

the location. At the height of the peak commute, each new ETL is carrying 20 to 30 percent more vehicles than a untolled general purpose (GP) lane in some places, which helps the entire highway flow more smoothly.

The project would not change the number of untolled GP lanes and would not remove the ability for high-occupancy vehicles (HOVs) to use the new ETLs. The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would expand the current HOV lane to a new dual-lane ETL. The Washington State Transportation Commission is responsible for establishing the HOV occupancy requirements. It is assumed the new ETLs associated with the Project would operate the same as the existing ETLs that are to the north of the Project (Bellevue to Lynnwood) as follows:

- HOV 2+ would travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass.
- During the peak time, HOV 3+ would travel for free from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. with a *Good To Go!* pass.
- At all times, transit, HOV 3+, and motorcycles would travel for free with a *Good To Go!* pass.
- At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass.

Comment E18 – Barbara Bisjak, Private Individual, April 11, 2018

From: Barbara Bisjak [bisbam9@gmail.com]
Sent: Wednesday, April 11, 2018 8:55 AM
To: I405comments@wsdot.wa.gov
Cc: COLIN. CAMPBELL ; Barbara Jo Bisjak
Subject: R the affluent winning AGAIN...

YIKES...yet another TOLL...to some it's pocket-change & welcome as eases their travel, to others a \$\$ burden . E18.1
Let's open all lanes between SC & Bellevue since not expanding lanes...and only ONE pool no chg or minimal E18.2
Bellevue north —

BTW.. whatever happened to that nice train track between Renton and Bellevue, actually Woodinville. Why not E18.3
put that to good use as commuter option.

I will not be able to attend, but my voice matters and I want it heard. E18.4

Sincerely,
barbara bisjak

Sent from my iPhone

Comment E18.1

YIKES...yet another TOLL...to some it's pocket-change & welcome as eases their travel, to others a \$\$ burden.

Response E18.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to fund new facilities and manage traffic throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission (WSTC) determines the toll rates and exemptions.

Currently, WSTC is the toll authority. As such, it has the responsibility of establishing toll rates and exemptions for state toll facilities in Washington. While tolling is used to improve traffic, and raise revenue for capital improvements and to improve traffic flows, WSTC recognizes tolling carries a real financial impact for those drivers who regularly travel on tolled facilities. Whenever called upon to revise toll rates, WSTC carefully reviews traffic and revenue projections, listens to members of affected communities, and seeks to ensure customers are treated fairly. See also the WSTC website at <http://www.wstc.wa.gov/HighwayTolling/default.htm>.

Comment E18.2

Let's open all lanes between SC & Bellevue since not expanding lanes...and only ONE 🚗 pool no chg or minimal Bellevue north —

Response E18.2

The I-405 Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would add a new express toll lane (ETL) in each direction through this area, which would improve overall operations. In addition, WSDOT is proposing the I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would also add a southbound untolled general purpose (GP) lane from I-90 to 112th Avenue NE and southbound I-405 to eastbound I-90 ramp improvements. The current funded project is focused on new ETLs, but the long-term I-405 Master Plan includes completing one additional untolled GP lane in each direction between Bellevue and Renton. The additional I-405 Master Plan is currently unfunded and its timeline is unclear. WSDOT is committed to building out the full plan as funding becomes available and is working with the Washington State Legislature to fund the master plan.

Comment E18.3

BTW. whatever happened to that nice train track between Renton and Bellevue, actually Woodinville. Why not put that to good use as commuter option.

Response E18.3

King County is planning to construct the Eastside Rail Corridor (ERC) Regional Trail along the existing rail corridor tracks between Renton and Bellevue. WSDOT is partnering with King County to build portions of this trail between Renton and Bellevue as part of the upcoming I-405 Renton to Bellevue Widening and Express Toll Lanes construction contract. See the ERC project website at <https://kingcounty.gov/services/parks-recreation/parks/trails/regional-trails/popular-trails/eastside-rail-corridor.aspx>.

For more information on the use of the ERC for rail in the future please see http://your.kingcounty.gov/dnrp/library/parks-and-recreation/documents/cip/ERC_FAQs.pdf.

Comment E18.4

I will not be able to attend, but my voice matters and I want it heard.

Response E18.4

We always welcome feedback and comments from the public. For the latest contact information for our project team members, visit WSDOT's I-405 program website at <https://www.wsdot.wa.gov/Projects/I405/default.htm>.

Comment E19 – Chris Graham, Private Individual, April 11, 2018

From: Chris graham [salaman2122@gmail.com]
Sent: Wednesday, April 11, 2018 9:58 AM
To: I405comments@wsdot.wa.gov
Subject: Stop 405 Tolls

I am strongly against the extension of these toll lanes. You are taking away the HOV lane without adding an additional lane, this will in turn create more congestion on 405. This will create longer commute times and frustration for the people. Please stop the toll lanes.

Chris Graham

I E19.1
I E19.2

Comment E19.1

I am strongly against the extension of these toll lanes.

Response E19.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E19.2

You are taking away the HOV lane without adding an additional lane, this will in turn create more congestion on 405. This will create longer commute times and frustration for the people. Please stop the toll lanes.

Response E19.2

Combined, the I-405 Downtown Bellevue Vicinity Express Toll Lanes Project (Project) and the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project would add one new lane in each direction and convert the existing high-occupancy vehicle (HOV) lane to create a continuous dual-lane express toll lane (ETL) system from downtown Bellevue to SR 167 in Renton. The Project would not change the number of untolled general purpose (GP) lanes. The addition of new ETLs would improve I-405 speed and reliability for drivers who choose to use them.

Overall, the number of people moving through the I-405 corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The existing ETLs (Bellevue to Lynnwood) are benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began. Similarly, the I-405 Renton to Bellevue Widening and Express Toll Lanes construction contract is expected to improve traffic across all lanes, new ETLs and untolled GP lanes, in most areas.

See Section 4.1 of the Environmental Assessment for more information.

Comment E20 – Sue Israel, Private Individual, April 11, 2018

From: SUE ISRAEL [suzau20@comcast.net]
Sent: Wednesday, April 11, 2018 10:35 AM
To: I405comments@wsdot.wa.gov
Subject: STOP ALL TOLLING ON 405

This tolling has to stop. Traffic is absolutely horrible on 405 and the hot lanes are not filled up. This tolling is punishing the people who do not use the hot lanes and they end up in the horrible stop and go traffic.

E20.1

It is time for WSDOT to really take a look at the traffic problems and not just decide it is a good idea because the state is making money on the hot lanes.

E20.2

Second of all, why does WSDOT have to have a company outside of Washington run the hot lanes. Not of this makes sense to a resident who has lived here my whole life.

E20.3

Let's listen to what the residents say that use I-405 and not let the politicians decide what needs to be done.

E20.4

suzau20@comcast.net

Comment E20.1

This tolling has to stop. Traffic is absolutely horrible on 405 and the hot lanes are not filled up. This tolling is punishing the people who do not use the hot lanes and they end up in the horrible stop and go traffic.

Response E20.1

Before the Bellevue to Lynnwood express toll lanes (ETLs) opened, the previous high-occupancy vehicle (HOV) lanes on I-405 were not a reliable option for carpoolers because they were frequently as congested the untolled general purpose (GP) lanes. This is the same for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project). Carpools are often stuck in the same congestion as folks in the untolled GP lanes, receiving little to no benefit from the carpool lanes.

Tolling is a strategic tool to help manage congestion and provide a reliable trip for I-405 users by moving more vehicles and people when traffic is at its worst. Several key components to effectively managing these lanes during peak travel times include dynamic

pricing and changing occupancy requirements to reflect demand levels for the new ETLs at different times of the day.

The I-405 ETLs use dynamic price tolling to provide faster, more predictable trips to transit, carpoolers and toll-paying vehicles. Toll rates in the I-405 ETLs are based on real-time traffic conditions. Every few minutes, the traffic management computer system updates toll rates based on how many cars are in the lanes and how fast they are going. The goal is to use the laws of supply and demand to keep traffic moving. When traffic is flowing smoothly and there is plenty of room in the ETLs, the price is low to encourage cars to get in. When the lanes start to fill up and slow down, the price goes up to discourage too many cars from getting in so that the lanes can keep flowing efficiently.

The existing ETLs between Bellevue and Lynnwood initially opened as a tolled facility operating 24-hours a day, 7-days a week. A few months after opening, the hours of operation were adjusted to 5 a.m. to 7 p.m. on weekdays when demand for lanes is greatest. In addition, the occupancy requirement of 2+ or 3+ varies during the day to help maximize use of the lanes while keeping them moving:

- HOV 2+ travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass.
- During the peak time, HOV 3+ travel for free from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. with a *Good To Go!* pass.
- At all times, transit, HOV 3+, and motorcycles travel for free with a *Good To Go!* pass.
- At all other times and major holidays, the lanes are free and open to all without a *Good To Go!* pass.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. At the height of the peak commute, each new ETL is carrying 20 to 30 percent more vehicles than an untolled GP lane in some places, which helps the entire highway flow more smoothly.

Comment E20.2

It is time for WSDOT to really take a look at the traffic problems and not just decide it is a good idea because the state is making money on the hot lanes.

Response E20.2

See Global Response 1.

Comment E20.3

Second of all, why does WSDOT have to have a company outside of Washington run the hot lanes. Not of this makes sense to a resident who has lived here my whole life.

Response E20.3

See Global Response 2.

Comment E20.4

Let's listen to what the residents say that use I-405 and not let the politicians decide what needs to be done.

Response E20.4

See Global Response 12.

Comment E21 – Michael Dunican, Private Individual, April 11, 2018

From: dunigold@frontier.com [dunigold@frontier.com]
Sent: Wednesday, April 11, 2018 5:40 PM
To: I405comments@wsdot.wa.gov
Subject: Stop All Tolling

The State of Washington needs to end its war on drivers and cars. No road should be tolled in the State with the second highest gas tax min the US. WADOT should live within its means and stop wasting tax dollars on bike lanes, transit and dreaming up ways to tax driving more. Every project done by WADOT has done more to increase congestion and increase commute times for everyone except those in the Lexus lanes. I suggest cutting WADOT staffing by 50% and spend the savings on road construction that is fairly bid on without prevailing wage cost usage. Tolling for roads that we already paid for is unethical.

Michael Dunican
Lake Stevens, WA

E21.1
E21.2
E21.3
E21.4
E21.5

Comment E21.1

The State of Washington needs to end its war on drivers and cars. No road should be tolled in the State with the second highest gas tax min the US.

Response E21.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Original investments through the gas tax are not keeping pace with current demands and needs, and gas tax revenues are declining because of fuel efficiency increases (<https://www.wsdot.wa.gov/publications/fulltext/state-of-transportation/appendixes/state-fuel-tax.htm>).

Comment E21.2

WADOT should live within its means and stop wasting tax dollars on bike lanes, transit and dreaming up ways to tax driving more.

Response E21.2

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) and other express toll lane (ETL) projects are part of the I-405 Master Plan, which is a multimodal plan to manage congestion on the corridor. The vision of the Master Plan includes untolled general purpose (GP) lanes, managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT's ability to manage lanes to provide a reliable trip for users of the corridor. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, it has made substantial investments in untolled GP lanes to address key chokepoints as well as implement the first phase of new ETLs from Bellevue to Lynnwood. WSDOT is committed to building out the full plan as funding becomes available and is working with the Washington State Legislature to fund the master plan.

See Global Response 2.

Comment E21.3

Every project done by WADOT has done more to increase congestion and increase commute times for everyone except those in the Lexus lanes.

Response E21.3

See Global Response 8.

Comment E21.4

I suggest cutting WADOT staffing by 50% and spend the savings on road construction that is fairly bid on without prevailing wage cost usage.

Response E21.4

Comment noted.

The I-405 Downtown Bellevue Vicinity project is required to pay minimum prevailing wages in accordance with Revised Code of Washington (RCW) 39.12 and Washington Administrative Code (WAC) 296-127.

Comment E21.5

Tolling for roads that we already paid for is unethical.

Response E21.5

See Global Response 11.

Comment E22 – Mick Hodges, Private Individual, April 11, 2018

From: Mick Hodges [mickhodges@comcast.net]
Sent: Wednesday, April 11, 2018 8:01 AM
To: I405comments@wsdot.wa.gov
Subject: Stop this illegal tolling

Sent from my iPad

E22.0

Comment E22.0

Stop this illegal tolling

Response E22.0

See Global Response 7.

Comment E23 – Wayne and Karen Swan , Private Individual, April 11, 2018

From: Wayne and Karen Swan [wnkswan@hotmail.com]
Sent: Wednesday, April 11, 2018 11:20 AM
To: I405comments@wsdot.wa.gov
Subject: Taxes not tolls

Please end these ridiculous tolls.
Need money?
Ask for taxes.
Tolls do nothing to prevent congestion and may actually be causing it.

I'll pay for new lanes, just quit making us pay to use them.
Thank you,

Wayne Swan
Get Outlook for Android<<https://aka.ms/ghei36>>

|
| E23.1
|
| E23.2
|

Comment E23.1

Please end these ridiculous tolls. Need money? Ask for taxes.

Response E23.1

See Global Response 1.

Comment E23.2

Tolls do nothing to prevent congestion and may actually be causing it. I'll pay for new lanes, just quit making us pay to use them.

Response E23.2

See Global Response 1.

Comment E24 – Lynnette Lotterer, Private Individual, April 11, 2018

From: Lynnette Lotterer [lynnettelotterer@gmail.com]
Sent: Wednesday, April 11, 2018 8:10 PM
To: I405comments@wsdot.wa.gov
Subject: Toll lane from Renton to Bellevue

Do not take away the HOV lane from Renton to Bellevue.
We do not want another toll lane.
Leave our roads the way they are and quit making things (traffic) worse.

LynnetteLotterer@gmail.com
Sent from my iPad

E24.1

Comment E24.1

Do not take away the HOV lane from Renton to Bellevue. We do not want another toll lane.
Leave our roads the way they are and quit making things (traffic) worse.

Response E24.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not remove the ability for high-occupancy vehicles (HOVs) to use the new express toll lanes (ETLs). The Project would expand the current HOV lane to a new dual ETL. The Washington State Transportation Commission is responsible for establishing the HOV occupancy requirements. It is assumed the new ETLs associated with this Project would operate the same as the existing ETLs that are to the north of this Project (Bellevue to Lynnwood) as follows:

- HOV 2+ travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass.
- During the peak time, HOV 3+ travel for free from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. with a *Good To Go!* pass.

- Transit, HOV 3+, and Motorcycles would travel for free with a *Good To Go!* pass.
- At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass.

See Global Response 8.

Comment E25 – Kathryn Hannaa, Private Individual, April 11, 2018

From: Kathryn Hanna [kathrynhanna5@gmail.com]
Sent: Wednesday, April 11, 2018 8:18 AM
To: I405comments@wsdot.wa.gov
Subject: Toll Lanes

I definitely do not support extending the toll lanes from Bellevue to Renton. There should be other ways to take care of the traffic problems other than charging our citizens.

Thank you.
Kathryn Hanna

]

E25

Comment E25

I definitely do not support extending the toll lanes from Bellevue to Renton. There should be other ways to take care of the traffic problems other than charging our citizens.

Response E25

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Revenue collected from the express toll lanes (ETLs) is used to operate and maintain the roadway and fund additional needs within the I-405 corridor. Two-thirds of the money from each toll helps fund improvements for I-405, such as the northbound peak-use shoulder lane on I-405 between Canyon Park and Lynnwood. The remaining third of the revenue generated by the new ETLs covers operating costs. This includes WSDOT's customer service centers, phone lines, enforcement, and online support.

Comment E26 – Doug Wright, Private Individual, April 11, 2018

From: Doug Wright [doug.wright@me.com]
Sent: Wednesday, April 11, 2018 11:26 AM
To: I405comments@wsdot.wa.gov
Subject: Toll lanes for Bellevue to Renton

Please don't add another toll lane. The toll lanes you already created have had no benefit to the people, only to the government in taxes you collect. Congestion is worse than ever. Please don't take another lane away from us. We need another general purpose lane. The 2 that we have are not enough. And it's not fair that only those that have more disposable income can use the toll lanes.

I must tell you in the 13+ years that I have lived in King County (from Bellingham) it has gotten less and less enjoyable living here. It has gotten more and more expensive to live here and this won't help. I can hardly wait for another 8 years when I can retire, because I plan on moving away from here.

Doug,
Sent from my iPad

I E26.1
I E26.2
I E26.3
I E26.4
I E26.5

Comment E26.1

Please don't add another toll lane.

Response E26.1

The primary purpose of the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) is to provide a reliable trip choice for I-405 users, increase vehicle capacity and person throughput, improve reliability for transit, reduce Project-wide congestion, and improve safety performance.

Washington State is proposing to integrate tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements.

Before the I-405 Bellevue to Lynnwood express toll lanes (ETLs) opened, the previous high-occupancy vehicle (HOV) lanes on I-405 were not a reliable option for carpoolers because they were frequently as congested as the untolled general purpose (GP) lanes. Carpools and transit were often stuck in the same congestion as cars in the untolled GP lanes, receiving little to no benefit from the carpool lanes.

Comment E26.2

The toll lanes you already created have had no benefit to the people, only to the government in taxes you collect. Congestion is worse than ever.

Response E26.2

Revenue collected from the express toll lanes (ETLs) is used to operate and maintain the roadway and fund additional needs within the I-405 corridor. Two-thirds of the money from each toll helps fund improvements for I-405, such as the northbound peak-use shoulder lane on I-405 between Canyon Park and Lynnwood. The remaining third of the revenue generated by the new ETLs covers operating costs. This includes WSDOT's customer service centers, phone lines, enforcement, and online support.

Comment E26.3

Please don't take another lane away from us. We need another general purpose lane. The 2 that we have are not enough.

Response E26.3

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. The toll lanes offer a choice to drivers to pay a toll for a reliable trip when they need it. The Project and other express toll lane (ETL) projects are part of the I-405 Master Plan, which is a multimodal plan to manage congestion on the corridor. The vision of the I-405 Master Plan includes untolled GP lanes, managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT's ability to manage lanes to provide a reliable trip for users of the corridor. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, it has made substantial investments in untolled GP lanes to address key chokepoints as well as implement the first phase of ETLs from Bellevue to Lynnwood. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund the master plan.

Comment E26.4

And it's not fair that only those that have more disposable income can use the toll lanes.

Response E26.4

See Response E26.3.

Comment E26.5

I must tell you in the 13+ years that I have lived in King County (from Bellingham) it has gotten less and less enjoyable living here. It has gotten more and more expensive to live here and this won't help. I can hardly wait for another 8 years when I can retire, because I plan on moving away from here.

Response E26.5

The Puget Sound region is experiencing unprecedented growth, including the communities around I-405, causing some of the worst congestion in the state. Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements.

Comment E27 – Nesiha Love, Private Individual, April 11, 2018

<p><u>From:</u> nesiha love [nesihalove@gmail.com] <u>Sent:</u> Wednesday, April 11, 2018 9:14 AM <u>To:</u> I405comments@wsdot.wa.gov <u>Subject:</u></p> <p>We don't need toll please stop them</p>	E27.0
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Comment E27.0

We don't need toll please stop them.

Response E27.0

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to fund new facilities and manage traffic throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment 28 – Derrick Fargo

Derrick Fargo, Private Individual, April 11, 2018 (28)

From: Derrick Fargo [admmcf@gmail.com]
Sent: Wednesday, April 11, 2018 2:36 PM
To: I405comments@wsdot.wa.gov
Cc: Michael Krahn; Natalya Krahn
Subject: We Oppose The Tolls

I am writing on behalf of myself, Michael Krahn, and Natalya Krahn (who are cc'd on this email)
We are against extended toll lanes from Bellevue to Renton.

We pay enough to drive on our roads as it is.

Please take this message to our representative and to the WSDOT: "NO MORE TOLLS!"

--
Derrick Fargo
Administrative Assistant
Manna Cashflow, LLC
direct: 425-998-7909
office 404.800.5751 ext. 2
cell: 360.224.9973

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E28.0

Comment E28.0

I am writing on behalf of myself, Michael Krahn, and Natalya Krahn (who are cc'd on this email). We are against extended toll lanes from Bellevue to Renton. We pay enough to drive

on our roads as it is. Please take this message to our representative and to the WSDOT: "NO MORE TOLLS!"

Response E28.0

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to fund new facilities and manage traffic throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E29 – Paul D. Talbott, Private Individual, April 11, 2018

From: Paul Talbott [pault@tciincgc.com]
Sent: Wednesday, April 11, 2018 10:34 AM
To: I405comments@wsdot.wa.gov
Subject: We the People!

It is time to purge the leadership of WSDOT who have been in charge of one boondoggle after another in their ridiculous efforts to do away with automobiles. Quit trying to turn the United States into Europe. We love our independence and our automobiles. I-405 should be twice if not three times the size it is! Reducing the capacity is ABSOLUTELY UNACCEPTABLE!

E29.0

Paul D. Talbott / President
TCI Inc.
General Contractors
<http://www.tciincgc.com><<http://www.tciincgc.com>>
13500 Bel Red Road Suite #9
Bellevue, WA 98005
425-454-5310

Comment E29.0

It is time to purge the leadership of WSDOT who have been in charge of one boondoggle after another in their ridiculous efforts to do away with automobiles. Quit trying to turn the

United States into Europe. We love our independence and our automobiles. I-405 should be twice if not three times the size it is! Reducing the capacity is ABSOLUTELY UNNACCEPTABLE!

Response E29.0

The Puget Sound region is experiencing unprecedented growth including the communities around I-405 causing some of the worst congestion in the state. In 2002, WSDOT developed a multimodal vision for the corridor to move more people and manage congestion along I-405, which was to be completed by 2020. This vision supported by agencies at local, state and federal levels, specifically included multimodal elements. These include managed lanes, Bus Rapid Transit (BRT), park and rides, and pedestrian and bicycle improvements. WSDOT is committed to building out the full plan as funding becomes available and is working with the Washington State Legislature to fund the I-405 Master Plan.

Comment E30 – P. Gerald Marra, Private Individual, April 12, 2018

From: Gerry Marra [pgmarra@hotmail.com]
Sent: Thursday, April 12, 2018 8:49 PM
To: I405comments@wsdot.wa.gov
Subject: A solid NO to more toll lanes on I-405

Your adding more toll lanes to I-405 south of Bellevue is not wanted or needed. The toll lanes north of Bellevue on I-405 are a total waste of money and do nothing to encourage drivers to get to their destination in a timely manner. Stop this unwanted nonsense NOW with more tolls! I am on the verge of having to sell my house and move out of this area due mainly to the excessive charges for my car tags. You folks are in never never land.

P. Gerald Marra
Bellevue, WA 98008
425-641-6955

I E30.1
I E30.2
I E30.3

Comment E30.1

Your adding more toll lanes to I-405 south of Bellevue is not wanted or needed.

Response E30.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

The Puget Sound region is experiencing unprecedented growth, including the communities around I-405, causing some of the worst congestion in the state. Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location.

The I-405 Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would add a new express toll lane (ETL) in each direction through this area, which would improve overall operations. In addition, WSDOT is proposing the I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would also add a southbound untolled general purpose (GP) lane from I-90 to 112th Avenue NE and southbound I-405 to eastbound I-90 ramp improvements.

As a result of these capacity improvements traffic congestion would greatly improve in this area. Please see Section of 4.1 of the Transportation Discipline Report for more details.

Comment E30.2

The toll lanes north of Bellevue on I-405 are a total waste of money and do nothing to encourage drivers to get to their destination in a timely manner.

Response E30.2

Before the Bellevue to Lynnwood express toll lanes (ETL) opened, the previous high-occupancy vehicle (HOV) lanes on I-405 were not a reliable option for carpoolers because they were frequently as congested the untolled general purpose (GP) lanes. Carpools were often stuck in the same congestion as folks in the untolled GP lanes, receiving little to no benefit from the carpool lanes.

The express toll lanes bring reliability to transit and provide drivers a choice. Today, WSDOT's analysis shows that untolled GP lanes in most place between Bellevue and Lynnwood are moving faster than they did before the express toll lanes opened. As a result, transit on I-405 is saving up to 11 minutes and ridership has increased 9 percent. ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began (see the I-405 ETL performance reports on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>).

Comment E30.3

Stop this unwanted nonsense NOW with more tolls! I am on the verge of having to sell my house and move out of this area due mainly to the excessive charges for my car tags. You folks are in never never land.

Response E30.3

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. The toll lanes offer a choice to drivers to pay a toll for a reliable trip when they need it.

Revenue collected from the express toll lanes (ETLs) is used to operate and maintain the roadway and fund additional needs within the I-405 corridor. Two-thirds of the money from each toll helps fund improvements for I-405, such as the northbound peak-use shoulder lane on I-405 between Canyon Park and Lynnwood. The remaining third of the revenue generated by the new ETLs covers operating costs. This includes WSDOT's customer service centers, phone lines, enforcement, and online support.

Comment E31 – Mike Miller, Private Individual, April 12, 2018

From: Mike Miller [mkmiller4444@gmail.com]
Sent: Thursday, April 12, 2018 5:51 PM
To: I405comments@wsdot.wa.gov
Subject: Downtown Bellevue EA comment

Greetings,

I have been a resident of Bellevue my entire 50 years, driving I-405 for 34 years. I certainly hope that this project gets a major revision and add 2-3 lanes in each direction. Lets not be so short sighted again, as we have for several decades. We all know it will need another lane, just as soon as this new one is completed. So, as any smart business would do, build for the future, not to catch up with the past.

E31.1

I know the argument will be, it costs XX more to do it, and its not in the budget. Well, it will cost 10X that in 15 years to do it, so bite the bullet, toll everyone, as it is inevitable, and build the future capacity that will be needed. I can't understand how shortsighted the people that make this decisions are in not seeing we need 5-6 lanes in each direction. (That goes for I-5, 167, I-90, and the debacle that is 520.)

E31.2

I went to Bellevue High school in the mid-1980's. We would go for lunch at Dick's on NE 45th in the U-district, and make it back for the next period with time to spare. We had the correct capacity back then, why can't you do it today?

E31.3

I drive 25,000+ miles a year in outside sales in this town, and it is just stupid how long it takes to get from place. Today alone it took me 75 minutes to go from NE 45th in the U-district, to the east hill of Kent, at about 3:00PM. That is 26 miles! Why do you think Boeing, Amazon, and others are looking or have already moved their headquarters? The huge cost of doing business, and lost time in traffic, is going to have the most impact on our local economy. Far more cost to us than adding the correct number of lanes.

E31.4

This is not that hard to figure out, just get it done, and save future generations billions!

E31.5

Mike Miller

Comment E31.1

Greetings,

I have been a resident of Bellevue my entire 50 years, driving I-405 for 34 years. I certainly hope that this project gets a major revision and add 2-3 lanes in each direction. Lets not be so short sighted again, as we have for several decades. We all know it will need another lane, just as soon as this new one is completed. So, as any smart business would do, build for the future, not to catch up with the past.

Response E31.1

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) and other express toll lane (ETL) projects are part of the I-405 Master Plan to address corridor-wide problems. Fixing congestion is the highest priority and WSDOT is working with the legislature to fund other investments consistent with the I-405 Master Plan.

The long-term I-405 Master Plan includes one additional untolled general purpose (GP) lane in each direction between Bellevue and Renton. This Project is currently unfunded, and its timeline is unclear. WSDOT is committed to building out the full plan as funding becomes available.

Implementation of the master plan requires funding that is not currently allocated by the Legislature. WSDOT will continue to provide high priority projects to the Washington State Legislature as we work to fully build the master plan.

Comment E31.2

I know the argument will be, it costs XX more to do it, and its not in the budget. Well, it will cost 10X that in 15 years to do it, so bite the bullet, toll everyone, as it is inevitable, and build the future capacity that will be needed. I can't understand how shortsighted the people that make this decisions are in not seeing we need 5-6 lanes in each direction. (That goes for I-5, 167, I-90, and the debacle that is 520.)

Response E31.2

See Response E31.1.

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Original investments through the gas tax are not keeping pace with current demands and needs, and gas tax revenues are declining because of fuel efficiency increases (<https://www.wsdot.wa.gov/publications/fulltext/state-of-transportation/appendixes/state-fuel-tax.htm>).

Comment E31.3

I went to Bellevue High school in the mid-1980's. We would go for lunch at Dick's on NE 45th in the U-district, and make it back for the next period with time to spare. We had the correct capacity back then, why can't you do it today?

Response E31.3

The capacity today exceeds the available lane space. Overall, the number of people moving through the I-405 corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods. The express toll lanes (ETLs) move more vehicles and people when traffic is at its worst compared to a regular lane. When drivers choose to leave the regular lanes to use the ETLs instead, they free up space for the other drivers around them. Building more general purpose (GP) lanes would not solve the need of the growing population forecasts.

Comment E31.4

I drive 25,000+ miles a year in outside sales in this town, and it is just stupid how long it takes to get from place. Today alone it took me 75 minutes to go from NE 45th in the U-district, to the east hill of Kent, at about 3:00PM. That is 26 miles! Why do you think Boeing, Amazon, and others are looking or have already moved their headquarters? The huge cost of doing business, and lost time in traffic, is going to have the most impact on our local economy. Far more cost to us than adding the correct number of lanes.

This is not that hard to figure out, just get it done, and save future generations billions!

Response E31.4

See Responses E31.1, E31.2, and E31.3.

Comment E32 – Roger Heimdahl, Private Individual, April 12, 2018

From: D&R Heimdahl [dar.rog@comcast.net]
Sent: Thursday, April 12, 2018 9:16 AM
To: I405comments@wsdot.wa.gov
Subject: enough already with the tolls

We are already having to pay illegal tolls on 405 north of Bellevue just because there are those that do not know the difference between the meanings of the words AND and OR. (and of course because it is a cash cow and provides extra lanes for the rich). I doubt this or any other email that is against tolling will do anything because I believe those in charge have already decided what the outcome is that they want and will stick with it no matter what anyone else thinks. Follow the money.

E32.1

E32.2

Roger Heimdahl

Comment E32.1

We are already having to pay illegal tolls on 405 north of Bellevue just because there are those that do not know the difference between the meanings of the words AND and OR. (and of course because it is a cash cow and provides extra lanes for the rich).

Response E32.1

See Global Response 7.

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. The new ETLs offer a choice to drivers to pay a toll for a reliable trip when they need it.

Comment E32.2

I doubt this or any other email that is against tolling will do anything because I believe those in charge have already decided what the outcome is that they want and will stick with it no matter what anyone else thinks. Follow the money.

Response E32.2

WSDOT and other regional transportation agencies are genuinely interested in hearing from the public and addressing public concerns.

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to fund new facilities and manage traffic throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E33 – Renay Bennett, Private Individual, April 12, 2018

From: Renay Bennett [renaybennett@msn.com]
Sent: Thursday, April 12, 2018 8:09 PM
To: I405comments@wsdot.wa.gov
Subject: No more tolls!

The state has not met their own laws to continue this, so why are we even talking about this?! Stop making life hard for regular working people and END THE TOLL LANES!!!
Renay Bennett

E33.1

E33.2

Comment E33.1

The state has not met their own laws to continue this, so why are we even talking about this?!

Response E33.1

See Global Response 7.

Comment E33.2

Stop making life hard for regular working people and END THE TOLL LANES!!!

Response E33.2

See Response E16.0.

Comment E34 – Roy Hurlbut, Private Individual, April 12, 2018 (34)

From: Roy Hurlbut [reh3173@hotmail.com]
Sent: Thursday, April 12, 2018 9:07 AM
To: I405comments@wsdot.wa.gov
Subject: Stop It Now

The 405 tolling is a disaster. Traffic is worse than ever and everyone is behaving badly in the left lane and the road is UNSAFE! Get rid of the tolling fiasco experiment!!

I E34.1
I E34.2
I E34.3

Roy Hurlbut

Redmond, WA

Comment E34.1

The 405 tolling is a disaster.

Response E34.1

See Global Response 8.

Comment E34.2

Traffic is worse than ever and everyone is behaving badly in the left lane and the road is UNSAFE!

Response E34.2

See Global Responses 1 and 3.

Comment E34.3

Get rid of the tolling fiasco experiment!!

Response E34.3

See Global Response 1.

Comment E35 – Daniel Burnstein, Private Individual, April 13, 2018

From: Burnstein & Gershman [jogdanbu@drizzle.com]
Sent: Friday, April 13, 2018 7:19 PM
To: I405comments@wsdot.wa.gov
Subject: No more toll lanes on 405!

Please do not create more toll lanes on I-405. They are unjust, providing privileged transportation for those who can pay while increasing the drive time of those in the non-toll lanes.

I E35.1
I E35.2

Daniel Burnstein
2106 48th Ave SW
Seattle, WA 98116

Comment E35.1

Please do not create more toll lanes on I-405.

Response E35.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and to fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E35.2

They are unjust, providing privileged transportation for those who can pay while increasing the drive time of those in the non-toll lanes.

Response E35.2

See Global Response 10.

In the Bellevue to Lynnwood project, the untolled general purpose (GP) lanes would move faster today than they did before the express toll lanes (ETLs) opened as travel times are 2 to 7 minutes shorter than they were before tolling began.

Comment E36 – Pamela Turner, Private Individual, April 14, 2018

From: Ed and Pam [ebbypam@comcast.net]
Sent: Saturday, April 14, 2018 10:25 AM
To: I405comments@wsdot.wa.gov
Subject: "Hot" lanes

Good morning,

As a long time resident of Bellevue (since 1974), and an obvious frequent user of I-405, please take the following comments seriously. E36.1

I have no problem with combining HOV and toll lanes. However, I have a big, big problem with these lanes taking more up two lanes. Your stated goal is to move traffic quicker with less congestion. How in the world does taking away from the general purpose lanes accomplish this? You are favoring the well-to-do over the rest of us. Please, just once, think of the pollution that is caused by all the cars in the general purpose lanes either sitting or moving ever so slowly during rush hour. It is far worse than if cars were moving along at a reasonable speed. E36.2

If you absolutely insist that there be two toll lanes, at the very minimum you could add another general purpose lane. I know that the toll lanes are "cash cows" for the state government – use some of that for the rest of us. If people want to use the toll lanes, that is perfectly fine with me. I don't believe our government is evil, or trying to make life miserable for anyone not earning six figures, but these toll lanes are infuriating to the vast majority of people using I-405. E36.3
E36.4
E36.5

Pamela Turner

[X]<https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=emailclient&utm_term=icon> Virus-free. www.avast.com<https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=emailclient&utm_term=link>

Comment E36.1

As a long time resident of Bellevue (since 1974), and an obvious frequent user of I-405, please take the following comments seriously. I have no problem with combining HOV and toll lanes. However, I have a big, big problem with these lanes taking more up two lanes. Your stated goal is to move traffic quicker with less congestion. How in the world does taking away from the general purpose lanes accomplish this?

Response E36.1

See Global Response 5.

Comment E36.2

You are favoring the well-to-do over the rest of us.

Response E36.2

See Global Response 10.

Comment E36.3

Please, just once, think of the pollution that is caused by all the cars in the general purpose lanes either sitting or moving ever so slowly during rush hour. It is far worse than if cars were moving along at a reasonable speed.

If you absolutely insist that there be two toll lanes, at the very minimum you could add another general purpose lane.

Response E36.3

See Global Responses 8.

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. Additionally, the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which is intended to be constructed at the same time as the Project, would add southbound untolled GP lanes from I-90 to 112th Avenue NE, between NE 44th Street and NE 30th Street, and make southbound I-405 to eastbound I-90 ramp improvements. As a result of these capacity improvements, traffic congestion would greatly improve in this area. Please see Section 5 of the Transportation Discipline Report. The Environmental Assessment (pages 4-2 to 4-7) finds that air quality will be similar with or without the Project.

Comment E36.4

I know that the toll lanes are “cash cows” for the state government – use some of that for the rest of us

Response E36.4

See Global Response 2.

Comment E36.5

If people want to use the toll lanes, that is perfectly fine with me. I don't believe our government is evil, or trying to make life miserable for anyone not earning six figures, but these toll lanes are infuriating to the vast majority of people using I-405.

Response E36.5

See Global Response 12.

Comment E37 – Anita Skoog, Private Individual, April 14, 2018

From: Anita Skoog [askoog@outlook.com]
Sent: Saturday, April 14, 2018 12:01 PM
To: I405comments@wsdot.wa.gov
Subject: I-405 Express Toll Lanes in Bellevue

WSDOT

Subject: I-405 Express Toll Lanes in Bellevue

Sounds like you're having an Open House not a Public Hearing April 17 at Bellevue City Hall.
"Our project team will be ready to answer your questions".....

Either way, you don't care what the public thinks. But you'll be able to say you had "robust public input". BS!

I will NEVER use an express lane - unless the highway – can't call it a freeway anymore! – is burning down.

But you don't care.

Hope you live a miserable life in the brave new world you are creating.

Long Time Bellevue Resident

E37.1

E37.2

Comment E37.1

Sounds like you're having an Open House not a Public Hearing April 17 at Bellevue City Hall. "Our project team will be ready to answer your questions"..... Either way, you don't care what the public thinks. But you'll be able to say you had "robust public input". BS!

Response E37.1

WSDOT and other regional transportation agencies are genuinely interested in hearing from the public and addressing public concerns. Members of the public have been invited to review and provide input starting in 1998, when WSDOT, Federal Highway Administration (FHWA), King County Metro Transit, and local jurisdictions came together to address congestion and improve mobility in the I-405 corridor, as well as in 2010 as part of the I-405 and SR 167 Eastside Corridor Tolling Study.

Before we opened the express toll lanes (ETLs), we conducted multiple focus groups of a diverse set of drivers who use I-405 or the SR 167 high-occupancy toll (HOT) lanes. These focus groups showed participants across all income ranges to be supportive of HOT lanes, stating their support of choices to return home faster or spend more time with family or friends.

More recent surveys of customers who have used the ETLs also found high satisfaction with the value of the ETLs across all income levels, with no statistical correlation between income and satisfaction.

Extensive public involvement with communities along the I-405 corridor continues today through regular open houses, hearings, neighborhood meetings, city council and civic group briefings, and other correspondence. We always welcome feedback and comments from the public. For the latest contact information for our project team members, visit WSDOT's I-405 program website at <https://www.wsdot.wa.gov/Projects/I405/default.htm>.

Comment E37.2

I will NEVER use an express lane - unless the highway – can't call it a freeway anymore! – is burning down. But you don't care. Hope you live a miserable life in the brave new world you are creating.

Response E37.2

Comment noted.

Comment E38 – Andrea, Private Individual, April 15, 2018

From: Andrea Andrea [andrea.jeffress@gmail.com]
Sent: Sunday, April 15, 2018 11:42 AM
To: I405comments@wsdot.wa.gov
Subject: Toll Lanes

I hear that there is a proposal to eliminate HOV lanes in favor of expanding the toll lanes. I happen to think that this is a really disgusting idea because it is elitist, making it laborious and prohibitive for people of lesser means. If living in a Democracy means screw the poor, then we have arrived.

E38.0

Comment E38.0

I hear that there is a proposal to eliminate HOV lanes in favor of expanding the toll lanes. I happen to think that this is a really disgusting idea because it is elitist, making it laborious

and prohibitive for people of lesser means. If living in a Democracy means screw the poor, then we have arrived.

Response E38.0

See Global Response 10.

Comment E39 – Amy Shoukry, Private Individual, April 16, 2018

From: Amy S [amyandtherain@hotmail.com]
Sent: Monday, April 16, 2018 6:31 PM
To: I405comments@wsdot.wa.gov
Subject: Against Toll Lanes

As a person who makes a trip to the airport for myself or a family member's visit at least once a month on top of other travel down 405 through Renton. This is a horrible idea. This will push more traffic through Issaquah and highway 18 and 900. This area is already struggling, congested, and subject to fatalities. E39.1

I use the existing carpool lane every time I take 405 south from i90 and I do not want a tracker. I refuse to get one for use on 405 north of Bellevue even though I always have 3 or more in the vehicle. The adjustments to toll lanes there was a disaster and anyone who says different is obviously lying. Just look at your own statistics. E39.2

During commute times using the car pool lane on 405 only saves drivers about 10 minutes at best between the airport and i90 because it is congested. We are all in this together. If you really need to make a change then open up the carpool lane for everyone. Not my favorite, but better than wasting 2 lanes that no one can use. E39.3

People in King county are already taxed to the limit on car tabs and using the 520 bridge. If no tolls= leaving like it is, then, leave it like it is. E39.4

Amy Shoukry E39.5

Comment E39.1

As a person who makes a trip to the airport for myself or a family member's visit at least once a month on top of other travel down 405 through Renton. This is a horrible idea. This will push more traffic through Issaquah and highway 18 and 900. This area is already struggling, congested, and subject to fatalities.

Response E39.1

See Global Response 4.

Comment E39.2

I use the existing carpool lane every time I take 405 south from i90 and I do not want a tracker. I refuse to get one for use on 405 north of Bellevue even though I always have 3 or more in the vehicle.

Response E39.2

It is assumed the new express toll lanes (ETLs) would operate from 5 a.m. to 7 p.m. on weekdays. At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass. If in the future you would like to be able to use the new ETL lanes for free, and would like to purchase a transponder, you can access information about Good to Go! passes at <http://www.wsdot.wa.gov/GoodToGo/default.htm>.

Comment E39.3

The adjustments to toll lanes there was a disaster and anyone who says different is obviously lying. Just look at your own statistics. During commute times using the car pool lane on 405 only saves drivers about 10 minutes at best between the airport and i90 because it to, is congested.

Response E39.3

See Global Response 1.

Comment E39.4

We are all in his together. If you really need to make a change then open up the carpool lane for everyone. Not my favorite, but better than wasting 2 lanes that no one can use.

Response E39.4

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new throughout the state. Having a free-flow option moves more vehicles and people overall than just adding another untolled general purpose (GP) lane, which would quickly become another stop-and-go lane. Express toll lanes (ETLs) give drivers a choice to pay a toll for a reliable trip when they need it. They also bring back predictability and speed for carpoolers and transit users, who us the lanes toll-free, by keeping traffic moving reliably.

Comment E39.5

People in King county are already taxed to the limit on car tabs and using the 520 bridge. If no tolls= leaving like it is, then, leave it like it is.

Response E39.5

The Transportation Discipline Report evaluated a No Build Alternative and found that without the improvements traffic conditions would continue to deteriorate. Please see the Transportation Discipline Report pages 5-1 through 5-20.

Comment E40 – Jeff Freeman, Private Individual, April 16, 2018

From: Jeff [freebuzz2000@comcast.net]
Sent: Monday, April 16, 2018 11:59 AM
To: I405comments@wsdot.wa.gov
Subject: Downtown Bellevue EA comment

I frequently travel I405 and wanted to give a comment about the proposed and current Express Toll lanes. I am completely against this failed notion. It does not improve traffic times, reduces a lane for general traffic, and is completely useless for the poor who cannot afford the extra tolls for the “fast” lane. Time should be spent researching ways to reduce all traffic congestion, not giving rich people a lane to use exclusively. We need smart onramps and traffic flow solutions and increased general traffic lanes. Please do not implement another “rich” lane that does not fully address the terrible traffic we have along the 405 corridor.

Thoughtfully Yours,

Jeff Freeman

E40.1
E40.2
E40.3
E40.4

Comment E40.1

I frequently travel I405 and wanted to give a comment about the proposed and current Express Toll lanes. I am completely against this failed notion.

Response E40.1

See Global Response 1.

Comment E40.2

It does not improve traffic times, reduces a lane for general traffic, and is completely useless for the poor who cannot afford the extra tolls for the “fast” lane.

Response E40.2

See Global Responses 5 and 10.

Comment E40.3

Time should be spent researching ways to reduce all traffic congestion, not giving rich people a lane to use exclusively. We need smart onramps and traffic flow solutions and increased general traffic lanes.

Response E40.3

The new I-405 express toll lanes (ETLs) are one piece of a long-term set of improvements for the corridor that includes all modes of transportation. The plan includes all transportation modes, including new lanes in each direction, a corridor-wide Bus Rapid Transit (BRT) line and bicycle and pedestrian paths. The plan aims to address bottlenecks such as the SR 167, SR 520, SR 522 and I-90 interchanges, improve key arterials, build new transit centers, and add about 1,700 new vanpools and over 5,000 park and ride spaces. Other features of the I-405 Master Plan include new lanes in each direction, local street improvements, transit improvements (including a new BRT system), and bicycle and pedestrian improvements. Starting more than a decade ago, WSDOT has worked with cities, counties, federal agencies, transit agencies and community groups to develop consensus on a long-term vision for the multimodal redevelopment of this highway. For more information on the I-405 Master Plan, visit <https://www.wsdot.wa.gov/Projects/I405/I405MasterPlan.htm>.

Comment E40.4

Please do not implement another “rich” lane that does not fully address the terrible traffic we have along the 405 corridor.

Response E40.4

See Global Responses 5 and 10.

Comment E41 – Dyana Stevens, Private Individual, April 16, 2018

From: Dyana Stevens [dyana.stevens@gmail.com]
Sent: Monday, April 16, 2018 4:06 PM
To: I405comments@wsdot.wa.gov
Subject: HOT lanes Bellevue to Renton

Hello,

I think this is a fabulous idea. I find that traffic from Bellevue to Renton and vice versa is a nightmare, even if I do have an extra person for the carpool lane. The HOT lanes have made a huge difference Lynnwood to Bellevue, I'd love to see it extended.

Thanks!

E41.0

Comment E41.0

I think this is a fabulous idea. I find that traffic from Bellevue to Renton and vice versa is a nightmare, even if I do have an extra person for the carpool lane. The HOT lanes have made a huge difference Lynnwood to Bellevue, I'd love to see it extended.

Response E41.0

The primary purpose of the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) is to provide a reliable trip choice for I-405 users, increase vehicle capacity and person throughput, improve reliability for transit, reduce Project-wide congestion, and improve safety performance.

Washington State is proposing to integrate tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements.

The express toll lanes (ETLs) between Bellevue and Lynnwood have improved vehicle and people throughput, provide drivers a choice for a faster trip and raised revenue to reinvest in the corridor. The ETLs have improved reliability for transit and buses traveling on I-405 are saving up to 11 minutes and ridership has increased up to 9 percent.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. The ETLs are also providing benefits for drivers in the untolled general

purpose (GP) lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began.

See also the I-405 express toll lanes performance reports located on the WSDOT website: <https://www.wsdot.wa.gov/Tolling/405/library.htm>.

Comment E42 – Angela Pederzani, Private Individual, April 16, 2018

From: A P [lovestorain@hotmail.com]
Sent: Monday, April 16, 2018 8:02 PM
To: I405comments@wsdot.wa.gov
Subject: No 405 tolls

To whom it may concern,
As a resident of Renton, and a regular driver of 405 I do not support the extension of 405 tolls. Since the installation of the 405 tolls north of Bellevue, there has been a SIGNIFICANT increase in traffic cutting through my neighborhood to avoid 405. Maple Valley Highway has become clogged by traffic that was never there before with people avoiding 405. An extension of the tolls will NOT help that, it will make it far worse.

I have not heard one person in favor of the tolls currently in place, nor anyone in favor of the extension. I urge you to actually listen to the people who LIVE and WORK in this area, this tolling will not solve anything.

Angela Pederzani

Sent from my iPhone

E42.1

E42.2

E42.3

Comment E42.1

To whom it may concern,

As a resident of Renton, and a regular driver of 405 I do not support the extension of 405 tolls.

Response E42.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

See Global Response 1.

Comment E42.2

Since the installation of the 405 tolls north of Bellevue, there has been a SIGNIFICANT increase in traffic cutting through my neighborhood to avoid 405. Maple Valley Highway has become clogged by traffic that was never there before with people avoiding 405. An extension of the tolls will NOT help that, it will make it far worse.

Response E42.2

See Global Response 4.

Comment E42.3

I have not heard one person in favor of the tolls currently in place, nor anyone in favor of the extension. I urge you to actually listen to the people who LIVE and WORK in this area, this tolling will not solve anything.

Response E42.3

See Global Response 12.

Comment E43 – Linda Bosshart, Private Individual, April 16, 2018

From: WAYNE [wmboss@comcast.net]
Sent: Monday, April 16, 2018 8:46 PM
To: I405comments@wsdot.wa.gov
Subject: No toll lanes

Please do not add toll lanes from Bellevue to Renton on I405. On top of tolls, the proposal will also up car occupancy to three. Two is a good number to encourage carpooling. Stop the pillage of those of us on the east side. In Renton, we should have had light rail. I have no idea who thought this new process up, but I am pretty sure they don't drive over here regularly. Please go to the legislature and find your road funding in another process.

Sincerely,
Linda Bosshart
45 year Renton resident

Sent from XFINITY Connect Mobile App

I E43.1
I E43.2
I E43.3
I E43.4
I E43.5

Comment E43.1

Please do not add toll lanes from Bellevue to Renton on I405.

Response E43.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling,

WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

See also Global Response 1.

Comment E43.2

On top of tolls, the proposal will also up car occupancy to three. Two is a good number to encourage carpooling. Stop the pillage of those of us on the east side

Response E43.2

Before the Bellevue to Lynnwood express toll lanes (ETLs) opened, the previous high-occupancy vehicle (HOV) lanes on I-405 were not a reliable option for carpoolers because they were frequently as congested the regular lanes. This is the same for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project). Carpools are often stuck in the same congestion as folks in the regular lanes, receiving little to no benefit from the carpool lanes. New ETLs and the occupancy requirement are necessary to make these lanes run more smoothly at peak times.

See also Global Response 6.

Comment E43.3

In Renton, we should have had light rail.

Response E43.3

Comment noted. The current funded project does not include light rail.

Comment E43.4

I have no idea who thought this new process up, but I am pretty sure they don't drive over here regularly.

Response E43.4

The current, funded project does not include light rail. Light rail projects are currently under construction by Sound Transit in several locations. For this Project, WSDOT is working with Sound Transit to implement Bus Rapid Transit (BRT) on I-405 from Lynnwood to Burien by 2024. The I-405 Master Plan (www.wsdot.wa.gov/Projects/i405/corridor/feis), which was developed in partnership with corridor residents, businesses, elected officials, and local governments in 2002, selected BRT as the preferred high-capacity transit system for the east side of Lake Washington.

For more information, visit Sound Transit's website at <https://www.soundtransit.org/projects-and-plans/bus-rapid-transit-i-405>.

Comment E43.5

Please go to the legislature and find your road funding in another process.

Response E43.5

See Global Response 11.

Comment E44 – Sean Walsh, Private Individual, April 16, 2018

From: Sean Walsh [benbobclark@gmail.com]
Sent: Monday, April 16, 2018 6:51 PM
To: I405comments@wsdot.wa.gov
Subject: Toll lanes

To whom it may concern,

Do NOT put in more toll lanes! The ones we currently have do NOT help the flow of traffic and are illegal in many ways. The voters had NO say in the matter! If you want to fix traffic, I suggest you widen the freeway by putting in more general purpose lanes. I know many people would be more than happy to pay a little toll to cover the expenses of extra GP lanes, but the idea that people will want to pay now for what used to be free is insane! What you do in this situation will show your true colors in regards to traffic. If more toll lanes are put in, you will expose yourselves as greedy, power-hungry pigs who have no concern for the well being of the citizens who put you in office to begin with. FIX THIS MESS!

Sincerely,
Sean Walsh

E44.1
E44.2
E44.3
E44.4

Comment E44.1

To whom it may concern, Do NOT put in more toll lanes!

Response E44.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State

Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

See Global Response 1.

Comment E44.2

The ones we currently have do NOT help the flow of traffic and are illegal in many ways. The voters had NO say in the matter!

Response E44.2

See Global Responses 7 and 8.

Comment E44.3

If you want to fix traffic, I suggest you widen the freeway by putting in more general purpose lanes.

I know many people would be more than happy to pay a little toll to cover the expenses of extra GP lanes, but the idea that people will want to pay now for what used to be free is insane! What you do in this situation will show your true colors in regards to traffic.

Response E44.3

See Global Response 8.

Comment E44.4

If more toll lanes are put in, you will expose yourselves as greedy, power-hungry pigs who have no concern for the well being of the citizens who put you in office to begin with. FIX THIS MESS!

Response E44.4

See Response E44.1.

Comment E45 – Janell Wildermuth, Private Individual, April 16, 2018

From: Janell Wildermuth [janellwild@comcast.net]
Sent: Monday, April 16, 2018 7:31 PM
To: I405comments@wsdot.wa.gov
Subject: Tolling more of I405-NO

I can't even fathom your thinking. The tolls on I405 through Bellevue etc, have not met their goals and have infuriated so many. Why would you think repeating the disaster is a good idea? We pay for the roads why not let us use them? I pray you will not impose tolls on I405 through Renton and if I must march I will, anything to stop this travesty.

I E45.1
I E45.2
I E45.3

Janell Wildermuth
Renton, WA 98059

Kathy Clancy
Bellevue, WA

Comment E45.1

I can't even fathom your thinking. The tolls on I405 through Bellevue etc, have not met their goals and have infuriated so many.

Response E45.1

See Global Response 7.

Comment E45.2

Why would you think repeating the disaster is a good idea? We pay for the roads why not let us use them?

Response E45.2

See Global Response 1.

Comment E45.3

I pray you will not impose tolls on I405 through Renton and if I must march I will, anything to stop this travesty.

Response E45.3

See Global Response 1.

Comment E46 – Kris Otnes, Private Individual, April 17, 2018

From: Kris Otnes [otnesk@gmail.com]
Sent: Tuesday, April 17, 2018 8:25 AM
To: I405comments@wsdot.wa.gov
Subject: ETL Expansion

Hello,

I'd like to unequivocally state that I'm completely opposed to any expansion of the HOT lanes on 405. The initial segment from Bellevue to Lynnwood has been a failure and WSDOT should not have ever used public funds to create these tolling lanes.

This expansion is worse than doing nothing at all.

Thanks,

Kris Otnes

E46.1

E46.2

Comment E46.1

I'd like to unequivocally state that I'm completely opposed to any expansion of the HOT lanes on 405.

Response E46.1

Washington State is integrating tolling as a strategic tool to help manage congestion, enhance mobility, and generate revenue for future improvements. When studying tolling, WSDOT evaluates the funding and congestion-management needs for a corridor along with impacts on and benefits to the transportation system and surrounding communities.

Since 2007, WSDOT has implemented a range of tolled projects that are helping to manage traffic and fund new facilities throughout the state. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Comment E46.2

The initial segment from Bellevue to Lynnwood has been a failure and WSDOT should not have ever used public funds to create these tolling lanes. This expansion is worse than doing nothing at all.

Response E46.2

See Global Response 1.

Comment E47 – Tomas Vetrovsky, Private Individual, April 18, 2018

From: Tomas Vetrovsky [tomasv@tomasv.com]
Sent: Wednesday, April 18, 2018 4:38 PM
To: I405comments@wsdot.wa.gov
Subject: I-405 - Renton to Bellevue Widening and Express Toll Lanes

Hi,

I have reviewed the proposal and have few concerns as someone who commutes to Bellevue every day for work.

However one of them is very critical and that is the elimination of the south HOV lane on the right side between SE 8th and I90.

I am not sure what the logic of the design is, but that lane is helping to ease out so much traffic in the critical section of the HWY.

A lot of people drive to SE 8th and take the ramp there, because they can continue to Seattle without crossing the other 3 lanes of I405, which slows the traffic even more and is creating higher chance of accidents.

Please, please whatever you decide to do in terms of tolling, do not eliminate that right side HOV lane.

I understand earthwork would be required, but it is definitely worth it, if that section needs to be widen to keep that.

Thank you

Tomas Vetrovsky

E47.0

Comment E47.0

I have reviewed the proposal and have few concerns as someone who commutes to Bellevue every day for work.

However one of them is very critical and that is the elimination of the south HOV lane on the right side between SE 8th and I90.

I am not sure what the logic of the design is, but that lane is helping to ease out so much traffic in the critical section of the HWY.

A lot of people drive to SE 8th and take the ramp there, because they can continue to Seattle without crossing the other 3 lanes of I405, which slows the traffic even more and is creating higher chance of accidents.

Please, please whatever you decide to do in terms of tolling, do not eliminate that right side HOV lane.

I understand earthwork would be required, but it is definitely worth it, if that section needs to be widened to keep that.

Response E47.0

The proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would be constructed along with the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would include additional mainline capacity improvements and southbound I-90 ramp improvements. The right-side high-occupancy vehicle (HOV) exit to I-90 will remain in place; however, it will be accessed 950 feet north of I-90. The current right-side HOV lane has very low use, approximately 300 vehicles per hour in the peak whereas the new ETL is anticipated to serve over 1,500 vehicles per hour at this location. Together the operational and capacity improvements of these projects will greatly improve traffic conditions in this section that you are referring to. Please see the Traffic Discipline Report (pages 5-20 to 5-46).

We have limited space available due to wetlands and streams for widening in the southbound direction and want to move as many vehicles as possible through this area.

Comment E48 – Carolyn Vache, Private Individual, April 18, 2018

From: Carolyn Vache [cvache@comcast.net]
Sent: Wednesday, April 18, 2018 11:20 AM
To: I405comments@wsdot.wa.gov
Subject: Stop tolling on I-405

The toll lanes have made congestion on I 405 between Bellevue and Lynnwood worse by taking up too many lanes. Please do not tool 405 from Bellevue to Renton, it will only create more gridlock on an already overloaded highway.

Thank you,
Carolyn Vache
17723 NE 133 St
Redmond, WA 98052

Sent from Mail<<https://go.microsoft.com/fwlink/?LinkId=550986>> for Windows 10

E48.0

Comment E48.0

The toll lanes have made congestion on I 405 between Bellevue and Lynnwood worse by taking up too many lanes. Please do not tool 405 from Bellevue to Renton, it will only create more gridlock on an already overloaded highway.

Response E48.0

See Global Responses 1 and 8.

Comment E49 – Susan Nelson, Private Individual, April 18, 2018

From: Susan Nelson [sabresuz@msn.com]
Sent: Wednesday, April 18, 2018 3:29 AM
To: I405comments@wsdot.wa.gov
Subject: Toll lane

I have been a resident of Renton for 42 years. I would love nothing more than to have a toll lane on 405. It's so overcrowded and almost every vehicle is single passenger. I however don't think it should be 3+ people toll. I think it should be just like 167. That's a wonderful route project. If you have two or more it's free if you don't you can pay the toll.

Susan Nelson
206-743-2816
480 Olympia Avenue
Renton, wa 98056

Sent from my iPhone

E49.1

Comment E49.1

I have been a resident of Renton for 42 years. I would love nothing more than to have a toll lane on 405. It's so overcrowded and almost every vehicle is single passenger. I however don't think it should be 3+ people toll. I think it should be just like 167. That's a wonderful route project. If you have two or more it's free if you don't you can pay the toll.

Response E49.1

Comment noted. See Global Response 6.

Comment E50 – Babette Bechtold, Private Individual, April 18, 2018

From: Ed _Babette Bechtold [bzbechtold@hotmail.com]
Sent: Wednesday, April 18, 2018 8:53 PM
To: I405comments@wsdot.wa.gov
Subject: Toll lane feedback

By adding just ½-mile of new general purpose capacity in the entire project means that the billions of dollars invested is only for tolled capacity and will only benefit a few wealthy drivers. This is flawed design. Please reconsider.

E50.0

Sincerely,
Babette Bechtold

Sent from my iPhone

Comment E50.0

By adding just ½-mile of new general purpose capacity in the entire project means that the billions of dollars invested is only for tolled capacity and will only benefit a few wealthy drivers. This is flawed design. Please reconsider.

Response E50.0

Your comment appears to be referencing the \$1.22 billion funded by the Washington State Legislature as part of the Connecting Washington package for I-405 improvements. The budget for the I-405 Renton to Bellevue Widening and Express Toll Lanes construction contract includes not only building a new express toll lane system between Renton and Bellevue (I-405, Downtown Bellevue Vicinity Express Toll Lanes Project [Project] and proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project) but also many other elements either currently under construction or under future contracts, including:

- Building the I-405/SR 167 Direct Connector, a new flyover ramp connecting the I-405 HOV lanes to the SR 167 HOT lanes (currently under construction and scheduled to open by traffic by summer 2019).

- Building southbound untolled general purpose (GP) (auxiliary) lanes between I-90 and 112th Avenue SE and between NE 44th Street and NE 30th Street (proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Making improvements at key ramps in the area, including southbound I-405 to eastbound I-90, and northbound I-405 to SR 520 (proposed I-5 to I-90 Vicinity ETL Project).
- Additional interchange improvements in a future phase, including extending the NE 6th Street direct access ramp in Bellevue to connect to the east side of I-405 and adding lane capacity in the I-90 vicinity (future project to begin construction in 2025).
- Building portions of the Eastside Rail Corridor Regional bicycle and pedestrian trail in partnership with King County (I-405 Downtown Bellevue Vicinity ETL Project and proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Building a new inline bus station and direct access ramp for I-405 Bus Rapid Transit at NE 44th Street in Renton in partnership with Sound Transit (proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Building new noise walls, fish passage, stormwater and other environmental improvements.
- Making major bridge and structural improvements throughout the area to accommodate completion of a future untolled GP lane in each direction as part of the I-405 Master Plan.

In summary, the Project would not change the number of untolled GP lanes. The proposed Tukwila to I-90 Vicinity Express Toll Lanes project, which is intended to be constructed at the same time as the Project, would add untolled GP lanes in the areas noted above. As a result of these combined capacity improvements (both untolled GP lanes and new ETLs), we expect that traffic congestion would greatly improve across all lanes in most areas. Please see Section 5 of the Transportation Discipline Report for more details.

Comment E51 – Tom Dickhaus, Private Individual, April 18, 2018

From: T Dickhaus [tdickhaus@hotmail.com]
Sent: Wednesday, April 18, 2018 4:25 PM
To: I405comments@wsdot.wa.gov
Subject: Tolls - A very bad idea

I405Comments,

Tolls are a very bad way to fund public roads. 30 cents of every dollar collected goes towards collecting a dollar.

Politicians love tolls so that they can claim they didn't raise taxes.

Just so you know I am not unrealistic. Raising Car licensing & registration Fees or the gas tax are much more efficient funding models. Those collection mechanisms are 99% efficient and they don't involve unreliable electronic tolling technology. People who have more money buy more cars than they can drive – Licensing fees. People who have more money buy bigger cars – that's why in Europe, the size of the engine determines the annual car fee. It's a progressive fee structure.

The only entity that benefits from tolling in WA state is the ETC Corporation in Texas:

<http://www.etc.com/>

I wonder what "gifts" they have given to WSDOT and our elected officials?

A funding model for roads that relies on credit card companies and the public is a very bad way to fund public infrastructure.

Sincerely,
Tom Dickhaus
7325 86th Ave SE
Mercer Island, WA 98040

E51.0

Comment E51.0

I405Comments,

Tolls are a very bad way to fund public roads. 30 cents of every dollar collected goes towards collecting a dollar. Politicians love tolls so that they can claim they didn't raise taxes.

Just so you know I am not unrealistic. Raising Car licensing & registration Fees or the gas tax are much more efficient funding models. Those collection mechanisms are 99% efficient and they don't involve unreliable electronic tolling technology. People who have more

money buy more cars than they can drive – Licensing fees. People who have more money buy bigger cars – that’s why in Europe, the size of the engine determines the annual car fee. It’s a progressive fee structure.

The only entity that benefits from tolling in WA state is the ETC Corporation in Texas:

<http://www.etcc.com/>

I wonder what "gifts" they have given to WSDOT and our elected officials?

A funding model for roads that relies on credit card companies and the public is a very bad way to fund public infrastructure.

Response E51.0

See Global Response 2.

Comment E52 – Kari Scully, Private Individual, April 20, 2018

From: Kari Scully [kariscully@yahoo.com]
Sent: Friday, April 20, 2018 8:34 AM
To: I405comments@wsdot.wa.gov
Subject: No more tolls

Fix the issues created long ago. We are ta ed enough.

Sent from Yahoo Mail on Android<[https://go.onelink.me/107872968?](https://go.onelink.me/107872968?pid=InProduct&c=Global_Internal_YGrowth_AndroidEmailSig__AndroidUsers&af_wl=ym&af_sub1=Internal&af_sub2=Global_YGrowth&af_sub3=EmailSignature)
[pid=InProduct&c=Global_Internal_YGrowth_AndroidEmailSig__AndroidUsers&af_wl=ym&af_sub1=Internal&af_sub2=Global_YGrowth&af_sub3=EmailSignature](https://go.onelink.me/107872968?pid=InProduct&c=Global_Internal_YGrowth_AndroidEmailSig__AndroidUsers&af_wl=ym&af_sub1=Internal&af_sub2=Global_YGrowth&af_sub3=EmailSignature)>

E52.0

Comment E52.0

Fix the issues created long ago. We are ta ed enough.

[Sent from Yahoo Mail on Android](#)

Response E52.0

In 2002, WSDOT developed a multimodal vision for the corridor to move more people and manage congestion along I-405, which was to be completed by 2020. This vision included managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT’s ability to manage lanes to provide a reliable trip for I-405 users. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, which includes additional untolled

general purpose (GP) lanes and other improvements, it has made substantial investments in untolled GP lanes to address key chokepoints, and has implemented the first phase of express toll lanes (ETLs) from Bellevue to Lynnwood. The new ETLs provide drivers a choice when they need it and give transit a reliable trip. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund the I-405 Master Plan.

Comment E53 – Linda Logie, Private Individual, April 22, 2018

From: Linda Logie [llogie@q.com]
Sent: Sunday, April 22, 2018 7:51 PM
To: I405comments@wsdot.wa.gov
Subject: Toll Lanes on 405

My husband and I live in the Renton Highlands and are retired. We travel 405 between Renton and Bellevue frequently and like using the HOV lane when we do. When possible we schedule appointments in that area to avoid heavy traffic hours but that cannot always be done. With the proposed changes we will be forced into the toll lanes or sit for 45 minutes to an hour and a half each way.

E53.1

Those toll lanes are a HOT button for us as you mostly see single drivers in the toll lanes, therefore destroying two people car pools. That just adds to our pollution and traffic congestion for all of us.

E53.2

It seems obvious that the only concern for the state is how fast the toll lanes move and there is no interest or concern for the general purpose lanes. The toll lanes are a HUGE money maker for the state but yet none of that money seems to be going to reduce our taxes or pay for new general purpose lanes. I've heard that the tolling company gets 75% of the toll money, and the state gets 25% and that the 25% can only be used to maintain 405 or the tolling equipment.

E53.3

E53.4

The current traffic congestion from Bellevue to Renton is relentless and is no longer due to any "rush hour". Would it be too much to hope that the state would be looking for a solution that would increase the number of general purpose lanes that affect the largest segment of the population instead of a smaller segment of the population who have no difficulty paying for the exorbitant tolls now imposed or those being discussed in the future.

E53.5

Sincerely,

Linda Logie
3634 NE 10th Lane
Renton, WA 98056

Comment E53.1

My husband and I live in the Renton Highlands and are retired. We travel 405 between Renton and Bellevue frequently and like using the HOV lane when we do. When possible we schedule appointments in that area to avoid heavy traffic hours but that cannot always be done.

Response E53.1

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not remove the ability for high-occupancy vehicles (HOVs) to use the express toll lanes (ETLs). This Project would expand the current HOV lane to a new dual ETL. The Washington State Transportation Commission is responsible for establishing the HOV occupancy requirements. It is assumed the new ETLs associated with the Project would operate the same as the existing ETLs that are to the north of the Project (Bellevue to Lynnwood) as follows:

- HOV 2+ would travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass.
- During the peak time, HOV 3+ would travel for free from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. with a *Good To Go!* pass.
- At all times, transit, HOV 3+, and motorcycles would travel for free with a *Good To Go!* pass.
- At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass.

Comment E53.2

With the proposed changes we will be forced into the toll lanes or sit for 45 minutes to an hour and a half each way.

Those toll lanes are a HOT button for us as you mostly see single drivers in the toll lanes, therefore destroying two people car pools. That just adds to our pollution and traffic congestion for all of us.

Response E53.2

See Response 53.1

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. When combined with other I-405 projects, the Project would create a continuous express toll lane (ETL) system from I-5 in Lynnwood to SR 167 in Renton. The proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which is intended to be constructed at the same time as the Project, would add southbound untolled GP lanes from I-90 to 112th Avenue NE, between NE 44th Street and NE 30th Street, and make southbound I-405 to eastbound I-90 ramp improvements. As a result of these capacity improvements, traffic congestion would greatly improve in this area. Please see Section 5 of the Transportation Discipline Report.

The Environmental Assessment finds that air quality would be similar with or without the Project. Please see the Air Quality Technical Report.

Comment E53.3

It seems obvious that the only concern for the state is how fast the toll lanes move and there is no interest or concern for the general purpose lanes.

Response E53.3

See Global Response 5.

Comment E53.4

The toll lanes are a HUGE money maker for the state but yet none of that money seems to be going to reduce our taxes or pay for new general purpose lanes. I've heard that the tolling company gets 75% of the toll money, and the state gets 25% and that the 25% can only be used to maintain 405 or the tolling equipment.

Response E53.4

See Global Response 2.

Comment E53.5

The current traffic congestion from Bellevue to Renton is relentless and is no longer due to any "rush hour". Would it be too much to hope that the state would be looking for a solution that would increase the number of general purpose lanes that affect the largest segment of the population instead of a smaller segment of the population who have no difficulty paying for the exorbitant tolls now imposed or those being discussed in the future.

Response E53.5

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled general purpose (GP) lanes. The Project and other express toll lane (ETL) projects are part of the I-405 Master Plan, which is a multimodal plan to manage congestion on the corridor. The vision of the Master Plan includes untolled GP lanes, managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT's ability to manage lanes to provide a reliable trip for users of the corridor. While the Washington State Legislature has not been able to fund the complete I-405 Master Plan, it has made substantial investments in untolled GP lanes to address key chokepoints and implement the first phase of ETLs from Bellevue to Lynnwood. WSDOT is committed to building out the full plan as funding becomes available and is working with the Legislature to fund the Master Plan. (See also Global Response 5, first paragraph.)

The ETLs between Bellevue and Lynnwood provide drivers a choice for a faster trip and have improved reliability. The new ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began.

Comment E54 – Zhang, Private Individual, April 25, 2018

From: zhang38122@gmail.com [zhang38122@gmail.com]
Sent: Wednesday, April 25, 2018 6:38 AM
To: I405comments@wsdot.wa.gov
Subject: Subdivide toll lanes

I suggest to devide the two-lane toll lane into faster lane and slower lane by charging a even higher rate for the faster lane. That way drivers will have more choices and can get to their destinations faster if they have an urgent situation.

E54

Sent from my iPhone

Comment E54.0

I suggest to devide the two-lane toll lane into faster lane and slower lane by charging a even higher rate for the faster lane. That way drivers will have more choices and can get to their destinations faster if they have an urgent situation.

Response E54.0

The new express toll lanes (ETLs) would be managed to provide a reliable trip. Attempting to individually manage the lanes for different speed vehicles would not be practical as vehicles need to change lanes within the ETLs to enter and exit the facility.

Comment E55 – Jim Hanson, Private Individual, April 26, 2018

From: Jim Hanson [hansonjb@gmail.com]
Sent: Thursday, April 26, 2018 9:17 AM
To: I405comments@wsdot.wa.gov
Subject: 405 improvements--badly needed fix to westbound i90 ramp to north i405

as you consider the project—please take note of the _dangerous_ and _very significant_ backups on the westbound i90 approach to northbound i405.

this ramp should be increased to two lanes. the traffic volume and the importance of i90 traffic going north on i405 justify the two lanes.

yes, this would make 405 seven lanes going into Bellevue—the additional lane would exit only at 4th/8th street (or if you have to—have the additional lane merge after i405 starts going downhill into downtown Bellevue/ shortly before the se 8th street exit).

justification:

--would reduce dangerous backups on i90 with stopped traffic in the right two lanes and traffic going 40, 50, 60mph in the left lanes

--would increase traffic flow—the backup is significant and most of the time, it is just a bottleneck directly caused by the one lane only ramp

--look at the traffic numbers—4 lanes continue into seattle on i90 but a large percentage (much more than 1/5 of the lanes) of the traffic actually exits for i405 north

--not good for carpools/buses who must wait in this traffic to go from the i90 carpool lane to i405 carpool lane—interchanges should _not_ bottleneck such carpools/public transportation.

Jim Hanson :)
hansonjb@gmail.com<<mailto:hansonjb@gmail.com>>

E55.0

Comment E55.0

as you consider the project—please take note of the _dangerous_ and _very significant_ backups on the westbound i90 approach to northbound i405.

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--not good for carpools/buses who must wait in this traffic to go from the i90 carpool lane to i405 carpool lane—interchanges should not bottleneck such carpools/public transportation.

Response E55.0

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would add a new lane in each direction through this area, which would improve overall operations. The proposed Tukwila to I-90 Vicinity Express Toll Lanes project, which is intended to be constructed at the same time as the Project, would also add a southbound untolled general purpose (GP) lane from I-90 to 112th Avenue NE and southbound I-405 to southbound I-90 ramp improvements. As a result of these capacity improvements traffic congestion would greatly improve in this area. See the Traffic Discipline Report.

Although not currently funded, the I-90 westbound to I-405 northbound ramp improvements are included as part of the I-405 Master Plan. The I-405 Master Plan includes high-occupancy vehicle (HOV) direct access ramps in all four quadrants of the I-405/I-90 interchange. WSDOT continues to work with the Legislature to fully fund the I-405 Master Plan.

Comment E56 – Lisa McConnell, Private Individual, April 26, 2018

From: I405comments
To: [Laura Higashi-Poynter](mailto:Laura.Higashi-Poynter)
Subject: FW: comments for downtown Bellevue vicinity
Date: Tuesday, May 8, 2018 12:15:45 PM

From: Lisa McConnell [lisaamcc@hotmail.com]
Sent: Thursday, April 26, 2018 2:07 PM
To: I405comments@wsdot.wa.gov
Subject: comments for downtown Bellevue vicinity

I attended the Environmental Assessment public hearing in Bellevue on April 17th. I have a few comments based on discussions and information boards that I saw at the hearing.

1. Even though this is more for the next EIS, Renton to Bellevue, I am in support of the WSDOT plans to pave the 2.5 miles of the Eastside Rail Corridor as mitigation for “taking” of the Lake Washington Loop Trail for widening of I405 from 44th to Coal Creek. In particular, I think it is imperative that this occur well BEFORE closing of the Lake Washington Loop Trail, as there is no alternative detour route for pedestrians and bicyclists in this section. I look forward to the day that this is connected north of Coal Creek to the Wilburton Gap and Trestle.

2. Having bicycles mixed directly with pedestrians on the south side of Main Street Bridge is unacceptable. There are many reasons that bicyclists belong in the road rather than upon the sidewalk, including obstructions <<http://www.pedestrians.org/topics/obstructions.htm>>, unpredictable pedestrian movements, limited visibility, and the limited design speed of sidewalks, especially in urban or high pedestrian traffic areas. Furthermore, this bridge location is directly adjacent to the East Link East Main Street Station, a station with no parking and accessed by pedestrians and cyclists only. The Main Street Bridge is the link between East Link Main Street Station and the planned development of the Wilburton Commercial area. I expect both East Link and the Wilburton Commercial redevelopment to be successful and have a high volume of people accessing it. I think we should create a multimodal bridge that can handle that high volume success. If South Lake Union can tell us anything, it is that successful urban areas have a high volume of pedestrian traffic on their sidewalks. Sidewalks which should be wide enough to safely accommodate pedestrian flow, and which should be separated from higher speed bicycle traffic. And this should be built NOW and not try to retrofit more width later. This is especially true on the western side end of the bridge where the draft design of the shared use path currently narrows from 14 feet on the bridge to 7 feet at the corner, where pedestrians and cyclists queue to wait for the signal crossing. This corner is exactly where it should be widest or more “plaza” like to allow for the many directions of pedestrian traffic to move as well as wait for safe signal crossing. It certainly should not be a place where you add the entrance of higher speed bike traffic onto the sidewalk. Lets not wait for conflict and injury before we design a sidewalk that is safe for pedestrians and a bike lane that is useful for cyclists.

E56.1

3. We have an opportunity at the new pedestrian and bicycle bridge over I405 to not only reconnect the Eastside Rail Corridor for multimodal transportation but also provide a means for wildlife such as salamanders and frogs to reach the Median Creek Mitigation Site and to nearby wetlands such as Mercer Slough and Kelsey Creek. Inclusion of a wildlife path will make the best use of the Median Creek Mitigation site as well as positively impacting native species attempting to migrate across I405 to reach Mercer Slough or Kelsey Creek. WSDOT’s work to mitigate the Project’s effect on water quality and runoff are to be commended, in particular the plans to improve the Median Creek site. And although fish are key species, often overlooked are other natives such as reptiles and amphibians that are a critical part of our wetland ecosystem. Amphibians in particular have hard time as they often need to migrate to breed and lay eggs in different habitat than where the adult stage lives. Providing this wildlife corridor on the bridge over I405 greatly improve the lives of amphibians, reptiles, and other small species who often see the greatest impact with habitat destruction. The Green River Natural Resource Area in Kent has successfully converted from a highly industrial site to a wetland that accommodates many of these species and would be a great resource and example.

E56.2

Thank you for your consideration,
Lisa McConnell

Comment E56.1

I attended the Environmental Assessment public hearing in Bellevue on April 17th. I have a few comments based on discussions and information boards that I saw at the hearing.

Even though this is more for the next EIS, Renton to Bellevue, I am in support of the WSDOT plans to pave the 2.5 miles of the Eastside Rail Corridor as mitigation for “taking” of the Lake Washington Loop Trail for widening of I405 from 44th to Coal Creek. In particular, I think it is imperative that this occur well BEFORE closing of the Lake Washington Loop Trail, as there is no alternative detour route for pedestrians and bicyclists in this section. I look forward to the day that this is connected north of Coal Creek to the Wilburton Gap and Trestle.

Having bicycles mixed directly with pedestrians on the south side of Main Street Bridge is unacceptable. There are many reasons that bicyclists belong in the road rather than upon the sidewalk, including obstructions, unpredictable pedestrian movements, limited visibility, and the limited design speed of sidewalks, especially in urban or high pedestrian traffic areas.

Furthermore, this bridge location is directly adjacent to the East Link East Main Street Station, a station with no parking and accessed by pedestrians and cyclists only. The Main Street Bridge is the link between East Link Main Street Station and the planned development of the Wilburton Commercial area.

I expect both East Link and the Wilburton Commercial redevelopment to be successful and have a high volume of people accessing it. I think we should create a multimodal bridge that can handle that high volume success.

If South Lake Union can tell us anything, it is that successful urban areas have a high volume of pedestrian traffic on their sidewalks. Sidewalks which should be wide enough to safely accommodate pedestrian flow, and which should be separated from higher speed bicycle traffic.

And this should be built NOW and not try to retrofit more width later. This is especially true on the western side end of the bridge where the draft design of the shared use path currently narrows from 14 feet on the bridge to 7 feet at the corner, where pedestrians and cyclists queue to wait for the signal crossing. This corner is exactly where it should be widest or more “plaza” like to allow for the many directions of pedestrian traffic to move as well as wait for safe signal crossing. It certainly should not be a place where you add the entrance of higher speed bike traffic onto the sidewalk.

Lets not wait for conflict and injury before we design a sidewalk that is safe for pedestrians and a bike lane that is useful for cyclists.

Response E56.1

King County is planning to construct the Eastside Rail Corridor (ERC) Regional Trail along the existing rail corridor tracks between Renton and Bellevue. WSDOT is partnering with King County to build portions of this trail between Renton and Bellevue as part of the upcoming I-405, Renton to Bellevue Widening and Express Toll Lanes construction contract.

See the ERC project website at <https://kingcounty.gov/services/parks-recreation/parks/trails/regional-trails/popular-trails/eastside-rail-corridor.aspx>.

For the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project), WSDOT would build a new bridge for nonmotorized travel over southbound I-405 to connect with the ERC.

As part of the proposed I-405, Tukwila to I-90 Vicinity Project, we plan to construct the ERC portion before closing of the Lake Washington Loop Trail. WSDOT fully supports bike and pedestrian safety, and we intend for these projects to improve safety for all users.

WSDOT continues to coordinate with the City of Bellevue and will share your concerns about the Main Street Bridge and balancing the competing needs of travel modes. Although a multimodal bridge is not included in the I-405 Master Plan, the Project would not preclude future investments of this type.

Comment E56.2

We have an opportunity at the new pedestrian and bicycle bridge over I405 to not only reconnect the Eastside Rail Corridor for multimodal transportation but also provide a means for wildlife such as salamanders and frogs to reach the Median Creek Mitigation Site and to nearby wetlands such as Mercer Slough and Kelsey Creek. Inclusion of a wildlife path will make the best use of the Median Creek Mitigation site as well as positively impacting native species attempting to migrate across I405 to reach Mercer Slough or Kelsey Creek. WSDOT's work to mitigate the Project's effect on water quality and runoff are to be commended, in particular the plans to improve the Median Creek site. And although fish are key species, often overlooked are other natives such as reptiles and amphibians that are a critical part of our wetland ecosystem. Amphibians in particular have hard time as they often need to migrate to breed and lay eggs in different habitat than where the adult stage lives. Providing this wildlife corridor on the bridge over I405 greatly improve the lives of amphibians, reptiles, and other small species who often see the greatest impact with habitat destruction. The Green River Natural Resource Area in Kent has successfully converted from a highly industrial site to a wetland that accommodates many of these species and would be a great resource and example.

Response E56.2

The Eastside Rail Corridor (ERC) crossing does not preclude the path for use as a migratory/movement corridor for wildlife.

Comment E57 – Marsha and Jim Hebert, Private Individual, April 26, 2018

From: Marsha Hebert [marsha.jimabear@gmail.com]
Sent: Thursday, April 26, 2018 6:22 PM
To: I405comments@wsdot.wa.gov
Subject: TOLL LANES

We were unable to attend the April 17th public hearing. We live in Bothell and traveling from Bothell to Bellevue has become so difficult since the toll lanes went in that we avoid it when we can. We are retired and on a fixed income. Paying for those tolls is NOT an option, and limiting free travel in the toll lane to three plus people in the vehicle (after they of course purchase the dashboard flipper) also eliminates us.
As Hablewitz says:

E57.1

You cannot make the highway go faster by charging money to use it. Further, he is right, tolling is hurting the people who can afford it the least, those who live beyond King County because they can't afford a home or apartment in Seattle or the Eastside. Those people, and their affected families, have lost quality of life.

We do sometimes travel from Bothell to Lynnwood, and much more rarely from Bothell to Bellevue and beyond Bellevue. It is our observation that the majority of the cars in the toll lanes have only a single driver and NO passengers. After all, why carpool if you can pay to ride by yourself and can afford it. THIS JUST ADDS TO THE CONGESTION, AND DOES NOTHING TO ALLEVIATE IT. It further puts two person carpools back in the general purpose lanes, thereby eliminating their incentive to carpool. CLAIMING THAT THE TOLL LANES ARE HELPING IS A BALD FACED LIE. CONGESTION HAS VERY SIGNIFICANTLY GOTTEN FAR WORSE SINCE THE TOLL LANES WENT IN, and that was IMMEDIATE. It is very obvious to those of us that try to use 405 that the toll lanes just add more cars to the general purpose lanes, further clogging the freeway (name needs to be changed as it is no longer a freeway), and that increase in bumper to bumper vehicles is very detrimental to our environment, our health and the health of our region.

E57.2

Yes, business could do much to help by requiring their employees to carpool when available, and by allowing telecommuting. I did telecommuting for my last eight years before retirement. It was a wonderful opportunity, and with the technology available now, there is no reason why more companies shouldn't offer it to their employees. Prior to that, I van pooled. That was ALL WAY BEFORE THE TOLL LANES WENT IT. The company I worked for provided incentives to carpool, and eventually also offered telecommuting. They have now moved out of this region. Too bad. I can't imagine why a company would even want to locate in the greater Seattle area at this point and suspect that more will flee.

E57.3

Rather than tolling, our government needs to focus on programs (or requirements) for companies to encourage or require carpools or telecommuting. This would help to save the environment, and assist their employees to be able to live happier, healthier, more productive lives. I should think, will telecommuting, that would also be incentive enough for employees to stay with their company, thereby benefiting the company with employee trust.

Bottom line, the TOLL LANES ARE VERY OBVIOUSLY ALL ABOUT HOW MUCH MONEY THE STATE CAN BRING IN, AND NOTHING ABOUT ALLEVIATING CONGESTION. Further, the more cars that are on the road, the more the state also collects in gas taxes. SO QUIT LYING TO US.

E57.4

We have paid taxes for the past 50 years, and must continue to pay taxes, helping to pay for a road that we can no longer use. Tolling from Bellevue to Renton will eliminate our visits to friends in Renton and Des Moines, shopping in Renton, etc. 405 from Lynnwood (or Bothell in our case) to Renton will be nothing but a parking lot

for far too much of the day. Our loss, not that you care. It is all just about money for the state and the rich tolling company. You should ALL BE VERY ASHAMED OF YOURSELVES FOR PURPENTRATING YOUR LIES.

E57.4

Frustrated and Unhappy,
Marsha & Jim Hebert

Comment E57.1

We were unable to attend the April 17th public hearing. We live in Bothell and traveling from Bothell to Bellevue has become so difficult since the toll lanes went in that we avoid it when we can. We are retired and on a fixed income. Paying for those tolls is NOT an option, and limiting free travel in the toll lane to three plus people in the vehicle (after they of course purchase the dashboard flipper) also eliminates us.

As Hablewitz says:

You cannot make the highway go faster by charging money to use it. Further, he is right, tolling is hurting the people who can afford it the least, those who live beyond King County because they can't afford a home or apartment in Seattle or the Eastside. Those people, and their affected families, have lost quality of life.

Response E57.1

See Global Response 10 (paragraphs 1 and 4).

WSDOT and the Federal Highway Administration (FHWA) examined the effects of the cost of the tolls and all electronic toll lane (ETL) systems on low-income and minority persons, and persons with limited English proficiency, known collectively as environmental justice populations. Any toll that charges all users the same amount, regardless of income, disproportionately affects low-income users. These effects would be offset by improved peak travel times in most locations, reliability and travel conditions in both the untolled general purpose (GP) lanes and the new ETLs. The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled GP lanes. WSDOT has outlined several measures to reduce the impact of the tolls on low-income users as described on page 6-7 of the Environmental Assessment.

Currently, the Washington State Transportation Commission (WSTC) is responsible for establishing toll rates and exemptions for state toll facilities in Washington. While tolling is used to improve traffic flows, WSTC recognizes tolling carries a financial impact for those drivers who choose to travel in the tolled lanes. Whenever called upon to revise toll rates, WSTC carefully reviews traffic and revenue projections, listens to members of affected communities, and seeks to ensure customers are treated fairly. See also the WSTC website at <http://www.wstc.wa.gov/HighwayTolling/default.htm>.

Additionally, we are aware that the Project would not remove the ability for high-occupancy vehicles (HOVs) to use the new ETLs. Please see page 3-5 in the Environmental Assessment for information on the potential carpool policy.

Comment E57.2

We do sometimes travel from Bothell to Lynnwood, and much more rarely from Bothell to Bellevue and beyond Bellevue. It is our observation that the majority of the cars in the toll lanes have only a single driver and NO passengers. After all, why carpool if you can pay to ride by yourself and can afford it. THIS JUST ADDS TO THE CONGESTION, AND DOES NOTHING TO ALLEVIATE IT. It further puts two person carpools back in the general

purpose lanes, thereby eliminating their incentive to carpool. CLAIMING THAT THE TOLL LANES ARE HELPING IS I A BALD FACED LIE. CONGESTION HAS VERY SIGNIFICANTLY GOTTEN FAR WORSE SINCE THE TOLL LANES WENT IN, and that was IMMEDIATE. It is very obvious to those of us that try to use 405 that the toll lanes just add more cars to the general purpose lanes, further clogging the freeway (name needs to be changed as it is no longer a freeway), and that increase in bumper to bumper vehicles is very detrimental to our environment, our health and the health of our region.

Response E57.2

See Global Response 1.

Comment E57.3

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Rather than tolling, our government needs to focus on programs (or requirements) for companies to encourage or require carpools or telecommuting. This would help to save the environment, and assist their employees to be able to live happier, healthier, more productive lives. I should think, will telecommuting, that would also be incentive enough for employees to stay with their company, thereby benefiting the company with employee trust.

Response E57.3

WSDOT works with public and private partners on programs you describe. The Washington State Commute Trip Reduction (CTR) program benefits our state's transportation system, economy, CTR participants and other drivers on the road. WSDOT has worked with King County Metro to identify carpoolers and provide free flex passes. To date WSDOT has distributed 74,000 free flex passes to carpoolers.

To read more about the costs and benefits of the CTR Program, download the 2015 CTR Report to the Washington State Legislature.

Comment E57.4

Bottom line, the TOLL LANES ARE VERY OBVIOUSLY ALL ABOUT HOW MUCH MONEY THE STATE CAN BRING IN, AND NOTHING ABOUT ALLEVIATING CONGESTION. Further, the more cars that are on the road, the more the state also collects in gas taxes. SO QUIT LYING TO US.

We have paid taxes for the past 50 years, and must continue to pay taxes, helping to pay for a road that we can no longer use. Tolling from Bellevue to Renton will eliminate our visits to friends in Renton and Des Moines, shopping in Renton, etc. 405 from Lynnwood (or Bothell in our case) to Renton will be nothing but a parking lot for far too much of the day. Our loss, not that you care. It is all just about money for the state and the rich tolling company. You should ALL BE VERY ASHAMED OF YOURSELVES FOR PURPENTRATING YOUR LIES.

Response E57.4

See Global Responses 1 and 2.

Comment E58 – John Janssen, Private Individual, April 27, 2018

From: John Janssen [johnjanssen@comcast.net]
Sent: Friday, April 27, 2018 5:45 PM
To: I405comments@wsdot.wa.gov
Subject: I405 toll lane expansion - stick to the statute as currently written, first, please!

Hello,

We have horrendous commute times through the I-405 corridor. More lanes and/or reduced congestion is very important to many. However, the current tolling is fraudulent. WSDOT has had no authority to continue tolling since the end of Q3 2017. The requirement (not guideline) for 45mph 90% of the time was not met. The excuse of "technically, we cannot discontinue tolling unless the State orders us to stop" is pathetic.

If the State adhered to lawful governance, the current tolling would stop, refunds would be given for all fraudulent collections, and then honest citizenry could respectfully consider new proposals. I count myself in the latter group.

Thank you for your attention.

Regards,

John Janssen

E58.1

E58.2

Comment E58.1

We have horrendous commute times through the I-405 corridor. More lanes and/or reduced congestion is very important to many.

Response E58.1

Comment noted. See Global Response 1.

Comment E58.2

However, the current tolling is fraudulent. WSDOT has had no authority to continue tolling since the end of Q3 2017. The requirement (not guideline) for 45mph 90% of the time was not met. The excuse of "technically, we cannot discontinue tolling unless the State orders us to stop" is pathetic.

If the State adhered to lawful governance, the current tolling would stop, refunds would be given for all fraudulent collections, and then honest citizenry could respectfully consider new proposals. I count myself in the latter group.

Response E58.2

See Global Response 7.

Comment E59 – Rick Goethals, Private Individual, April 28, 2018

From: Rick Goethals [rick_goethals@yahoo.com]
Sent: Saturday, April 28, 2018 5:51 PM
To: I405comments@wsdot.wa.gov
Subject: I405 Bellevue to Renton tolling?

For the record, I am absolutely against changing the requirement from 2 passengers for access to the proposed carpool/HOT lanes on I405 from Bellevue to Renton for the REVERSE COMMUTE.

E59.1

I have been carpooling (2 passengers) since 2004 from Bellevue (home) to Renton (work) during the morning hours.

The current carpool lane traffic flows very well from Bellevue to Renton during the morning commute. Increasing the requirement to three passengers would be a bad idea and lead to the REVERSE COMMUTE carpool lane(s) to be under utilized by pushing two passenger commuters to the mainline lanes.

E59.2

Do the right thing and leave alone the two passenger requirement during the REVERSE COMMUTE for carpool lane access.

Regards,
Rick Goethals
16513 SE 19th Street
Bellevue, WA 98008

Comment E59.1

For the record, I am absolutely against changing the requirement from 2 passengers for access to the proposed carpool/HOT lanes on I405 from Bellevue to Renton for the REVERSE COMMUTE.

I have been carpooling (2 passengers) since 2004 from Bellevue (home) to Renton (work) during the morning hours.

Response E59.1

See Global Response 6.

Comment E59.2

The current carpool lane traffic flows very well from Bellevue to Renton during the morning commute. Increasing the requirement to three passengers would be a bad idea and lead to the REVERSE COMMUTE carpool lane(s) to be under utilized by pushing two passenger commuters to the mainline lanes.

Do the right thing and leave alone the two passenger requirement during the REVERSE COMMUTE for carpool lane access.

Response E59.2

See Global Response 6.

Comment E60 – Bill and Jeanie McBee, Private Individual, April 28, 2018

From: Jeanie McBee [jamcbee@comcast.net]
Sent: Saturday, April 28, 2018 10:41 PM
To: I405comments@wsdot.wa.gov
Subject: I405 tolling

We wish to loudly proclaim our objection to the tolling of 405 and now spending over a billion dollars to make the tolling area even longer. These are clearly lanes for people who can afford to pay the tolls, not for regular middle income families who have to reject paying a toll in order to have money to feed families, make mortgage payments, pay always-increasing taxes, both property taxes and others, etc., etc. All of we citizens pay taxes to fund the roads, and yet special lanes are made for a few. It doesn't bother us that some people have a lot more money and we do. It does bother us that the DOT makes policies that prohibit those with less money from using the roads that their taxes helped pay for.

Bill and Jeanie McBee
20117 73 Avenue NE
Kenmore, WA 98028
jamcbee@comcast.net

E60.1
E60.2

Comment E60.1

We wish to loudly proclaim our objection to the tolling of 405 and now spending over a billion dollars to make the tolling area even longer.

Response E60.1

In the 2015 Connecting Washington funding package, the Washington State Legislature directed WSDOT to continue widening the I-405 corridor between Renton and Bellevue, with the assumption that toll revenue would fund part of that improvement. Revenue from the express toll lanes (ETLs) is required to be reinvested into the I-405 corridor to fund needed improvements. Ultimately, the Washington State Legislature determines which facilities are authorized to be tolled. The Washington State Transportation Commission determines the toll rates and exemptions.

Your comment appears to be referencing the \$1.22 billion funded by the Legislature as part of the Connecting Washington package for I-405 improvements. The budget for the I-405 Renton to Bellevue Widening and Express Toll Lanes construction contract includes not only building a new express toll lane system between Renton and Bellevue (I-405, Downtown Bellevue Vicinity Express Toll Lanes Project [Project] and proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project) but also many other elements either currently under construction or under future contracts, including:

- Building the I-405/SR 167 Direct Connector, a new flyover ramp connecting the I-405 HOV lanes to the SR 167 HOT lanes (currently under construction and scheduled to open by traffic by summer 2019).
- Building southbound untolled general purpose (auxiliary) lanes between I-90 and 112th Avenue SE and between NE 44th Street and NE 30th Street (proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Making improvements at key ramps in the area, including southbound I-405 to eastbound I-90, and northbound I-405 to SR 520 (proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Additional interchange improvements in a future phase, including extending the NE 6th Street direct access ramp in Bellevue to connect to the east side of I-405 and adding lane capacity in the I-90 vicinity (future project to begin construction in 2025).
- Building portions of the Eastside Rail Corridor Regional bicycle and pedestrian trail in partnership with King County (I-405 Downtown Bellevue Vicinity project and proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Building a new inline bus station and direct access ramp for I-405 Bus Rapid Transit at NE 44th Street in Renton in partnership with Sound Transit (proposed Tukwila to I-90 Vicinity Express Toll Lanes project).
- Building new noise walls, fish passage, stormwater and other environmental improvements.
- Making major bridge and structural improvements throughout the area to accommodate completion of a future untolled general purpose (GP) lane in each direction as part of the I-405 Master Plan.

In summary, the Project would not change the number of untolled GP lanes. The proposed Tukwila to I-90 Vicinity Express Toll Lanes project, which is intended to be constructed at the same time as the Project, would add untolled GP lanes in the areas noted above. As a result of these combined capacity improvements (both untolled GP lanes and new ETLs), we expect that traffic congestion would greatly improve across all lanes in most areas. Please see Section 5 of the Transportation Discipline Report for more details.

Comment E60.2

These are clearly lanes for people who can afford to pay the tolls, not for regular middle income families who have to reject paying a toll in order to have money to feed families, make mortgage payments, pay always-increasing taxes, both property taxes and others, etc., etc. All of we citizens pay taxes to fund the roads, and yet special lanes are made for a few. It doesn't bother us that some people have a lot more money and we do. It does bother us that the DOT makes policies that prohibit those with less money from using the roads that their taxes helped pay for.

Response E60.2

See Global Response 10.

WSDOT and the Federal Highway Administration (FHWA) examined the effects of the cost of the tolls and all electronic toll lane (ETL) systems on low-income and minority persons, and persons with limited English proficiency, known collectively as environmental justice populations. Any toll that charges all users the same amount, regardless of income, disproportionately affects low-income users. These effects would be offset by improved peak travel times in most locations, reliability and travel conditions in both the untolled general purpose (GP) lanes and the new ETLs. The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would not change the number of untolled GP lanes. WSDOT has outlined several measures to reduce the impact of the tolls on low-income users as described on page 6-7 of the Environmental Assessment.

The new ETL system has benefits for people of all income levels. Today, WSDOT's analysis shows that untolled GP lanes in most places between Bellevue and Lynnwood are moving faster than they did before the ETLs opened. We expect to see the same results for both the Project and the proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project. For more information, please see Section 5 of the Project Transportation Discipline Report.

Overall, the number of people moving through the corridor has increased between 5 and 30 percent, and vehicle volumes have increased 22 percent during peak periods, depending on the location. ETLs have improved reliability for transit. As a result, transit on I-405 is saving up to 11 minutes and ridership has increased 9 percent. ETLs are also benefitting drivers in the untolled GP lanes, as travel times are 2 to 7 minutes shorter than they were before tolling began. See the I-405 ETL performance reports on the WSDOT website at <https://www.wsdot.wa.gov/Tolling/405/library.htm>.

Currently, the Washington State Transportation Commission (WSTC) is responsible for establishing toll rates and exemptions for state toll facilities in Washington. While tolling is

And I am reading the paragraph below and it is not clear if they are trying to say that "northbound morning peak trips in the general purpose lanes would increase by about one minute," do they mean if they do not go ahead with the tolling project or if they did nothing.

"In 2025 at project opening, most trips during the morning and afternoon commutes in the downtown Bellevue area will be the same or better than if WSDOT did not build this project. However, northbound morning peak trips in the general purpose lanes would increase by about one minute."

All you are saying is that travel times in the general purpose lanes would increase, but will that bring the toll lane into compliance or not? And what happens if you spend all the proposed money and traffic deteriorates?

And besides, I thought that people would rather sit in their vehicles using up the same amount of gas than pay a toll, so in all probability, more people would use the general lanes than the toll lanes and use more of the back roads like Bellevue Way which in turn, will create more traffic on the backroads which has not been reflected in the Environmental Impact Studies.

I am totally against the loss of HOV lane from SE 8th Ave to the I-90.

Re. Environmental Justice. And as far as environmental justice, those with money will be the beneficiaries in that they will be able to afford the price of the toll not matter what, but what about those that are struggling? Would low income drivers need to still pay the toll price? And it is the lower income folks who can't afford to live in Bellevue and who have to move further to live in Snohomish Co. and they now have to commute and who would have to pay the tolls/HOT prices to use the I-405 to get to Renton which is unfair. Putting on express buses would be more beneficial than adding HOT lanes.

Re: Stormwater and Stormwater Runoff. You take the I-90 Two-Way HOV Project, in The End Result, we were told how it "Adds to existing drainage and storm water treatment systems to clean roadway runoff, but that project, probably like this project will not do a thing to clean the roadway runoff. WSDOT do not clean the freeway surfaces which would be beneficial. WSDOT couldn't care less about stormwater runoff. One would think that cleaning the freeway surfaces every now and again would help stop all the contaminants from leaching into the water. You just have to take a look at the I-90 between Bellevue and Mount Baker to realize that the outer roadway surface is not being cleaned at all.

Re: Ecosystem. "The project would result in permanent loss of less than half an acre of wetlands and about two acres of vegetation adjacent to the existing roadway. These effects may reduce habitat available to local species; however, because the project area is highly urbanized, WSDOT does not expect any fragmentation or loss of connectivity of habitat."

When you see what Sound Transit and WSDOT did to the Mercer Slough, I have no idea how you were allowed to destroy that whole area. It is an environmental disaster in the making. Whenever you use the word "may," that translates into "will," so it is in all likelihood that the habitat available to local species will be reduced. What are they planning to do that will cause the reduction in habitat anyway?

Re: Noise. "Aside from temporary construction noise, overall highway noise levels are expected to stay the same as today's conditions." You have to be joking. It is a nightmare for us. You have ruined the lives of people who live along the freeway with your projects. The freeway noise is already unbearable, so adding more lanes and removing landscaping is going to increase the current noise to critical levels. And I don't know where you get that the noise is "from temporary construction noise." It is the permanent noise/sound from all the lanes of traffic without any noise barriers, the kind of paving, and removal of landscaping that has created the already unacceptably loud freeway noise or what you refer to "temporary construction noise.". How on earth can you expect there to be so many lanes without so much as one noise barrier and expect no permanent noise? And when you state that you will mitigate the noise, you have no intention of doing anything of the sort. Even though you say you will mitigate, unless you show us the detailed mitigation plans, you are not going to mitigate. It just sounds good for those who read the Enviromental Impact Studies, that's all and that is if anyone even bothers to read the Environmental Impact Studies.

What will it take for you to understand that the freeway noise is and is going to be too loud for people living and working adjacent to the I-405 without the addition of the extra freeway lanes, so adding anymore lanes is just going to make it unbearable.

E61.02

E61.03

E61.04

E61.05

E61.06

E61.07

E61.08

E61.09

E61.10

Re the Air Quality. "Part 75 of Volume 40 of the Code of Federal Regulations (CFR) requires continuous monitoring and reporting of sulfur dioxide (SO2), carbon dioxide (CO2), and nitrogen oxides (NOx) emissions. Most of these emissions are measured with Continuous Emission Monitors (CEM), which monitor important information such as the amount of pollution emitted from a smokestack (pollutant concentration) and how fast the emissions occur (stack gas volumetric flow rate). Lower-emitting sources may use less rigorous methods."

E61.11

It does not say anything about modeling. So what are the dates of your air quality monitoring for this project and is it ongoing like it should be according to the Federal Regulations?

It just seems like there has been a degradation in air quality and it seems to me that the construction trucks with their diesel exhaust fumes which seem to be contributing to the degrade in air quality all around.

E61.12

"Impacts may also include removal of existing vegetation, and additional headlight glare from additional traffic." Like I said before, when WSDOT uses the word "may," that means "will, so there will be removal of vegetation and additional headlight glare. That is not acceptable.

E61.14

And there is a really wide shoulder lane as you take the ramp from the I-90 to the I-405 South and I was wondering, why can't you make that shoulder into a lane which would allow drivers heading towards Coal Creek, could use that lane which would free up the other two lanes leading to the I-405 S?

E61.13

So, when all is said and done, I hope you will shelve this toll project. It is not worth the money. If you want to put on more rapid transit buses and if you want to put up noise barriers and repair the freeway surface where the I-90 is and the I-405 ramp, and replace the landscaping you removed, I have no problem with your spending money on those things and if you want to take the toll off the 520 and the I-405 from Bellevue to Bothell, that would be good. Adding HOT lanes/ tolls are not the answer to the I-405.

E61.15

Thank you.

Sarah Fletcher

Comment E61.01

I was unable to attend the meeting. Here are my comments. And for the record, I may be wrong, but I thought that tolling I-405 wasn't even legal because the toll lanes are not moving as quickly as state law requires. See article below. So are you trying to tell us that by having WSDOT extend the express toll lane system between NE 6th Street and north of I-90, as part of the full [I-405 Renton to Bellevue Widening and Express Toll Lanes construction contract](#) that will have higher speeds and on average it will then meet the speed requirements?

It is just that this is what the latest report says:

"With the opening of the peak use shoulder lane in April, speeds in the northbound single-lane lane section are now meeting the legislative performance target but the southbound single-lane still struggles to meet the standard."

Does that sound like the toll in the southbound direction is successful? And if you have done all what has been suggested and the performance is still not in compliance, is the suggestion then to add another toll lane, is that what you are trying to do?

This is what it says about compliance:

"(E)Compliance. —

If the State fails to bring a facility into compliance under subparagraph (D), the Secretary shall subject the State to appropriate program sanctions under section 1.36 of title 23, Code of Federal Regulations (or successor regulations), until the performance is no longer degraded.

(2) Degraded facility. —

(A)Definition of minimum average operating speed. — In this paragraph, the term "minimum average operating speed" means—

(i) 45 miles per hour, in the case of a HOV facility with a speed limit of 50 miles per hour or greater; and

(ii) not more than 10 miles per hour below the speed limit, in the case of a HOV facility with a speed limit of less than 50 miles per hour.

(B)Standard for determining degraded facility. —

For purposes of paragraph (1), the operation of a HOV facility shall be considered to be degraded if vehicles operating on the facility are failing to maintain a minimum average operating speed 90 percent of the time over a consecutive 180-day period during morning or evening weekday peak hour periods (or both).

(C)Management of low emission and energy-efficient vehicles. —

In managing the use of HOV lanes by low emission and energy-efficient vehicles that do not meet applicable occupancy requirements, a State agency may increase the percentages described in subsection (f)(3)(B)(i)."

What I don't understand is that with all those Environmental Impact Studies and Reports, how come no-one forecast the I-405 tolling disaster? .

<https://www.seattletimes.com/seattle-news/transportation/i-405-toll-lanes-moving-fast-but-not-as-fast-as-state-law-requires/>

Response E61.01

See Global Responses 8 and 7.

Comment E61.02

And I am reading the paragraph below and it is not clear if they are trying to say that "northbound morning peak trips in the general purpose lanes would increase by about one minute," do they mean if they do not go ahead with the tolling project or if they did nothing.

"In 2025 at project opening, most trips during the morning and afternoon commutes in the downtown Bellevue area will be the same or better than if WSDOT did not build this project. However, northbound morning peak trips in the general purpose lanes would increase by about one minute."

All you are saying is that travel times in the general purpose lanes would increase, but will that bring the toll lane into compliance or not? And what happens if you spend all the proposed money and traffic deteriorates?

Response E61.02

Traffic performance would stay the same or improve for the southbound AM, southbound PM, and northbound PM commutes when the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) is completed. The northbound AM commute would see a 1-minute increase of travel time in the untolled general purpose (GP) lanes. This would be due to the increase in traffic arriving in this area that was previously stuck in congestion in the Renton and South Bellevue areas. Overall corridor operations would be greatly improved with the Project; however, this particular location and time period would see a 1-minute slowing in the untolled GP lanes.

Please see pages 4-25 and 4-26 of the Environmental Assessment.

Comment E61.03

And besides, I thought that people would rather sit in their vehicles using up the same amount of gas than pay a toll, so in all probability, more people would use the general lanes than the toll lanes and use more of the back roads like Bellevue Way which in turn, will create more traffic on the backroads which has not been reflected in the Environmental Impact Studies.

Response E61.03

See Global Response 4.

Comment E61.04

I am totally against the loss of HOV lane from SE 8th Ave to the I-90.

Response E61.04

The proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would be constructed along with the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would include additional mainline capacity improvements, as well as southbound I-90 ramp improvements. The right-side high-occupancy vehicle (HOV) exit to I-90 would remain in place; however, it would be accessed about one-half mile north of I-90. The current right-side HOV lane has very low use, approximately 300 vehicles per hour in the peak whereas the new express toll lane (ETL) is anticipated to serve over 1,500 vehicles per hour at this location. Together, the operational and capacity improvements of these projects would greatly improve traffic conditions in the section to which you are referring.

We have limited space available due to wetlands and streams for widening in the southbound direction and want to move as many vehicles as possible through this area.

Comment E61.05

Re. Environmental Justice. And as far as environmental justice, those with money will be the beneficiaries in that they will be able to afford the price of the toll not matter what, but what about those that are struggling? Would low income drivers need to still pay the toll price? And it is the lower income folks who can't afford to live in Bellevue and who have to move

further to live in Snohomish Co. and they now have to commute and who would have to pay the tolls/HOT prices to use the I-405 to get to Renton which is unfair. Putting on express buses would be more beneficial than adding HOT lanes.

Response E61.05

See Global Response 10.

In 2002, WSDOT developed a multimodal vision for the corridor to move more people and manage congestion along I-405, which was to be completed by 2020. This vision included managed lanes and Bus Rapid Transit (BRT), which rely on WSDOT's ability to manage lanes to provide a reliable trip for I-405 users. WSDOT is partnering with Sound Transit on the implementation of I-405 BRT. Sound Transit is investing nearly \$900M to provide BRT in the I-405 corridor. This high-capacity transit system would operate in the new express toll lanes (ETLs) providing another choice for I-405 users.

Comment E61.06

Re: Stormwater and Stormwater Runoff. You take the I-90 Two-Way HOV Project, in The End Result, we were told how it "Adds to existing drainage and storm water treatment systems to clean roadway runoff., but that project, probably like this project will not do a thing to clean the roadway runoff. WSDOT do not clean the freeway surfaces which would be beneficial. WSDOT couldn't care less about stormwater runoff. One would think that cleaning the freeway surfaces every now and again would help stop all the contaminants from leaching into the water. You just have to take a look at the I-90 between Bellevue and Mount Baker to realize that the outer roadway surface is not being cleaned at all.

Response E61.06

As a state agency, WSDOT is committed to improving stormwater quality (see website at <https://www.wsdot.wa.gov/environment/water-erosion-control/reports-research>).

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would manage water quality with a combination of best management practices and stormwater treatment facilities to avoid or minimize direct effects on water quality following guidelines in the WSDOT Highway Runoff Manual (WSDOT 2016). The Project would modify existing or add new detention storage to control flow where applicable. Stormwater would be treated for enhanced water quality before being discharged to streams. Discharges to Mercer Slough are exempt from flow control requirements. Because enhanced stormwater treatment can only remove a percentage of the total pollutant load, any increase in pollutant-generating surfaces (impervious road areas) would result in some residual increase in pollutant load. WSDOT would mitigate this condition by designing stormwater runoff treatment systems to treat 3.16 acres more area than the new impervious surface area added by this project. As a result, WSDOT would maintain flow conditions where required and reduce the quantity of suspended solids and total metals discharged. Please see Chapter 6 and the Stormwater Discipline Report, Exhibit 3.1 for proposed stormwater improvements.

Comment E61.07

Re: Ecosystem. "The project would result in permanent loss of less than half an acre of wetlands and about two acres of vegetation adjacent to the existing roadway. These effects may reduce habitat available to local species; however, because the project area is highly urbanized, WSDOT does not expect any fragmentation or loss of connectivity of habitat."

When you see what Sound Transit and WSDOT did to the Mercer Slough, I have no idea how you were allowed to destroy that whole area. It is an environmental disaster in the making. Whenever you use the word "may," that translates into "will," so it is in all likelihood that the habitat available to local species will be reduced. What are they planning to do that will cause the reduction in habitat anyway?

Response E61.07

In the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) area there is no surface water connection between impacted wetlands or their associated buffers and fish-bearing waterbodies. Terrestrial vegetation may be temporarily affected by clearing and grading. WSDOT would prepare and implement a revegetation plan. WSDOT must permanently remove vegetation during construction it would be replaced with native vegetation within or near the study area.

To address the unavoidable wetland and buffer impacts associated with the Project, WSDOT proposes to provide compensatory mitigation at the Kelsey Creek and Charles Plummer Wetland Mitigation Sites. The Project would have no direct impacts on Mercer Slough.

Comment E61.08

Re: Noise. "Aside from temporary construction noise, overall highway noise levels are expected to stay the same as today's conditions." You have to be joking. It is a nightmare for us. You have ruined the lives of people who live along the freeway with your projects. The freeway noise is already unbearable, so adding more lanes and removing landscaping is going to increase the current noise to critical levels. And I don't know where you get that the noise is "from temporary construction noise." It is the permanent noise/sound from all the lanes of traffic without any noise barriers, the kind of paving, and removal of landscaping that has created the already unacceptably loud freeway noise or what you refer to "temporary construction noise.". How on earth can you expect there to be so many lanes without so much as one noise barrier and expect no permanent noise? And when you state that you will mitigate the noise, you have no intention of doing anything of the sort. Even though you say you will mitigate, unless you show us the detailed mitigation plans, you are not going to mitigate. It just sounds good for those who read the Environmental Impact Studies, that's all and that is if anyone even bothers to read the Environmental Impact Studies.

Response E61.08

See Global Response 9.

Comment E61.09

What will it take for you to understand that the freeway noise is and is going to be too loud for people living and working adjacent to the I-405 without the addition of the extra freeway lanes, so adding anymore lanes is just going to make it unbearable.

Response E61.09

See Global Response 9.

Comment E61.11

Re the Air Quality. "Part 75 of Volume 40 of the Code of Federal Regulations (CFR) requires continuous monitoring and reporting of sulfur dioxide (SO₂), carbon dioxide (CO₂), and nitrogen oxides (NO_x) emissions. Most of these emissions are measured with Continuous Emission Monitors (CEM), which monitor important information such as the amount of pollution emitted from a smokestack (pollutant concentration) and how fast the emissions occur (stack gas volumetric flow rate). Lower-emitting sources may use less rigorous methods." It does not say anything about modeling. So what are the dates of your air quality monitoring for this project and is it ongoing like it should be according to the Federal Regulations?

Response E61.11

Puget Sound Clean Air Agency, the Washington State Department of Ecology, and U.S. Environmental Protection Agency monitor air quality on a regional scale. Our project-level analysis is focused on the effects the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would have on air quality, specifically whether the future emissions would exceed any of the federal criteria. WSDOT uses traffic projections for our analysis, rather than monitoring.

The air quality analysis for the Project is required for compliance with the Federal Air Quality Conformity Rules (Washington Administrative Code [WAC] 173-420 and 40 Code of Federal Regulations [CFR] Part 93). Please note that 40 CFR Part 75 applies to the requirements of the Acid Rain Program, which does not apply to the Project.

Comment E61.12

It just seems like there has been a degradation in air quality and it seems to me that the construction trucks with their diesel exhaust fumes which seem to be contributing to the degrade in air quality all around.

Response E61.12

As indicated in the Air Quality section of the Environmental Assessment, the I-405 corridor is in compliance (attainment) with all National Ambient Air Quality Standards (NAAQs). Recent air quality monitoring data from monitoring stations near the Project vicinity measured concentrations of four pollutants: carbon monoxide (CO), particulate matter with a diameter of less than 10 micrometers (PM₁₀), particulate matter with a diameter of less than 2.5 micrometers (PM_{2.5}), and ozone. Exhibit 4-1 in the Environmental Assessment

indicates that the air pollutant concentrations for the past three years have remained below the NAAQS.

Measures to minimize air quality effects during construction are summarized in the Chapter 6 of the Environmental Assessment.

Comment E61.13

"Impacts may also include removal of existing vegetation, and additional headlight glare from additional traffic." Like I said before, when WSDOT uses the word "may," that means "will, so there will be removal of vegetation and additional headlight glare. That is not acceptable.

Response E61.13

WSDOT's policy for disturbed vegetation encourages the contractor to minimize the footprint needed to construct the project. WSDOT would work with certified arborist to trim or remove trees as needed during construction of retaining walls. In accordance with the WSDOT Roadside Policy Manual (WSDOT 2015) we would locate staging and laydown areas where there is no vegetation, undesirable vegetation (such as Himalayan blackberries), or vegetation, such as grassed road shoulders, that is easy to restore.

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project) would manage headlight glare following guidelines in the WSDOT Design Manual (WSDOT 2017). Most of the Project area is separated by elevation in the median between northbound and southbound I-405, which addresses headlight glare from opposing traffic. In addition, most of the barrier in the Project area would be replaced with a barrier that is 6 inches higher than existing barrier. Other considerations for headlight glare would be evaluated and remediation implemented if needed.

Comment E61.14

And there is a really wide shoulder lane as you take the ramp from the I-90 to the I-405 South and I was wondering, why can't you make that shoulder into a lane which would allow drivers heading towards Coal Creek, could use that lane which would free up the other two lanes leading to the I-405 S?

Response E61.14

The proposed I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project, which would be constructed at the same time as the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (Project), would add a southbound untolled general purpose (GP) lane from I-90 to 112th Avenue NE and southbound I-405 to southbound I-90 ramp improvements. As a result of these capacity improvements traffic congestion would greatly improve in this area. Please see Section 5 of the Transportation Discipline Report for more details.

Comment E61.15

So, when all is said and done, I hope you will shelve this toll project. It is not worth the money. If you want to put on more rapid transit buses and if you want to put up noise barriers and repair the freeway surface where the I-90 is and the I-405 ramp, and replace the landscaping you removed, I have no problem with your spending money on those things and if you want to take the toll off the 520 and the I-405 from Bellevue to Bothell, that would be good. Adding HOT lanes/ tolls are not the answer to the I-405.

Response E61.15

See Global Response 1.

Providing a reliability for transit is even more critical as Sound Transit is investing nearly \$900M to implement Bus Rapid Transit (BRT) in the corridor. This high-capacity transit system will operate in the new express toll lanes (ETLs) providing another choice for I-405 users.

Comment E62 – Dorinda Otto, Private Individual, April 30, 2018

From: Dorinda Otto [md.otto@hotmail.com]
Sent: Monday, April 30, 2018 7:21 AM
To: I405comments@wsdot.wa.gov
Subject: Request to Not Toll

Hello,

Please do not add any more toll lanes to I-405. The first toll lanes are already a nightmare for we who live in Bellevue. We are forced to always take surface streets. We certainly don't want to pay \$10 to get to the mall. The other lanes are so backed up we risk getting rear-ended by a distracted driver. E62.1

Yes, please add lanes to I-405 so we can get to the airport easier, but do not ruin that drive by condensing the rest of us into fewer lanes by adding toll lanes. We would be forced to use I-90 to I-5 to get to SeaTac. The impacts of adding toll lanes cannot be measured by only using toll lane data. Think of the rest of the traffic, that is moving far more slowly than ever before. E62.2

We are Bellevue residents for 26 years now. Our WSDOT is making life here less and less desirable. It is frustrating to see those toll lanes unoccupied while we are all dangerously congested in the far right lanes. Thank you for your attention. E62.3
~Dorinda Otto

Comment E62.1

Hello,

Please do not add any more toll lanes to I-405. The first toll lanes are already a nightmare for we who live in Bellevue. We are forced to always take surface streets. We certainly don't

want to pay \$10 to get to the mall. The other lanes are so backed up we risk getting rear-ended by a distracted driver.

Response E62.1

See Global Responses 1 and 3.

Comment E62.3

Yes, please add lanes to I-405 so we can get to the airport easier, but do not ruin that drive by condensing the rest of us into fewer lanes by adding toll lanes. We would be forced to use I-90 to I-5 to get to SeaTac. The impacts of adding toll lanes cannot be measured by only using toll lane data. Think of the rest of the traffic, that is moving far more slowly than ever before.

Response E62.3

See Global Responses 1 and 5.

Comment E62.4

We are Bellevue residents for 26 years now. Our WSDOT is making life here less and less desirable. It is frustrating to see those toll lanes unoccupied while we are all dangerously congested in the far right lanes.

Response E62.4

See Global Response 3.

Comment E63 – T. Vanlienden, Bellevue, Private Individual, May 1, 2018

From: Publius [t_dv@yahoo.com]
Sent: Tuesday, May 01, 2018 4:50 AM
To: I405comments@wsdot.wa.gov
Subject: no more toll lanes

we have spent tax dollars for adding new lanes, only to later be turned into toll lanes

this is theft

these lanes have mad congestion worse, and created more accidents

we don't need any more toll lanes

we need the tax payers to do a class action lawsuit

T. Vanlienden, Bellevue

E63.1

E63.2

Comment E63.1

we have spent tax dollars for adding new lanes, only to later be turned into toll lanes this is theft

Response E63.1

See Global Response 11.

Comment E63.2

these lanes have mad congestion worse, and created more accidents we don't need any more toll lanes we need the tax payers to do a class action lawsuit

Response E63.2

See Global Response 3.

Comment E64 – Marie Chorlton, Private Individual, May 2, 2018

From: Marie Chorlton [CHORLTONGALS@msn.com]
Sent: Wednesday, May 02, 2018 10:59 PM
To: I405comments@wsdot.wa.gov
Subject: I-405 toll lane expansion

Washington State Department of Transportation,

We live in the Woodridge neighborhood of Bellevue. We were unable to attend the 4/17th meeting, so would like to comment on the effects of this expansion to our neighborhood.

First, the noise from the freeway is already extremely loud for those of us living here. The noise level is WAY beyond the "acceptable" cap determined several years ago.

We understand that there was an agreement back then to mitigate some of the noise coming from the freeway. It was to build a higher wall than existing, with a cap. And that residents were told in meetings that this would be done.

But this was not done at all!

The reasoning given later was that it was cost prohibitive. So although the freeway expansion at that time would go forward, nothing would be done about the ever increasing noise blasting at the residents of our neighborhood all day long.

The I-405 noise levels are a major issue that effect the quality of life for those of us living here. We can no longer sleep with windows open. Sitting on our decks or patios is no longer peaceful. Additionally, it directly effects our housing values over the course of time.

Noise abatement for our Woodridge neighborhood must be part of this expansion if it is to be done at all. It must be factored into costs and WSDOT needs to follow through on this. The residents of Woodridge hill should not be overlooked again on this matter.

Thank you,

Dave and Marie Chorlton

Sent from Outlook <<http://aka.ms/weboutlook>>

E64.0

Comment E64.0

Washington State Department of Transportation,

We live in the Woodridge neighborhood of Bellevue. We were unable to attend the 4/17th meeting, so would like to comment on the effects of this expansion to our neighborhood.

First, the noise from the freeway is already extremely loud for those of us living here. The noise level is WAY beyond the "acceptable" cap determined several years ago.

We understand that there was an agreement back then to mitigate some of the noise coming from the freeway. It was to build a higher wall than existing, with a cap. And that residents were told in meetings that this would be done.

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The reasoning given later was that it was cost prohibitive. So although the freeway expansion at that time would go forward, nothing would be done about the ever increasing noise blasting at the residents of our neighborhood all day long.

The I-405 noise levels are a major issue that effect the quality of life for those of us living here. We can no longer sleep with windows open. Sitting on our decks or patios is no longer peaceful. Additionally, it directly effects our housing values over the course of time.

Noise abatement for our Woodridge neighborhood must be part of this expansion if it is to be done at all. It must be factored into costs and WSDOT needs to follow through on this. The residents of Woodridge hill should not be overlooked again on this matter.

Response E64.0

See Global Response 9.

ATTACHMENT 2 – ERRATA TO THE ENVIRONMENTAL ASSESSMENT

The following corrections apply to the Environmental Assessment (EA) and accompanying Discipline Reports (DRs) for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) (Project), which was issued on April 2, 2018. Changes to the EA text are identified by their corresponding page number in the document’s original published edition.

Page 3-6, first and second paragraphs

How ~~w~~ould tolling revenue be used?

Federal law and state law provide specific requirements on how toll revenues can be used. Federal law regarding the use of toll revenues is contained in 23 United States Code (USC) Section 129 (a)(3). This law states that all toll revenues received from operation of the toll facility are used for such things as debt service, a reasonable return on investment for any private financiers of the Project, operations and maintenance costs, and payments associated with any public-private partnership agreements. Current state law is more restricted on how toll revenue can be used.

In addition to these federal requirements, the Revised Code of Washington (RCW) 47.56.820 requires that all revenue from an eligible toll facility must be used only to construct, improve, preserve, maintain, manage, or operate the eligible toll facility on or in which the revenue is collected. ~~Similar to the federal law~~ Currently in Washington State, expenditures of toll revenues must be approved by the Legislature and must be used only to cover operations and maintenance costs; to repay debt, interest and other financing costs; and to make improvements to the eligible toll facilities.

Page 4-6, Exhibit 4-4

Source: ~~Washington Department of Ecology~~. 2015 WSDOT. 2016

Page 4-29, third paragraph

We used demographic data to determine if minority, low income, or persons with limited English proficiency live in the area or use I-405. Potential benefits and adverse disproportionate effects of the Project including effects on community character and livability were evaluated. The transportation analysis provided key information to identify potential effects related to traffic, access, and mobility for people living and working in the study area, including environmental justice populations. We used demographic analyses to determine if any benefits or any adverse effects would disproportionately affect environmental justice populations, and if so, whether any disproportionate effects would be high or severe. We identified mitigation if appropriate.

Page 4-33, third paragraph

An important aspect of environmental justice is providing opportunities for full and fair participation by potentially affected communities. WSDOT conducted interviews of social service providers who serve environmental justice populations in the study area and I-405 travelshed. The purpose of these interviews was to share information about the Project,

including the introduction of ETLs, and gather their insights on how environmental justice populations may benefit or experience ~~disproportionate~~ adverse effects as a result of the Project.

Page 4-33, fourth paragraph

In general, interview participants expressed concern that a toll would dissuade low-income individuals from using ETLs. A few interview participants explained their clients cannot afford gas for their automobiles and expressed skepticism that these clients would be able to afford a toll. On the other hand, some interview participants felt that, because the GP lanes would continue to be available, their clients would not be ~~disproportionately~~ adversely affected. Additionally, some social service providers indicated that, after initial confusion about and frustration with the Bellevue to Lynnwood ETLs, the negative feedback from staff and clients has subsided and some people appreciate having the option of purchasing a faster trip when they need it.

Page 4-35, fourth paragraph

Use of the ETLs ~~would~~ also disproportionately affect persons with limited-English proficiency and low-income populations. ~~Persons with limited English proficiency may~~ Such users who have difficulty understanding the ETL system and how to acquire a transponder. Persons with limited English proficiency may be less likely to use the system or could incur additional costs in Pay-by-Mail surcharges.

In addition, to use the electronic toll collection system, individuals who do not have a credit or debit card must travel to a customer service center in Seattle, Bellevue, or Gig Harbor to open an electronic toll account and preload or replenish it using cash. This may discourage individuals from using the ETLs, or they may incur additional costs in pay by mail surcharges. Most individuals without credit or debit cards are immigrants or have low incomes.

Page 4-37, third paragraph

The WSTC would set toll policy and toll rates for the ETLs on I-405 in the study area. This could include a future policy or toll rate applying to the entire I-405/SR 167 ETL facility. As with any tolled facility, the cost to use the entire length of the system would disproportionately affect environmental justice users, for whom the total cost would represent a higher proportion of annual household income. ~~Disproportionate~~ The severity of these effects would be offset by improved peak travel times in most locations, reliability, and travel conditions in both the GP lanes and the ETLs. The Project would not change the number of GP lanes or reduce GP capacity. We do not anticipate the Project to have a disproportionately high and disproportionate adverse effect on environmental justice populations.

Page 4-38, bulleted list

The following bullet has been added under the third bullet on this page.

- At the time of publication of this document, there were no known homeless encampments along this stretch of I-405. However, it is possible that homeless encampments could be located in construction areas when construction begins. WSDOT works with law enforcement to ensure WSDOT-owned property is used as it is intended. If there is a homeless encampment that requires clearing, WSDOT and/or its construction contractors

post signage in English and Spanish at least 72 hours prior to construction activities, conduct a visual assessment of the area to determine the specific needs for clearing an encampment, and contact advocacy groups to enlist their help in notifying and relocating homeless populations.

Page 4-39, second paragraph

~~These~~The severity of these disproportionate effects would be offset by improved travel time, reliability, and travel conditions in both GP lanes and the ETLs systemwide. As of 2009, low-income individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts. This option could offset ~~some of the~~the severity of this disproportionate effect. In addition, WSDOT is currently working to expand the network of retail location where people can buy *Good To Go!* passes with cash, making it easier for people to purchase a pass without a bank account. As concluded in the analysis of ETLs on these and other segments of I-405, we do not anticipate the I-405/SR 167 corridor ETL system would result in disproportionately high indirect effects on environmental justice populations.

Page 4-43, second paragraph

Channel habitat connections exists between~~T~~the Mercer Slough wetland complex creates a natural (wetland) barrier with no channel habitat connection downstream of and the Median creek and Trail Creek culvert crossings per WDFW's 2015 Habitat Assessment.

Page 4-44, second paragraph

Overall, the Project would reduce pollutant loading relative to existing conditions. There would be minor increases in dissolved copper, which is associated with concerns about direct effects on fish, in some TDAs, but other TDAs would more than compensate for those increases. For all locations, the dilution assessment demonstrated that dissolved copper levels will be below effects thresholds on fish. The dilution analysis was completed using the HI-RUN model in accordance with the 2009 Memorandum of Agreement between FHWA, National Marine Fisheries Service (NMFS), U.S. Fish and wildlife Service (USFWS), and WSDOT for analyzing the effects of stormwater on ESA. HI-RUN user guidelines state that dilution values less than 1 foot suggest near instantaneous dilution to below the biological effects threshold.

Page 4-54, third paragraph

WSDOT prepared a BA (WSDOT 2016c) for the Project in compliance with Section 7 of the ESA. The BA assessed the potential effects on the listed species shown in Exhibit 4.4-5. On March 22, 2016, NMFS ~~issued a Biological Opinion that concluded~~ concurred with the finding that the Project is not likely to adversely affect the Puget Sound Chinook salmon and Puget Sound steelhead trout (NMFS Tracking No. WCR-2016-4189). No consultation with USFWS was required as the ~~NMFS did not provide an evaluation of potential effects on the other listed species because the BA concluded~~ the Project would have no effect on these bull trout or any terrestrial species. In addition, NMFS did not provide an evaluation of potential effects on critical habitat for these species since none are present in the study area. Documentation of the Section 7 ESA consultation can be found in Attachment L, Agency and Tribal Correspondence. ~~Concurrence from USFWS and NMFS occurred on March 22, 2016.~~

Page 5-12, second paragraph

WSDOT is in the process of complying with the terms of the 2013 United States District Court injunction.

Page 6-12, fourth bullet

~~WSDOT will leave large woody debris found in any landslide material in riparian areas and retain it for future restoration use or donate it to a local watershed group if there is a need for the material.~~

WSDOT and our contractors will make efforts to retain woody debris removed from the Project footprint for use in restoration in the immediate vicinity.

Note to Reader: the entire Environmental Justice Discipline Report was added to the Errata to indicate where changes have occurred.

I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6)

Errata: Environmental Justice Discipline Report





Title VI

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SUMMARY

What is the Project?

The Washington State Department of Transportation (WSDOT) is proposing to construct the *I-405, Downtown Bellevue Vicinity Express Toll Lanes Project* (MP 11.9 to 14.6) (referred to in this report as “the Project”) to improve traffic operations and safety on Interstate 405 (I-405) through Bellevue. This discipline report assesses the Project’s operational and construction effects on environmental justice populations as well as No Build conditions if the Project were not constructed.

The Project is part of a comprehensive strategy identified in the *2002 I-405 Corridor Program Final Environmental Impact Statement Environmental Impact Statement* and subsequent Federal Highway Administration (FHWA) *Record of Decision* to reduce traffic congestion and improve mobility along the state’s second-busiest highway. The Project is needed because travelers on Interstate 405 (I-405) face one of the most congested routes in the state, particularly during peak travel times.

What are the Primary features of the Project?

The Project would make roadway, structural, trail, and transit improvements in the I-405 corridor from just north of the Interstate 90 (I-90) interchange (MP 11.9) to north of the NE 6th Street interchange (MP 14.6), along with widening the I-405 northbound off-ramp to State Route 520 (SR 520) in Bellevue. Specifically, the Project will add one new lane in each direction (except between MP 13.5 north to tie-in with the existing express toll lane [ETL] system) and convert the one existing high-occupancy vehicle (HOV) lane to create a dual ETL system. When combined with other 405 projects, the Project would result in a continuous express tolling system from Interstate 5 (I-5) in Lynnwood to State Route 167 (SR 167) in Renton.

What is an express toll lane (ETL)?

A limited-access freeway lane that is actively managed through a variable toll system to regulate its use and thereby maintain express travel speeds and reliability. Toll prices rise or fall in real time as the lane approaches capacity or becomes less used. This ensures traffic in the express toll lane remains flowing at express travel speeds of 45 to 60 miles per hour. Transit and carpools do not pay a toll.

What is the purpose of this report?

This Environmental Justice Discipline Report evaluates the benefits and effects of the Project to environmental justice populations and then compares them to the effects of not building the Project (the No Build conditions).

What is the study approach?

When we evaluate the potential effects of a project on environmental justice populations, we ask whether the Project would have a disproportionately high and adverse effect on low-income, minority, or persons with limited English proficiency. To make this determination, we ask the following questions:

- Do individuals with low incomes, individuals who identify themselves as minorities, or persons with limited English proficiency live or work in the study area?
- If so, would the Project affect the livability of neighborhoods in the study area?
- Would the Project disrupt community cohesion, i.e., linkages that low income, minority, and limited English proficient individuals have with their neighbors and community?
- How would the Project affect access to transit, bicycle, and pedestrian facilities in neighborhoods where low income, minority, and limited English proficient individuals live?
- How would the Project affect public safety in these neighborhoods?
- How would the Project affect access to schools, recreational facilities, and religious organizations that are of importance to individuals with low incomes, individuals who identify themselves as minorities, or individuals with limited English proficiency?
- Would the Project help or hurt minority-owned businesses employing or serving individuals with low incomes, individuals who identify themselves as minorities, or individuals with limited English proficiency?

Because the Project also includes ETLs that would affect I-405 users, we determined whether individuals who identify as a minority, have low incomes, or are limited English proficient use I-405. Then, we examined how these users may be affected by the ETLs

We used two study areas for this report:

What is a disproportionately high effect?

According to the U.S. Department of Transportation (USDOT), A disproportionately high and adverse effect on minority and/or low-income populations means an disproportionate-adverse effect that (1) is predominantly borne by a minority population and/or a low-income population, or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the disproportionate-adverse effect that will be suffered by the non-minority population and/or non-low-income population.

- To examine potential construction and operational effects of widening I-405, we looked at the geographic area within 0.50 mile of either side of I-405 from the project limits.
- To analyze potential benefits and effects of ETLs, we identified the travelshed for the study area (from MP 11.9 to 14.6). The travelshed includes census tracts along the entire I-405 project corridor.

To analyze effects that may be delayed or distant from the Project, we also looked at geographic areas outside the study area.

What are the existing conditions in the study areas?

There are minority, low-income, and limited English-proficient individuals living in the study areas who drive or use transit on I-405 between the project limits. These individuals—along with all other I-405 motorists and transit riders—deal with daily traffic congestion on I-405.

How would the Project affect environmental justice populations?

Benefits

All users of I-405—including those driving in the general purpose (GP) lanes—would benefit from faster, more reliable trips as a result of the Project. The additional capacity and an ETL system would improve most travel times for the GP lanes and ETLs compared to the No Build conditions. The improvements would result in an increase in person throughput; in other words, 1,000 to 3,000 more people would be able to move through the study areas compared to No Build conditions. WSDOT also anticipates improved safety compared to the No Build due to a reduction in congestion and congestion-related crashes.

In addition, Sound Transit's expansion of the regional mass transit system includes multiple future improvements in the study area. Sound Transit will be implementing bus rapid transit on I-405 between south Renton and Lynnwood and constructing freeway stations that will allow buses to pick up and drop off riders without having to exit and re-enter the I-405 corridor. The two-lane ETL system will provide the

infrastructure needed to facilitate a fast, reliable bus rapid transit system and will benefit transit riders, including those who identify as minority, have low incomes, or are limited English proficient.

Disproportionate Adverse Impacts

Environmental justice populations could be ~~disproportionately adversely~~ affected by the proposed ETLs in two ways:

- The cost of the toll to use ETLs ~~could~~ would disproportionately affect ~~environmental justice~~ low-income populations because the cost to use the ETLs would represent a higher proportion of household income than for middle- and high-income users.
- Use of the electronic toll collection system could disproportionately affect ~~environmental justice populations~~ persons with limited English proficiency and low-income populations because some users may have difficulty understanding the electronic toll system and how to acquire a transponder. In addition, unbanked and underbanked individuals may have difficulty obtaining a responder and loading or replenishing a *Good To Go!* account.

Although our analysis concludes that ETLs would result in disproportionate impacts on environmental justice populations, we found that these effects would not be disproportionately high and adverse for the following reasons:

- All users, including low-income and limited English proficient users, would continue to have an accessible, convenient, and free travel option: the GP lanes on I-405.
- All lanes on I-405, including GP lanes, would experience improved travel times for most trips because of the Project.
- Most motorists, including individuals who have low incomes or are limited English proficient, would not lose a travel option because of the Project. The only exception are two-person carpools, which would have to pay a toll to use the ETLs during peak periods. These carpools can use the HOV lanes for free today. However, because travel times in the GP lanes are

expected to improve with the Project, two-person carpools would still have the same or faster travel times with the Project than without for most trips. As such, even two-person carpools would benefit from the Project compared to the No Build conditions.

What measures will WSDOT take to avoid or minimize disproportionately high and adverse effects on environmental justice populations?

Although there is no need for additional mitigation, WSDOT will continue conducting targeted outreach to engage minority, low-income, and persons with limited English proficiency of the study area and I-405 travelshed. To reduce possible barriers to obtaining and maintaining a *Good To Go!* account for persons who have low-incomes or are underbanked:

- WSDOT will continue to offer the option for low-income persons who are eligible for public benefits to use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts.
- WSDOT is working to expand the network of retail locations where people can buy *Good To Go!* passes with cash, making it easier for people to purchase a pass without a bank account.

~~Note that, as of 2009, low-income individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts. This option could offset some of the disproportionate effects. In addition, WSDOT is currently working to expand the network of retail location where people can buy *Good To Go!* passes with cash, making it easier for people to purchase a pass without a bank account. Would the Project result in unavoidable disproportionately high effects on environmental justice populations?~~

The Project would not ~~result in any~~ have a disproportionately high and adverse effects on environmental justice populations.

What would happen if the Project is not built?

If the Project is not built, congestion would continue to worsen on I-405, and travel times would increase in both GP lanes and

HOV lanes. Carpools and single-occupant vehicles (SOVs) would experience increased delay.

As the regional population grows, demand for travel would make congestion worse than it is today, especially in bottleneck areas, where there would be longer queues to get on I-405 and more hours of congestion. Drivers unable to access I-405 due to congestion would seek alternative routes, including local roads through neighborhoods.

Transit experiences delay on I-405 because of congestion during peak periods in the HOV lanes and general-purpose lanes. Congested conditions would continue to worsen in future years, further delaying transit. This would further reduce transit reliability and could result in increased costs for transit agencies and compromised service for transit users.

Sound Transit's bus-rapid transit would not be able to use the two-lane ETL system in the study area. The result would be the bus-rapid transit system would not meet its intent to provide fast, reliable service.

SECTION 1 INTRODUCTION

This environmental justice discipline report was prepared in support of the *I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6)* (the Project) *Environmental Assessment (EA)* to evaluate environmental effects related to proposed improvements on I-405.

The Project is part of a comprehensive strategy identified in the *2002 I-405 Corridor Program Final Environmental Impact Statement (EIS)* and subsequent Federal Highway Administration (FHWA) *Record of Decision* to reduce traffic congestion and improve mobility along the state's second-busiest highway. The Project is needed because travelers on I-405 face one of the most congested routes in the state, particularly during peak travel times.

What are the primary features of the Project?

The Project would make roadway, structural, trail, and transit improvements in the Interstate 405 (I-405) corridor from just north of the I-90 interchange (MP 11.9) to north of the NE 6th Street interchange (MP 14.6), along with widening the I-405 northbound off-ramp to State Route 520 (SR 520) in Bellevue. Specifically, the Project would add one new lane in each direction (except between MP 13.5 north to tie-in with the existing express toll land [ETL] system) and convert the one existing high-occupancy vehicle (HOV) lane to create a dual ETL system. When combined with other I-405 projects, the Project would result in a continuous express tolling system from Interstate 5 (I-5) in Lynnwood to State Route 167 (SR 167) in Renton.

What is the purpose of this report?

The Washington State Department of Transportation (WSDOT) prepared this report to comply with several federal laws, orders, regulations, and guidance that establish the need to evaluate the effects of publicly funded projects on environmental justice populations.

Why is environmental justice an important element to consider?

WSDOT builds transportation systems to improve the safety and mobility of people and goods. In addition, WSDOT

Minority Persons

A minority is an individual who identifies as Black (a person having origins in any of the black racial groups of Africa); Hispanic (a person of Mexican, Puerto Rican, Cuban, Central American, South American, or other Spanish culture or origin, regardless of race); Asian (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); American Indian/Alaskan Native (a person having origins in any of the original peoples of North America and who maintains cultural identification through tribal affiliation or community recognition); or some other race.

acknowledges the state's vital interests in protecting and preserving natural resources and other environmental assets in addition to the health, safety, and wellbeing of its residents. Therefore, it is important to examine the potential effects of the Project on environmental justice populations during the environmental documentation phase of a transportation project

Federal Orders, Regulations, and Guidance on Environmental Justice

The National Environmental Policy Act (NEPA) requires agencies to analyze and evaluate the social and economic effects of publicly funded projects.

Title VI of the Civil Rights Act of 1964 is the foundation for environmental justice. It requires that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Presidential Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations in 1994; US Department of Transportation (USDOT Order 5610.2(a)), Order to Address Environmental Justice in Minority Populations and Low-Income Populations; and FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (FHWA Order 6640.23(a)) all guide agencies to identify and address potential **disproportionate adverse** effects not only on minority populations, but also on low-income populations.

Other federal laws, such as the NEPA, Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended, and the Transportation Equity Act (TEA-21) also include the non-discrimination requirements outlined in Title VI.

The President’s Executive Order 13166 on Improving Access to Services for Persons with Limited English Proficiency (August 11, 2000) reaffirms the Title VI prohibition against national origin discrimination and ensures that persons who are limited in English proficiency have meaningful access to federally funded programs and activities, consistent with Title VI. FHWA’s Order 6640.23A guides WSDOT to provide

Low-income persons

A low-income person is an individual whose household income falls below the federal poverty guidelines, as defined by the U.S. Department of Health and Human Services. For 2017, the federal poverty guideline for a household of four in one of the 48 contiguous states and Washington D.C. was \$24,600.

Persons with Limited English Proficiency

A limited English proficient person is an individual who has difficulty speaking, reading, writing, or understanding the English language and whose difficulties may deny that individual the opportunity to meaningfully engage in the transportation decision-making process. This definition applies to an individual who:

- Was not born in the United States.
 - Speaks a native language other than English and comes from an environment where a language other than English is dominant.
 - Comes from an environment where a language other than English has had a substantial effect on that individual's English-language proficiency.
-

limited English proficient populations with fair and equal access to the decision-making processes for publicly funded projects, as well as the benefits of these projects. Consistent with FHWA policy guidance, our environmental review includes addressing effects on limited English proficient community members.

SECTION 2 PROJECT DESCRIPTION

What improvements are proposed with the the Project?

The Project would extend along I-405 approximately 2.7 miles from just north of the I-90 interchange (MP 11.9) to north of the NE 6th Street interchange (MP 14.6). The Project proposes the following improvements by mile posts, as shown in Exhibit 2-1, sheets 1 and 2:

- **Northbound I-405, I-90 to NE 6th Street (MP 11.9 to 13.7)** – Develop approximately 1.6 miles of new lane in the northbound direction by widening or restriping I-405 from MP 11.9 to 13.5. In this same section of I-405, convert the existing HOV lane to an ETL. The new lane coupled with the existing HOV lane would create a dual ETL. Between MP 13.5 and 13.7, convert the existing HOV lane to an ETL. The ETL would connect to the existing ETLs from downtown Bellevue to Lynnwood. Westward expansion of I-405 is proposed south of SE 8th Street, and eastward expansion is proposed north of SE 8th Street.
- **Southbound I-405, I-90 to NE 6th Street (MP 11.9 to 13.7)** – From MP 11.9 to 12.5, reconfigure the existing outside HOV lane to the inner roadway and convert both of the existing HOV lanes to ETLs. From MP 12.5 to 13.5, develop a new lane by widening or restriping. This new lane coupled with the existing HOV lane would result in a dual ETL south of NE 4th Street. Between MP 13.5 and 13.7, convert the existing HOV lane to an ETL. The ETL would connect to the existing ETLs from downtown Bellevue to Lynnwood. Where new pavement is needed, eastward expansion is proposed.
- **I-405 Eastside Rail Corridor Overpass (MP 12.4)** – Build a new northbound I-405 bridge structure adjacent to the existing I-405 structure over the Eastside Rail Corridor Regional Trail. The new structure would carry the two ETLs and the GP lanes would remain on the existing structure.
- **Eastside Rail Corridor Regional Trail (MP 12.09 to 12.49)** – Construct a new bridge for nonmotorized

travel over southbound I-405 near MP 12.15. Build a section of nonmotorized trail to connect with the Eastside Rail Corridor Regional Trail.

- **S SE 8th Street Interchange (MP 12.78)** – Widen the northbound I-405 overpass over SE 8th Street.
- **Main Street Overpass (MP 13.31)** – Reconstruct the Main Street bridge (photo on right) over I-405.
- **Northbound I-405 to SR 520 Ramp (MP 14.6)** – Widen the existing northbound off-ramp to SR 520 from two lanes to three lanes for approximately 600 feet beginning where the NE 10th Street on-ramp merges onto the I-405 ramp.
- **Stormwater** – Build new flow control and runoff treatment facilities.
- **Other Improvements** – Provide pavement markings, drainage improvements, permanent signing, illumination, intelligent transportation systems, barriers, and tolling gantries.
- **Context Sensitive Solutions** – Incorporate CSS to enhance mobility, safety, the natural and built environment, and aesthetics throughout the Project corridor.
- **Property Acquisitions** – Acquire portions of five commercial and public properties to accommodate the Project.
- **Minimization Measures** – Implement avoidance and minimization measures or compensate for unavoidable effects on the environment, as described in Chapter 6, Measures to Avoid or Minimize Effects.



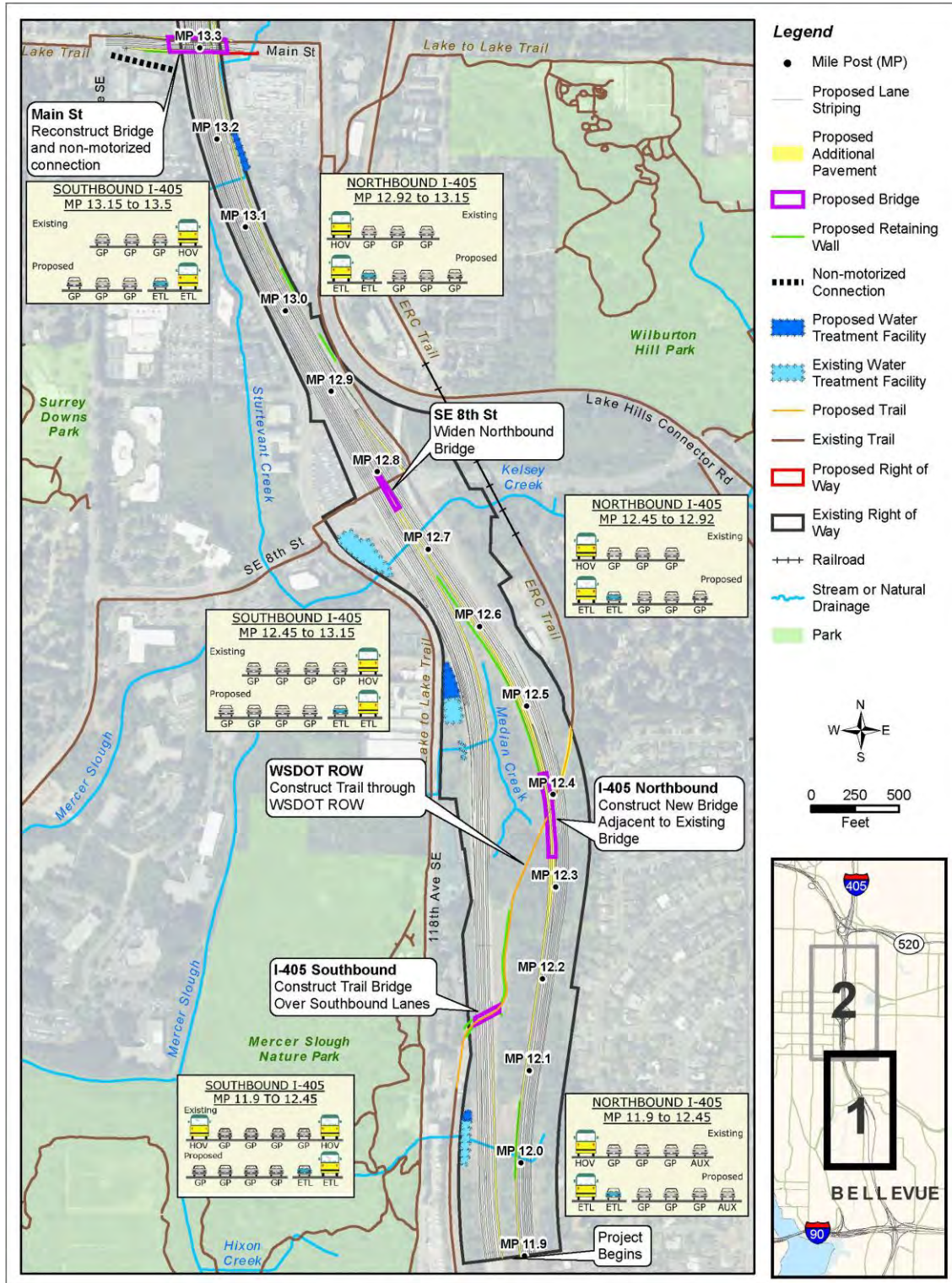
Existing Main Street Overpass

What are Context Sensitive Solutions?

The *Context Sensitive Solutions (CSS)* process is a model for transportation project development that has received much discussion and broad acceptance. Its essence is that a proposed transportation project must be planned not only for its physical aspects and road serving specific transportation objectives, but also for its effects on the aesthetic, social, economic, and natural environment, as well as the needs, constraints, and opportunities in a larger community setting.

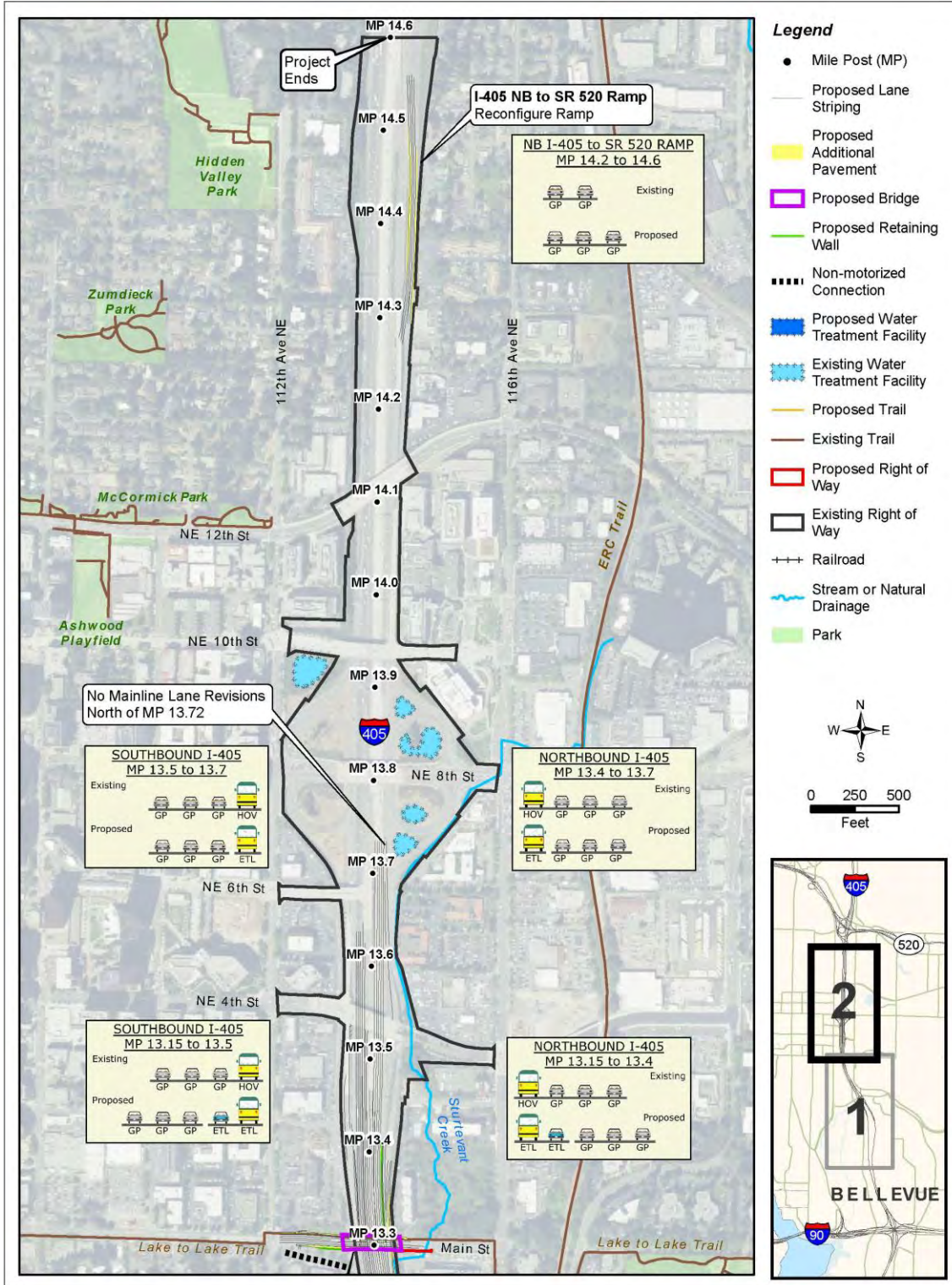
I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 2-1. Project Improvements, Sheet 1 of 2



I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 2-2. Project Improvements, Sheet 2 of 2



How would the express toll lanes work?

At this time, the Washington State Transportation Commission (WSTC) has not established operational hours, user exemptions, occupancy requirements, and operating parameters for ETLs proposed with the Project. WSTC would set operational requirements for the ETLs prior to opening day. For this analysis, we assumed the requirements for the current I-405, Bellevue to Lynnwood ETL system would be used for the Project. These assumptions, listed below, represent the most recent operating guidance from the WSTC for ETLs:

- **Limited Access** – The system would have designated entry and exit points, with a buffer between the ETLs and the GP lanes. These access points would vary in length, depending on the location.
- **Dynamic and Destination Pricing** – The I-405 ETL system would use both dynamic and destination pricing to determine a driver’s toll at the time they enter the ETL. With dynamic pricing, toll rates vary based on congestion within the corridor to maintain performance. Electronic signs are used to communicate the current toll rate for drivers. Toll rates are updated every few minutes, but the driver’s price is set when they enter the system. With destination pricing, the toll is based on the driver’s destination. Toll signs show up to three toll rates for different toll zones, or destinations. Drivers pay the rate they see upon entering the ETLs to reach their destination, even if they see a different toll rate for their destination further down the road. When both pricing approaches are used together, it means the toll that drivers pay is based both on the congestion in the corridor and the distance they are traveling.
- **Operating Hours and Good To Go! Passes** – The ETL system is expected to operate from 5 a.m. to 7 p.m. on weekdays, with the system toll-free and open to all at other hours and on major holidays. Transit, HOVs, and motorcycles would need to have a *Good To Go!* pass to use the ETLs for free during operating hours. Eligible HOV users would

How does dynamic pricing work?

Electronic monitors along the roadway measure real-time information on speed, congestion, and number of vehicles in the *express toll lanes (ETLs)*. This information is used to determine whether tolls go up or down to optimize lane use.

As the ETLs become congested, toll rates increase, and as congestion decreases, toll rates decrease. The use of dynamic pricing allows the lanes to operate with high volumes, but avoid becoming congested.

When would tolls be charged to use the ETLs?

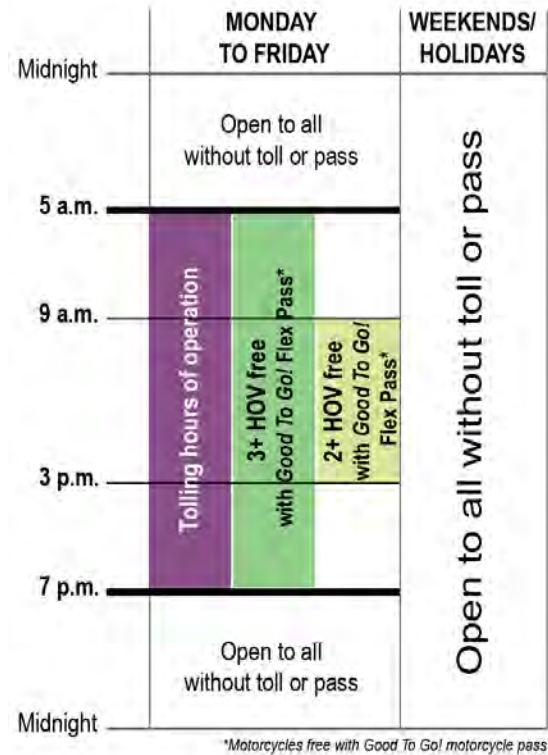
It is assumed the ETLs would operate from 5 a.m. to 7 p.m. on weekdays. At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass.

During operating hours:

- **SOVs** would pay a toll to use the lanes.
- **Transit, HOV 3+, and Motorcycles** would travel for free with a *Good To Go!* pass.
- **HOV 2+** would travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass. From 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. HOV2+ would pay a toll to use the ETLs with or without a *Good To Go!* pass.
- **Large vehicles** over 10,000 pounds gross vehicle weight would not be able to use the ETLs at any time.

be required to set the *Good To Go!* pass to the HOV mode to avoid charges. SOVs could choose to pay a toll to use the ETLs during operating hours with or without a *Good To Go!* pass.

- **Occupancy Requirements** – During the peak periods (weekdays from 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m.), transit vehicles and carpools with three or more persons (HOV 3+) would be able to use the lanes for free with a *Good To Go!* pass. From 9 a.m. to 3 p.m., the system would be open toll-free to those with two or more passengers with a *Good To Go!* pass. Motorcycles ride toll-free in the ETLs with a *Good To Go!* pass.
- **Vehicle Weight** – Vehicles over 10,000 pounds gross vehicle weight will be prohibited, which is consistent with HOV lane restrictions throughout Washington.
- **Electronic Tolling** – Payments will be made via electronic tolling with a *Good To Go!* pass. For drivers who choose not to use a *Good To Go!* Pass, WSDOT offers optional photo billing (pay by mail) for an extra fee.



How would tolling revenue be used?

Federal law and state law provide specific requirements on how toll revenues can be used. Federal law regarding the use of toll revenues is contained in 23 United States Code (USC) Section 129 (a)(3). This law states that all toll revenues received from operation of the toll facility are used for such things as debt service, a reasonable return on investment for any private financiers of the Project, operations and maintenance costs, and payments associated with any public-private partnership agreements.

In addition to these federal requirements, the Revised Code of Washington (RCW) 47.56.820 requires that all revenue from an eligible toll facility must be used only to construct, improve, preserve, maintain, manage, or operate the eligible toll facility on or in which the revenue is collected. Similar to the federal law, expenditures of toll revenues must be approved by the

Legislature and must be used only to cover operations and maintenance costs; to repay debt, interest and other financing costs; and to make improvements to the eligible toll facilities.

As required by state law, all toll revenue generated from the Project ETLs would be used to construct, improve, preserve, maintain, manage, or operate the I-405 corridor.

What is the Project construction schedule?

Construction of the Project is expected to last up to 5 years beginning in 2019 and ending in 2024.

SECTION 3 STUDY APPROACH

What is the study area and how was it determined?

The study area varies depending on the resource and potential effect or benefit being evaluated. This Environmental Justice Discipline Report includes two study areas, described below:

- To examine potential construction and operational effects of widening I-405, we looked at the geographic area within 0.50 mile of either side of I-405 between the project limits.
- To analyze potential benefits and effects of ETLs, we identified the travelshed for the study area (from MP 11.9 to 14.6). The travelshed includes census tracts along the entire I-405 project corridor.

For this discipline report, we refer to the geographic area within 0.50 mile of either side of I-405 between the project limits as the study area. We refer to the geographic area from which I-405 users come as the I-405 travelshed.

To analyze effects that may be delayed or distant from the Project, we also considered geographic areas outside the study areas.

What policies or regulations are related to effects on environmental justice populations?

The methodology for this Environmental Justice Discipline Report is consistent with federal and state policies and plans that inform FHWA and WSDOT guidance. These include the guidance described in Section 1, Introduction, of this report, as well as the following federal and state policies:

- FHWA's Community Impact Assessment: A Quick Reference for Transportation
- WSDOT's *Environmental Procedures*, Section 458, Social and Economic, and Section 470, Public Services and Utilities (WSDOT 2017a)
- Federal Highway Administration *Environmental Justice Reference Guide* (FHWA 2015)

How did we collect information for this report?

To evaluate the affected environment, we used EJScreen, a website developed and maintained by the U.S. Environmental Protection Agency. EJScreen uses data from the 2010 U.S. Decennial Census and American Community Survey (ACS) 3- and 5-year estimates. EJScreen allows us to collect information on demographic characteristics of populations in the study area.

We verified Census and ACS findings with Washington State Office of Superintendent of Public Instruction demographic data on students enrolled in elementary schools in each study area for the most recent school year available.

We met with the Transportation technical lead for the Project to do the following:

- Determine the travelshed for I-405.
- Understand potential increases or reductions in traffic congestion, travel delays, and the level of service for the I-405 GP lanes, ETLs, and transit routes that serve the corridor.
- Identify any transit routes that would not be able to access ETLs because of where they enter and exit I-405, and determine how these routes would be affected.

In addition, we met with the technical lead and/or reviewed analyses for the following disciplines:

- Economics, to identify potential effects on businesses in the study areas—including those that are owned by, employ, or serve low-income or minority populations—as a result of roadway widening in the Project and implementing ETLs.
- Visual Quality, Air Quality, Noise, Hazardous Materials, Public Services and Utilities, Cultural Resources, Social, and Section 4(f) to identify potential benefits and effects on surrounding communities—especially those with low-income, minority, and persons with limited English proficiency—as a result of widening in the Project and implementing ETLs.
- Land Use, to identify potential benefits to affected communities as a result of widening in the Project and

potential effects on surrounding neighborhoods as a result of changes to land use.

- Relocations, to identify potential property acquisitions and relocations as a result of the Project, especially in neighborhoods where there are low-income, minority, and limited English proficient populations.

We conducted a literature review of existing research on the effects of ETLs on affected communities and environmental justice populations. We also referenced previous environmental justice analyses of ETL projects, including the *SR 167 High-Occupancy Toll (HOT) Lanes Pilot Program, I-405 Bellevue to Lynnwood Project, and the I-405, Tukwila to Renton Improvement Project (I-5 to SR 169 – Phase 2) Re-evaluation*.

Several additional data sources and databases informed the demographic analysis, existing conditions, and analysis of the effects of the Project on environmental justice populations, including:

- King County Metro Transit rider/nonrider surveys (2016).
- U.S. Bureau of Transportation Statistics, which compiles, analyzes, and makes accessible information on the nation's transportation systems.
- U.S. Census TIGER/Line Files, an acronym for the "Topologically Integrated Geographic Encoding and Referencing" system. These are the maps prepared for the U.S. Census Bureau that contain all of the essential census geography, including street addresses, governmental unit boundaries, and submunicipal boundary data such as Census Tracts, Block Groups, and Blocks. These maps enable transportation analysts and decision-makers to closely examine the spatial patterns of socioeconomic characteristics such as income and race.

Public Involvement

Public involvement with communities in the study area has influenced the Project. Members of the public have had an opportunity to review and provide input, starting in 1998 when WSDOT, FHWA, King County Metro Transit, and local jurisdictions came together to address congestion and improve mobility in the I-405 corridor. Extensive public involvement

with communities along the I-405 corridor continues today. Public input influenced WSDOT's decision to advance the Project.

Most of the public outreach to date has been provided in English. Section 6, Measures to Avoid or Minimize Effects, of this document, which describes mitigation, includes outreach in multiple languages.

Outreach activities specific to the proposed improvements are listed below:

- Public Open House in BellevueHeld two public open houses about the Project in Bellevue (photo on right) in both August 2015 and September 2016:
 - Mailed approximately 4,600 postcards announcing the public open houses that occurred in both Bellevue and Renton.
 - Published display advertisements in area papers and online publications, in languages other than English, announcing the open houses.
 - Hung posters and distributed postcards to community gathering places, such as libraries, throughout the corridor announcing the open houses.
 - Emailed notices of the open houses to WSDOT project listservs and other agency or community group lists.
 - Sent press releases announcing the open houses to local and regional media outlets.
- Briefed community groups and councils, such as the Bellevue Downtown Association, Bellevue Chamber of Commerce, Bellevue Sunrise Rotary, and Bellevue City Councils.



Public Open House in Bellevue

- Hosted targeted meetings regarding noise and project design with neighborhoods along the Project alignment, including the Woodridge neighborhood in Bellevue.
- Responded to area residents' and commuters' questions and comments through telephone, email, and in-person conversations. Major topics of interest have included preliminary Project designs, ETL operations, property acquisition, noise walls, landscaping and clarifications regarding the funded Project versus Master Plan improvements.
- Provided a project website with information such as project benefits, finances, timeline, and public involvement opportunities

From 2014 to the present, WSDOT has been conducting public involvement throughout the I-405 corridor regarding ETLs. This includes the following:

- Holding over 200 briefings with community and neighborhood organizations, local jurisdictions (staff and elected officials), and other interested groups.
- Staffing booths at 10 fairs and festivals in the corridor, including Renton River Days and Bellevue Strawberry Festival.
- To supplement this outreach with more targeted engagement for environmental justice populations, WSDOT conducted seven interviews with social service providers who serve environmental justice populations in the study area and I-405 travelshed, including:
 - City of Bellevue Human Services Division (August 15, 2016)
 - City of Burien Department of Human Services (September 23, 2016)
 - City of Redmond Human Services (August 29, 2016)
 - City of Renton Department of Human Services (August 11, 2016)
 - Coal Creek YMCA (January 12, 2017)

How does WSDOT communicate with the public?

Speaker's Bureau: Formal presentations by WSDOT personnel to community organizations.

Environmental Outreach: Field studies put I-405 environmental team members in touch with neighbors in the corridor.

Project Website: www.wsdot.wa/projects/I-405 was designed as a resource for the public and has been updated regularly.

Newsletters/Project Updates: Newsletter mailings and email updates offer an ideal opportunity to inform the public on project progress.

- Hopelink (August 25, 2016)
- Youth Eastside Services (August 16, 2016)

The purpose of these interviews was to share information about the Project—including the introduction of ETLs—and gather insight on how environmental justice populations may benefit or experience effects as a result of the Project. Most questions and concerns raised in these interviews were about how ETLs may affect low-income and limited English proficient individuals.

WSDOT reached out to 28 other human service agencies and social service providers to offer project briefings, but did not receive a response or the request was turned down. WSDOT will continue to reach out to these organizations as the Project progresses.

Engagement with Tribes

American Indians are environmental justice populations. WSDOT coordinates with Tribal Governments to identify and address social, cultural, environmental, and other issues of significance to tribal members.

WSDOT is committed to respectful, effective consultation and communication with tribal governments in recognition that project activities may affect their rights and interests. WSDOT Executive Order E1025.01 on Tribal Consultation reaffirms the commitment to an effective working relationship with tribal governments.

WSDOT participated in government-to-government consultation with four federally recognized tribes during preparation of the I-405 Corridor Program EIS: Muckleshoot Indian Tribe, Snoqualmie Tribe, Tulalip Tribes, and the Confederated Tribes and Bands of the Yakama Nation. WSDOT also consulted with the Duwamish Tribe as an interested party.

More recently, WSDOT consulted with the tribes to discuss ecosystems effects and approach to wetlands and stream mitigation for the Project. During those discussions, WSDOT informed the tribes about the ETLs, but did not receive any feedback specific to the tolling.

On February 11, 2016, WSDOT sent letters to the Muckleshoot Tribe, the Snoqualmie Nation, and the Confederated Tribes and Bands of the Yakama Nation requesting tribal participation

in the identification of cultural resources in and around the study area. To date, there has been no response.

WSDOT continues to consult with these tribes as it advances the Project, engaging tribal governments at each stage of the environmental analysis.

How did we evaluate effects?

Analytic Techniques to Address Non-Toll-Related Effects

To identify potential effects on minority or low-income populations, as well as persons with limited English proficiency (in addition to reviewing findings from other disciplines such as transportation and land use) we considered the outcomes from WSDOT's interviews with social service providers and public outreach for the Project to find answers to the following questions:

- How would construction and operation of the Project potentially affect environmental justice populations, compared to if the Project is not built?
- How would construction and operation benefit environmental justice populations?

In reviewing summaries from the interviews and social service providers and public outreach, we considered feedback from low-income, minority, and limited English proficient community members about the potential benefits and effects of the Project, magnitude of those effects, and suitability of proposed mitigation to avoid or minimize effects.

After we identified potential effects and benefits, we isolated the Project effects that would affect people differently, such as noise or increased traffic congestion.

We also examined whether the Project could affect community cohesion—linkages that people in a community have with their neighbors and social resources like schools, community centers, recreational facilities, and churches.

Next, we determined whether any adverse effects or benefits would disproportionately affect low-income or minority populations, and whether these effects would be high and adverse. FHWA directs WSDOT to apply two criteria to determine whether an effect is disproportionately high and adverse:

- The effect is predominantly borne by a minority population and/or a low-income population
- The effect would be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the effect on the nonenvironmental justice populations/general population.

We used a geographic information system (GIS) to map the potential effects over census block group demographic data. This approach compared the minority and poverty status of those who would be affected by the Project to those who would not be affected. We also compared the limited English proficient status of those affected by the Project to those not affected.

In determining whether there would be disproportionately high and adverse effects on low-income or minority populations, we also considered project benefits that affect low-income or minority populations.

In addition, we considered the following:

- Are there reasonable and feasible measures to avoid or minimize effects?
- Are there any project benefits that would affect low-income or minority populations?
- Did WSDOT modify the Project to avoid or minimize effects?

Analytic Techniques to Address Toll-Related Effects

To identify potential effects and benefits of the ETL system and the all-electronic toll system on low-income, minority, and limited English proficient populations, we relied on outcomes from the interviews with social service providers, the results from surveys with SR 167 users on their experiences with HOT lanes, and our literature review.

To determine the proportion of I-405 users who are low-income, minority, or limited English proficient, we overlaid the map of the travelshed for I-405 with demographic data from EJScreen. We created three overlaid travelshed maps: low-income populations in the travelshed, minority populations in the travelshed, and limited English proficient populations in the travelshed.

We evaluated whether any effects of the ETL system and all-electronic tolling on low-income populations would be considerably more severe or greater in magnitude than the effects suffered by the general population. To make this determination, we compared modeled travel times with and without the addition of or conversion to ETLs for the following user types:

- Drivers of SOVs who would use the GP lanes.
- Drivers of SOVs who would pay to use the ETLs.
- Two-person carpools who can now use the HOV lanes for free, but must pay during peak travel periods when the HOV lane is converted to an ETL.
- Three-person carpools who would be able to use the ETL for free when it is converted.
- Transit riders.
- Paratransit providers and riders.

We examined the distribution of *Good To Go!* passes to see if there are any demographic differences between geographic areas that have higher *Good To Go!* penetration compared to geographic areas with lower *Good To Go!* usage.

SECTION 4 EXISTING CONDITIONS

This section describes the existing conditions in the two study areas described in Section 2, Study Approach.

Why do we evaluate existing conditions?

Existing conditions describe the study area today, before any project construction takes place. By evaluating existing conditions and comparing them to our expectations for future conditions during operation of the Project, we can understand how the Project would benefit or affect environmental justice populations.

What information did we use to evaluate the existing conditions?

To evaluate existing conditions, we first described the current demographic characteristics of the study area using EJScreen and data from the Office of Superintendent of Public Instruction (OSPI).

In addition, we collected information on the following in the study area:

- Neighborhoods
- Community cohesion
- Religious and social facilities and services, specifically those that serve low-income, minority, or limited English proficient populations
- Pedestrian, transit, and bicycle facilities
- Parks and recreation activities and facilities that low-income, minority, or limited English proficient populations use
- Community gathering places that are important to low-income, minority, or limited English proficient populations
- Businesses that are owned by or serve low-income, minority, or limited English proficient populations

What are the existing conditions for environmental justice populations in the study area?

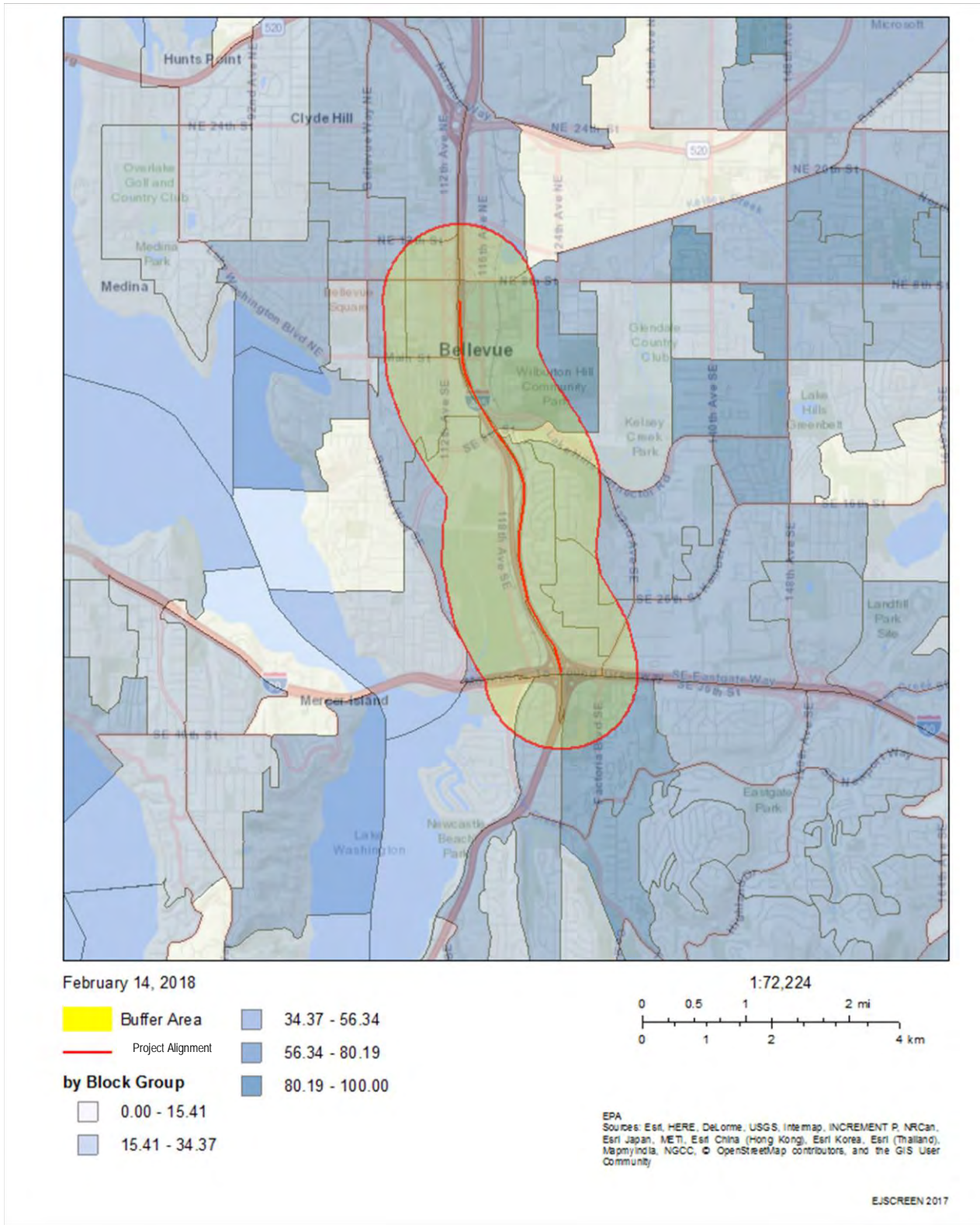
When conducting an environmental justice analysis of a project or projects, the first question we ask is whether individuals who identify as minorities, individuals with low incomes, or individuals with limited English proficiency live or work in the neighborhoods surrounding or affected by the Project.

According to EJScreen, there are environmental justice populations in the study area, defined as 0.50 mile on either side of I-405 between the project limits. Exhibits 4-1 through 4-3 show EJScreen maps with the percentage of residents who identify as minority, have incomes at or below the poverty level, or are limited English proficient, respective.

.

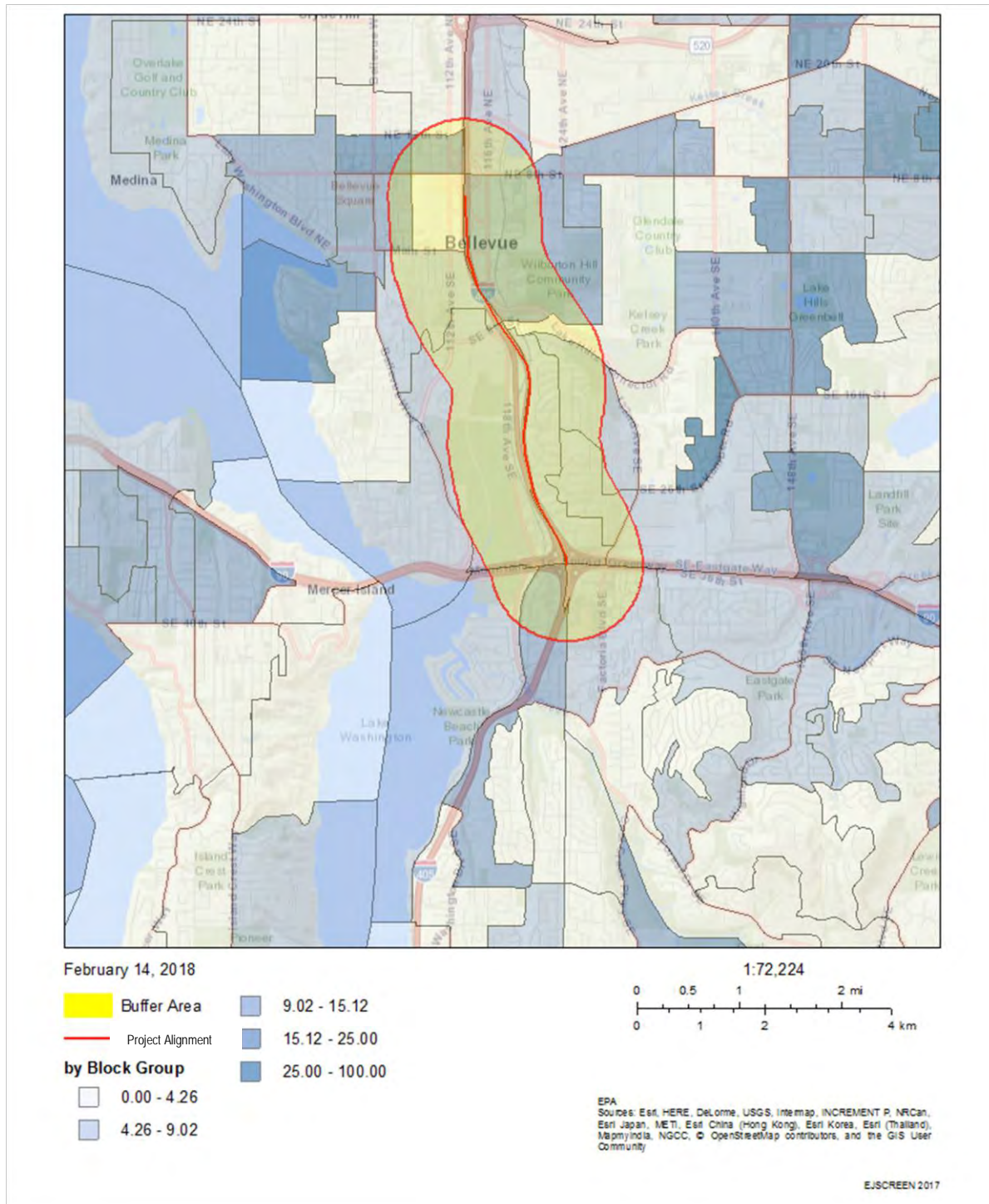
I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 4-1. Percent of Minority Residents in the Study Area



I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 4-2. Percent of Low-Income Residents in the Study Area



I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 4-3. Percent of Linguistically Isolated Residents in the Study Area

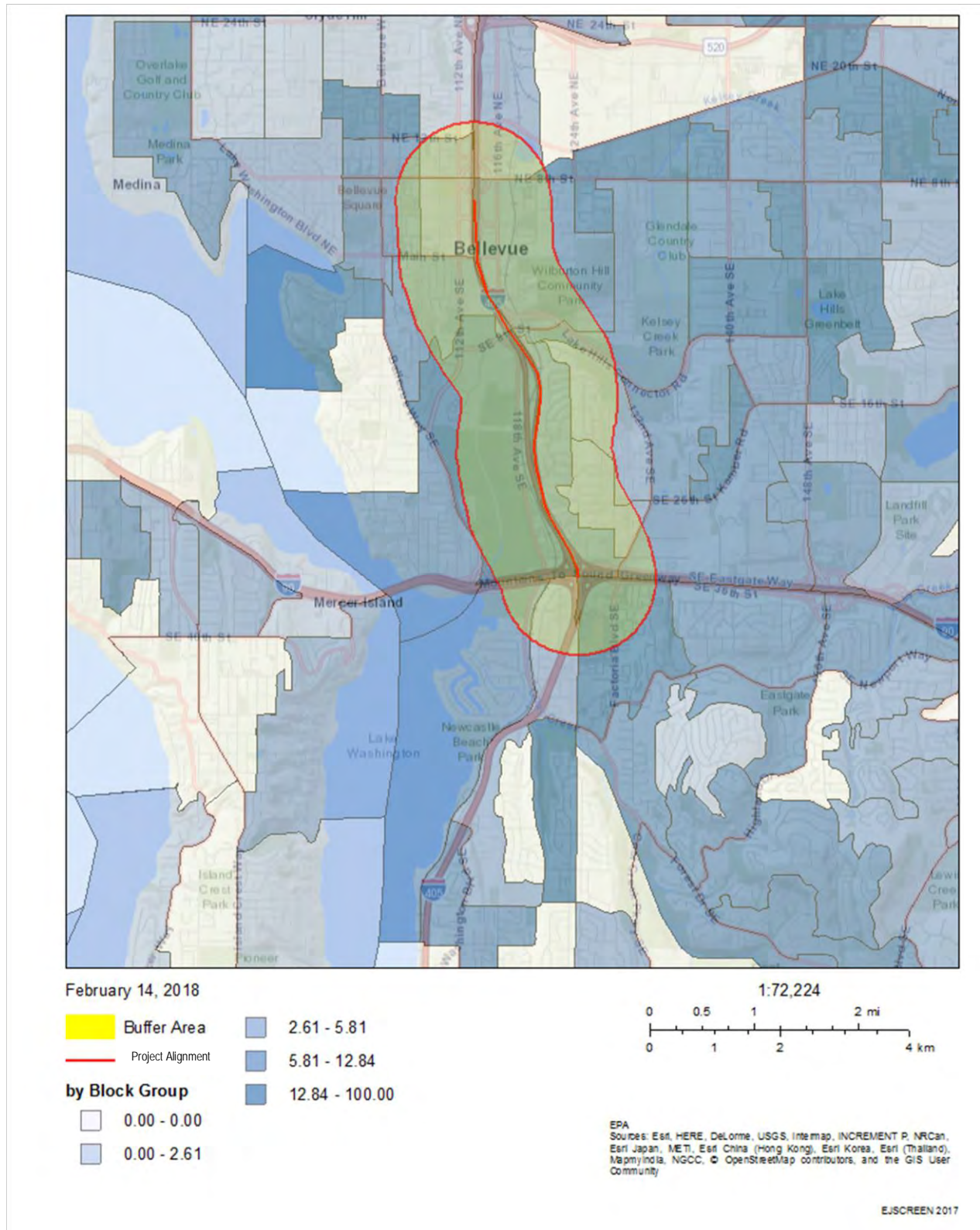


Exhibit 4-4 shows demographics in the study area. Exhibit 4-5 shows the census block groups on a map. Our analysis confirms there are minority and/or low-income populations living in the study area.

Exhibit 4-4. Minority and Low-Income Populations in the Study Area

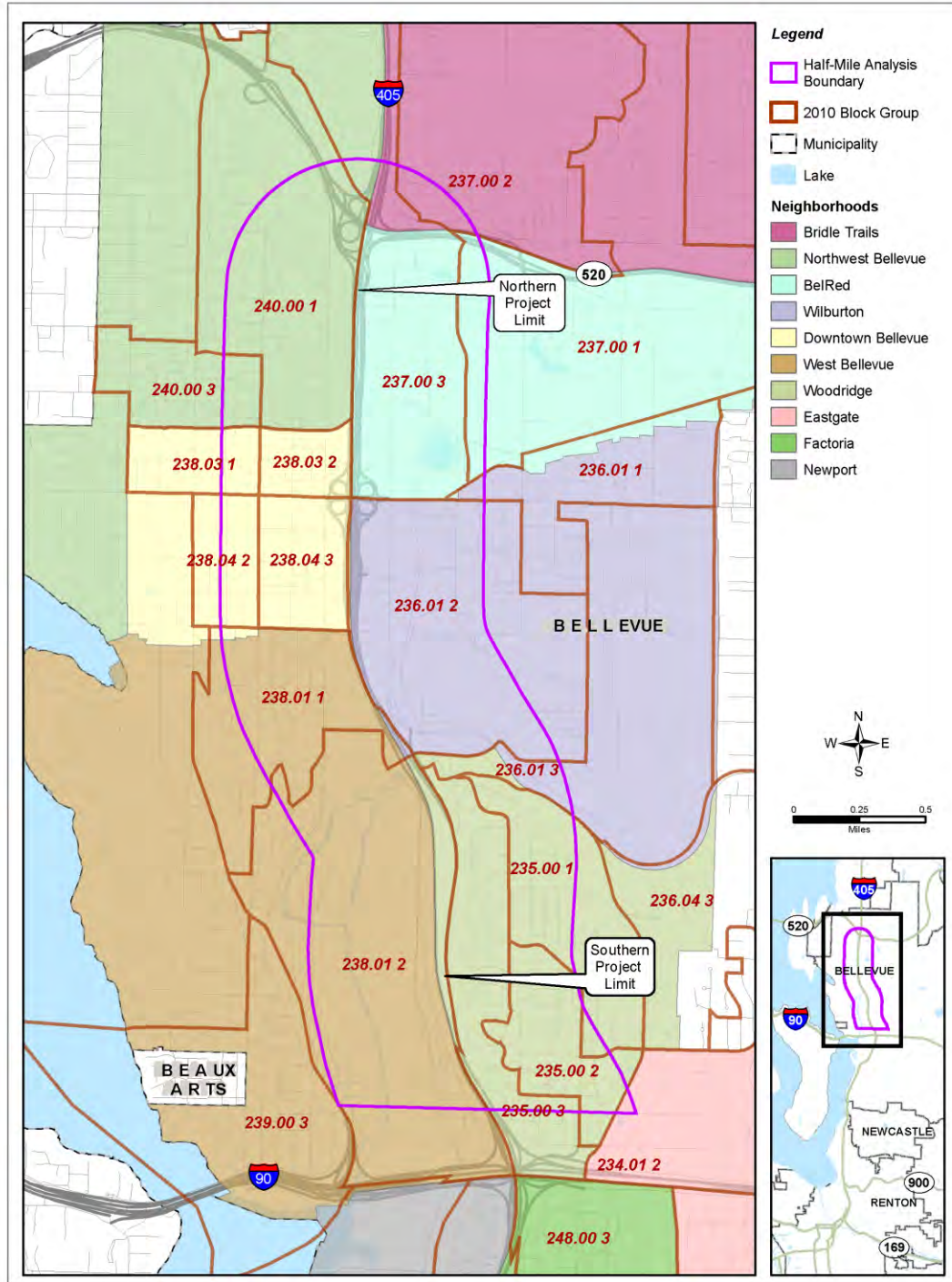
Neighborhood	Census Block Group	Percent Identifying as Minority	Percent Population at or below Federal Poverty Level
Woodridge	235001	34	4
Woodridge	235002	37	4
Woodridge	235003	42	12
Wilburton	236012	60	13
Bel-Red	237003	35	7
West Bellevue	238011	46	9
West Bellevue	238012	37	8
Downtown Bellevue	238032	52	14
Downtown Bellevue	238042	51	12
Downtown Bellevue	238043	45	8
Project Area Average		44	9

Source: U. S. Census Bureau 2015 American Community Survey Five-Year Estimates (2016a)

I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 4-5. Census Block Groups in the Study Area

Note: Census block numbers correspond with the last six digits in Exhibit 4-4.



These data echo the results of the demographic analysis of elementary schools in the study area. Exhibit 4-6 shows the demographics of students enrolled in elementary schools in the study area.

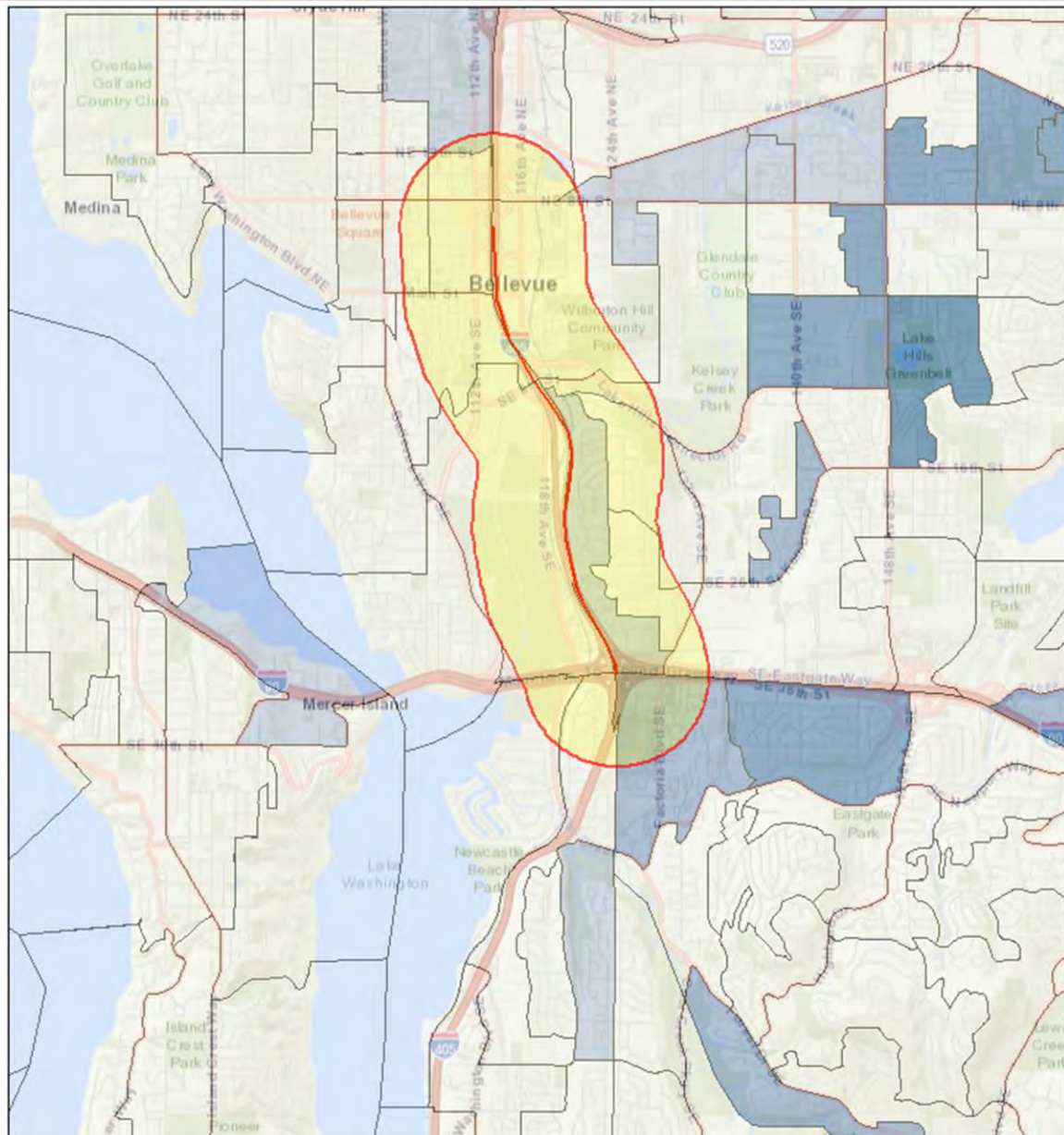
Exhibit 4-6. Demographic Data for Students at Elementary Schools in the Study Area, 2017

School	Percent Identifying as a Race other than White	Percent Hispanic (of any race)	Percent Free- or Reduced-Price Lunch Eligible	Percent Bilingual or Transitional
Enatai	55	12	18	23
Woodridge	63	10	19	23
Study Area Average	59	11	19	23

Source: WA Office of Superintendent of Public Instruction, School Report Card in 2015–16 (2016)

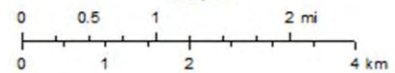
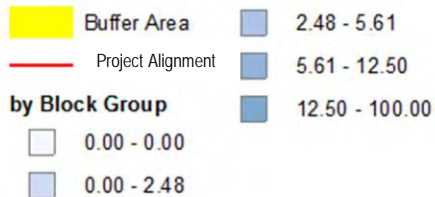
We conducted a deeper analysis to determine if specific language needs exist in the study area. The U.S. Department of Justice recommends translating materials when 5 percent or more of a study area speak that language at home. This recommendation has some limitations; not everyone who speaks a language other than English at home is unable to speak and read English well. To understand language needs in the study area, therefore, we used EJSscreen, which has a tool for identifying “linguistically isolated households.” EJSscreen defines linguistically isolated households as those in which all members age 14 and over speak a language other than English and do not speak English “very well” (2017). Exhibit 4-7 shows the percentage of individuals who live in linguistically isolated households in each census block group in the study area. Based on this demographic analysis, we recommend translating project information into Spanish.

Exhibit 4-7. Percent of Population Living in Linguistically Isolated Households Who Speak Spanish in the Study Area



February 14, 2018

1:72,224



EPA
 Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, OpenStreetMap contributors, and the GIS User Community

EJSCREEN 2017

Several social service providers interviewed by WSDOT indicated that they translate their own written materials into Spanish. In addition, social services work with clients who speak the following languages:

- Arabic
- Farsi
- Korean
- Mandarin
- Russian
- Somali
- Vietnamese

None of the above languages are spoken by 5 percent or more of the study area population, but WSDOT may consider translating and interpreting into some of these languages if it appears there is a need over the duration of project design and construction.

Neighborhoods where Environmental Justice Populations Live

There are five recognized neighborhoods in the study area: Downtown Bellevue, Wilburton, Woodridge, Bel-Red, and West Bellevue.

Based on the demographic analysis, environmental justice populations live in all five neighborhoods. Census block groups do not overlap exactly with designated neighborhood boundaries, but the analyst can make inferences about the demographic makeup of each neighborhood by overlaying 2011–2015 American Community Survey estimates with neighborhood maps.

The Wilburton neighborhood appears to have concentrations of linguistically isolated populations. Small pockets of West Bellevue and Downtown Bellevue also have linguistically isolated residents. A linguistically isolated person is the U.S. Census Bureau's term for a person who speaks limited to no English.

The Crossroads neighborhood in Bellevue, which is 2 miles outside the study area, is known as one of East King County's most ethnically and linguistically diverse neighborhoods. Residents of the Crossroads neighborhood represent

10 percent of Bellevue’s population. Crossroads Mini City Hall is a neighborhood service center extending city services and community connections to East Bellevue residents. As a fully equipped satellite office inside Crossroads Shopping Center, the Mini City Hall provides customer service and outreach in eight languages to Bellevue's diverse population.

Community Cohesion in Neighborhoods

The neighborhoods—including those with substantial minority, low-income, and persons with limited English proficiency—in the study area are well established. These neighborhoods have existed for a long time, and the city of Bellevue supports community cohesion in its neighborhoods. The city assigns a city employee to serve as a neighborhood liaison to each of the recognized neighborhoods. The liaison links the neighborhood to city departments and services. The city offers neighborhood grant programs that provide funds and technical assistance to support neighborhoods in making self-identified improvements.

Religious and Social Service Facilities and Providers that Serve Environmental Justice Populations

Religious Facilities

Through interviewing social service providers and conducting a community profile, we identified the following places of worship that are important to minority, low-income, and/or persons with limited English proficiency in the study area.

- Bellevue Korean Presbyterian Church, located in Bellevue and serving Korean-speaking residents
- Bread of Life Christian Church, located in Bellevue and serving Chinese-speaking residents
- Korean Pilgrim Presbyterian Church, located in Bellevue and serving Korean-speaking residents
- Social Service Providers

There are dozens of community-based and social service providers who serve minority, low-income, and persons with limited English proficiency in the study area. Appendix C, Social Service Providers Interviewed by WSDOT, includes a full list of these service providers.

Pedestrian and Bicycle Facilities in Study Area Neighborhoods

Although pedestrian and bicycle travel is prohibited on I-405, there are several pedestrian and bicycle facilities located adjacent to I-405 in neighborhoods:

- Two bicycle/pedestrian trail crossings of I-405. The Mountains to Sound Greenway, which runs parallel to I-90, and the Lake to Lake Trail, which crosses I-405 at Main Street in Bellevue.
- Several sidewalks alongside roads that cross over or under I-405, as well as some dedicated bicycle lanes. These are located throughout the study area.

Although not yet constructed, the right-of-way that would become the future Eastside Rail Corridor Regional Trail runs alongside I-405 until I-405 bisects the trail just north of the I-90 interchange. WSDOT would construct a crossing over I-405 to connect both sides of the trail as part of the Project. The Eastside Rail Corridor right-of-way south of I-90 is a gravel trail that is open to the public; King County Parks Division would construct a fully paved trail when funding is available.

Businesses or Community Gathering Places of Importance to Environmental Justice Populations

Interviews with social service providers in the study area and a community profile did not turn up any businesses or community gathering places of importance to environmental justice populations within the study area.

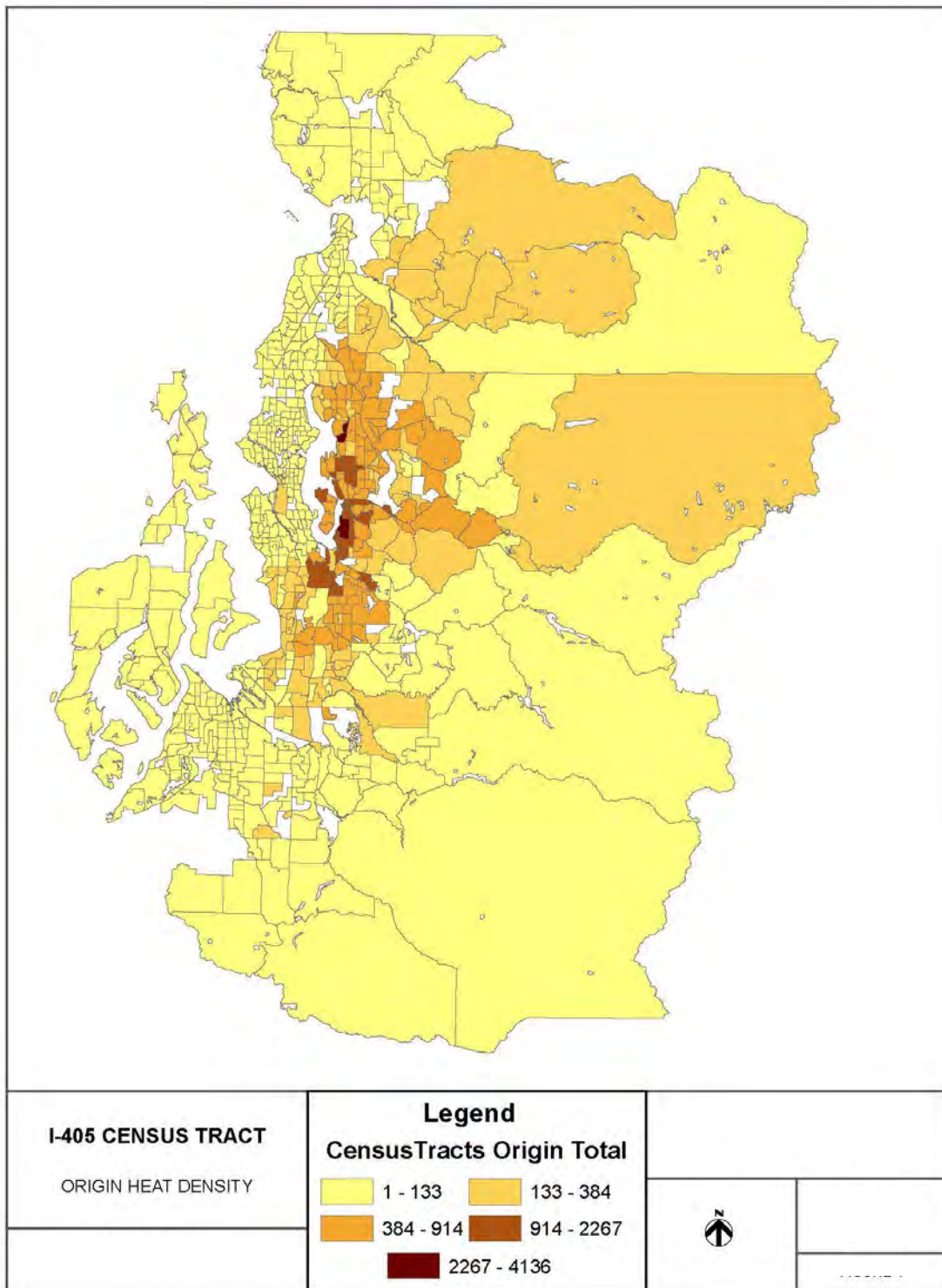
What are the existing conditions for environmental justice populations in the I-405 travelshed?

ETLs could affect not just residents within the study area, but also residents who use the entire I-405 corridor. To identify the travelshed for the study area (from MP 11.9 to 14.6), WSDOT generated a heat map of users based on the census tracts from which their trips originated. Exhibit 4-8 shows this heat map. The travelshed includes census tracts along the entire I-405 corridor.

What is a travelshed?

A travelshed is the geographic area from which most trips on a specific corridor originate.

Exhibit 4-8. Census Tracts Trip Origin



Are there environmental justice populations who use I-405?

Our analysis of the travelshed for the Project indicates there are minority, low-income, and persons with limited English proficiency living in the travelshed. Most I-405 users in the study area come from the census tracts in Renton and south Bellevue, where there are substantial minority and/or low-income populations as well as some persons with limited English proficiency (Exhibits 4-9 through 4-11).

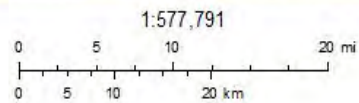
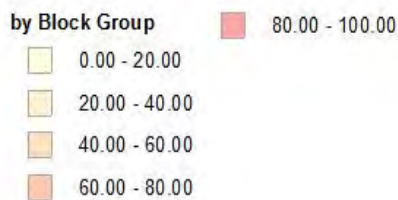
Based on our demographic analysis of the I-405 travelshed, we can infer that individuals who identify as a minority, have low incomes, or are limited English proficient use I-405.

I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 4-9. I-405 Travelshed – Percent Minority



July 28, 2017

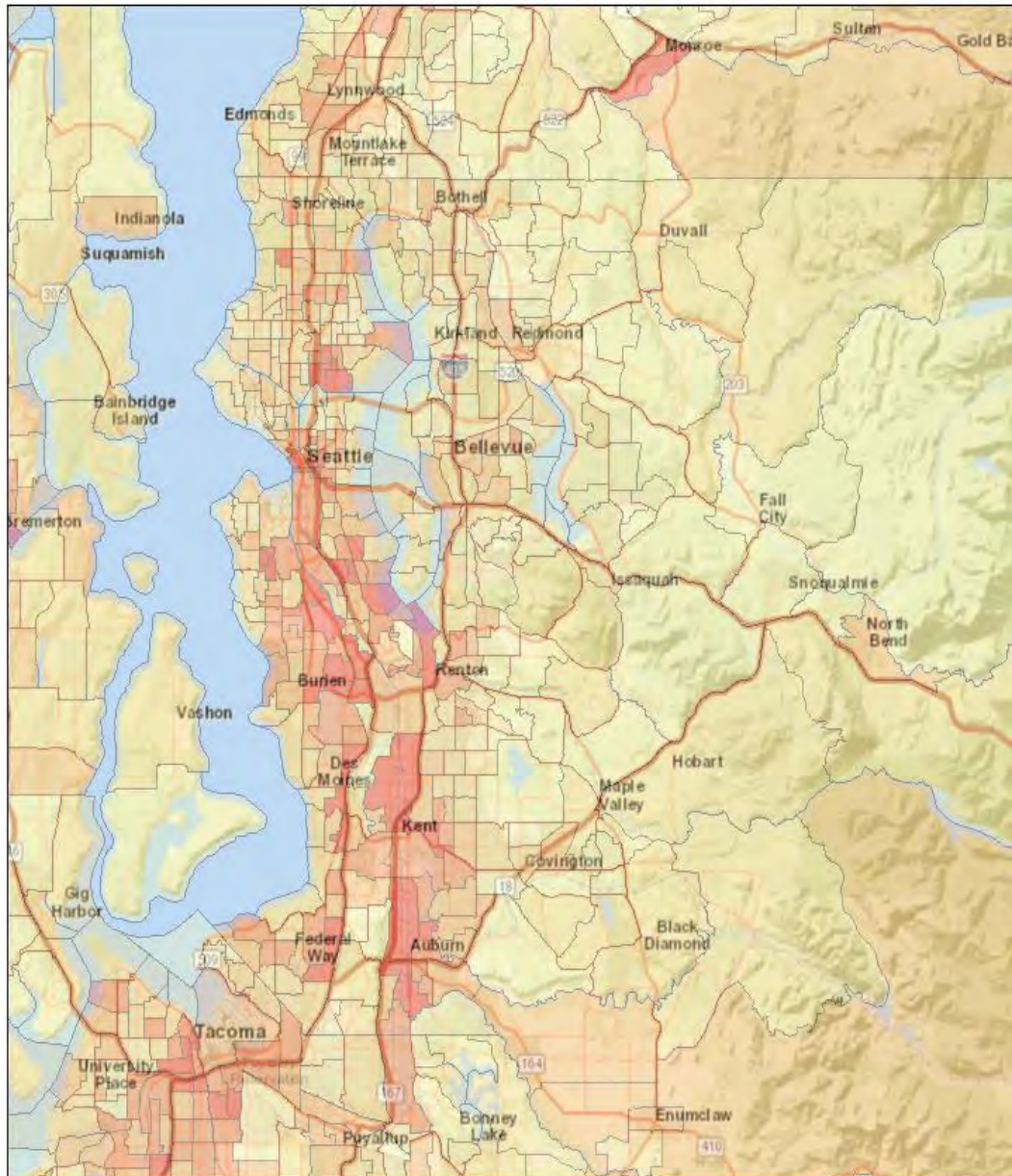


EPA
 Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community

EJSCREEN 2016

I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

Exhibit 4-10. I-405 Travelshed – Percent Low-income



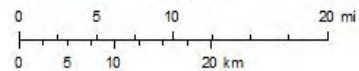
July 28, 2017

by Tract

- 0.00 - 6.13
- 6.13 - 10.80
- 10.80 - 16.62
- 16.62 - 26.40

26.40 - 100.00

1:577,791



EPA
 Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan,
 Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand),
 MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User
 Community

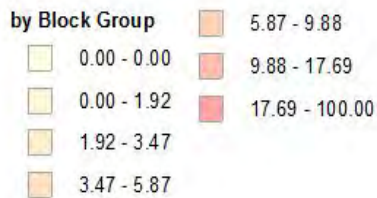
EJSCREEN 2016

I-405, DOWNTOWN BELLEVUE VICINITY EXPRESS TOLL LANES PROJECT (MP 11.9 TO 14.6)
 ENVIRONMENTAL JUSTICE DISCIPLINE REPORT

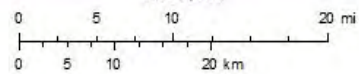
Exhibit 4-11. I-405 Travelshed – Percent Linguistically Isolated



July 28, 2017



1:577,791



EPA
 Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, OpenStreetMap contributors, and the GIS User Community

EJSCREEN 2016

Transportation and Travel that Affects Environmental Justice Populations

Congestion on I-405 Travelshed

In the study area, I-405 experiences traffic congestion in both directions and in both the HOV and GP lanes. This congestion lasts for many hours of the day.

WSDOT has a statewide goal of maintaining a 45-miles per hour (mph) speed in the HOV lanes, but the I-405 HOV lanes regularly do not meet this goal. This typically happens when the GP lanes are congested because slower GP lanes cause HOV users to drive more slowly and cautiously. The HOV lanes on I-405 in the study area are open access, meaning drivers can enter or exit these lanes at any point. HOV drivers are likely to slow down when the GP lanes are moving slowly, out of concern for sudden lane changes to and from the HOV lanes.

Similarly, many intersections in the study area are congested during peak travel periods.

Transit Service on I-405 Travelshed

Based on our demographic analysis, we can infer there are minority, low-income, and persons with limited English proficiency who use transit on I-405 in the study area.

According to the 2015 King County Metro Transit Rider/Non-Rider Survey (2015), approximately 30 percent of transit riders identified as belonging to a minority group. Interestingly, there were no significant differences between transit riders and nonriders in terms of how likely they are to identify as a minority. There are also low-income transit riders; of those transit riders who live in East King County, 12 percent have annual household incomes below \$35,000. Regular transit riders in King County are more likely than nonriders to have annual household incomes below \$35,000.

Transit service is available throughout the study area. King County Metro Transit and Sound Transit provide this service. All bus routes in the study area offer weekday service, and three routes offer weekend service. Many of these buses use I-405 between MP 11.9 and 14.6 for at least a portion of their trip. The I-405, Tukwila to I-90 Vicinity Express Toll Lanes Project (MP 0.0 to 11.9) and Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) Transportation Discipline Report (Transportation Discipline Report) provides.

more detailed information about existing transit service in the study area. Transit vehicles use the HOV lanes as well as an HOV-only ramp at NE 6th Street that provides direct HOV lane access.

Transit vehicles experience delay because the HOV lanes are congested during peak periods throughout the study area. This reduces transit reliability and means passengers are sitting on buses or waiting at transit stops for longer periods.

Regional Trends that Affect Environmental Justice Populations

East King County, along with the rest of the greater Puget Sound region, has experienced rapid job and population growth since the end of the Great Recession. In addition to increased traffic congestion on the region's highways and arterials, this boom has increased demand for housing, thus driving up purchase prices and rents. A May 2017 article by the Seattle Times reports home prices in the region have been rising faster than any other metro region in the country. Rents have also been increasing, rising 57 percent in the last six years (Seattle Times, May 2017).

According to the U.S. Department of Housing and Urban Development (HUD), households spending more than 30 percent of income for housing costs are "cost-burdened" and may have difficulty affording necessities such as food, clothing, transportation, and medical care. Households spending more than 50 percent are "severely cost-burdened" (HUD 2017).

A Regional Coalition for Housing (ARCH) is a partnership of King County and East King County cities that assist with preserving and increasing the supply of affordable housing in the area. According to a 2015 analysis by ARCH, in East King County, nearly 40 percent of renters and 35 percent of homeowners with a mortgage are cost-burdened, and over 14 percent of households are severely cost-burdened. This percentage has increased somewhat since 2000. Perhaps most relevant to this environmental justice analysis, nearly 75 percent of low-income households in East King County are cost-burdened, compared to only 13 percent of higher income households. (ARCH 2015)

When households are cost-burdened, it makes it that much harder for them to pay for other needs, such as transportation.

In addition, Washington State is considered to have the most regressive tax structure in the United States, according to the Institute on Taxation and Economic Policy (ITEP), a nonprofit, nonpartisan research organization. ITEP uses modeling to project the real-life economic effects of tax policies on taxpayers at every income level. Washington State's tax policies have multiple features that disproportionately burden lower-income taxpayers. According to ITEP, for households earning less than \$21,000 a year, state and local taxes represent nearly 17 percent of household income, compared to families making over \$100,000, who pay less than 7 percent of household income in state and local taxes (ITEP 2015). When considering the effect of tolls — another regressive form of taxation — on low-income people, it is important to consider them in the context of an already regressive tax structure. Section 5, Project Effects, discusses the cumulative effects of these regressive tax policies plus tolling on low-income people.

SECTION 5 PROJECT EFFECTS

To evaluate the how operation of the Project would affect environmental justice populations, we asked three questions:

1. Would the Project result in adverse effects or benefits compared to No Build conditions?
2. Would those adverse effects or benefits disproportionately affect minority, low-income, or persons with limited English proficiency, or would the effects be appreciably greater for these groups than for the general population?
3. If there is an disproportionate-adverse effect, would it be disproportionately high-~~or~~ severe?

How would operation of the Project affect environmental justice populations?

Non-Toll-Related Effects

Exhibit 5-1 compares the non-toll-related effects of the Project on environmental justice populations to effects under No Build condition

Exhibit 5-1. Project Operational Effects on Environmental Justice

Evaluation Element	No Build	The Project
Historic and cultural resources of significance to Tribes	No effects on historical and cultural resources of significance to Tribes.	No effects on historic and cultural resources of significance to Tribes.
Fishing and aquatic resources of significance to Tribes	No effects on fish or aquatic resources of significance to Tribes.	No effects on fish or aquatic resources of significance to Tribes.
Noise in neighborhoods	Conditions for the No Build are similar to those discussed for the Project.	<p>With the Project, noise levels are projected to stay the same or increase by 1 dBA or 2 dBA over existing noise levels in 2016, and would be similar to the 2045 No Build.</p> <p>Noise modeling results showed that a hospital and a hotel were predicted to be at or above WSDOT's noise impact level with the Project. However, these facilities do not have outdoor use areas; therefore, interior noise levels must be considered under WSDOT and FHWA noise policies. When interior noise levels were considered, these sites were expected to be below FHWA's interior noise impact level of 51 dBA under Category D, as described in Attachment C, Noise Discipline Report. Therefore, an evaluation of mitigation is not required.</p> <p>Based on the demographic analysis, the population affected by noise would not be predominantly minority or low-income.</p>
Air quality, water quality, public services, utilities, and visual effects in neighborhoods	No changes in air quality, water quality, public services, utilities, and visual effects in neighborhoods.	<p>Improvements on I-405 would not require relocation, service outages, or delayed response time of emergency services due to detours, as most of the widening would be achieved through restriping instead of roadway expansion, and any necessary widening would occur within the median of I-405 between the northbound and southbound lanes.</p> <p>Public service providers (police, fire, and ambulance services) would benefit from a more reliable trip in the ETLs. The new lanes would also provide an overall benefit to public services by improving access to service locations and reducing response time for emergency vehicles.</p> <p>No other effects on air quality, water quality, public services, utilities, or visual effects.</p>

Exhibit 5-1. Project Operational Effects on Environmental Justice

Evaluation Element	No Build	The Project
Bicycle and pedestrian facilities	No improvement to the Lake to Lake Trail in Bellevue as it crosses over I-405. WSDOT has a letter of understanding with King County to build a structure across I-405 to connect the future Eastside Rail Corridor Regional Trail, so even with No Build, WSDOT would build that crossing.	WSDOT would construct a new trail crossing to connect the future Eastside Rail Corridor Regional Trail at Wilburton, just north of the I-90 interchange. This would improve connectivity for bicyclists and pedestrians in the corridor. WSDOT would also provide a wide multiuse path on the south side of the rebuilt Main Street crossing, making the Lake to Lake Trail in Bellevue more bicycle and pedestrian friendly as it crosses over I-405.
Displacement of residents	No residents would be displaced.	No residents would be displaced.
Community cohesion	Traffic congestion would increase on I-405 and at local intersections, which could affect individuals' access to community resources. This would have a negative effect on community cohesion.	No residents or businesses would be displaced. No communities would be bisected. No community gathering places would be disproportionately adversely affected. The Project would have no effect on community cohesion.
Effects on businesses, community gathering places, and faith-based organizations of importance to environmental justice populations	No effect on businesses, community gathering places, or faith-based organizations of importance to environmental justice populations.	No effect on businesses, community gathering places, or faith-based organizations of importance to environmental justice populations.

dBA = A-weighted decibels; ETL = electronic toll lane; FHWA = Federal Highway Administration; WSDOT = Washington State Department of Transportation

Toll-Related Effects

Travel Time Benefits

With the ETLs, all I-405 users would benefit from a faster, more reliable trip. According to Transportation Discipline Report, the additional capacity from the ETL system would improve travel times for most trips in the ETLs and the GP lanes compared to No Build conditions.

Motorists using the GP lanes between the project limits would experience faster travel times for most trips during morning and afternoon peak periods compared to No Build. The Transportation Discipline Report provides specific forecasted travel times in 2025 and 2045.

Travel times in the ETLs would also improve for most trips as compared to the travel times in the HOV lanes under No Build. WSDOT expects the ETLs to operate near posted speed limits through most of the study area, even during peak periods.

It is assumed the ETLs would operate from 5 a.m. to 7 p.m. on weekdays. At all other times and major holidays, the lanes would be free and open to all without a *Good To Go!* pass.

During operating hours:

- SOVs would pay a toll to use the lanes.
- Transit, HOV 3+, and Motorcycles would travel for free with a *Good To Go!* pass.
- HOV 2+ would travel for free from 9 a.m. to 3 p.m. with a *Good To Go!* pass. From 5 a.m. to 9 a.m. and 3 p.m. to 7 p.m. HOV2+ would pay a toll to use the ETLs with or without a *Good To Go!* pass.
- Large vehicles over 10,000 pounds gross vehicle weight would not be able to use the ETLs at any time.

With the Project, most two-person carpools travelling in either the GP lanes or ETLs would benefit from improved travel times compared to travelling in the HOV lane under the No Build. No Build assumes the occupancy requirement for the existing HOV lane would not change from two or more persons in a vehicle to three or more people in a vehicle.

To understand how two-person carpools would be affected by the ETLs, we compared forecasted travel times for two-person

carpools in the GP lanes during peak periods to travel times in the HOV lanes under the No Build. According to the Transportation Discipline Report, most trips in 2025 and 2045 in the GP lanes would be the same or faster than trips in the HOV lanes under the No Build conditions, even during peak periods.

The ETL system is expected to reduce delay and improve reliability for transit service that use these lanes. Some transit routes would continue to operate in the GP lanes. These transit routes would also benefit from expected decreases in most travel times for the GP lanes.

Sound Transit's expansion of the regional mass transit system includes multiple future projects in the study area. These include funding for bus rapid transit on I-405 between south Renton and Lynnwood, as well as freeway stations that would allow buses to pick up and drop off riders without having to exit and re-enter the I-405 corridor. These projects, along with the Project, would benefit transit riders. There may also be effects on environmental justice populations associated with the expansion of mass transit on I-405. Sound Transit is evaluating the effects of the I-405 Bus Rapid Transit project in a separate environmental process and documenting potential benefits on environmental justice populations.

By adding capacity and improving traffic operations, the ETLs would reduce congestion-related crashes in the study area. Such crashes are typically rear-end and sideswipe crashes, which make up most existing freeway crashes in the study area.

Cost and Use of the Tolls

The cost of using the ETLs to gain a faster trip could be a barrier for some I-405 travelers. The ETLs in the study area would use an electronic toll system to collect tolls (see the sidebar for an explanation on how the ETL system would work).

The electronic toll collection system could be a barrier for I-405 travelers who do not understand the system or how to acquire a transponder. To use the electronic toll collection system, individuals who do not have a credit or debit card—the “unbanked” or “underbanked”—must travel to a customer service center in Seattle, Bellevue, Tacoma, or Gig Harbor to open an electronic toll account and preload or replenish it

How will electronic toll collection work for the ETLs?

WSTC has not yet set toll rates and other policies for the ETL system, so for this analysis we assume the policies will be the same as those set for the Bellevue to Lynnwood ETLs, in operation since 2015.

To use the ETL system, drivers would have to acquire a transponder to place in their vehicle windshield and use a credit card, debit card, or checking account or travel to a customer service center in Seattle, Bellevue, Tacoma, or Gig Harbor to preload and replenish their electronic toll account. Pay by Mail would allow drivers without a transponder to use the ETLs and receive a bill in the mail. WSDOT assesses a surcharge to such users. The current Pay by Mail surcharge for the Bellevue to Lynnwood ETLs is \$2.

ETLs would operate from 5 a.m. to 7 p.m. on weekdays. The system would be toll free and open to all during other hours. Carpools of 3+ could use the ETLs for free during hours of operation but would need a transponder, which has a switch the user can activate when driving as a carpool. This tells the communications system that the vehicle should not be charged for the trip. Carpools with two occupants would be able to use the ETLs for free between 9 a.m. and 3 p.m. weekdays.

using cash.¹ This may discourage some unbanked and underbanked I-405 motorists from using the ETLs, or they may incur additional costs in Pay by Mail surcharges.

Ramp Metering

WSDOT is considering some potential modifications to HOV ramp metering to prioritize transit and further improve transit reliability.

Would the Project result in a disproportionately high and adverse effect on environmental justice populations?

Non-Toll-Related Effects

We did not find any disproportionately high and adverse effects from the Project on environmental justice populations in the study area.

Toll-Related Effects

In determining whether an effect is “disproportionately high and adverse”, the U.S. Department of Transportation Environmental Justice Order notes that agencies should consider planned mitigation measures, offsetting benefits to the affected minority and environmental justice populations, and the relevant number of similar existing system elements in non-minority and non-environmental justice areas. There are two ways in which ETLs could disproportionately affect environmental justice populations:

- The cost of the toll to use ETLs ~~could~~ would disproportionately affect environmental justice populations because the cost to use the ETLs would represent a higher proportion of household income than for middle- and high-income users.
- Use of the electronic toll collection system could disproportionately affect environmental justice persons with limited English proficiency and low-income populations because some users may have difficulty

¹ *The Federal Deposit Insurance Corporation (FDIC) defines “unbanked” as those adults without an account at a bank or other financial institution, and no ability to conduct transactions electronically. “Underbanked” individuals have limited access to mainstream financial services and typically rely on nontraditional forms of finance, including check chasing services, loan sharks, and pawnbrokers. The FDIC estimates there are 10 million unbanked or underbanked individuals in the United States, most of which are immigrants and/or people with low incomes.*

understanding the electronic toll system and how to acquire transponder. In addition, unbanked and underbanked individuals may have difficulty obtaining a responder and loading or replenishing a *Good To Go!* account.

Although our analysis concludes that ETLs would result in disproportionate impacts on environmental justice populations, we found that these effects would not be high and adverse for the following reasons:

- All users, including low-income and limited English proficient users, would continue to have an accessible, convenient, and free travel option: the GP lanes on I-405.
- All lanes on I-405, including GP lanes, would experience improved travel times for most trips because of the Project.
- Most motorists, including individuals who have low incomes or are limited English proficient, would not lose a travel option because of the Project. The only exception are two-person carpools, which would have to pay a toll to use the ETLs during peak periods. These carpools can use the HOV lanes for free today. However, because most travel times in the GP lanes are expected to improve with the Project, two-person carpools would still have the same or faster travel times with the Project than without for most trips. As such, even two-person carpools would benefit from the Project compared to the No Build conditions.

The following paragraphs describe our analysis and conclusions.

Any toll that charges all users the same amount, regardless of income, disproportionately affects environmental justice users. This is because, compared to users with moderate and high incomes, the toll represents a higher proportion of annual income. It becomes even more important to consider the effect tolls may have on environmental justice households in the Puget Sound region, where 75 percent of environmental justice families are cost-burdened by their housing costs.

Some social service providers interviewed by WSDOT expressed concern about this, indicating many environmental

justice motorists do not have the financial resources to pay the toll. Outcomes from WSDOT's interviews with community-based organizations and social service providers in the study area suggest there may be some differences between income groups on how they use the ETLs. In general, interview participants expressed concern a toll would dissuade environmental justice individuals from using them. A few interview participants explained their clients cannot afford gas for their automobiles and expressed skepticism that these clients would be able to afford a toll. On the other hand, some interview participants felt that, because the GP lanes would continue to be available, their clients would not be ~~disproportionately adversely~~ affected.

Multiple studies on ETL use indicate users of all incomes value the faster trip and use the lanes when they absolutely need to be somewhere on time. In 2009, WSDOT conducted a survey of SR 167 HOT lane users, a system in South King County similar to the ETLs on I-405, and found HOT lane users spanned all income categories, including households with relatively low incomes. The survey showed most SR 167 HOT lane users had household incomes of \$50,000 to \$124,000, and nearly 16 percent of users had household incomes under \$50,000 (WSDOT 2012). Studies of State Route 91 (SR 91) express lanes in California indicate about three-quarters of vehicles using the express lanes at any given time belong to low- and middle-income users. Furthermore, environmental justice drivers are as likely to approve of the lanes as drivers with higher incomes. In fact, over half of commuters with household incomes under \$25,000 a year approved of providing toll lanes in public opinion surveys (FHWA 2017). Some social service providers interviewed by WSDOT echoed these findings, indicating that, after initial confusion about and frustration with the Bellevue to Lynnwood ETLs, the negative feedback from staff and clients has subsided and some people appreciate having the option of purchasing a faster trip when they need it.

To understand the extent to which these tolls may ~~disproportionately~~ affect environmental justice users, we estimated the annual cost for a typical user. The sidebar to the right explains how we developed this estimate. We estimated the annual cost for the average ETL user to be \$106.56 for users with a *Good To Go!* pass and \$178.56 for users who pay by

How did we estimate the annual cost to a typical user of ETLs?

Estimating the annual cost for a typical user proved to be challenging, for two reasons. First, toll rates to use the lanes would vary, depending on the amount of traffic congestion in the lanes. During relatively quiet periods, toll rates in the I-405 Bellevue to Lynnwood ETLs can be as low as \$0.75. During peak periods, toll rates in the Bellevue to Lynnwood ETLs can go as high as \$10. Second, toll rates for the Project have not yet been set.

Given these uncertainties, we based our estimate on what has been happening with the Bellevue to Lynnwood ETLs over the past 21 months. According to the WSDOT I-405 Express Toll Lanes 21-Month Update (2017), the average toll during the peak period in the peak direction was \$2.96. The average user makes between two to five trips per month, so we assumed three trips per month for our estimate.

mail.² Exhibit 5-2 shows the percentage of annual household income the toll represents for low-, middle-, and high-income users.

Exhibit 5-2. Comparison of Percentage of Household Income for Different User Types

User Type	Environmental justice User	Middle-Income User	High-Income User
Description of user type	\$28,780/year or less (HHS federal poverty level of household of 5 people)	Median household income for King County: \$82,000/year	1.5 times median household income for King County (\$123,000/year or more)
Percent of annual income for <i>Good To Go!</i> passholders	0.4%	0.1%	0.1%
Percent of annual income for Pay by Mail users	0.6%	0.2%	0.2%

HHS = U.S. Department of Health and Human Services

While this exhibit demonstrates the tolls would represent a higher proportion of household income for environmental justice users, these estimates do not suggest the tolls are unaffordable for these users. Given the relative infrequency with which the average I-405 motorists chooses to pay the toll and use the ETLs, the annual cost of making this choice tends to be relatively small for most users. Furthermore, because the ETLs are free for all users at night and on weekends, the tolls would only affect environmental justice and other ETL users during the daytime. As such, while we believe the toll to use ETLs would disproportionately affect environmental justice users, we do not believe it would be a high and adverse impact. Furthermore, this disproportionate the severity of these effects would be offset by increased travel speeds for drivers traveling toll-free in the GP lanes.

² To calculate these average annual costs, we assumed an average toll of \$2.96 x three times per month x 12 months per year. For Pay by Mail users, we added a \$2-per-trip surcharge.

The electronic toll collection system ~~would~~could disproportionately affect limited English proficient travelers. These users may have difficulty understanding the electronic toll system and how to acquire a transponder such that they may be less likely to use the ETL system or could incur additional costs in Pay by Mail surcharges. Social service providers interviewed by WSDOT echoed this concern, adding that when WSDOT opened the ETLs from Bellevue to Lynnwood, there was a lot of confusion amongst clients about how to use them and whether there would still be a non-tolled option available.

Because most unbanked and underbanked individuals are immigrants and individuals with low incomes, the barrier for these individuals to obtaining a transponder and loading or replenishing a *Good To Go!* account could have a disproportionate effect on environmental justice populations.³ However, as of 2009, environmental justice individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* transponder accounts. This option could offset some of the disproportionate effect.

To determine if there is an economic difference between *Good To Go!* passholders and people who do not hold a *Good To Go!* pass, we consulted a 2016 WSDOT survey of *Good To Go!* pass users (WSDOT 2016) and obtained zip code data for people who have purchased a *Good To Go!* pass from WSDOT (WSDOT, 2016). Based on our analysis of these data, it appears that the current distribution of *Good To Go!* passes is related more to geographic proximity to a tolled facility and population density than economic conditions. Given the data currently available, there is not enough information to conclude whether there is an economic difference between *Good To Go!* passholders and people who do not hold a *Good To Go!* pass.

To understand the severity of the effect of the toll and electronic toll collection system on environmental justice or limited English proficient individuals, we compared forecasted average travel times during the peak hours of the

³ According to a telephone survey conducted by WSDOT in 2009 for the SR 520: I-5 to Medina Bridge Replacement and HOV Project, more than 25 percent of low-income respondents indicated they would not be able to use a credit, debit, or checking account to prepay their electronic transponder account (2009).

day for people who would use the GP lanes and people who would use the ETLs. Exhibits 5-3 and 5-4 shows these comparisons. When the ETLs are operating, we anticipate that some two-person carpools will choose to use the GP lanes during peak periods instead of paying the toll to use the ETLs. The travel time forecasts in the transportation analysis consider the expected increase in traffic volumes as two-person carpools move into the GP lanes.

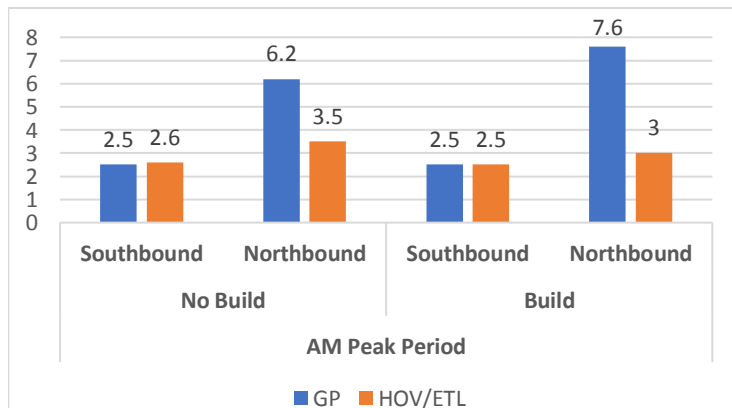
Travel Times

Overall, greater traffic volumes would travel through the study area at speeds similar to or higher than the No Build for most trips due to the ETLs and increased capacity. Vehicles would operate at higher speeds in the ETLs and would have a more reliable trip than the No Build HOV lanes. This would give more users, including transit and carpools, a faster trip.

In the year 2025, most trips during the AM and PM peak periods would be the same or better than the No Build conditions in both directions of travel. The one exception is 2025 northbound AM peak trips; these trips would increase by about 1 minute in the GP lanes.

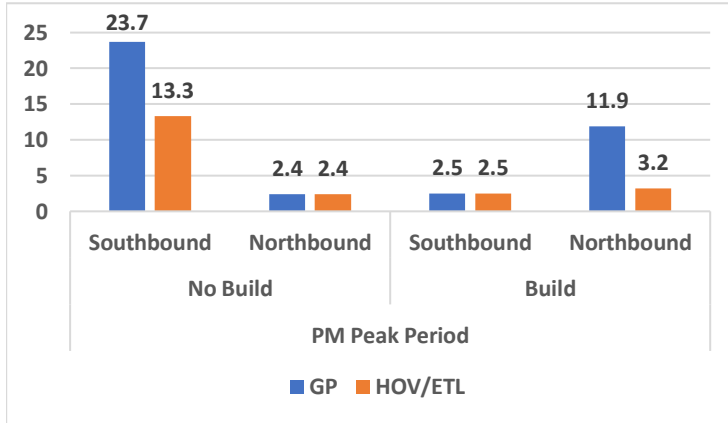
The remainder of this section focuses on travel times in 2045, i.e., the design year for the Project. In 2045, as shown in Exhibit 5-3, average travel times during the AM peak period would be the same in the southbound direction for both the No Build and Build alternatives. In the northbound direction, travel times would increase by about 1 minute in the GP lanes with the Build Alternative.

Exhibit 5-3. 2045 Average Travel Times during the AM Peak Period between I-90 and SR 520 (minutes)



As shown in Exhibit 5-4, average travel times during the 2045 PM peak period in the southbound direction would improve greatly. With the Project, travel times would be under 3 minutes for both the GP lanes and ETLs as compared to 23 minutes in the GP lanes and 11 minutes in the HOV lane under the No Build Alternative.

Exhibit 5-4. Average Travel Times during the PM Peak Period in 2045 between I-90 and SR 520 (minutes)



By 2045 in the PM peak period, northbound I-405 travel times would increase by 9 minutes between I-90 and SR 520 compared to the No Build Alternative. Under the No Build PM peak period, congestion from southbound I-405 spills back onto I-90 and SR 520, which meters traffic to northbound I-405. With the Build Alternative, southbound I-405 operations improve, relieving congestion at interchanges on I-90 and SR 520. In the northbound direction of I-405, this results in more congestion and longer travel times in the greater Bellevue area. Southbound I-405 is able to accommodate the shift in congestion through Bellevue with no negative effects. Other I-405 Master Plan improvements are planned in this area of the corridor and are expected to provide future benefits that will improve travel times.

This leads us to conclude that, while the cost of the tolls and use of the all-electronic toll system would have a disproportionate adverse effect on environmental justice populations, that effect would not be high because of faster be offset by improved travel times for most trips as compared to the No Build, even for motorists who do not use the ETLs.

How would construction of the Project affect environmental justice populations?

Construction of the Project is anticipated to take 5 years and would have the following benefits and effects:

- The Project would cost \$750 to \$800 million to construct, which would require construction jobs that could benefit all populations.
- Construction vehicles would increase traffic delay on the I-405 mainline, ramps to and from I-405, and local arterials in the study area during the construction period. The exact haul routes and quantity of construction vehicles would not be known until a construction contract is signed, but we anticipate most construction vehicles would use I-405, SR 167, and I-90 to bring materials to and from construction sites. This would affect all I-405 users and motorists on local streets, including minority, low-income, and limited English proficient motorists.
- Transit riders—including minority, low-income, and limited English proficient riders—could face revised routes and closed transit stops during construction.
- Additional temporary construction-related effects to neighborhoods within the study area would also include noise, dust, visual effects, and reduced access to community resources such as parks, recreational facilities, public services, and utilities.
- At the time of publication of this document, there were no known homeless encampments along this stretch of I-405. However, it is possible that homeless encampments could be located in construction areas when construction begins. WSDOT works with law enforcement to ensure WSDOT-owned property is used as it is intended. If there is a homeless encampment that requires clearing, WSDOT and/or its construction contractors post signage in English and Spanish at least 72 hours prior to construction activities, conduct a visual assessment of the area to determine the specific needs for clearing an encampment, and contact advocacy groups to enlist their help in notifying and relocating homeless populations.

In addition, we expect the Main Street overpass in Bellevue to be constructed in phases, with an anticipated closing of up to two lanes for over a year. WSDOT would maintain bi-directional traffic flow during construction to the extent possible.

Would the Project have other effects that may be delayed or distant from the Project?

An indirect effect is caused by the proposed action, but would take place later in time than the direct effects, or would have an impact outside the study area. Indirect effects may include future changes to land use patterns or population growth. According to the WSDOT Environmental Manual (WSDOT 2017), in general, projects in new locations or that cause dramatic changes to the transportation facility are more likely to contribute to indirect impacts than projects in areas that are already developed or that rely primarily on existing right-of-way.

To determine if the Project would contribute indirect effects, we examined local and regional comprehensive plans that affect the study area. We looked for whether the Project would support or ~~disproportionately adversely~~ impact changes in the type, rate, or timing of planned growth. The Project is consistent with PSRC's *Vision 2040* and *Transportation 2040* long-range plans, King County's Countywide Planning Policies, and local policies for the City of Bellevue

Would the Project have cumulative effects on environmental justice populations?

Under NEPA, cumulative effects result from the incremental effects of a project when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes the action. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. Cumulative effects include past, present, and reasonably foreseeable future actions within the study area that, together with the Project, may have a cumulative effect on the environment. Past and present actions affecting environmental resources are reflected in the existing conditions of the study area.

As described earlier in Section 2, Project Description, the ETLs for the Project would—in combination with the I-405, Tukwila

to I-90 Express Toll Lanes Project (MP 0.0 to 11.9), Bellevue to Lynnwood ETLs, and SR 167 HOT Lanes—create a 40-mile-long ETL system from Auburn on SR 167 to Lynnwood on I-405. The WSTC has not yet set toll policy and toll rates for the entire SR 167/I-405 ETL system, so we do not know how much it would cost a motorist to travel from Auburn to Lynnwood in the ETLs. Regardless of the toll policy, the cost to use the entire ETL system would disproportionately affect low-income users, for whom the total cost would represent a higher proportion of annual household income. However, these ~~disproportionate~~ adverse effects would be offset by improved travel time, reliability, and travel conditions in both the GP lanes and the ETLs systemwide. As concluded in the analysis of ETLs on these and other segments of I-405, we do not anticipate the full ETL system would result in disproportionately high and adverse indirect effects on environmental justice populations.

Other current and future projects include many transportation improvements by WSDOT, Sound Transit, and the City of Bellevue on I-405 and local networks to address traffic congestion and safety; add bicycle and pedestrian facilities; and expand or improve transit service. Lastly, we considered regional and local trends that affect environmental justice populations, including population growth in the study area and I-405 travelshed, an increase in minority and/or low-income populations, and increasing traffic congestion.

The Project would not have direct or indirect effects on environmental justice populations in the study area except as related to tolling. The ETLs would contribute to a positive cumulative effect on regional transportation, and would likely contribute to a negative cumulative effect on the economic burdens of low-income users of I-405.

While projected job and population growth in the region is likely to increase traffic congestion, the ETLs—in conjunction with other reasonable and foreseeable transportation investments in the I-405 travelshed—would improve transportation conditions for all I-405 users, including environmental justice populations.

As described earlier in Section 5, Project Effects, the operation of ETLs would affect low-income populations because the cost to use the ETLs would represent a higher proportion of their household income than middle- and high-income users. The

all-electronic toll system would also affect low-income populations because they are more likely than middle and high-income populations to be unbanked or underbanked, making it more difficult to use the system. In combination with rising housing costs in the I-405 travelshed and Washington State's regressive tax system described in Section 4, Existing Conditions, the ETLs would have a minor contribution to a negative cumulative effect on economic burdens of low-income users of I-405.

Although the Project would result in a minor contribution to negative cumulative effects on environmental justice populations the impacts would be offset by improved travel times for all users of I-405. We conclude the Project would not result in disproportionately high and adverse cumulative effects on environmental justice populations. As such, we do not propose mitigation measures for cumulative effects. That said, there are state, regional, and local efforts to improve transportation and land use planning to accommodate growth and reduce effects on all, including environmental justice populations. Refer to the Socioeconomic and Environmental Justice section of the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) *Environmental Assessment* for more information about these efforts.

SECTION 6 MEASURES TO AVOID OR MINIMIZE EFFECTS

What measures will WSDOT take to mitigate effects of the Project on environmental justice populations during construction?

We did not identify any construction effects for the Project that would disproportionately affect environmental justice populations. WSDOT will implement the following measures for construction effects of the Project on all populations in the study area:

- Apply best management practices to control dust, noise, and visual effects.
- Develop and implement traffic management plans to minimize traffic congestion and the effects of increased construction-related truck traffic on surrounding neighborhoods and arterials.
- Require the contractors to provide at least one week's notice for major or highly disruptive construction activities.
- Provide temporary accommodations during highly disruptive construction activities.
- Maintain existing roadway capacity during construction activities to the extent possible.
- Minimize lane or roadway closures and schedule them to occur when there will be the least effect on traffic within the study area, such as during overnight and weekend periods.

WSDOT will continue to conduct targeted outreach to minority [populations](#), low-income [populations](#), and persons with limited English proficiency [in](#) the study area and I-405 travelshed before and during construction. The following measures are part of WSDOT's commitment to public involvement for the Project:

- Translate project materials about construction effects—especially those related to transit re-routes and temporary closures of transit stops—into Spanish

- Distribute project materials—especially prior to construction-related closures that will affect motorists and transit riders—through social service agencies, Crossroads Mini-City Hall, community-based organizations, libraries, community groups, and schools

What measures will WSDOT take to mitigate effects of the Project on environmental justice populations during project operation?

Although there is no need for additional mitigation, WSDOT will continue conducting targeted outreach to engage minority populations, low-income populations, and persons with limited English proficiency of the study area and I-405 travelshed. Ongoing public involvement activities when the Project is constructed will include the following measures:

- Maintaining ongoing communications with community-based organizations and social service providers throughout design of the Project, and scheduling briefings with them at project milestones.
- Developing a summary of the EA for this Project and posting the summary to the WSDOT website and in libraries throughout the study area. As part of its standard outreach practice, WSDOT will translate outreach materials related to the environmental documents, such as flyers and newspaper announcements, as well as any documents for which the agency receives a request for translation.
- Distributing project materials through social service agencies, community-based organizations, libraries, community groups, and schools and host booths at community events in the study area.
- Planning and implementing a public information campaign in multiple languages to explain ETLs, how to obtain a *Good To Go!* pass, and how to set up an account, with the goal of increasing the proportion of passholders who identify as minority, have low incomes, or are limited English proficient.
- Including information about how to use the ETLs in Spanish and other languages, as needed, as part of the

public information campaign, such as how to enter and exit the lanes, how to determine the cost, and how to obtain a free *Good To Go!* pass for carpools.

- Conducting outreach about the Project and ETLs at community fairs and festivals, including events at Bellevue's Crossroads Mini-City Hall, in one of the Eastside's most ethnically and linguistically diverse neighborhoods.
- Conducting media outreach, specifically with ethnic media outlets serving the study area.

To reduce possible barriers to obtaining and maintaining a *Good To Go!* account for persons who have low-incomes or are underbanked:

- WSDOT will continue to offer the option for low-income persons who are eligible for public benefits to use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts.
- WSDOT is working to expand the network of retail locations where people can buy *Good To Go!* passes with cash, making it easier for people to purchase a pass without a bank account.

~~Note that, as of 2009, low income individuals who are eligible for public benefits may use their Electronic Benefit Transfer cards to open and maintain their *Good To Go!* accounts. This option could offset some of the disproportionate effects. In addition, WSDOT is currently working to expand the network of retail location where people can buy *Good To Go!* passes with cash, making it easier for people to purchase a pass without a bank account~~

SECTION 7 UNAVOIDABLE EFFECTS

Would the Project have any disproportionately high and adverse effects on environmental justice populations that cannot be avoided?

While the cost of the tolls and use of the all-electronic toll system would have a disproportionate effect on environmental justice populations, that effect would not be disproportionately high and adverse because it would be offset by faster travel times for most trips as compared to the No Build, even for motorists who do not use the ETLs.

SECTION 8 REFERENCES

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APPENDIX A ACRONYMS AND ABBREVIATIONS

Term	Meaning
ACS	American Community Survey
ADA	American with Disabilities Act
ARCH	A Regional Coalition for Housing
CSS	Context Sensitive Solutions
EA	Environmental Assessment
EIS	Environmental Impact Statement
ESA	federal Endangered Species Act
ETL	express toll lane
FHWA	Federal Highway Administration
GIS	geographic information system
GP	general purpose
HOT	high-occupancy toll
HOV	high-occupancy vehicle
I-405	Interstate 405
I-5	Interstate 5
I-90	Interstate 90
ITEP	Institute on Taxation and Economic Policy
mph	miles per hour
MP	milepost
NEPA	National Environmental Policy Act
OSPI	Office of Superintendent of Public Instruction
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
SOV	single-occupant vehicle
SR 167	State Route 167
SR 91	State Route 91
the Project	I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6)

Term	Meaning
USC	United States Code
USDOT	U.S. Department of Transportation
WSDOT	Washington State Department of Transportation
WSTC	Washington State Transportation Commission

APPENDIX B GLOSSARY

Term	Meaning
Environmental justice	Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
Express toll lane	A limited-access freeway lane that is actively managed through a variable toll system to regulate its use and thereby maintain express travel speeds and reliability. Toll prices rise or fall in real time as the lane approaches capacity or becomes less used. This ensures traffic in the express toll lane remains flowing at express travel speeds of 45 to 60 miles per hour. Transit and carpools do not pay a toll.
Limited English proficient	A limited English proficient person is an individual who has difficulty speaking, reading, writing, or understanding the English language and whose difficulties may deny that individual the opportunity to meaningfully engage in the transportation decision-making process. This definition applies to an individual who: <ul style="list-style-type: none">• Was not born in the United States;• Speaks a native language other than English and comes from an environment where a language other than English is dominant; or• Comes from an environment where a language other than English has had a substantial effect on that individual's English language proficiency.
Low-income	A low-income person is an individual whose household income falls below the federal poverty guidelines, as defined by the U.S. Department of Health and Human Services. For 2017, the federal poverty guideline for a household of four in one of the 48 contiguous states and Washington D.C. is \$24,600.
Minority	Minority means a person who is: (1) Black: a person having origins in any of the black racial groups of Africa; (2) Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race; (3) Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent; (4) American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural

Term	Meaning
	identification through tribal affiliation or community recognition; or (5) Native Hawaiian and Other Pacific Islander: people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands
Travelshed	The geographic area from which I-405 users come is referred to as the I-405 travelshed.

APPENDIX C SOCIAL SERVICE PROVIDERS INTERVIEWED BY WSDOT

City of Bellevue Human Services Division

City of Burien Department of Human Services

City of Redmond Human Services

City of Renton Department of Human Services

Coal Creek YMCA

Hopelink

Youth Eastside Services

ATTACHMENT 3 – NOTICES

This attachment provides the notices prepared for the Determination of Nonsignificance (DNS) prepared under Washington State Environmental Policy Act (SEPA) Rules along with information on publication of these notices.



I-405 Program Office
600-108th Avenue NE Ste. 405
Bellevue, WA 98004
425-456-8582
TTY: 1-800-833-6388
www.wsdot.wa.gov

March 27, 2018

SUBJECT: SEPA Determination of Nonsignificance (DNS) for the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6), Adoption of Environmental Assessment

Dear Environmental Assessment Recipient:

Attached is the Washington State Department of Transportation's (WSDOT) document entitled, *I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6) Environmental Assessment (EA)*. This document is adopted as WSDOT's SEPA environmental checklist for this project.

After reviewing our EA and other information on file with WSDOT, we have determined that this proposal, the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project, will not have a probable significant adverse impact on the environment. A copy of the determination of nonsignificance for this proposal is attached.

You are invited to comment on this DNS by submitting written comments no later than April 16, 2018, to Allison Hanson at the I-405 Project Office, 600 – 108th Avenue NE, Suite 405, Bellevue, WA 98004, or by email at I405comments@wsdot.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cameron Kukes', written over a light blue horizontal line.

Cameron Kukes
WSDOT Northwest Region Environmental Manager

Enclosure

DETERMINATION OF NONSIGNIFICANCE (DNS)

Description of proposal:

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project provides improvement to 2.7 miles of I-405 (milepost 11.9 to milepost 14.6) from just north of the I-90 interchange to north of the NE 6th Street interchange. These improvements are a part of the I-405 Corridor Program. The project includes the following improvements:

- **Northbound I-405, I-90 to NE 6th Street (MP 11.9 to 13.7)** – Develop approximately 1.6 miles of new lane in the northbound direction by widening or restriping I-405 from MP 11.9 to 13.5. In this same section of I-405, convert the existing high occupancy vehicle (HOV) lane to an express toll lane (ETL) system. The new lane coupled with the existing HOV lane would create a dual ETL. Between MP 13.5 and 13.7, convert the existing HOV lane to an ETL. The ETL would connect to the existing ETLs from downtown Bellevue to Lynnwood. Westward expansion of I-405 is proposed south of SE 8th Street, and eastward expansion is proposed north of SE 8th Street.
- **Southbound I-405, I-90 to NE 6th Street (MP 11.9 to 13.7)** – From MP 11.9 to 12.5, reconfigure the existing outside HOV lane to the inner roadway and convert both of the existing HOV lanes to ETLs. From MP 12.5 to 13.5, develop a new lane by widening or restriping. This new lane coupled with the existing HOV lane would result in a dual ETL south of NE 4th Street. Between MP 13.5 and 13.7, convert the existing HOV lane to an ETL. The ETL would connect to the existing ETLs from downtown Bellevue to Lynnwood. Where new pavement is needed, eastward expansion is proposed.
- **I-405 Eastside Rail Corridor Overpass (MP 12.4)** – Build a new northbound I-405 bridge structure adjacent to the existing I-405 structure over the Eastside Rail Corridor Regional Trail. The new structure would carry the two ETLs and the general purpose (GP) lanes would remain on the existing structure.
- **Eastside Rail Corridor Regional Trail (MP 12.09 to 12.49)** – Construct a new bridge for nonmotorized travel over southbound I-405 near MP 12.15. Build a section of nonmotorized trail to connect with the Eastside Rail Corridor Regional Trail.
- **SE 8th Street Interchange (MP 12.78)** – Widen the northbound I-405 overpass over SE 8th Street.
- **Main Street Overpass (MP 13.31)** – Reconstruct the Main Street Bridge over I-405.
- **Northbound I-405 to SR 520 Ramp (MP 14.6)** – Widen the existing northbound off-ramp to State Route 520 (SR 520) from two lanes to three lanes for approximately 600 feet beginning where the NE 10th Street on-ramp merges onto the I-405 ramp.
- Other improvements that would be made as part of the Project include stormwater facility expansion, pavement markings, drainage improvements, signing, illumination, intelligent transportation systems, barriers, and tolling gantries. Some partial property acquisitions would be needed from five commercial and public properties.

Proponent: Washington State Department of Transportation, I-405 Program

Location of proposal, including street address, if any:

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project extends along I-405 approximately 2.7 miles from just north of the I-90 interchange (MP 11.9) to north of the NE 6th Street interchange (MP 14.6).

Lead Agency: Washington State Department of Transportation, I-405 Program

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request. Please note that the checklist document is titled *I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment*, and it was completed in April 2018. The document is available to be read during normal business hours at I-405 Project Office, 600 108th Avenue NE, Suite 405, Bellevue 98004; Bellevue Community College Library, and Bellevue Regional Library. The document is also available electronically at <http://www.wsdot.wa.gov/Projects/I405/RentontoBellevue/>.

There is no comment period for this DNS.

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below. Comments must be submitted by April 16, 2018.

. **Responsible Official:** Cameron Kukes

Position/Title: WSDOT Northwest Region Environmental Manager

Address: WSDOT Northwest Region Office, 15700 Dayton Ave North, Shoreline, WA 98133

Phone: 206-440-4548

Date: 3/27/2018

Signature:  _____

**NOTICE OF AVAILABILITY OF ENVIRONMENTAL ASSESSMENT AND
ENVIRONMENTAL PUBLIC HEARING**

I-405, Downtown Bellevue Vicinity Express Toll Lanes Project (MP 11.9 to 14.6)

Purpose of Notice

The Washington Department of Transportation (WSDOT) will issue an Environmental Assessment (EA) on April 2nd, 2018, for the I-405 Downtown Bellevue Vicinity Express Toll Lanes Project. The intent of this notice and of the public hearing is to provide for the exchange of information regarding the effect of the proposed project on the community. This purpose is in accordance with and pursuant to the National Environmental Policy Act (NEPA) and the Federal Highway Act (Title 23 U.S.C., 101 et. Seq.) and amendments.

DESCRIPTION OF PROPOSAL:

The I-405, Downtown Bellevue Vicinity Express Toll Lanes Project extends along I-405 approximately 2.7 miles from just north of the I-90 Interchange to north of the NE 6th Street interchange. The major project features include the following:

- Implementing two express toll lanes in each direction from just north of the I-90 interchange to the NE 6th Street interchange, with a single express toll lane for approximately 0.2 mile adjacent to the NE 6th Street ramps in downtown Bellevue. The express toll lanes will be a combination of a new lane and a conversion of the existing single high-occupancy vehicle (HOV) lane.
- Widening the northbound off-ramp to SR 520 from two lanes to three lanes.
- Making overpass and bridge improvements at Main Street and SE 8th Street, and as well as a new northbound I-405 bridge adjacent to the existing southbound I-405 bridge over the Eastside Rail Corridor Regional Trail.
- Constructing a new bridge for bicycles and pedestrians over southbound I-405 and a section of trail to connect with the Eastside Rail Corridor Regional Trail.

The purpose of the project and projected benefits include:

- Providing a reliable trip choice for I-405 users
- Increasing vehicle capacity and person throughput
- Improving reliability of transit
- Reducing project-wide congestion
- Improving safety performances

PROPONENT: Washington State Department of Transportation

PUBLIC HEARING:

An Environmental Hearing will be held on April 17, 2018. The Environmental Hearing will provide the public with an opportunity to talk with staff, submit comments on the

Environmental Assessment, and view plans, maps, environmental documents and other pertinent information on display. The environmental Hearing will occur on:

Tuesday, April 17, 2018

5:30-7:30 pm

Bellevue City Hall, Concourse

450 110th Ave NE

Bellevue WA, 98004

The public hearing is accessible to persons with disabilities. Individuals requiring reasonable accommodation may request written materials in alternative formats by emailing the Office of Equal Opportunity at wsdotada@wsdot.wa.gov or by calling toll free, 855-362-4ADA (4232). Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

WSDOT ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, national origin or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For additional information regarding WSDOT's Title VI Program, contact the Department's Title VI Coordinator at 360-705-7098.

CONTACT AGENCY:

I-405 Program

Allison Hanson, I-405 Program Environmental Manager

Washington State Department of Transportation

600 108th Avenue NE, Suite 405

Bellevue, Washington 98004

(425) 450-2703

EA ISSUED: The Environmental Assessment (EA) was prepared to meet National Environmental Policy Act (NEPA) requirements and was issued April 2nd, 2018, initiating a 30-day comment period. The EA describes potential environmental impacts that could result from the proposed project and suggests mitigation measures that could prevent or minimize these impacts. The EA is available to be read during normal business hours at: I-405 Project Office, 600 108th Avenue NE, Suite 405, Bellevue 98004; Bellevue Community College Library, and at

Bellevue Regional Library. The document is also available electronically at <http://www.wsdot.wa.gov/Projects/I405/RentontoBellevue/>.

COMMENTING: Comments on the EA are solicited and will be accepted until May 2, 2018. Comments in writing can be submitted by email to I405comments@wsdot.wa.gov or mailed to:

I-405 Program team

Attn: Allison Hanson, I-405 Program Environmental Manager

Washington State Department of Transportation

600 108th Avenue NE, Suite 405

Bellevue, Washington 98004

Written and oral comments will be given equal weight and all comments received or postmarked by May 2, 2018 will be considered by WSDOT in preparing the Final EA.

ATTACHMENT 4 – FONSI DISTRIBUTION LIST

To promote communication and enhance interagency coordination, we acknowledge that this Finding of No Significant Impact (FONSI) is a public document and that the Washington State Department of Transportation (WSDOT) and Federal Highway Administration (FHWA) have involved the public, agencies, and tribes in implementing the National Environmental Policy Act (NEPA) procedures. Notices of availability of the FONSI with links to the online document were sent to the following government agencies:

Federal Agencies

U.S. Environmental Protection Agency, Region 10

U.S. Army Corps of Engineers

U.S. Fish and Wildlife Service

U.S. National Marine Fisheries Service

Federal Highway Administration

Tribal Governments

Confederated Tribes and Bands of the Yakama Nation

Muckleshoot Indian Tribe

Snoqualmie Tribe

Tulalip Tribes

Duwamish Tribe

Stillaguamish Tribe

State Agencies

Washington State Department of Archaeology and Historic Preservation

Washington State Department of Ecology

Washington State Transportation Center

Regional Agencies

Sound Transit

Local Agencies

City of Bellevue

King County

Libraries

Bellevue College

Bellevue Regional Library

ATTACHMENT 5. CORRESPONDENCE WITH THE MUCKLESHOOT INDIAN TRIBE FISHERIES DIVISION

Note: Please also see the Muckleshoot Indian Tribe Fisheries Division comment letter and WSDOT responses on pages A1-52 through A1-59.



MUCKLESHOOT INDIAN TRIBE
Fisheries Division

39015 - 172nd Avenue SE • Auburn, Washington 98092-9763
Phone: (253) 939-3311 • Fax: (253) 931-0752



April 25, 2018

Ms. Megan White
Director of Environmental Services
Washington State Department of Transportation
PO Box 47331
Olympia, WA 98504

Ms. Lindsey Handel
Urban Transportation Engineer
Federal Highways Administration
711 South Capitol Way, Suite 501
Olympia, WA 98501

RE: I-405, Downtown Bellevue Vicinity Express Toll Lanes Project, NEPA Environmental Assessment and SEPA Determination of Non-Significance

Dear Ms. White and Ms. Handel:

The Muckleshoot Indian Tribe Fisheries Division recently learned that WSDOT/FHWA released an Environmental Assessment and appendices for the I-405 Downtown Bellevue Vicinity Express Toll Lanes Project (*MP 11.9 to 14.6*). We found out about the NEPA EA's existence on April 19, 2018 while doing online research for other portions of the I-405 project on April 19, 2018. We immediately contacted Ms. Allison Hanson to find out where the EA had been sent to the Muckleshoot Tribe. We subsequently learned that a hard copy had been sent to the Tribal Chair, Ms. Virginia Cross, but not to the individual natural resource programs at MIT as we previously indicated to WSDOT and FHWA was the appropriate routing and notification. With the EA, we also found that WSDOT issued a SEPA Determination of Non-Significance on March 27, 2018, which we also did not receive and should have as an affected Indian Tribe.

Per the EA, comments are due May 2, 2018. The DNS comment deadline was April 16, 2018. Based on this information and the lack of correct notification of either the DNS or the EA, we request a 30-day extension to both the EA and SEPA DNS comment periods (or June 2, 2018), so that we may fully evaluate the EA, its appendices and provide any comments that we may have to WSDOT and FHWA. We appreciate your full consideration of this request and ask for a written response.

Sincerely,

Karen Walter
Watersheds and Land Use Team Leader

Cc: Allison Hanson and Cameron Kukes, WSDOT Environmental Managers
Megan Cotton and Steve Shipe, WSDOT Tribal Liaisons



U.S. Department
of Transportation

**Federal Highway
Administration**

Washington Division

Suite 501 Evergreen Plaza
711 South Capitol Way
Olympia, Washington 98501-1284
(360) 753-9480
(360) 753-9889(FAX)
<http://www.fhwa.dot.gov/wadiv>

April 30, 2018

HFO-WA.1/WA 518

Ms. Karen Walter
Watersheds and Land Use Team Leader
Muckleshoot Indian Tribe
39015 172nd Avenue SE
Auburn, WA 98092

**I-405, Downtown Bellevue Vicinity Express
Toll Lanes Project, NEPA EA**

Dear Ms. Walter:

Thank you for your letter dated April 25 regarding the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment (EA) and Determination of Non-Significance (DNS). We regret that you didn't directly receive a hard copy of the EA and we apologize for that.

FHWA agrees to extend the NEPA comment period for the Muckleshoot Indian Tribe to June 2, 2018. If it would be helpful during your review, FHWA and the project team would be happy to meet with you prior to June 2 to walk through the EA and respond to any questions you may have. In regard to your request for an extension to the SEPA DNS comment period, WSDOT will be responding to your letter separately.

We understand WSDOT will be reviewing their guidance and FHWA will work with them to ensure documents reach the appropriate Tribal staff. Again, we apologize for you not directly receiving a hard copy of the EA. We value our working relationship with you and want to ensure effective consultation with you into the future.

Sincerely,

DANIEL M. MATHIS, P.E.
Division Administrator

By: Lindsey L. Handel, P.E.
Urban Area Engineer



**Washington State
Department of Transportation**

Transportation Building
310 Maple Park Avenue S.E.
P.O. Box 47300
Olympia, WA 98504-7300
360-705-7000
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www.wsdot.wa.gov

May 1, 2018

Ms. Karen Walter
Muckleshoot Indian Tribe
Watersheds and Land Use Team Leader
39015 172nd Avenue SE
Auburn, WA 98092

RE: I-405, Downtown Bellevue Vicinity Express Toll Lanes Project, NEPA Environmental Assessment and SEPA Determination of Non-Significance

Dear Ms. Walter:

Thank you for your letter dated April 25th regarding the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project Environmental Assessment (EA) and SEPA Determination of Non-Significance (DNS). We discussed your request to extend both the EA and the DNS comment periods with FHWA, and per the separate letter you received from them on April 30th, FHWA has extended the NEPA EA comment period to June 2nd for the Muckleshoot Indian Tribe.

In regard to the State Environmental Policy Act (SEPA), as noted in your letter, the comment period is closed. In order to meet critical project timelines, we need to begin the permit review process for which a completed SEPA determination is required. However, our formal consultation commitment to the tribe continues after the comment period and we will respond to any comments the Tribe provides.

We sincerely regret that we didn't send copies to you directly. WSDOT issued its SEPA DNS by adopting the National Environmental Policy Act (NEPA) EA, consistent with [WAC 197-11-610 \(2\)](#). The NEPA EA is the functional equivalent of the SEPA environmental checklist. The DNS was packaged with the EA and was sent to the Tribal Chair, Ms. Virginia Cross, on April 2nd. Because of an error in the DNS, a second hard copy of the DNS was sent to the same address on April 3rd. We appreciate your points regarding the EA and DNS distribution. Looking back, WSDOT recognizes that our guidance to project teams is not as clear as it should be. WSDOT will review our NEPA/SEPA distribution guidance and discuss areas for improvement with WSDOT's Tribal Liaison. We want to make sure that we consistently provide you with environmental documents in a timely manner.

We would also like to take this opportunity to inform you that we are drafting an EA for the section of I-405 just south of I-90, called the I-405 Tukwila to I-90 Vicinity Express Toll Lanes Project. We anticipate that we will go out for SEPA and NEPA review in mid-June of this year on that project. Information about both the I-405 Downtown Bellevue and the Tukwila to I-90 projects is available on-line at <https://www.wsdot.wa.gov/projects/i405/rentontobelleuve/environmental-review>. We will ensure you receive a timely copy of those documents when they are available for review.

Ms. Karen Walter
May 1, 2018
Page 2

WSDOT and FHWA appreciate you taking the time to review the I-405, Downtown Bellevue Vicinity Express Toll Lanes Project EA. The project team is available to answer any questions you may have. We would also be happy to meet with you at your convenience. If you have questions, you can call me directly at 360-705-7480, or Allison Hanson, I-405 Program Environmental Manager, at (425) 450-2703.

Thank you for all of your ongoing consultation and coordination efforts with WSDOT and the I-405 Program and we look forward to continuing to work with you.

Sincerely,

 FOR MEGAN WHITE

Megan White, P.E., Director
Environmental Services Office

MW:cr

Cc: Lindsey Handel, FHWA
Kim Henry, Allison Hanson, Lisa Hodgson, I-405 Program Team
Cameron Kukes, WSDOT
Megan Cotton, WSDOT
Steve Shipe, WSDOT