From: Nancy Brainard [mailto:nbrainard@qwest.net]
Sent: Thursday, April 15, 2010 3:18 PM
To: SR 520 Bridge SDEIS
Subject: SDEIS Comments

C-028-001 The SR 520 SDEIS is deficient on several critical fronts

Most serious are its failures to study key measures that could avoid damage to the surrounding urban and natural environment. Specifically:

- Failure to adequately study the noise reduction that can be achieved by designing and properly installing the best kind of quieter pavement into the road. (I live less than 100 feet from 520 on a hill above the roadbed. Sound walls here will not help. Noise here today is already above federal health standards.)

C-028-002
- Failure to adequately study the feasibility (for mobility) and the benefits (to the urban and natural environment) of reducing 520's six lanes (plus shoulders) to four lanes (plus shoulders) from Montlake to I-5.

C-028-003
- Failure to adequately study the feasibility and benefits of an immersed tube tunnel (rather than a second bridge) to carry 520 traffic that is headed across the Montlake cut.

C-028-004
- Failure to adequately study the impacts that surrounding neighborhoods will suffer if the lids referred to in the SDEIS as "optional" are not built.

C-028-005 In addition, I add my support to the further comments submitted by the Coalition for a Sustainable SR 520, The Madison Park Community Council, The Montlake Community Council, the Shelby-Hamlin Group, the Roanoke Park/Portage Bay Community Council, the Seattle Yacht Club, the Queen City Yacht Club and the Laurelhurst Community Club.

I submit the above comments as an experienced representative of the North Capitol Hill Neighborhood Association on SR 520 issues, who has served on the state-funded Local Impact Committee, the City of Seattle's Stakeholders Advisory Committee and the state's Mediation Team. Thank you for your attention.

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Jennifer Young, Environmental Manager
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April 15, 2010

Sent electronically

Dear Ms. Young:

C-029-001

We are writing in response to the SDEIS for the SR 520 project. First we want to endorse and support the comments from Canterbury Shores SR 520 Committee and the Board of Directors of Canterbury Shores and we support the letter from Jim Hagan on the 520 plans. We have adopted those reports as additional reports on behalf of the Madison Park Community Council.

The proposed SR 520 design would inflict permanent long-standing damage to vital Seattle neighborhoods, destroy precious wetlands, wildlife areas and wildlife (beaver and heron, potentially nesting eagles) on the north east end of the arboretum and cause permanent visual and noise damage along the western side of the 520 corridor (Madison Park to I-5). Also, the design does not improve traffic congestion on surface streets in Seattle or I-5 going north and south. In all likelihood, it would add to congestion on surface streets.

C-029-002

In addition, we would like to reply to a number of issues in the SDEIS:

1) Process: Omission.

We appreciated the earlier work on 520 with the mediation committee. What is of grave concern to us, however, was the process after the 520 design went to the Legislative Work Group (LWG). The LWG announced the final design recommendations in mid-November 2009, with a public comment period ending December 4th—a totally inadequate public comment time for a final design of a project of this magnitude. While there were numerous community meetings on the various alternatives prior to the alternatives going to the Legislative Work Group (LWG), there were virtually none after the final design A+ was proposed. The City Council had a meeting; a Town Hall by our 43rd District state legislators was held, but only one WSDOT public meeting was held to address the SDEIS.

'Due process' is a fundamental right in the United States. There was no due process to vet the impacted communities on the design once the final decision was made. We urge WSDOT to work with the impacted communities as the final design is drawn to prevent unilateral and adverse impacts.

C-029-003

2) Construction Priorities: Omission/error

The SDEIS stated the goal for 520 Replacement:

The purpose of the project is to improve mobility for people and goods across Lake Washington within the SR 520 corridor from Seattle to Redmond in a manner that is safe, reliable, and cost effective, while avoiding, minimizing, and/or mitigating impacts on affected neighborhoods and the environment. Page 1-4, SDEIS

It was repeatedly stated in the SDEIS that the bridge is in danger of structural failure from storms and earthquakes. If there were to be an incremental approach to SR 520, the first priority would be the floating part of the bridge, because it is the most vulnerable to earthquake and storms, the second would be the bridge over Portage Bay, and the third would be the west approach of 520.

If the project is phased, WSDOT would first complete the project components that are vulnerable to windstorms and earthquakes.

Exhibit 2-21 shows how these vulnerable elements are prioritized. The highest-priority components in the project area are:

- *The floating portion of the Evergreen Point Bridge, which is vulnerable to windstorms. This is the highest priority in the corridor because of the frequency of severe storms and the high associated risk of catastrophic failure.*
- *The Portage Bay Bridge, which is vulnerable to earthquakes. This is a slightly lower priority than the floating bridge because the frequency of strong earthquakes is much less than that of severe storms.*
- *The west approach of the Evergreen Point Bridge, which is also vulnerable to earthquakes.* ***Replacing these components would allow WSDOT to fulfill the safety and reliability aspect of the project purpose and need, while the remainder of the project would fulfill the mobility aspect.*** *It is important to note that, while the new bridge(s) might be the only parts of the project in place for a period of time, WSDOT's intent is to build a complete project that fully meets all aspects of the purpose and need.* SDEIS, 2-24

However, the legislature and the Governor have released the funding for the safety work for the floating part of SR 520 to be used for work on the East Side of 520, which is *not* one of the priorities listed in the SDEIS.

C-029-004

The SDEIS also reported that after its public comment period, the number one lesson learned was to "protect and enhance the neighborhoods" (SDEIS 1-39-41).

What have we learned from these outreach efforts?

WSDOT continues to hear comments from the public similar to those that were heard before and during the comment period for the Draft EIS. Comments provided during ongoing outreach activities have included the following common themes:

- *Protect and enhance neighborhoods and community connectivity.*
- *Maintain local parks and trails and add a new bicycle path.*
- *Include noise reduction measures throughout the SR 520 corridor.*
- *Minimize air pollution.*

C-029-004

- *Toll the SR 520 Bridge (Evergreen Point Bridge) to raise revenue for the project, but carefully consider toll rates.*
- *Improve and expand the HOV and bus system.*

This plan in fact does the reverse of these public comment priorities.

So what is the priority for 520? Barge ahead? Or address the safety concerns outlined in Chapter 1 of the SDEIS?

C-029-005

3) Retrofitting: Omission.

Statements were made in the SDEIS that retrofitting would be as expensive as building a new bridge. But, no evident calculations were included to support this statement. Given that both I-5 and Highway 99 have been retrofitted, why was this not addressed with more detail/evidence in the report or documented in some fashion?

C-029-006

4) Noise: Omission/error

Noise is a significant health risk. Many parts along the west corridor of 520 will be adversely impacted by noise from construction and post construction use of 520. The matter is of such concern that the impact of noise was addressed at some length the Seattle-King County Department of Public Health:
http://www.kingcounty.gov/healthservices/health/ehs/hia.aspx

The only 'solutions' addressed in the SDEIS were quieter pavement and 'noise' walls eight to 14 feet tall.

Not addressed in the SDEIS is the impact of concrete walls on the weight of the bridge or their visual impact on surrounding neighborhoods. What is the impact of noise walls on air quality inside those walls? What is the impact of gale force winds on a higher concrete structure with 8 to 14 foot solid concrete walls?

Has the concrete barrier design been reviewed by the appropriate, independent structural or civil engineers?

C-029-007

The SDEIS indicated that only 16 residences would be impacted by noise. It appears that the condominiums and apartments with many residents may have been counted as one 'residence' rather than the numerous separate residents who live in those buildings. The Canterbury Shores alone has 90 units many with multiple residents, and this does not include the number of people living in Canterbury Shores or the other condominiums and apartments on the NE part of Madison Park.

C-029-008

5) Environment: Error and Omission.

Construction would destroy one beaver lodge. There are in fact three beaver lodges in the in the Arboretum area. One active lodge is in the footprint of the construction bridge

C-029-008

at the north east end of the Arboretum, between Broadmoor Golf Course and 520. Where would these beavers go? Given the construction will take up to seven years, there would be no local area where they could build a lodge. The SDEIS clearly states that there is no planned mitigation for the wildlife.

The proposed project would remove a large beaver lodge in Union Bay adjacent to Foster Island, which would displace the animals, but is not expected to reduce the viability of the beaver population in this area. Operation of any of the options would have minimal effects on bald eagles and peregrine falcons. 5-140

Not only are beavers present, there are nearby nesting eagles and heron whose feeding grounds are located at the northeast end of the Arboretum. The impact is just as dire in this area as it is for Foster Island and Marsh Island. What are the mitigation plans for destroying or replacing feeding grounds? Has this environmental impact been reviewed with the state Department of Fish and Wildlife? If not, that is an omission.

The SDEIS also states that new bridge will have an adverse impact on the wetlands area because of the shadow effect caused by the height and width of the new bridge. Given the fact that we live in an eco-system, what impact will the loss of the wetlands have on salmon and other fish? If we lose them do we lose other wildlife dependent on these feeding grounds—in the water and on land? The height and width of the bridge needs to be examined to mitigate the impact on remaining salmon runs to and from Puget Sound. What impact will the dredging have on salmon? Given that salmon are a major cultural and historic resource of the Pacific Northwest, we ask that WSDOT work with the state Fish and Wildlife Department to mitigate the impact of the bridge on fish and wildlife in and around Lake Washington.

Wildlife and Habitat
There are no mitigation measures proposed specifically for wildlife. SDEIS, 5-146

C-029-009

6) East West vs. North South/impact on local traffic: Error and Omission

Apparently, WSDOT did not work with SDOT to analyze the impact of the new design on traffic in the greater Seattle area. This needs to be addressed prior to construction. For example, WSDOT traffic analysis did not include a major intersection to and from 520: 23rd Ave. and Madison. Without examining and modeling traffic alternatives, traffic in Seattle has the potential of being adversely impacted with greater congestion on city streets.

The impact of the 520 design on traffic flows appears not to have been thoroughly addressed. The SDEIS itself indicates that congestion going north and south would have only marginal improvements. Unless North/South traffic flow is addressed and congestion resolved, that congestion will continue to have a negative impact on 520. Traffic cannot get on or off the new bridge because the north/south capacity is not adequate to 'absorb' an increased influx of cars.

C-029-009 *Local traffic operations along Montlake Boulevard NE and NE Pacific Street would improve with Option A compared to the No Build Alternative. Option A traffic patterns would improve operations at four intersections in the Montlake area and* ***degrade*** *operations at one intersection in the NE 45th Street interchange area and two intersections at the Roanoke/Harvard interchange. Page 5-14*

C-029-010 **7) Limited solution to larger problem: Error and omission**

While the purpose of the 520 design was to focus on the safety and capacity of 520, why were no other solutions examined other than an expanded bridge? A major impact would be to reduce the number of cars using 520. This could be accomplished in part with an expansion of park and ride sites on the East and West Sides. These lots would drive people to transit, not cars. Consider the difference between the East Coast vs. LA. The East Coast realized that it could not rely totally on cars for transportation. While they have a rail system we do not, creating park and rides now would accomplish two things—drive people to buses while we plan for rail and reduce traffic on the bridge more quickly. This has the advantage of adding jobs now as well.

C-029-011 Also, some of the comments from the Seattle King County Public Health Department report on the health impacts of 520 were not addressed. Their recommendations included interim traffic design changes, traffic management for the construction period and creating incentives for transit ridership. Why were these and other alternatives not explored?

C-029-012 **8) Lighting: Omission**

There is virtually no information on what the new lighting will look like, its location and impact. It was noted that lighting would be necessary for the pedestrian and bike lane. If there are higher signs and lights on 520, where will they be placed and what impact will the height of the lights have on neighboring communities?

C-029-013 **9) Health Impact: Omission.**

The Seattle King County Department of Public Health cited a number of health issues related to construction and noise. These were not addressed in the SDEIS:

a) Particulate matter. This has not been addressed for the construction phase or post construction.
b) Air quality. While air quality was addressed, there is no air quality, noise or particulate impact study on the impact of 8-14 foot noise barriers on the noise, air quality and particulate matter impact within those noise barriers.
c) Vibrations from pile driving.

10) Visual blight and health impact: Omission.

If the number one finding from community participation was to *"protect and enhance the neighborhoods,"* then the Seattle King County Public Health Department's Health Impact recommendations need to be examined in this regard. The 520 design with 8 to 14 feet noise walls would be a significant visual blight along the lake.

C-029-013

The bridge design must support the needs of the neighborhoods, not just the convenience of the WSDOT for bridge maintenance. The height of the proposed bridge at 20 feet above the water with an 8-14 foot concrete noise walls would be an incredible visual blight that impacts the quality of life of the boating community as well as the residential communities all around the lake.

These barriers, while reducing noise, would have an adverse impact on the health of people living near this bridge and an adverse impact on the economic vitality of the western corridor. It would lower property values and render economically viable communities vulnerable to the adverse impact of height, noise and quality of life we now enjoy.

The possibility of driving people out of these communities is real and significant. If the economic health of Seattle communities is not considered as a factor, this is a significant design omission.

C-029-014

11) Safety: Error/omission

a) Funding for Safety. The original goal of re-designing 520 was to improve the safety of the bridge. The first section of the SDEIS went to great lengths to talk about the imminent structural dangers facing 520 from storms to earthquakes. It went to great lengths to show its vulnerability to structural damage. More than twice the number of cars cross the bridge now than it was designed for. (SDEIS, 1-4 to 5).

However, the legislature and the Governor released funds the week of March 29 to the east side to begin construction. These were federally designated funds. Do they have the authority to do that? And, if so, where will the funds come from to replace that money for the safety upgrades?

If safety is the highest concern, it is not reflected in the SDEIS itself. Funding for safety upgrades need to be addressed.

C-029-015

b) Height of bridge. There are several safety concerns with the height of the bridge. One was addressed above re: concrete barriers and wind storms. Concrete is not flexible.

Another safety concern with the height of the new bridge is ice. If the proposed bridge is 25' plus feet above the water, compared to its' current 11 foot height, what impact would a winter storm have on the bridge? The height means there is more room for ice on and *below* the bridge deck. What plans does WSDOT have for snow and ice removal that would be both safe for drivers and environmentally safe as well?

C-029-016

12) Cost over runs? Who pays the bill?

Finally, it is not clear who pays the bill. Where will the money come from *specifically*, and who will have to foot the bill if there are cost overruns? If the

C-029-016 money for safety improvements for 520 has now been given for improvements on the east side, does this mean the east side is off the hook if there are overruns on the west side? By starting on the east side first, rather than last, as indicated in the SDEIS, their work will have been well into completion by the time the floating bridge work and the western interchanges will have been started or completed. Does that leave Seattle holding the bill? And if so, where will that money come from? From property taxes on homes whose values have been negatively impacted by the bridge itself?

C-029-017 In conclusion: There are significant errors and omissions in the SDEIS, changes in the process and priorities, and sequencing of construction from that outlined in the SDEIS itself. These issues need to be addressed before we move forward with any construction—east side or west side.

We recognize the importance of moving ahead. We also recognize significant structural and capacity issues remain and need to be addressed. We look forward to a good faith effort to work with SDOT and WSDOT to create a stable, safe and environmentally 'friendly' bridge and a construction process that has minimal impact on the quality of life in Seattle. We look forward to creating a final design that addresses these important issues so the adjoining communities have a voice in the impact of the bridge on effective transportation and vibrant neighborhoods.

Sincerely,

Ken Myrabo, President, Madison Park Community Council, on behalf of the Madison Park Community

Cc: Governor Christine Gregoire
County Executive Dow Constantine
Senator Ed Murray, Representatives Chopp and Pedersen
Mayor Mike McGinn
King County and City Council Members
Senators Murray and Cantwell, Congressman McDermott

April 15, 2010

Jenifer Young
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C-030-001

I am President of the Portage Bay/Roanoke Park Community Council (PB/RP CC) and I wish to offer the following comments on the SR-520 SDEIS. The comments incorporate, by reference, the comments made by other residents of the PB/RP community (including, but not limited to: Alice Byers, Robert Buchanan, Gerry Conley, Ron Melnikoff, Erin O'Connor, Walter Oelwein, Joan Stewart and Douglas Stewart) and by Fran Conley, Coordinator for the Sustainable 520 Coalition, and Jerry G. Lilly, President, JGL Acoustics, Inc.

My comments are divided into two categories: (a) The adequacy of the DEIS and (b) Errors and omissions contained in the SDEIS.

C-030-002

(a) The adequacy of the DEIS

(1) Upon completion of SR-520's Scoping Phase, WSDOT issued a scoping document summarizing what it had learned and the approach it would follow. The document stated that mitigation would be "integral to and inseparable from" the SR-520 project. However, the SDEIS says that mitigation may or may not occur depending on the availability of funds. The phrase "integral to and inseparable from" was used by WSDOT officials and consultants in numerous public meeting when discussing community and environmental impacts and we were assured the mitigation commitment was the basis upon which the project would proceed. It was only in the SDEIS that WSDOT revealed that community mitigation was not firm but depended on the availability of funding. If community mitigation is no longer "integral to and inseparable from" the SR-520 project, its scoping documents are no longer relevant, information presented to and received

C-030-002

from WSDOT during public meetings is no longer relevant, and the entire scoping and public participation process needs to be redone.

C-030-003

(2) The SR-520 planning process had an extended mediation process established by the legislature (Engrossed Substitute Senate Bill [ESSB 6099]). At the mediation committee's initial meetings there was disagreement about how many lanes SR-520 would have. The legislature had stipulated a 6-lane roadway with one lane in each direction for HOV and transit use and said that the roadway should be able to accommodate light rail in the future. One group argued that the legislature had mandated 6 vehicle lanes and that future light rail would be accommodated by expanding the roadway to 8 lanes. Another group argued that the 6-lane roadway had to be designed so that future light rail could be accommodated without adding more lanes. Because the two sides could not agree, the matter was referred to the mediation's Oversight Committee which was composed of the Governor and elected members of the state legislature. The finding of the Oversight Committee was that there was to be a total of 6-lanes in the SR-520 corridor, including the accommodation for future light rail. The recent Nelson-Nygaard (N/N) review of the SDEIS commissioned by the City of Seattle reported that WSDOT's SR-520 design will not accommodate light rail. If light rail is to be added to SR-520 in the future it will require an entirely new effort – including the possibility of having to build a new bridge and light rail corridor. The current design does not meet the legislative mandate given to WSDOT.

C-030-004

(3) WSDOT has taken the position that it will only consider alternatives moved forward by the SR-520 Mediation Committee. There are recreational open spaces and park lands within the PB/RP community that will be adversely impacted construction of an expanded SR-520 corridor (see comments submitted by Gerald Conley on this point for more details). Federal requirements under Section 4-F require that WSDOT investigate all available alternatives when open spaces and park lands will be adversely impacted and only if none are available will such impacts be considered unavoidable and mitigation pursued. Because WSDOT limited its SDEIS analysis to only those alternatives that came out of the mediation process, this was not done. And worse yet, the SDEIS states that mitigation may or may not be provided depending on the availability of funding The SDEIS is therefore inadequate and needs to be redone.

C-030-005

(4) The Roanoke Historic District is an 18.25 acre area bordered by 10th Avenue East on the east, Harvard Avenue East on the west, East Shelby Street on the north and East Roanoke Street (and SR-520) on the south. It is a residential area of 99 homes within a framework of tree-lined streets, well maintained grounds and distinctive natural features. Over two-thirds of its homes are of architectural significance and it is one of only two residential districts in the City of Seattle listed on the Federal Register of Historic Districts. Section 106 requires that no historic places be impacted, or if they are, mitigation must be provided. The SDEIS discusses possible detour routes through the historic district, noise levels of over 100 dB within the historic district during construction, and the use of streets adjacent to the historic district as haul routes during construction (for additional details, see the comments submitted by Erin O'Connor). The SDEIS provides, at best, trivial attention to these impacts. If the final SDEIS remains in its current form both with regard to impact identification and the stipulation of required mitigation, we will appeal to the State Historic Preservation Officer (SHPO) not to sign the Section 106 required Memorandum of Agreement with WSDOT. And worse yet, the SDEIS again states that mitigation may or may not be provided depending on the availability of funding

C-030-006

(5) It is my understanding that courts have ruled that a project such as the SR-520 corridor cannot divided up into segments and individually analyzed in different EISs when the design of one segment will influence the impacts of, and alternatives available to, the other. WSDOT obtained a no significant impact Record of Decision (ROD) for that segment of SR-520 east of Medina. According to the recent N/N report commissioned by the City of Seattle however, the design for SR-520 east of Lake Washington precludes the possibility of building a six-lane SR-520 corridor that accommodates light rail on the west side. Since Seattle's mayor has said he wants to study the possibility of having a six lane SR-520 corridor that would accommodate light rail, WSDOT's current segmentation of the corridor combined with its stated intent to begin construction on the east side appears to violate the no segmentation rule.

C-030-007

(6) ESSB 6099 called for the SDEIS to contain a Health Impact Assessment of how the replacement and expansion of the SR-520 corridor could affect public Health. A generic overview of public health issues was conducted by King County Public Health and the Puget Sound Clean Air Agency and delivered to WSDOT (see comments by Douglas Stewart for more details). It was presented to the SR-520

C-030-007

Mediation Committee. The public health information contained in the report was never applied to the impact assessment of alternatives. Since – for example - the report found public health impacts were significantly impacted (reduced) by lids, and the size of the Montlake lid varies considerably by alternative, the public health information contained in the SDEIS was never used to assess different alternatives but only for making generalized, generic comments. This violates the mandate contained in ESSB 6099 and needs to be redone.

C-030-008

(7) ESSB 6099 required WSDOT study ways to reduce noise impacts within communities adjacent to SR-520. At the urging of the Mediation Committee WSWDOT convened an Expert Noise Panel to study this issue and recommend ways to reduce such impacts. The Panel meet, drafted a report, and presented it to the Mediation Committee. Thereafter, it was totally ignored by WSDOT in the SDEIS's assessment of noise impacts. (see comments by Steve Silverberg, Jim Simpkins and Alice Byers and the separately submitted comments by Jerry G. Lilly, President, JGL Acoustics, Inc.) WSDOT's position was that the only noise mitigation method meeting Federal Highway Administration (FHWA) standards is the use of noise walls, and that was the only type of mitigation contained in the SDEIS. However, a large number of the noise reducing options contained in the Expert Noise Panel's report could be incorporated in the design of the SR-520 corridor – thereby reducing noise and (possibly) eliminating the need to build noise walls. The so-called "K" option, for example, explicitly called for the use of rubberized asphalt quiet pavement to reduce noise in the SR-520 corridor, but this option was never used in the alternatives assessments conducted by WSDOT. This information is needed to make sound decisions about noise reduction along the SR-520 corridor and its omission means that the entire analysis of different alternatives' noise impacts needs to be redone.

C-030-009

(b) Errors and omissions contained in the DEIS

(1) Page 1-21, 4th bullet in the margin box: Currently reads, "Six lanes plus an auxiliary lane on the Portage Bay Bridge." Since the so-called auxiliary lane runs from one edge of the Portage Bay Bridge to the other, it should clearly be labeled as, "Seven lanes, one of which is an auxiliary lane."

C-030-010

(2) Page 1-23, 1st paragraph under the heading *What is the 6-lane Alternative?:* Currently reads: "The six lane alternative would widen the SR 520 corridor to six

C-030-010

lanes from I-5 in Seattle to Evergreen Point Road in Medina." This is incorrect, it should read, "The six lane alternative would widen the SR 520 corridor to six lanes main line lanes (i.e., not counting on- and off-ramps) from I-5 in Seattle to Evergreen Point Road in Medina, except for the Portage Bay bridge which would have seven lanes."

C-030-011

(3) Page 1-25, 1st paragraph under the heading *Noise Reduction*: Currently reads: "…including a WSDOT requirement … to attain a 10-decibel or greater reduction in the first row of properties affected by project noise." While this is true it is misleading. Documents distributed to impacted residences during construction of the Harvard and Boylston Avenues East noise walls clearly state that while WSDOT prefers a noise reduction of at least 10-decibels, it will construct noise walls when the noise reduction is 3-decibels or more. The SDEIS should be revised to reflect WSDOT's operating policies instead of its intents or targets.

C-030-012

(4) Page 2-1, 1st paragraph under the heading *What is the No Build Alternative?:* Currently reads: "For the transportation analysis included in this document, it was assumed that traffic in the No Build (NB) Alternative would not be tolled." Throughout the SDEIS, comparisons are made between traffic volumes, speeds, and other traffic-related variables between the NB and other alternatives. Because no information is presented about the NB alternative under a tolling assumption, these comparisons are meaningless. For example, Exhibit 5.1-3 (page 5-6) comparing peak vehicle demand and throughput between the NB alternative and alternatives A, K, and L shows westbound traffic slightly lower in the morning and slightly higher in the afternoon. Is this the result of the new roadway's alignment and wider shoulders or does it result from the A, K and L alternatives being tolled while the NB alternative is not? This type of information is necessary for making informed decisions, yet it is concealed throughout the SDEIS. Analysis of traffic volumes and flows for a tolled NB alternative is critically necessary to make informed decisions about how to optimize the SR-520 corridor. It needs to be provided throughout the SDEIS.

(5) Page 2-5, bottom paragraph: Currently reads, "Since traffic modeling assumptions were applied consistently across options, they show the relative performance of each option in comparison to No Build." As discussed above under (4), this is not true. Because the NB alternative is not tolled while the other alternatives are tolled in the traffic modeling, the relative performance of A, K,

C-030-012 and L alternatives cannot be compared with the NB alternative. Such comparisons are only valid when all alternatives are analyzed under the same assumptions.

C-030-013 (6) Page 2-9, 2nd full paragraph: Currently reads, "One idea discussed in mediation is to build a parking lot with a driveway entrance on the southwest corner of Roanoke and Boylston." Correct but very misleading. My mediation notes show the idea of a parking lot was briefly discussed and then rejected by the representatives of both the Roanoke and Eastlake neighborhoods. It was raised again during a post-mediation meeting between WSDOT and PB/RP CC representatives and was once again rejected.

C-030-014 (7) Page 2-10, 1st full paragraph: Currently reads: "Option A would have two general-purpose lanes and an HOV lane in each direction, plus a westbound auxiliary lane, making it about 10 feet wider than Options K or L." This is incorrect. Table 2.2, page 2-12, shows the width of the different options ranging from 10 to 21 feet. Also, a more accurate statement about the Portage Bay Bridge is, *Option A would have two general-purpose lanes and an HOV lane in an eastbound direction and three general-purpose lanes and an HOV lane in an westbound direction*. There is nothing in SR-520's Option A design that would distinguish the roadway or use characteristics of an auxiliary lane relative to a general purpose lane. The distinction is meaningless except that it identifies the lane as being on the Portage Bay Bridge.

C-030-015 (8) Page 2-34, 1st bullet under paragraph 4: Currently reads, "The floating portion of the Evergreen Point Bridge…is the highest priority in the corridor…because of the high risk of catastrophic failure." The last session of the Washington State legislature transferred funds from construction of the floating portion of the bridge to construction of SR-520's east of Lake Washington land-based roadway. The DEIS must (a) explain how this is compatible with the floating portion of the bridge being the project's priority or (b) the statement needs to be deleted.

C-030-016 (9) Page 2-38, 3rd paragraph: Currently reads, "…the Portage Bay Bridge would be built to its ultimate width – seven lanes for option A, six lanes for options K and L." This contradicts page 1-23, 1st paragraph, reads: "The six lane alternative would widen the SR 520 corridor to six lanes from I-5 in Seattle to Evergreen Point Road in Medina."

C-030-017

(10) Page 3-2, Exhibit 3-1 shows the Delmar/SR-520 and SR-520/I-5 lids used as staging areas. These lids are adjacent to the Roanoke Historic District. How will impacts of these staging areas on the Historic District be either avoided or mitigated – as required under Section 106? This issue is not discussed in the SDEIS.

C-030-018

(11) Page 3-4, 1st complete paragraph: Currently reads, "…several residential streets would also be used for truck haul routes, including 11th Avenue East and East Miller Street." This creates a haul route through a residential area and next to Seattle Prep school. The impact of a haul route on the school needs to be discussed.

C-030-019

(12) Page 3-5, Table 3-2, *Estimated Number of Peak Construction Period Haul Route Trips on Local Highways:* The table is both incorrect and misleading. For option A, the table reports 350 trips per day and 45 trips per hour on SR-520, and 270 trips per day and 35 trips per hour on I-5 (although not discussed in the SDEIS, the assumption appears to be that hauling will take place 8 hours per day). The correct number of trips per day is 43.8 on SR-520 and 33.8 on I-5. Similar errors exist for the other options. Additionally, this number of trips equals one truck trip every 1.4 minutes on SR-520 and every 1.8 minutes on I-5. During the 3-hours of so-called *rush hour* traffic, neither SR-520 nor I-5 can accommodate an additional truck entering the roadway every 1.4 and 1.8 minutes, respectively.

C-030-020

(13) Page 3-6, paragraph under the heading Delmar Drive East: Currently reads, "The Delmar Drive East bridge would be closed for approximately 9 months under all options. While it's closed, traffic would be detoured to 10th Avenue East." 10th Avenue East runs directly through the federally certified Roanoke Historic District, and the use of a street in a certified historic district street violates Section 106 requirements. The SDEIS must acknowledge that it will violate the tranquility of the historic district and address how this will be avoided or mitigated.

(14) Page 3-13, 1st paragraph under the heading *10th Avenue East/Delmar Drive East Lid*: Currently reads, "Delmar Drive East would remain closed for 9 to 12 months ." This contradicts the statement on page 3-6 that the bridge will be closed "approximately 9 months." The purpose of the SDEIS is to provide

C-030-020 information on worst case impact scenarios to decision makers. The statement on page 3-6 should read, "the bridge will be closed approximately 12 months."

C-030-021 (15) Page 5-2, 1st paragraph under heading *How is travel demand predicted to grow in the SR 520 corridor?*: Currently reads: "Between today and the year 2030, the region will … need to accommodate close to 50 percent more traffic." This is a misleading statement since table 5-1-1, page 5-5 shows the following:

	SR-520	total cross lake	SR-520 % change	total % change
existing	115,000	313,000		
NB	135,000	397,200	17.4%	26.9%
A	131,000	397,900	13.9%	27.1%
K/L	133,800	397,900	16.3%	27.1%

Total cross lake travel will increase by only half that amount and SR-520 will increase by only a third.

C-030-022 (16) Page 5-5, Table 5.1-1, *Daily Vehicle Demand*. This table must contain an error. Adding additional lanes and tolling SR-520 causes total cross lake vehicle trips to increase by two-tenths of one percent over a 20 year period. This needs to be explained.

C-030-023 (17) Page 5-40, entire section under the heading *How would the project affect economic activity?*: The economic analysis in this section is inadequate for the following reasons: (a) only project benefits are discussed and there is no acknowledgement of any economic costs resulting from the project even though businesses in the Montlake Blvd., North Capitol Hill (at Miller and 10th) and Roanoke Park (at Harvard and Eastlake) will experience street closures and suffer negative impacts from having the streets in front of them used as haul routes for as much as six years of construction – a long enough period of time to permanently impact their ability to survive; (b) there is a likelihood that houses negatively impacted during construction will flood the market and permanently lose value; even if they regain their value after construction, property tax revenues will decrease during the multi-year construction period (c) Table 5.2-4 is in error. It states that a decrease of $1.8 million in taxable value within the City of Seattle will result in a property tax decrease of $4,940 – an implied levy rate of 2.6944. The actual King County levy rate charged on Seattle properties in 2008

C-030-023

was 8.6879 – which would have resulted in a property tax decrease of $12,382, two and a half times greater than the SDEIS estimate; (d) the accepted, standard methodology to calculate the economic impact of the project on property tax revenues collected in Seattle is to calculate the net present value (NPV) of property tax decreases over the life of the project, the one-year tax effects contained in table 5.2-4 is both unusual and misleading. The SDEIS needs to address and present findings for each of these elements of economic cost.

C-030-024

(18) Page 5-99, the entire section under the heading *What has been done to avoid or minimize adverse effects on cultural resources?:* The only historic district impacted by the project that is currently listed in both the National Register of Historic Places (NRHP) and the Washington Heritage Register (WHR) is the Roanoke Park Historic District. IT IS NOT EVEN DISCUSSED IN THE SDEIS even though WSDOT's plans include having a detour route go right through the District. This is really an amazing omission – particularly since representatives of the PB/RP CC have held numerous meetings with WSDOT staff and consultants about their concerns over the impacts the project could have the District.

(19) Page 5-100, the entire section under the heading *How could the project mitigate avoidable adverse effects on cultural resources?:* The only historic district impacted by the project that is currently listed in both the National Register of Historic Places (NRHP) and the Washington Heritage Register (WHR) is the Roanoke Park Historic District. IT IS NOT EVEN DISCUSSED IN THE SDEIS even though WSDOT's plans include having a detour route go right through the District. This is really an amazing omission – particularly since representatives of the PB/RP CC have held numerous meetings with WSDOT staff and consultants about their concerns over the impacts the project could have the District.

C-030-025

(20) Page 6-8, Table 6.1-4, *Summary of Effects of Truck Traffic in Seattle*: The table's footnote "a" states that the calculations are based on a 10 hour haul day. This is in error. The "Per Hour" results in the table only work if they are calculated on the basis of an 8 hour haul day.

C-030-026

(21) Page 6-23, paragraph under the section heading *How would construction affect economic activity?:* Currently reads: "On balance, the positive effects [of

C-030-026

the project] … would be more widely dispersed through the local and regional economies than the location-specific negative effects of increased traffic congestion and noise. For this reason, construction of the 6-Lane Alternative is expected to have a net beneficial economic effect." This statement is both incorrect and misleading. It is incorrect because the project's widely dispersed benefits are not a "reason" for it to have a net beneficial economic effect. In fact, because the SDEIS does not even identify – let alone estimate/calculate - the project's potential non-construction economic costs, it is impossible to estimate its net economic effects. It is misleading because even if the statement were correct, the proper conclusion would be: "since the project's positive effects would be more widely dispersed through the regional economy than the location-specific negative effects of increased traffic congestion and noise, the project is expected to have a net beneficial economic effect on the region but a net negative economic effect on areas adjacent to the SR-520 corridor."

I appreciate the opportunity to submit the above comments for the PB/RP CC.

Sincerely

s/ Theodore Lane
President, PB/RP CC