



vickernick@hotmail.com

Printed: Tuesday, October 31, 2006 3:55 PM

From : moz cooper <mozcooper@hotmail.com>
Sent : Tuesday, October 31, 2006 3:53 PM
To : SR520DEIScomments@wsdot.wa.gov
CC : Csimon96@aol.com
Subject : Madison Park Community Council's response to the DEIS for the I-520 bridge.

October 31, 2006

To: Washington State Department of Transportation

From: Madison Park Community Council — 1900 43rd Avenue East, Seattle, WA 98112

Re: Comments on the Draft Environmental Impact Statement for the proposed expansion of the I-520 Bridge

Dear Sir/Madam:

The Madison Park Community Council (MPCC) has been actively involved in this project during and since the Trans-Lake Study Committee recommended expansion of the bridge as the primary means of increasing travel capacity across Lake Washington, and, as such, is very familiar with the issues involved in the potential re-alignment and enlargement of the roadway. We therefore submit these comments based on a wealth of background knowledge, and with the fervent hope that this project will do no further harm to our community over and above the negative impacts of the existing bridge.

With the primary "do no harm" goal in mind, we would suggest that the Draft Environmental Impact Statement as issued is largely inadequate as it affects our community, and, in fact, the other Seattle communities adjacent to the west end of the bridge, and would request that a Supplementary Impact Statement be prepared and issued to fully address two main issues, viz:-

(1) Demand for a New Bridge, and (2) Design Options to adequately address the issues raised by a potential expansion/re-alignment of I-520 at the Seattle end of the bridge.

DEMAND FOR A COMPLETELY NEW BRIDGE:

WSDOT has continually stated over a period of many years that the bridge is unsafe and therefore should be replaced. This argument seems to be entirely founded on a politically based motivation to expand the bridge rather than on sound engineering judgement.

Despite many requests by MPCC over a number of years, we have not been provided with, and hence doubt that there exists, an independently commissioned study showing that it is not economically feasible to repair the bridge to meet current seismic standards. We would request that such a study be authorized and included in a Supplementary Environmental Impact Statement.

WSDOT has offered two primary reasons for the purported structural inadequacy of the bridge, but has not addressed the potential to correct these inadequacies.

The first is the potential for collapse of the columns supporting the fixed spans on the Seattle approaches via implosion, explosion or lateral collapse. It would seem that the columns could be filled with concrete to prevent implosion; that they could be wrapped with steel (as per the columns adjacent to I-5) to prevent explosion, and could be extended downward with vertically parallel columns to prevent lateral collapse.

The second is the fact that the bridge currently floats too low in the water because of previous structural reinforcement to sustain the weight of further strengthening measures. It would seem that removal of the existing concrete "jersey" barriers and their replacement with similar barriers made of aluminum (as per recent work on Vancouver B.C.'s Lions' Gate Bridge) would be adequate.

In addition, it is important to note in any environmental impact statement a more accurate discussion of traffic capacity

C-015-001 | of the existing bridge versus one re-aligned. The current bridge carries 1,400 - 1,600 vehicles per lane per hour. This is much lower than a roadway built to modern design standards because of the existing narrow shoulders and vertical and horizontal twists. A newer bridge would carry 2,100 - 2,200 vehicles per lane per hour. This would evidently give a replacement four-lane bridge some forty percent more capacity than the current bridge. This fact should be noted prominently in the DEIS, and not hidden.

C-015-002 | DESIGN OPTIONS FOR THE SEATTLE APPROACHES

The primary planning efforts over many years have been expended on considering how many lanes a replacement bridge should have. Only very recently has significant attention been paid to connecting/re-connecting the Seattle approaches to the freeway. This has led to two poorly considered "solutions". The first is merely to expand the roadway to six lanes, and, essentially, to ignore the dramatic north-south traffic problems that would occur over and around the Montlake bridge. The second is to construct a massive new interchange over Marsh Island, (the poorly-named Pacific Interchange) which would have unacceptable impacts to the Arboretum.

Other options and design solutions are possible, but not partially or fully considered. Two options worthy of note are (1) a tube-tunnel option, or, (2) The Arboretum By-Pass design option, which is likely more practical because it incorporates the Pacific Street connection itself, with its attendant benefits of better transit access, and better north-south traffic flow, but without the destruction of the north end of the Arboretum wetlands.

It is imperative that more time and thought be given to design options for the Seattle approaches or it is likely that the project will reach an impasse because of the close-in Seattle communities' opposition.

C-015-003 | Other issues in the DEIS have also not been adequately addressed with respect to the concerns of MPCC. With respect to the use of the bridge itself, we have always supported the addition of shoulders and bicycle lanes, but not carpool lanes. If the bridge is to be expanded to six lanes, it is our belief that the additional two lanes must be reserved for transit/vanpools, in common with standard practice in the rest of the western world, rather than using the two extra lanes for carpools, which merely serve to sort traffic out by occupancy, thus causing congestion due to the weaving traffic, do nothing to encourage carpooling itself, and are quickly convertible and probably to be converted to general occupancy (i.e. single-occupancy car commuters).

C-015-004 | The other major issues are related to the excessive height and width of the current proposals in the vicinity of Madison Park. The proposed height will be unacceptably visually intrusive, and will cause the noise impacts of the bridge to be felt by a much greater number of citizens in our community. One rationale given by WSDOT for the height is to improve drainage of stormwater runoff from the bridge. This problem could, of course, be solved by adding more drains in the roadway surface and adding more pipes under the bridge deck instead of letting so much water flow down the roadway.

C-015-005 | We are concerned, and opposed to the current proposals to add 14-foot wide roadways masquerading as bicycle lanes down into Madison Park at either 37th or 43rd Avenue East, the former because of the destruction of the wetlands and division of the natural area at that location, and the latter because of the unacceptable visual blight on our waterfront community and the blockage of a passageway for fireboats. In addition, we have not been given the resources to study the safety aspects of the huge anticipated increase in bicycle traffic on our narrow streets.

C-015-006 | Finally we do not see addressed the provision of any real substitute access to our community to and from I-520 during the bridge construction period.

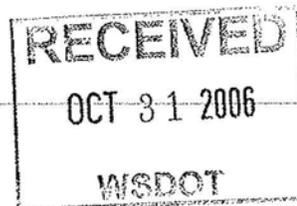
Thank you for your attention to our concerns; we also look forward to your response to our request for a necessary Supplementary Draft EIS.

Sincerely,

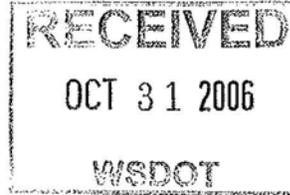
Maurice B. Cooper,

President, Madison Park Community Council.

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October 31, 2006



Microsoft

James Leonard, Area Engineer
WSDOT Environmental Services Office
414 Olive Way, Suite 400
Seattle, WA 98101

SUBJECT: SR520 Bridge Replacement and HOV Project Draft EIS Comments

Dear Mr. Leonard:

Thank you for considering Microsoft's comments in response to the Draft EIS for the SR520 Replacement and HOV Project. Our comments are broken down into two categories: 1) articulation of Microsoft's interest in the SR520 corridor, and, 2) specific comments on the DEIS within the regulatory context of RCW 43.21C and WAC 197-11.

The SR520 corridor from I-5 in Redmond to SR202 in Redmond represents the critical link from Microsoft's Corporate Headquarters from Seattle, the University of Washington and east to Redmond and beyond. In addition, our Seattle employees' use transit carpools and vanpools in large numbers even with the limitations of the current bridge. More importantly, this facility represents critical infrastructure for our business operations between our corporate headquarters, the Eastside, the University of Washington, downtown Seattle, and the rest of the region. Given the company's continued expansion on the Eastside we expect these demands to increase for the foreseeable future.

The DEIS does a good job of representing both the current corridor deficiencies and future impacts of the alternatives, both during construction and with final build out. It is clear from this analysis that there are environmental impacts from such a large redevelopment in the SR520 corridor. On balance the analysis shows that there are documented noise, visual, habitat and alignment impacts, but also long term storm water, safety, mobility and economic benefits from the described improvements.

After review of the DEIS and associated Technical Appendices we have the following comments:

1. SR520/Eastside connectivity – Given the scope of the DEIS there is limited information describing how Eastside improvements would integrate into both existing and proposed facilities east of NE Points drive in Kirkland. Chapter 7 should be expanded to describe how the alternatives integrate both with the current and future SR520/I-405 interchange.

c-016-001

C-016-002

2. Pontoon Sizing – Microsoft supports the six lane alternative as represented in the documentation. Although the document does a good job of identifying construction and navigation challenges in building and placing the new bridge pontoons there is little discussion regarding pontoons sizing for long term future growth. This discussion has received considerable attention during the comment period. Microsoft believes that pontoons sized sufficient to allow for future mobility growth, including high capacity transit (HCT), will afford future decision makers a wider range of future alternatives not be fully vetted today. The EIS should expand on the discussion in Chapter 3 to describe this prospect and disclose any potential environmental impacts and potential mitigation associated with engineering and placing these larger pontoons now.

C-016-003

3. Pacific Interchange – Microsoft supports the Pacific Interchange alternative as a better long term SR520 mobility solution. We acknowledge the construction impacts associated with its development to the University of Washington and immediate community. We believe the benefits of this interchange outweigh these impacts. These impacts are amplified by the planned construction of the Sound Transit North Link project during the same time horizon. Both DEIS and Appendix J should be updated from the existing 2005 data to further detail combined constructability and environmental impacts from both mega-projects occurring simultaneously.

Of the alternatives identified in the DEIS, Microsoft supports the six lane alternative, with inclusion of the Pacific Interchange as the most viable long term option for providing additional safety and multi-modal capacity in this corridor. We believe that providing expanded pontoon capacity to retain future options, including HCT, is also critical and consistent with precedent established on I-90. Finally, there is continued urgency for this project to move forward as quickly as possible. Continued delays only exacerbate existing safety and structural risks to the existing facility and significantly limit the regions ability to provide improved mobility in this corridor.

Thank you for providing us with the opportunity to provide this input.

Sincerely,



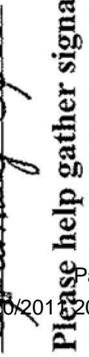
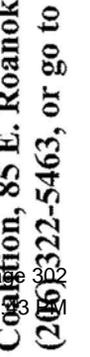
Chris Owens, General Manager – Real Estate & Facilities
Microsoft Corporation

WE OPPOSE THE SIX-LANE SR-520 ALTERNATIVES, ESPECIALLY THE "PACIFIC STREET INTERCHANGE." THE FOUR-LANE ALTERNATIVE THAT WE SUPPORT IS AFFORDABLE, BENEFITS TRANSIT, PROTECTS THE ARBORETUM & UNION BAY, HAS LESS CONSTRUCTION DISRUPTION AND PERMANENT NOISE, AND DOESN'T WORSEN GLOBAL WARMING

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Please help gather signatures! Mail or hand-deliver fully or partially completed petitions to No Expansion of SR520 Citizens Coalition, 85 E. Roanoke Street, Seattle, WA 98102-3222. To get involved, write to that address, e-mail to cleman@oo.net, phone (206) 322-5463, or go to the web site at www.noexpansionofSR520.org.

WE OPPOSE THE SIX-LANE SR-520 ALTERNATIVES, ESPECIALLY THE "PACIFIC STREET INTERCHANGE." THE FOUR-LANE ALTERNATIVE THAT WE SUPPORT IS AFFORDABLE, BENEFITS TRANSIT, PROTECTS THE ARBORETUM & UNION BAY, HAS LESS CONSTRUCTION DISRUPTION AND PERMANENT NOISE, AND DOESN'T WORSEN GLOBAL WARMING

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		<u>Seattle, WA 98136</u>		
	<u>Paul Olson</u>	<u>3632 Ashworth Ave N</u>		
		<u>Seattle WA 98103</u>		
	<u>Rosemary Rice</u>	<u>1025 21st Ave SW</u>	<u>Rosemary@makensay.com</u>	
		<u>Seattle, WA 98146</u>		

Please help gather signatures! Mail or hand-deliver fully or partially completed petitions to No Expansion of SR520 Citizens Coalition, 85 E. Roanoke Street, Seattle, WA 98102-3222. To get involved, write to that address, e-mail to cleman@oo.net, phone (206) 322-5463, or go to the web site at www.noexpansionofSR520.org.

From: [Jeannie Hale](#)
To: [Krueger, Paul W \(UCO\); SR 520 DEIS Comments;](#)
CC:
Subject: Federation Comments on SR 520 DEIS
Date: Tuesday, October 31, 2006 2:19:24 PM
Attachments: [FED2182SR520DEISCommentsLTR.doc](#)
[FEDSR520AttachmentsDEISComments.pdf](#)

Hi WSDOT,
Attached and pasted below are our comments on the SR 520 Replacement and HOV Project DEIS. Could you please confirm that you have received our letter and attachments? Thanks!
Jeannie Hale
Seattle Community Council Federation

October 31, 2006

Paul Krueger
Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, Washington 98124-4025

RE: SR 520, Evergreen-Montlake Bridge Replacement, Draft Environmental Impact Statement

Dear Mr. Krueger:

The Seattle Community Council Federation is an association of more than 20 community associations throughout the City of Seattle and several affiliated associations. Our membership extends from Broadview in the northwestern part of Seattle to Mount Baker in the southeastern part and from Friends of Lincoln Park in the southwest to Friends of Magnuson Park in the northeast. Our mailing list covers 25 of the 26 postal zones in Seattle. Representatives of our member organizations meet monthly to discuss issues affecting Seattle and the quality of our environment. It is the oldest such organization in Seattle having been founded in 1948. We oppose the Pacific Interchange alternative and support the four-lane option.

At its September meeting, the Federation discussed the SR 520 Bridge Replacement and HOV Project. During the discussion, representatives from community associations in all of Seattle made it very clear that the Arboretum is a treasured asset in our city. All strongly opposed damaging it in any way, including making Lake Washington Boulevard into more of a gateway to the Evergreen-Montlake Bridge than it is now. Representatives from various parts of Seattle—not only those from northeast Seattle neighborhoods—are also very concerned about the adverse impacts the proposed high Union Bay Bridge would have upon salmon in the Lake Washington watershed. Madison Valley

C-018-001

c-018-001 | and northeast Seattle representatives spoke about the Pacific Interchange as a resurrection of the R.H. Thompson Expressway, which Seattle voters rejected in the 1960's.

At its September meeting, the Federation authorized the enclosed statement to the City Council's Environment, Emergency Management and Utilities Committee at its public meeting on October 4, 2006. Delegates also set up a SR 520 Committee to prepare comments on the draft environmental impact statement (DEIS). The Committee called for comments from member organizations. The first responses came as this series of statements that had been prepared for submission to the Seattle City Council, listed in the order received:

- Attachment A: Statement of the Community Council Federation at the City Council October 4, 2006 meeting;

Seattle Community Council Federation
Letter of October 30, 2006 regarding DEIS on the SR 520 Replacement Project
Page 2

- Attachment B: Statement of the Laurelhurst Community Club;
- Attachment C: Statement of Greg Hill, representative of the Wallingford Community Council;
- Attachment D: Statement of Earl Bell, representative of the University Park Community Council;
- Attachment E: Observations on Rebuilding SR 520 of Larry Sinnott, lead on SR 520 issues for the Ravenna Bryant Community Association;
- Attachment F: A series of questions from the University District Community Council regarding the DEIS;
- Attachment G: Comments from the Eastlake Community Council; and
- Attachment H: Comments from the Hawthorne Hills Community Council.

The comments in the above attachments are incorporated by reference as part of this letter.

We ask that you respond to these questions from Federation member organization, Ravenna Springs Community Group:

- c-018-002 | • Does the Washington Department of Transportation (WSDOT) really expect that under the Pacific Interchange Montlake Boulevard will slim down from seven traveled lanes at the NE 45th Street viaduct to two through lanes immediately north of it? Can WSDOT point to any other place in Seattle where a major arterial drops from seven lanes to two lanes on its main north-south route so quickly? If not, then the DEIS should provide traffic studies on traffic flow on 25th Avenue NE north of NE 45th Street and the changes in traffic controls, including parking, that are realistically anticipated.
- c-018-003 | • Will WSDOT impose tolls on traffic that use the proposed Union Bay Bridge to go across Lake Washington Ship Canal between Capitol Hill and northeast Seattle? To go to I-5? If not, identify those volumes, including the amount of vehicles that will use this route once the Pacific Interchange reduces congestion during rush hours as the DEIS anticipates. How was this added

c-018-003 | traffic factored into calculations that assume tolls will reduce traffic volumes on Montlake Boulevard NE north of the Lake Washington Ship Canal?

c-018-004 | • The DIES omits any photos or discussion of the bird refuge at University Slough. This needs to be corrected.

c-018-005 | • The DEIS states that WSDOT intends to collect and treat drainage from Montlake Boulevard NE if the Pacific Interchange is built. Will it also intercept the glop dropping from the expansion joints of the NE 45th Street viaduct on 25th Avenue NE and the overflows that come from University Village and pollute University Slough? If so, will the City of Seattle and University Village be assessed for the betterment that they receive?

c-018-006 | • What will be the replacement wetlands for the portion of University Slough to be taken by the widening of NE 45th Street for the Pacific Interchange? Since this wetland is truly irreplaceable, what studies were made about shortening the widening of Montlake Boulevard NE so that it would cease at its juncture with the NE 45th Street viaduct west

Seattle Community Council Federation
Letter of October 30, 2006 regarding DEIS on the SR 520 Replacement Project
Page 3

of University Slough? What did these studies show? If no such studies were made, WSDOT needs to make them now.

c-018-007 | • Were the estimated tolls in the DEIS (Exhibit 3-16) based on WSDOT's cost estimates or the \$4.38 billion figure estimated by the Governor's Expert Review Panel—41 percent higher? If the former, what would the estimated tolls be using the \$4.38 billion figure?

c-018-008 | • A Seattle city councilmember said that he anticipated that the higher cost figure of the Governor's Expert Review Panel would prompt WSDOT to engage in "value engineering" and other methods to cut costs. What amenities, mitigation measures and environmental protections are most likely to be dropped or reduced?

The Federation also incorporates by reference the following memoranda and materials into this statement:

- Attachment I: Letter of September 15 from the Arboretum and Botanical Garden Committee commenting on the DEIS;
- Attachment J: Resolution of October 12, 2006 adopted by Seattle's Board of Park Commissioners;
- Attachment K: Statement of Seattle Audubon at October 4, 2006 public meeting;
- Attachment L: Memoranda from the Seattle Design Commission dated October 17, 2006 and August 11, 2006;
- Attachments M and N: Technical memoranda from OTAK, dated October 17, 2006 on the Arboretum and wetlands and from Mirai on the traffic impacts, dated October 13, 2006;
- Attachment O: Statement of the University of Washington Faculty Senate;
- Attachment P: Statement of the City-University Community Advisory Committee; and

- Attachment Q: Proposals on SR520 review to the Seattle Planning Commission and Suggestions to the Expert Review Panel for reducing costs of the SR 520 proposals from No Expansion of SR520 Citizens Coalition.

Thank you for considering the comments of the Seattle Community Council Federation.

Sincerely,

Jeannie Hale, President
3425 West Laurelhurst Drive NE
Seattle, Washington 98105
206-525-5135 / fax 206-525-9631
jeannieh@serv.net

Enclosures

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SEATTLE COMMUNITY COUNCIL FEDERATION

Environment, Emergency Management and Utilities Committee
Special Meeting, October 4, 2006
SR 520 Replacement Project

Good evening. My name is Jeannie Hale and I am President of the Seattle Community Council Federation, a coalition of community groups throughout the city. The Federation is opposed to the Pacific Street Interchange option. We urge you to select the four-lane alternative with shoulders and a bike lane as the preferred alternative. We will address three of the many issues associated with the Pacific Interchange option.

c-018-009 | Arboretum and Open Space. The Pacific Interchange would have devastating impacts upon the Washington Park Arboretum, the Foster Island / Montlake Cut natural area and the nearby wetlands. There is no conceivable way to mitigate the adverse impacts that would result. We share the concerns of the Arboretum and Botanical Garden Committee about diminishing one of the most important tree collections in North America. We agree with the Wallingford Community Council that the proposed viaduct that would be created by the Pacific Interchange would result in a string of concrete arches the length of the natural area and would wipe out beautiful and pristine open space. We agree with the Hawthorne Hills Community Council that the Pacific Interchange would cause irreparable harm to the Arboretum. Seattle cannot afford to lose its trees, green space and habitat.

c-018-010 | Transportation Alternatives. As was stated in the popular movie *Field of Dreams*, "Build it and they will come." More lanes mean more cars. A four-lane alternative with shoulders will be sufficient to address transportation needs and improve traffic flow. The City should be encouraging transit, bicycling and other transportation alternatives—not promoting driving. As the Council recently learned, 30 percent of global warming pollution is attributable to cars. The City has made a commitment to reduce greenhouse gas emissions by 680,000 metric tons and to meet the 2012 goals of the Kyoto Protocol. The Pacific Interchange alternative is a step backward in working to achieve the City's goals.

c-018-011 | Cost. The Pacific Interchange alternative is too expensive. There is no assurance that \$4.38 billion will be available to fund this option. The Governor's Expert Review Panel agrees with this assessment. The four-lane alternative is considerably less expensive and a more fiscally sound approach.

c-018-012 | At its September meeting, the Federation unanimously voted to withhold support of the Bridging the Gap transportation levy until Seattle government shows that it will treat all transportation projects in a fiscally and environmentally responsible manner. In supporting the Pacific Interchange as the preferred alternative, we do not believe that the City Council has met this mandate.

We appreciate the opportunity to comment and hope you will consider the views of the Seattle Community Council Federation.

Jeannie Hale

Jeannie Hale, President
3425 West Laurelhurst Drive NE
Seattle, Washington 98105
206-525-5135 / fax 206-525-9631 / jeannieh@serv.net

Laurelhurst Community Club

Serving 2800 Households and Businesses in Seattle's Laurelhurst Neighborhood

Laurelhurst Community Club SR520 Position Statement

September 11, 2006

The Laurelhurst neighborhood supports the city's goal of reducing driving by promoting pedestrian, bicycle and mass-transit alternatives. We also support the city's goal of being a leader in environmental stewardship and economic viability.

Our community supports reconstruction of the four-lane SR520 bridge and supports enhancing mass-transit capacity through the corridor. We oppose adding single-occupancy vehicle capacity, which we believe is inherent in each of the 6-lane alternatives. The addition of traditional HOV lanes will by default add SOV capacity to the general-purpose lanes by removing carpool and bus traffic. While statistical analysis shows that buses will run freely along these new lanes, experiences along other regional corridors have shown otherwise. Additionally, transportation modeling suggests that the eventual load from new HOV lanes will require Interstate 5 to be widened, which is not in any future State plans. The LCC supports bus rapid-transit or railways in dedicated rights-of way without automobile access.

Inter-modal Connectivity

The LCC supports a well-designed inter-modal connection between SR520 mass-transit and Sound Transit serving the larger community of NE Seattle. Suggestions include a dedicated southbound HOV lane from NE 45th to the UW stadium station, allowing for increased direct bus service from critical points in NE Seattle.

Local Traffic Impacts

Traffic through the Montlake corridor must be improved by this project, not made worse! The state, city, Sound Transit, the U of W and other stakeholders must devise a satisfactory long-term solution to this bottleneck. This is a bigger issue than SR520 alone. The effects of allowing continued expansion of University Village, Magnuson Park, Children's Hospital, Talaris, the UW, multi-family and elder care institutions, etc. must all be taken as a whole and a comprehensive transportation vision be created for NE Seattle. The DEIS focuses on whether the interchanges near the UW hospital and Montlake will rate a 'D' or an 'F'. Neither is acceptable for such a cost.

Noise

We support utilization of state-of-the-art "quiet pavement" to reduce noise and we support a lower speed limit on SR520 to both reduce noise and improve safety.

Washington Park Arboretum

We support a "net-zero" impact to the arboretum and surrounding wetlands and 100% funding of the Arboretum master-plan as a mitigation measure of the project. Additionally, we support measures meant to discourage vehicular through-traffic in the Arboretum.

C-018-013

Project Scale

Our specific opposition to the Pacific Interchange Option has much to do with its immense scale and completely inappropriate location above native wetlands. A similar criticism could be levied against the 6-Lane Base Option and the huge swath of pavement it cuts through historic neighborhoods and Portage Bay.

We support minimizing the visual scale and the total impervious surface area required for the project. Specific suggestions include larger landscaped lids and the narrowing of traffic lanes and shoulders. These measures are only a start and do not go nearly far enough. Additional measures must be identified to reduce what are currently unacceptable visual and environmental impacts over our waterways and wetlands. Toward this end, we support a thorough feasibility study of the tunnel/tube concept by experts in the field.

Conclusion

This project is huge. Construction for this project, in tandem with Sound Transit, will place an almost impossible burden on our community during construction. These projects, along with the Viaduct, will have an enormous impact on what we become as a city and a region over the next 50 to 100 years.

We understand that regional politics suggest that we A) choose from the options we've been given and B) that we'd better choose from one of the 6-Lane options. The Laurelhurst Community Club rejects this. The options on the table do not reflect our rhetoric regarding what we aspire to be as a city. We urge the city council to reject the 6-Lane alternatives on the table and demand that the State plan and build a four-lane plus dedicated transit-way for the future SR520. Inherent in this approach must be a much stronger package of mitigation measures to minimize the project's impact to our environment and our communities.

This statement was unanimously approved at the September 11, 2006 meeting of the Laurelhurst Community Club Board of Trustees. For further information, please contact:



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jeanseattle@earthlink.net



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From: Greg Hill
Sent: Tuesday, September 05, 2006 9:19 AM
To: Jan.Drago@seattle.gov
Cc: David.Della@Seattle.gov; Jean.Godden@Seattle.gov; Nick.Licata@seattle.gov; Peter.Steinbrueck@seattle.gov; Richard.Conlin@seattle.gov; Richard.McIver@seattle.gov; Tom.Rasmussen@Seattle.gov; The Honorable Sally Clark@Seattle.gov
Subject: Wallingford SR 520

Dear Councilmember Drago,

C-018-014

Pacific Interchange

This proposal, meant to relieve 520 traffic through Montlake, is like a loaded gun pointed at Wallingford. As with all freeway interchanges, it would substantially increase traffic on the streets with which it connects. The WSDOT web site predicts a substantial increase in traffic on Pacific, requiring the addition of two new lanes of traffic. However, the analysis of impacts stops abruptly at 15th Avenue NE. The Wallingford community understands that the majority of this new traffic will be headed through Wallingford.

Local Street Impacts

Latona School is already impacted by shortcut traffic from I-5 through Wallingford. This would grow worse with a shortcut to SR 520. South Wallingford Corridor Study identified a number of mitigations to deal with the impacts of existing traffic. A substantial increase in traffic will further deteriorate the pedestrian opportunities to walk to the Burke Gilman and the Lake Union shoreline.

More Traffic on Pacific will substantially increase conflicts on the Wallingford portion of the Burke-Gilman Trail.

None of this is contemplated or proposed for mitigation by the Pacific Interchange study. This is still another example of how highways designed to facilitate sprawl (this in East King County) destroy existing neighborhoods.

C-018-015

City-wide Traffic Impacts

As WSDOT has shown, the new SR 520 will be designed to be widened. If four lanes are adopted, it will be re-stripped for 6 lanes. If six lanes are adopted, it will be re-stripped for 8 lanes. Seattle talk a great deal about the environment: global warming, oil dependence, saving salmon. Our streets a filling up. Congestion continues to increase. As we become more dense, it will generate more traffic. We can not afford to let more vehicles enter the city.

When the spoken goals of the city are to reduce driving and promote pedestrian orientation and transit, why is the Seattle City Council supporting a six lane alternative that will substantially increase the number of vehicles entering the city?

C-018-016

Impact to Seattle Open Space

The Pacific Interchange will have a horrific impact two of Seattle's finest open spaces: the Foster Island / Montlake Cut natural area and the Washington Arboretum. The Foster Island / Montlake cut natural area is one of the most bucolic shoreline precincts in the city. For those on the shoreline trail or paddling in Union Bay, they experience a quiet place with many opportunities to enjoy seeing wildlife or to read or reflect in peace. The proposed viaduct literally runs a string of concrete arches the length of this natural area and will wipe out this most beautiful, pristine open space.

Formally connecting the Arboretum drive to Pacific is actually worse than the old RH Thompson Freeway proposal, because it utilizes entire length of the arboretum as a through way and focuses traffic, that today may choose many alternatives, into a single corridor through the arboretum.

C-018-017

Regional Impact

As a region, our transportation investments dictate our future land use patterns. The SR 520 project has nothing to do with relieving congestion and everything to do with sprawl in East King County. The SR 520 bridge should be built with a dedicated transitway in the center of the bridge. This should include installing the rails for future rail transit now. No other alternative will help to create a sustainable pattern of new growth in the eastern portion of the county.

C-018-018

We urge you to reject the Pacific Interchange and adopt a four lane + transit way approach for the new SR 520 bridge.

Gregory Hill, Transportation Chair
Wallingford Community Council

UNIVERSITY PARK COMMUNITY CLUB

OCTOBER 30, 2006

Paul Krueger
Environmental Manager
SR 520 Bridge Replacement Project

c-018-019 | [Comments sent to sr520deiscomments@wsdot.wa.gov](mailto:sr520deiscomments@wsdot.wa.gov)

These are Comments submitted by the University Park Community Club (UPCC) pursuant to the call for public comment on this project contained in the DEIS dated August 18, 2006. We join those individuals and organizations who have stated their concerns or their opposition to the Pacific Street Interchange Option (PSIO). As the manner in which all of the alternatives and options are presented serves to make it appear that this option under the six-lane alternative is the WSDOT "putative preferred alternative" (PPA) most of our comments will be addressed to it specifically.

First, we lay out our objections to the PPA and then we follow with what we believe is an alternative that will accomplish much of what is sought from this investment without the necessity of a total transformation of the neighborhoods north of the Ship Canal.

Put most succinctly, the UPCC does not see anything in the DEIS that is persuasive that the PPA would be anything but harmful to the environment north of the Ship Canal. It *might*, however, succeed in doing something for the Montlake neighborhood in terms of re-routing traffic that would pass through towards another adjacent area, but at what cost in terms of peace and tranquility for these other areas is nowhere examined in the DEIS.

To us, the Pacific Street Interchange, while it appears to offer some possibility of improving throughput of vehicles through this busiest of intersections, does so only by an "improvement" that is completely out of scale. The impact on one of our major recreational areas (e.g., the UW waterfront) would be devastating, not only in terms of diminished opportunity for recreation but also in terms of environmental impact. However, even if there were magically no impacts in the area surrounding the Interchange, the consequences at short distances from it are not spelled out or even cursorily mentioned in the DEIS. For example, there is no mention of projected congestion estimates for any intersection north of NE 45th or west of 15th AV NE. Those projections that are shown are in the vicinity of Montlake Blvd north of Pacific Street. Communities like ours are left wondering what it might look like in 2030 if the alternatives were built. The DEIS is not helpful to this process. No information is given regarding projections for general increase in traffic volumes in surrounding areas such as Ravenna, Wallingford, Bryant or Laurelhurst.

Members of our community know that any project of this scale will have unintended consequences that will likely be anywhere from significant to devastating. What troubles us is the lack of any attention in the DEIS to the consequences that **are** intended. The PSIO has been put forth as a sort of panacea for solving a problem that may not be amenable to solution: the movement of people and goods using automotive vehicles other than rapid transit without severe impacts on the areas through which the vehicles pass. This is a long term project. While no light rail is foreseen across the 520 bridge in the next expansion of the light rail system, it is certainly reasonable to expect such an expansion during the 50+ year lifetime of the new bridge. The DEIS contains mentions in passing that the bridge pontoons would be designed to be able to carry rail rapid transit, but there is no design for how this would be achieved.

If we really want to reduce the Montlake mess we have to turn to public transport and move the

c-018-019 bulk of the projected demand to this transport modality. This has not seriously been considered in the DEIS. There is not even a clear plan of how passengers transfer between different bus lines. There must be a valid concept of how a new light rail line would continue on either side of the bridge and connect to other lines and buses. For instance, the intersection near Marsh Island should be designed to accommodate the wider curves needed for light rail to make the turn towards Husky Stadium. Once light rail gets to the Pacific Street intersection is it going to go over all the planned new construction or below? Can the mezzanine floor of the presently planned station be modified for an underground east-west station for a line to Ballard, or is the 520 line going to make a turn and connect to the downtown line? We should not box ourselves in and prevent solutions needed in the future.

This Putative Preferred Alternative is the most expensive alternative, mostly because it involves the ambitious Union Bay Bridge but it will also be due to numerous lids and other benefits for the Montlake neighborhood. It is instructive to note the comments from the report of the Governor's Expert Review Panel dated September 1, 2006:

"The SR 520 project premised its finance plan on \$573 million of secured funding and over \$3.6 billion of anticipated funding. We think that premise is overly optimistic. Overall, we find it unreasonable to assume the project will realize sufficient funding from secured and anticipated funding sources. We doubt that an anticipated \$153 million in sales tax revenue will be transferred to the project. We have assumed that only the six-lane alternative, if selected, will receive Regional Transportation Improvement District (RTID) ballot measure funding of \$800 million. Moreover, we find no basis to believe that any of the second increment of the RTID funding target of \$1.4 billion will be available to the project.

Consequently, we find that the funding sources identified in the SR 520 finance plan fall far short in secured and anticipated funding categories. This shortfall is of particular concern, given the impacts to regional circulation if the structure should fail. The lack of alternative routes makes it essential to fully fund the solution chosen for SR 520 bridge alternative."

Thus, with the recent adjustments due to inflationary pressure and the Seattle City Council's apparent preference for the most expensive option, the process is dangerously close to assurance that the PPA will not be fully funded. This being the case, the UPCC urges the adoption of the 6-lane alternative with a second Montlake bridge as the most prudent way to proceed given the current fiscal situation of the State. The six-lane alternative is acceptable as an alternative only if the "HOV lanes" are dedicated not for HOV use but for transit use exclusively. To do otherwise would be to court a lack of full funding and thus to delay the immediate undertaking of bridge replacement.

The UPCC recognizes that the six-lane alternative is the likely selection by WSDOT and other decision-making bodies involved in the final selection. With the two additional lanes dedicated to transit, we could support the six lane alternative. Nonetheless, the UPCC wishes to emphasize its opposition to the Pacific Street Interchange Option no matter what level of funding turns out to be available. Our opposition, as outlined above, is not based entirely upon cost, but lack of benefits for our and other communities north of the Ship Canal as well as the lack of a viable public transit solution.

Please direct any questions or requests for clarification to the email address shown on page one.

I have been authorized and directed to submit these comments on behalf of the Executive Board of the University Park Community Club.

Earl J. Bell
Board Member

Observations on Rebuilding SR 520

by Larry Sinnott, Ravenna-Bryant Community Association Boardmember

C-018-020

The real concern for Ravenna-Bryant in the SR 520 rebuild is the high potential for increased traffic on 25th Av. NE and NE 75th St. A Montlake Interchange that is more efficient for cars will attract more commuters north of our neighborhood, and within our area, to drive down 25th Av through Montlake to eastside jobs. A Montlake Interchange that is more efficient for buses can move a lot more people, can save a lot of money in construction, and can have dramatically less impact on the Washington Park Arboretum. Ravenna-Bryant needs to have a big voice in this decision.

C-018-021

The real question at Montlake is what to do about the bottleneck crossing the Lake Washington Ship Canal, and there are 3 choices on the table. The easiest choice (base 4-lane alternative) is to rebuild SR 520 similar to what it is now and leave the Montlake Bridge the way it is now (adding a second draw bridge is an option). The most extreme choice (Pacific St/Marsh Is Interchange) would totally disconnect the current Montlake Interchange and rebuild it 70 feet up in the air over Marsh Is in the Arboretum, with a 125 foot high bridge over the Ship Canal into the Husky parking lot to a greatly expanded intersection at Pacific St. At 419 feet across and a still to be determined arched structure above the 125 foot bridge, it is similar in scale to the old Kingdome. This is the so-called "Pacific St Interchange" that is bankrolled by the Shelby-Hamlin community under the presumptuous name of "betterbridge.org". You might have received their glossy mailers and heard their sales pitches to the City Council and other elected officials, and WSDOT has embraced their plan as its way to move a few more cars than in other alternatives. What they are selling is very marginal gains in moving cars, with a consequent cost of an extra billion dollars and gargantuan concrete structures in the wetlands of the Arboretum. They say this is the "only plan that works". When all of the facts are laid on the table, that is a gross exaggeration! The answer we should be getting is which alternative moves the most people, at a reasonable cost, while enhancing (not further degrading) our internationally renown largest arboretum for trees in the world.

C-018-022

The better choice for the Montlake bottleneck is to build a second draw bridge along side the existing one, while being sensitive to it's historic character. With a better balance of options than is currently spelled out in the SR 520 Draft EIS, a 4 or 6-lane SR 520 would really address our future needs for moving people through this corridor, at a much more moderate cost of construction, with less width through Montlake, and much less degradation to the greenspaces we can not afford to throw away. A second draw bridge would allow the elimination of the Montlake bus flier stops, who's function would move to the transit hub at the Sound Transit Husky Station, significantly reducing the width of 520 through Montlake. I would totally change the 2 "braided ramps" designed into the 6-lane alternative, which I believe are overly wide, too costly, and put northbound buses on the wrong side of Montlake Blvd. Instead, I would have just one westbound transit only off-ramp in the middle of 520, up to the new signalized intersection, where it would have signal priority to get to the left lane northbound. I would still have GP and HOV ramps on both sides, where eastbound buses would use the HOV on-ramp. These 3 options for bus optimizations can work with both the 4 and 6-lane alternatives, and the choice there is how restrictive on Single Occupancy Vehicles (SOV) in the 4 (political hot potato!), versus how much more cost in the 6 for only marginal performance gains. WSDOT's DEIS and

c-018-022 | betterbridge.org's propaganda do nothing to optimize bus movements in the other alternatives, so their traffic conclusions are quite skewed.

c-018-023 | The last, and by no means least, option is to not rebuild freeway ramps back into the Arboretum. The existing ramps will be removed, and no new ramps should be reconnected to our Historic Olmsted Brother's designed Lake Washington Blvd. It is park property, not a city street, not a city arterial, and not a state route. The current eastbound Arboretum on-ramp being 200 yards from the eastbound Montlake on-ramp causes it's own congestion and WSDOT admits that when confronted. Rebuilt ramps still could not be used by buses or trucks, so they really only cater to cars (SOV) avoiding backups on I-5 and the Portage Bay section of 520. The latest traffic flow studies from SDOT show Lk Washington Blvd (curvilinear, 2-lane, shared with bicycles) through the Arboretum averaging 19000 cars per day, while 23rd Av. E (4-lane city arterial) immediately to the west, averages 18700 cars per day. We need to reverse that, not leave it about the same, not make it only "a little worse" like the Pacific St Interchange analysis claims. The SR 520 ramps to the Washington Park Arboretum should not be rebuilt!

Please participate in the following hearings and/or write to the decision makers below.

Decision Schedule;

City Council and Mayor

9:30 am Thu 7 Sep - Workshop on SR 520

Mon 25 Sep - Referral of Council and Mayor's SR 520 Preferred Alternative

Mon 16 Oct - Vote on Resolution for SR 520 Preferred Alternative

WSDOT Draft EIS

4:00 - 7:00 pm Mon 18 Sep - SR 520 Public Hearing at MOHAI

Mon 2 Oct - Close of written comment period

SR 520 Executive Cmte

?? Oct - SR 520 Joint Recommendation to Governor

Sec. of Transportation

Review of SR 520 Joint Recommendation

Governor

?? Jan - SR 520 Decision

The DEIS and its appendices should answer these questions, but have not done so yet::

C-018-024

Traffic ---

How will the state resolve the traffic congestion the Pacific Street Interchange would create at 15th Avenue N.E. and 15th Avenue N.E.? by more paving? if so, where?

How much additional traffic will occur on N.E. 45th St. and N.E. 50th St. through the University District? What will be its impact? What changes in the street configuration can be expected at Montlake Boulevard N.E. and N.E. 45th St. to accommodate traffic using the viaduct?

Will the Pacific Street Interchange prompt more traffic through the University of Washington Campus on weekends and after hours when there currently no parking attendants on duty? If so, how much?

How much traffic will come off or go on the N.E. 42nd St. ramps to the express lanes? What streets will the traffic use?

Explain in detail the effect of the Pacific Street Interchange on emergency vehicles go to University Hospital both from the Southeast and from the North and West especially in light of the level of service E at N.E. Pacific Street and 15th Avenue N.E.

The DEIS uses figures assuming that tolls continue at the suggested rate forever and makes its environmental analysis accordingly. What would be the range of volumes if tolls come off by 2030, or, if inflation over the next decades, allows users to pay lower value tolls to pay the fixed

How will the increased buses to the RTA station be handled? Where will the lay over zones be? Will there be bus only lanes? Will parking be restricted?

During the University Community Urban Center planning process, a traffic engineer from the City of Seattle opined that if traffic flows increased N.E. 45th St. and N.E. 50th would be made a couplet of one-wsy streets from I-5 to 15th Avenue N.E.? Would the Pacific Street Interchange make that unwanted circulation pattern more likely?

Will the added traffic on I-5 express lanes increase the noise levels on 7th Avenue N.E. south of N.E. 45th St. If so, how much?

The DEIS has no studies on the increased noise on University hospital? What impact will it have? please consider the cumulative noise levels adding in the noise from N.E. Pacific Street, which would be brought closer to the medical center.

Pedestrian mobility ---

How much added time will pedestrians have to spend waiting for the added traffic to clear up to that they can walk across?

What will be done to prevent right turning traffic from bullying pedestrians when they finally get a crosswalk light? and to stop left turning traffic from continuing to turn in front of pedestrians with a "walk" signal? Enforcement against motorists has been non-existent so far. How many added collisions will occur?

What plans are in the works with the Pacific Street Interchange for these two already hazardous situations that it aggravates:: (a) the pedestrian crossing of N.E. 45th St. between the bus stop on the south side and the Husky parking and the north side at the traffic signal near the base of the viaduct; and (b) passage Between the bus stop on the north side of N.E. 45th St. and the QFC at the entrance/exit of University Village near the base of the viaduct? Motorists look east for on coming traffic ignoring pedestrians approaching from the west. Eliminating the bus stops is not an acceptable response. Too many University students use those stops.

Will the State retrofit the pedestrian overpass over 15th Avenue N.E. by Schmitz Hall and the Henry Gallery near Campus Parkway to make it accessible by wheelchair?

When the assistant City's engineer proposed the one-way street couplets during the University Community Urban Center planning process, a retired architect responded that it would be better to build pedestrian underpasses in all directions at the intersection of N.E. 45th St. and 15th Avenue N.E. Will that be considered if the couplet concept surfaces again?

Parking ---

Where will the cars prompted by the "connectivity" that the Pacific Street Interchange

c-018-024

envisions be stashed?

What replacement will be made for the parking places displaced from the Husky Stadium lot? What impact does the loss of parking have on the University Hospital, which now relies on them? on friends and family of patients in the hospital?

Displacement ----

Where will the University acquire the almost 15 acres that the Pacific Street Interchange takes from the campus? It would be very wrong to take the replacement from the west or north, when the major displacement occurs in the southeast. Surely, WSDOT can not expect that the University, to squeeze the expanded enrollment and staff into its existing campus.

Does it serve the public interest for the University to locate more of its research facilities in South Lake Union, a possible replacement site? The University has often insisted that its research be linked to and proximate with its teaching and libraries.

Can property be taken from the parking lots of University Village, the Safeway, and other ownerships north of N.E. 45th St.? Parklands and wildlife refuges should be protected, yet the Pacific Street Interchange makes its entire take on the south. In our opinion, the greenery south of N.E. 45th St. has more value to the public than the parking areas abutting N.E. 45th St. on the north.

If the state builds drainage retention vaults in Montlake Boulevard N.E. and N.E. 45th St., what provision will be made for keeping a continuous flow of Ravenna Creek to University Slough and its wetlands?

What can be expected in the way of detouring traffic through the University District during construction of the Pacific Street Interchange? Please describe in full.



SR520 Position Statement
September 19, 2006

This is a response to the Draft EIS and current position taken by the City Council to the improvement of the SR520 bridge across Lake Washington and Portage Bay. The Eastlake neighborhood will be directly affected by the planned changes of the SR520 bridge and welcomes this opportunity to comment on the proposed options.

We have consistently supported that the existing four lanes be replaced. The needed redesign has been delayed from years of effort to expand SR520 in ways that will worsen its environmental impacts and simply shift traffic gridlock. The Eastlake community is in full support of the State of Washington's and City of Seattle's efforts to facilitate safe and improved traffic flow while reducing single occupancy vehicle induced traffic. According to the City of Seattle's blue ribbon commission report on global warming increased driving is our region's largest single contribution to global warming. We demand a solution which will improve our environment, our public open spaces and the establish pedestrian, bicycle and mass-transit alternatives.

Any mildly talented urban planner can see that the any of the options laid out in the EIS which propose to permanently float a freeway at ground/ water level through one of our most precious parks and wetlands at one of the wider parts of Lake Washington are a compromise at best. This is the wrong corridor for a freeway; an underground route would offer numerous benefits that none of the current options ('6 lane- base, Pacific Interchange and 4 lane option') can match. The alternatives available for review in the EIS clearly demonstrate that the four-lane SR520 will accommodate more traffic than the current bridge while inflicting less negative impacts on environment and neighborhoods than both 6-lane alternatives.

Both the Pacific Street and the base 6-lane alternatives are completely out of scale with their respective environments at the Arboretum and Seattle communities which they pass through. The current design for the Pacific Interchange shows a 419 foot wide structure on top of Foster and Marsh Islands (Arboretum officials are on record as saying the only thing that would grow under the proposed roadway would be blackberry bushes). The 6 lane base alternative shows a 376 feet wide swath of concrete going through the Arboretum west of Foster Island and 319 feet wide in Montlake. The current solution reminds of an 'interchange' designed by WSDOT in the mid 1960s as a part of what was then to be called the R.H. Thompson Expressway. The interchange, and the associated expressway, were rejected by the voters of the City of Seattle at that time in what the Seattle PI call's "probably Seattle's bloodiest freeway battle". The message has not changed: Structures of this size and mass do not belong above ground in Seattle.

The ECC supports public transit for the SR520 bridge (rail preferred), and a connection between SR520 mass-transit and Sound Transit serving NE Seattle. We oppose any additional flyover ramp connecting SR520 to I-5 unless it is rail transit-only. We also support any solution which will ensure a 'net-zero' impact to the arboretum and its wetlands and proposals to discourage vehicular through-traffic in the Arboretum.

Stake holder meetings

Our elected regional politicians hosted a forum (a series of bi-monthly meetings from April to August 2006) to discuss the options and to find a mutually agreeable solution. This process was flawed in many ways most notably by the fact that community leaders, UW, Parks and Arboretum representatives were to choose from the options WSDOT presented and basically rubberstamp one of the 6-lane options. When it became clear that most of us rejected the Pacific Interchange option we were silenced. The Eastlake Community Council rejects this undemocratic process and the description of the Pacific Street Interchange as a solution being 'community-generated'.

On August 11, 2006, eight stakeholders provided to the City the following statement:

"The organizations that we represent are opposed to the so-called Pacific Street Interchange proposal because it is overly large and expensive, and has unacceptable impacts on the Arboretum and its wetlands, Union Bay, the University of Washington, and the surrounding neighborhoods. Please include this statement in the body of the SR520 Seattle Advisory Committee report."

Jean Amick, Laurelhurst Community Council
Lisa Anderson, Madison Park Community Council
Matt Fox, University District Community Council President
Louis Hoffer, Broadmoor Homeowners' Association
Larry Sinnott, Ravenna-Bryant Community Association
Carsten Stinn, Eastlake Community Council President
Theresa Doherty, University of Washington Assistant Vice President
Fred Hoyt, University of Washington Botanical Gardens
Angela Belbeck, Seattle Board of Park Commissioners

Conclusion

We ask the City of Seattle and WSDOT to cooperate and to find a comprehensive solution for SR 520. The Eastlake Community will not endorse a project that the region cannot afford, which will further damage one of the most beautiful parks in the city, and will dump additional motor vehicles onto I-5 and neighborhood streets. The impact of this project is tremendous. The construction will coincide with the rebuilding of the Viaduct and Sound transit improvements. The outcome of those projects will dramatically shape this City and region in the near and distant future. The options presented do not live up to what Seattle and Washington voters deserve as a solution. The preferred option should not be regarded as a mistake by future generations. We ask the City of Seattle and WSDOT to reject both 6-lane options and collaborate on a 4-lane option plus dedicated transit way. The planning efforts should be directed towards mitigating the impact of this project on our environment and neighborhoods.

This statement was unanimously approved by the Eastlake Community Council Board of Directors.



Carsten Stinn
President Eastlake Community Council
(206) 784-0887
carsten@carstenstinn.com



HAWTHORNE HILLS COMMUNITY COUNCIL

Established 1945; Serving over 1900 homes in Northeast Seattle
6057 Ann Arbor Avenue NE
Seattle, WA 98115-7618
206-524-8713

September 29, 2006

Mayor Greg Nickels
Seattle City Hall
PO Box 94749
Seattle, WA 98124-4749

C-018-026

RE: Pacific Street Interchange and SR 520 replacement

Dear Mayor Nickels;

The Hawthorne Hills Community Council Board of Trustees unanimously voted at their September meeting to oppose the Pacific Street Interchange and to endorse an alternative bridge replacement of 4-lanes with a bicycle lane and shoulders.

We are concerned that increasing the width and building a large interchange on the west end of the bridge will encourage commuters and trucks to use both 25th Avenue NE and Sand Point Way NE to the point where those two roadways will become as busy as Lake City Way and will impact neighborhoods in Northeast Seattle in a negative manner.

We are also concerned that the impact of a wider SR 520 bridge and a Pacific Street Interchange will irreparable harm the Washington Park Arboretum. This is a jewel in the City and all efforts should be made to protect and preserve the Arboretum.

Sincerely,

Bonnie E. Miller, President

CC: Seattle City Council
Governor Christine Gregoire

September 15, 2006

Paul Krueger
WSDOT Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Re: SR 520 Replacement Project Options
Position statement from Arboretum and Botanical Garden Committee

c-018-027 Dear Mr. Krueger:

New SR 520 bridge alternatives that slice into wildlife-rich and wetlands-sensitive areas of the Washington Park Arboretum or that have the potential to overwhelm the Arboretum with what some estimate to be 49 percent more traffic at 520 ramps are of deep concern to the Arboretum and Botanical Garden Committee.

We, the members of the committee, are appointed by Seattle Mayor Greg Nickels, University of Washington President Mark Emmert, Gov. Christine Gregoire and the Arboretum Foundation Board of Directors, with the task of acting as stewards of the Arboretum, the keystone facility of the University of Washington Botanic Gardens.

All proposals thus far would take Arboretum land and destroy valuable plantings – one alternative even uses three times the space already taken up by 520 in the Arboretum and eliminates long-lived specimens planted during the fledgling years of the Arboretum in the '30s.

We are concerned first and foremost about diminishing the Arboretum's plant collections, which include one of the most important tree collections in North America. Which plantings might have to be sacrificed depends both on which alternative is selected as well as where a temporary bridge, construction yards and assembly areas might be located.

We're also concerned about the loss of habitat. Native plants, wetlands and wildlife on Foster and Marsh islands, for example, would be affected not only by the taking of land but by the looming shadows created by roadways in various proposals.

Research shows that green spaces and trees are not only the lungs of a city, able to scrub away air pollution, but also places that improve our quality of life in ways that are often underestimated. Simply being able to look out over natural scenes has been proven to increase one's sense of well being and neighborhood satisfaction and even helps hospital patients heal more quickly.

C-018-027

Because we believe Seattle's green space contributes to everyone's well being, we are concerned about the potential loss of restorative, recreational and educational opportunities around Foster and Marsh islands, areas favored by kayakers, canoeists, nature walkers and birders.

We think proposals that take Arboretum land for freeways will dismay thousands of citizens and gutting parts of the Arboretum's master plan will trouble all the community members who worked so hard on its development in recent years.

Part of that plan includes an agreement to move office and facilities workers into part of the building now occupied by the Museum of History and Industry, which is going to move. Any 520 alternative where the museum building is eliminated means less space in buildings at the heart of the Arboretum for displays, educational opportunities and public meeting facilities.

We believe Lake Washington Boulevard East already has all the traffic the road and the Arboretum, through which it passes, can handle. Designed to handle 4,000 cars daily, it now carries 20,000. Students, faculty and Arboretum visitors have described crossing the street as "running for their lives."

The Washington Department of Transportation expects the connection from Lake Washington Boulevard East to 520 to be closed for four and a half years during construction, no matter which alternative is selected. If a suitable route has been in service for all that time, we would like the city to permanently abandon that connection to 520, thus protecting the Arboretum from ever-increasing amounts of traffic in the future.

The Arboretum is a much-needed place of beauty and peace for the 250,000 people who visit annually, so we are concerned about proposals that increase noise and air pollution or that compromise the views.

The Arboretum is an important part of our heritage and, because it holds collections of international significance, the world will be watching how this region protects this asset. Its degradation should not be taken lightly.

c-018-027 | Approved by all of the Members of the Arboretum and Botanical Garden Committee -
Washington Park Arboretum
Deborah Andrews
Margaret Ceis
Jack Collins, 4569 Purdue Ave., N.E., Seattle, WA 98105; (206) 524-7482; jackcollins@nwscs.org
Donald Harris
Neal Lessenger
Sandra Lier
David Mabberley
David Towne
John Wott

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RESOLUTION

A RESOLUTION expressing the position of the Board of Park Commissioners regarding the SR 520 Bridge Replacement and HOV Project.

WHEREAS, the Seattle Board of Park Commissioners has been in continuous existence since 1887 and acts in an advisory capacity to the Mayor, City Council, Seattle of Parks and Recreation, and other City departments; and

WHEREAS, State Route 520 has been, since its completion in 1963, and continues to be to this day, a blight on the Washington Park Arboretum; creating noise and visual intrusions into the park; encouraging cut-through traffic along Lake Washington Boulevard in much higher volumes than was originally intended for the boulevard, disturbing the serenity of the Japanese Garden, and affecting the passage of people and wildlife between Marsh and Foster Islands and the remainder of the Arboretum; and

WHEREAS, the Washington Park Arboretum is Washington State's official State Arboretum and contains internationally recognized woody plant collections and North America's largest collection of *Sorbus* and Maple, the second largest collection of species Hollies and significant collections of oaks, conifers and camellias; and

WHEREAS, a new Master Plan for the Arboretum was adopted in 2001 that was the culmination of five years of planning work undertaken by Seattle Parks and Recreation, the University of Washington, the Arboretum Foundation, community groups and members of the general public; and that will guide improvements to the Arboretum for the next 20 years, including many specific projects to enhance the physical and natural characteristics of the Arboretum such as increasing habitat diversity by restoring the natural function of Arboretum Creek and the northern shoreline; and

WHEREAS, the Washington Park Arboretum contains the largest freshwater wetland complex of its type in the Seattle region, and the Master Plan, in conjunction with the existing wetlands, includes the restoration, enhancement, and creation of new wetlands by restoring the ecological and wildlife function of the former garbage dump surrounding existing SR Route 520 ramps, and creating a Pacific Northwest Marshland collection along the shoreline of Union Bay; and

WHEREAS, implementation the SR 520 Bridge Replacement and HOV Project, as currently proposed, will forever compromise the aesthetic setting, biological diversity, educational opportunities, and physical connections for people and wildlife within the Washington Park Arboretum:

NOW, THEREFORE, BE IT RESOLVED BY THE SEATTLE BOARD OF PARK COMMISSIONERS THAT:

The Board cannot endorse any of the alternatives identified in the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (EIS) due to the profound negative environmental impacts the project would have on the Washington Park Arboretum.

The preferred alternative chosen must be consistent with the following:

- The structure should minimize the impacts on the Washington Park Arboretum, especially including the Japanese Garden and Foster and Marsh Islands, and other adjacent and nearby parks such as East Montlake and McCurdy parks;
- The structure should have the least number of travel lanes possible;
- The structure width should be the minimum necessary for safe passage;
- Any structure should be designed to have the least amount of coverage and shadow impacts on park land below;
- Clear, open, and safe access for people and wildlife under the structure must be provided to reconnect severed components of the Arboretum; and,
- Any required wetland mitigation must occur within the Arboretum first; if the area within the Arboretum is insufficient to accommodate the required mitigation, Park sites within Seattle on or adjacent to Lake Washington must be considered.

Mitigation of the continuing highway and future project impacts must be considered, regardless of the alternative/option chosen, to re-establish the Arboretum experience. As a starting point, the following should be considered in any mitigation package:

- Completely fund the Arboretum Master Plan, including wetland and shoreline restoration and planting (approximately \$60 million);
- Develop the stormwater pond in East Montlake Park for educational use;
- Provide a park-like lid at Montlake (depending on the option, the lid should extend as far as possible given the geography) which

- will create a strong connection between the neighborhood and the Arboretum;
- Replace (at WSDOT's expense) all of the functions served by the MOHAI building;
 - Design and provide access and parking at East Montlake Park for access to the Arboretum Waterfront Trail and for hand-launched boats; and
 - Install sound walls along the eastern and portions of the northern and southern edges of the Japanese Garden.
 - Address the traffic impacts to the Arboretum caused by increased traffic along Lake Washington Boulevard (LWB) including prohibiting access to SR 520 from LWB or alternatively, allowing east bound traffic on LWB to access SR 520 via a round about at the intersection of LWB and the SR 520 on/off ramp; repaving LWB with "quiet" pavement; incorporating other traffic calming measures in LWB south of the Arboretum interchange to discourage through traffic movements, e.g., a traffic island at the intersection of Boyer Avenue E and LWB; and tolling the Arboretum ramps.

Adopted by the Board of Park Commissioners the ____ day of October, 2006 and signed by me in open session in authentication of its adoption this ____ day of _____, 2006.

Chair of the Board of Park
Commissioners



October 4, 2006

Re: Oral testimony on SR 520, Seattle City Council

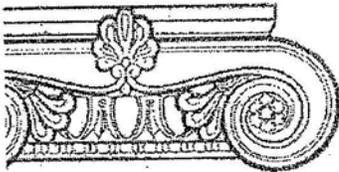
C-018-028

Good evening my name is Matt Mega and I am the Urban Habitat Director for Seattle Audubon. Seattle Audubon has more than 5,000 members throughout the greater Seattle region. We are here tonight to express our reservations and opposition to the Pacific Street Interchange Alternative. Not only is the Pacific Street Interchange coming in at an estimate over 4 billion dollars but it will create a concrete footprint and supporting infrastructure that will dramatically impact Foster and Marsh islands. These impacts would not only be detrimental to the wetlands and wildlife in the area but dramatically alter the experience of visitors to the Arboretum and Union Bay. The impacts would not stop there, a proposed concrete structure with no less than 187,000 square feet of new impervious surface would cross Marsh Island and Union Bay landing near Husky Stadium. Impacts to pedestrians, the Husky Stadium experience not to mention the wetland complex of Marsh Island would be immeasurable. The 1500 foot long structure crossing Union Bay would be over 110' feet tall and represent a mistake that would dwarf the R.H. Thompson Expressway Ramps to nowhere. The reconstruction of SR 520 is a necessary evil, no matter what option is chosen dramatic impacts to neighborhoods will occur. What does not make sense is why the City of Seattle would promote an option that will place undue burden on one of Seattle's last remaining regional green spaces. Impacts to the arboretum can be avoided by choosing a different option, allowing impacts to this highly used and treasured green space is unacceptable.

In 1994 (yes I did say 1994, 12 years ago) an environmental action agenda was promoted by Mayor Rice that challenged the City with instilling an "ethic of environmental stewardship into" everything we do..."every citizen, every business person and every government employee." Mayor Nickels current Environmental Action Agenda states that "a healthy urban environment isn't just a nice thing to have, it is vital to the health of our residents and our economy." Seattle Audubon is having a hard time reconciling the fact that the leadership of Seattle is considering choosing a highway option that will add the amount of concrete and impervious surface proposed in Pacific Street Interchange option across one of our areas last remaining forested wetland complexes and jeopardize the quality of the Arboretum. We strongly urge the City of Seattle to oppose the Pacific Street Interchange Option.

Thank you for the opportunity to comment tonight.

Matthew Mega, AICP
Director of Urban Habitat



**Seattle
Design
Commission**

Greg Nickels
Mayor

Karen Kiest
Chair

Tasha Atchison

Pam Beyette

Evan Bourquard

Brendan Connolly

John Hoffman

Mary Johnston

Anindita Mitra

Dennis Ryan

Darrell Vange

Guillermo Romano
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printed on recycled paper

October 6, 2006

**Seattle City Council
Mayor Greg Nickels
Seattle City Hall
600 Fourth Avenue
Seattle, WA 98124**

**RE: SR-520 Replacement Project
City Preferred Alternative**

Honorable Mayor Nickels and City Council Members:

As requested by the City Council at our briefing to the SR-520 Committee of the Whole on August 14th, the Seattle Design Commission has reconsidered the 6-lane Alternatives for the SR-520 Project, including the Pacific Interchange Option.

We feel it is premature to support any 6-lane option at this time. The Commission has conducted a series of reviews of the SR-520 Replacement project in seven courtesy briefings over the past four years and is impressed with how the project has evolved to respond to new ideas and local design concerns. We hope that the City's four representatives on the SR-520 Executive Committee can speak with one voice in advocating for the alternative that best serves the needs of Seattle.

It is clear from the available information that the physical impacts on Seattle of any 6-lane Alternative will be far greater than those of the 4-Lane Alternative. We cannot support the 6-lane options presented as we remain solid in our concerns for:

- impacts on the University of Washington
- impacts on the Arboretum and area wetlands
- impacts to Seattle neighborhoods
- inherent conflicts with Seattle's global reputation as an environmental policy leader

We also feel strongly that new project cost information released last month by WSDOT must now factor into your decision making.

We urge you to keep in mind that the overall goal of the project for the City should be to increase mobility with the least environmental impact possible. While we understand that the WSDOT project team

C-018-031

is tasked with looking at previously identified options in its DEIS, the best mobility and urban design solutions might be found in a Hybrid Alternative which has yet to be developed that pulls together the fundamental merit of the 4-lane Alternative and the added benefits of the several 6-lane options. Specifically, we recommend the Hybrid Alternative include:

- Dedicated transit ramps at key junctures
- Lids that offer improved surface connections
- Direct intermodal transportation connection at the University
- Aggressive traffic management and congestion pricing tools

We are in the process of reviewing the DEIS and will submit more detailed comments on the urban design elements to WSDOT later this month. In our early review, we have found a primary shortcoming is that the 4-lane Alternative did not consider all amenities to allow for a fair comparison with the 6-lane Options.

Without more compelling arguments, we still find the 4-Lane Alternative to be the most positive option for the City of Seattle. We fully recognize that, as currently conveyed by WSDOT, it does not accommodate dedicated transit. We remain concerned about the cost and long-term impacts of a 6-lane Alternative and do not believe it is the only option for ensuring a commitment to transit. Putting mobility first with environmental concerns in mind is only possible, we believe, in a 4-lane Hybrid Alternative.

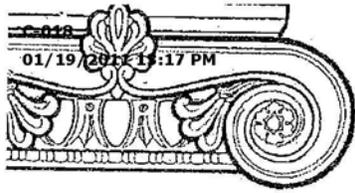
WSDOT has started the important early design work and clearly much more work and refinement lies ahead. The City needs a clear, long-range vision for this critical project in order to achieve excellence in design, mobility, transit connectivity and development that fits Seattle's unique urban and environmental context.

Sincerely,



Karen Kiest
Chair

cc: Tim Ceis and Emelie East, Mayor's Office
Michael Fong and Casey Hanewall, Council Central Staff
Phyllis Shulman, Council Staff
Grace Crunican, Bob Powers, Dave Allen, SDOT
Diane Sugimura and John Rahaim, DPD
Barb Wilson, Seattle Planning Commission



Seattle Design Commission

MEMORANDUM

- Greg Nickels
Mayor
- David Spiker
Chair
- Pam Beyette
- Adam Christiansen
- John Hoffman
- Karen Kiest
- Anindita Mitra
- Sheri Olson
- Nic Rossouw
- Dennis Ryan
- Darrell Vange
- Guillermo Romano
Executive Director
- Layne Cubell
Senior Staff

TO: Councilmember Richard Conlin
Chair, SR-520 Committee of the Whole (COW)

FROM: Seattle Design Commission and Staff
Guillermo Romano and Layne Cubell

DATE: August 11, 2006

RE: Briefing Materials for August 14, 2006 SR-520 COW

CC: Diane Sugimura and John Rahaim, DPD
Grace Crunican, Bob Powers and David Allen, SDOT
Phyllis Shulman, Michael Fong and Casey Hanewall, Council Staff

The Seattle Design Commission appreciates the chance to brief your Committee on its review of the SR-520 Improvement Project. Since March 2002, the Commission has had seven presentations on the project. Attached is a compilation of the Commission's recommendations from those reviews and highlighted below are some of the salient design issues discussed at these briefing sessions. Additionally, the Commission has had a representative on the state's SR520 Technical Committee since early 2005, weighed in on City Council's project principles formulated in June 2005 and most recently participated in a series of state-led workshops focused on the Pacific Interchange option. SR-520 Improvement Project is clearly one of the most significant projects facing the City today and the Commission continues to be strategic in providing timely design advice to both WSDOT and City leaders.

We commend the strong collaboration between the city and the state on this project and the efforts of Council and the Executive to work in close coordination. We applaud the recent efforts of the Seattle Advisory Committee and other groups in striving for design solutions that reflect sensitivity to local neighborhoods and that are context friendly. While we are aware that the larger decisions about the project will be made at the regional level, we support a strong unified stance by local officials to ensure that this significant roadway expansion project serves the needs of Seattle. Finally, we appreciate the strong role that SDOT is playing on this project as coordinator and local partner. Leveraging this major transportation project to realize more livable communities in Seattle by integrating with the fabric of the City is an important goal for all concerned.



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Over the years, the Commission has identified the following design related issues and items of concern:

- C-018-032
 - **Options** - favors a 4-lane option to meet the identified roadway expansion needs while holding fast to city transportation and environmental policies. Increasing vehicle trips over the bridge might make for good transportation engineering, but works against the goals of the US Mayors Climate Protection Agreement that both Seattle and Redmond have signed. All bridge replacement options should include a full set of enhancements and amenities to ensure a fair comparison. Appreciates that the Pacific Interchange might have merits for the local neighborhood, but make sure it works from a design perspective for areas north of the Montlake Cut, including the University of Washington, and address the concern for the monumental impact over Foster and Marsh Islands. The Commission is not supportive of the 2nd Montlake bascule bridge option.
- C-018-033
 - **Height, Width and Footprint** – keep to the absolute minimum and make any bridge solution as narrow and as low as possible. Slimmer is better. Especially focus on reducing the width of the interchange over the water where its impact on the wetlands will be most profound. Fully assess the profile and sections of the bridge and the intricate ramp system over Portage Bay, Union Bay and the west side of Lake Washington. Understand there are a number of tradeoffs involved – so study which ones make sense.
- C-018-034
 - **Lids and Buffers** – supports their exploration in all options identified, whether a 4-lane or 6-lane, recognizing they have real potential to better connect the Montlake and Roanoke neighborhoods and mend the longstanding divide of the Portage Bay viaduct and state highway. Appreciates the “topo-appropo” approach to lidding and siting the lids where conditions are most ripe. Consider the edge treatment and opportunities for landscape and art to both enhance and visually buffer the roadway.
- C-018-035
 - **Transportation Connections** – supports a solution that creates better opportunities for intermodal access, accommodates future transit needs, and provides important links to bike and pedestrian trails both north and south of the bridge. Work to ensure seamless transit connections with a transit hub centered around Sound Transit’s new Light Rail Stadium station. Accommodate HOV and transit lanes the full length of the bridge all the way to I-5 and ensure these remain in perpetuity, not as mere placeholders for future roadway expansion. A project of this scope must include a significant transit component from the outset.
- C-018-036
 - **Visual and Aesthetic Conditions** – the view under the bridge is as important as the view from above and studying recently released sections and profiles along with the visual simulations of the roadway and its surrounding context will be important. Push for real application of the Corridor Aesthetic Handbook and encourage simplicity, boldness and elegance in the overall bridge design and detailing of the bridge structure. Urge the team to move beyond purely engineered solutions to full, tangible designs to best contribute to the public’s understanding of the project. Good civic design should be a core feature, not an enhancement. Keep the pedestrian experience in mind along all points of the corridor.

C-018-037

- **Design Innovation** – noise walls, quiet pavement, and sustainable habitats (i.e. swales) should all be explored to ensure this project is a wise investment for another 50 to 100 years. Innovative design features can also help mitigate the project. Look for examples from other places and recognize this project as a unique design opportunity.

C-018-038

- **Environmental Habitat** – appreciate that wetlands, water quality, and nearby parks and open space are all being addressed. Pay special attention to those areas most precious to Seattleites - the Arboretum and the Olmsted legacy greenspaces and boulevard. Continue to work with Seattle Parks on replacement and relocation of parklands nearby. Strive for ecological solutions and consider wetlands replacement among the environmental design strategies.

C-018-039

- **Traffic Impacts** – need to be fully understood on all area streets and neighboring communities. The Commission was surprised to find that there is not much difference in localized traffic improvements between the 4-lane and 6-lane options. Be thoughtful about the real benefit of the project and rely on data included in the traffic studies to help define the City's preferred alternative.

In the coming weeks and months, the City along with the State will be making several important decisions about this project. The Commission would be pleased to provide input on these significant benchmarks, specifically the urban design element of the DEIS and also the identification of the city's Preferred Alternative. Please call on us as needed to assist you in any way we can.

Attachment: Seattle Design Commission Minutes on SR-520 compiled, 2006-2006

Technical Memorandum



10230 NE Points Drive
Suite 400
Kirkland, WA 98033
Phone (425) 822-4446
Fax (425) 827-9577

To: Theresa Doherty, University of Washington

From: Water and Natural Resources Staff
Dyanne Sheldon, Wetlands Scientist
Doug Gresham, Wetlands Scientist
Jenna Scholz, Hydrologist
Kevin O'Brien, Wildlife Biologist
Nicholas Allmendinger, Geologist

Copies: Dyanne Sheldon

Date: October 17, 2006

Subject: SR 520 Bridge Replacement and HOV Project EIS
Review

Project No.: 30907

C-018-040

This technical memorandum represents a series of comments on, and concerns about, the Draft Environmental Impact Statement (DEIS) for the proposed SR 520 Bridge Replacement and HOV Project. The DEIS was jointly prepared and submitted by the Federal Highway Administration (FHWA), the Washington State Department of Transportation (WSDOT), and Sound Transit.

Otak, Inc. was retained by the University of Washington to review, interpret, and comment on portions of the DEIS—specifically, those sections addressing wetland, water resources, wildlife, and geological issues in the Seattle and Lake Washington portions of the project. Comments and concerns for each of these resources are grouped together below under separate subheadings.

The stated purpose of an EIS is to respond to the requirements of the National Environmental Policy Act (NEPA) as well as the State Environmental Policy Act (SEPA). The EIS describes a project that has potential for significant adverse environmental effects, identifies alternatives to the project, and identifies and analyzes the potential adverse environmental effects, including ways and means to avoid, minimize, and mitigate for adverse environmental effects. An EIS is designed to represent a full disclosure document—one which identifies and analyzes environmental effects as thoroughly and objectively as possible.

The DEIS for the proposed SR 520 Bridge Replacement and HOV Project falls short of a thorough and objective identification and analysis of potential environmental effects of the project. As presented in the DEIS, several important analyses of environmental effects are either not performed, performed using questionable assumptions or inappropriate analyses, or some of the conclusions within the DEIS are based on analyses or data that are not provided within the DEIS or

SR 520 Bridge Replacement and HOV Project EIS Review

Theresa Doherty, University of Washington
SR 520 Bridge Replacement and HOV Project EIS Review

Page 2
October 17, 2006

its Technical Appendices. Numerous negative environmental effects which are likely to occur are minimized or dismissed. Furthermore, key conclusions regarding significant adverse environmental effects of the project provided in the various Technical Appendices are omitted from the main text of the DEIS. In many places within the DEIS, the language reads more as advocating the project rather than as a neutral description and assessment of the project and its potential effects.

Following are four sections presenting our specific comments addressing each of the resources we were asked to assess: Wetland; Water Resources; Wildlife Habitat; and Geology. General comments within each section are followed by specific comments and associated examples in tabular form.

Wetlands

The DEIS wetland analysis relies on old regulation and policy standards from the City of Seattle and Department of Ecology (Ecology), resulting in a four-fold difference in required buffers and discrepancies in wetland ratings. Although Technical Appendices reports may have been completed prior to the formal adoption of current standards (standards in place at the time of the publication of the DEIS), all of the draft versions of current codes and policies were available at the time of the original report preparation. Thus the wetland ratings and buffers are significantly under-represented in the DEIS.

Several discrepancies and inconsistencies occur in the DEIS text analyzing potential wetland impacts from the proposed project. Technical Appendix E (Ecosystems) has discrepancies between text and exhibits that describe wetland impacts. The text consistently underestimates impacts that are shown in exhibits (tables and figures), and may mislead the reader as to the extent of wetland impacts. There is minimal quantification of wetland impacts, only qualitative statements that impacts between alternatives are similar.

Statements on wetland impacts from shading and temporary construction techniques made in Appendix E are not substantiated with scientific literature citations or other available evidence. In general, the wetland section lacks peer-reviewed literature sources to justify statements on potential wetland impacts. Furthermore, the acreages of wetlands that will be impacted from shading is inconsistent among analyses: Appendix E and the DEIS text claim that wetland shading impact will occur immediately beneath all bridge structures, whereas the Appendix E Addendum claims that only twenty percent of the area beneath the proposed bridge structures will count as impact, based on a single reference not provided.

No substantive discussion of compensatory mitigation occurs in the DEIS. It is not clear what opportunities are under consideration or what opportunities exist in the project area or the watershed, although Appendix E mentions some potential mitigation sites.

C-018-040

Table 1 provides a series of wetland-specific comments and the appropriate locations in the DEIS documents.

Table I Wetland Comments		
Section	Page or Exhibit Number	Comment
Draft EIS	Exhibit 4-17	Buffer impacts for the Pacific St. interchange option listed in Exhibit 4-17 (6.6 acre) are higher than shown on Exhibit 7 in Appendix E (4.8 acre).
Draft EIS	Page 5-47	<p>Union Bay wetlands are described as Category II wetlands, which contradicts Exhibit 26 in Appendix E, which identifies them as Category I.</p> <p>The statement that all direct wetland impacts from filling are due to bridge pilings does not account for filling by stormwater pond outfall near Museum of History and Industry.</p> <p>Wetland impacts from shading by new bridges are considered less than existing structures but there are no scientific literature citations to substantiate this conclusion. Although some of the new bridges will be higher than current structures, they will also be wider, resulting in a different shade impact zone. The potential effects are not quantified rationally nor are there any citations as to what parameters were used to determine impact/no impacts from shading.</p>
Draft EIS	Page 5-49	A replacement ratio of 3:1 is described for mitigation of impacts to Category I wetlands, which contradicts Exhibit 28 in Appendix E which uses 4:1 ratio.
Appendix E— Ecosystems Discipline Report	Page 19 and Exhibit 11	<p>Wetlands were rated using the 1993 Ecology system instead of the significantly revised 2004 system. They state that the revised ratings would be applied during the permitting stage, however it should be used now so users of the DEIS are informed of current standards.</p> <p>The wetland rating system strongly influences the proposed buffer widths based on Ecology's <i>Wetlands in Washington State, Volume II</i> recommendations.</p>

c-018-040

Table I (cont.) Wetland Comments		
Section	Page or Exhibit Number	Comment
Appendix E— Ecosystems Discipline Report	Exhibit 12	The most recent version of the City of Seattle Municipal Code (25.09.160) should be used to identify the City's standards for wetland classification and buffer width requirements. This would require 200-foot buffers for these high functioning Category I wetlands instead of the 50-foot buffers listed in Exhibit 12. All calculations of buffer impacts from both construction and operations of the roadway should be revised to reflect this four-fold increase in buffer width.
Appendix E— Ecosystems Discipline Report	Page 51	The fifteen proposed stormwater treatment cells (20' x 40') attached to bridge columns are not considered direct wetland or lake impacts, only shading impacts. However, 12 out of 15 cells will displace existing wetlands (POW, PEM, and PSS) to create stormwater treatment facilities. We estimate that only 3 out of 15 cells occur in open water and may not be considered wetland impacts. In addition, there is no documentation that this experimental design has been proven to effectively treat stormwater. It should not be considered wetland enhancement.
Appendix E— Ecosystems Discipline Report	Exhibit 21	Direct impacts in Wetland LWS-4 have different values in graphic (0.12 acre) versus summary table (0.14 acre). Although the acreage differences are minor, the inconsistencies are troubling.
Appendix E— Ecosystems Discipline Report	Exhibits 21 and 23	Pedestrian/bicycle path between SR 520 and Lake Washington Blvd. ramp crosses Wetland LWS-4 and its buffer, but there is no listing of impacts. Any path in this area should be tallied as part of the impacts.
Appendix E— Ecosystems Discipline Report	Pages 72-73	Temporary construction impacts from shading by work and detour bridges are estimated to be 4+ years under 4-lane and 5+ years under 6-lane alternative. Although this area will eventually be revegetated, these timeframes represent generations of wildlife displaced from habitats, and involve significant periods of time following construction for the wetland and upland habitats to re-establish to current conditions. Furthermore, disruption of the established wetland communities due to construction can allow highly invasive non-native species (e.g. Himalayan blackberry, reed canarygrass, etc.) that favor disturbed conditions to establish. These "temporary" impacts should be accounted for in the mitigation approach.

C-018-040

Table I (cont.) Wetland Comments		
Section	Page or Exhibit Number	Comment
Appendix E— Ecosystems Discipline Report	Pages 73-74	Installation and eventual removal of 1,600 pilings under 4-lane and 1,800 pilings under 6-lane alternative for work and detour bridges will disturb wetlands, but this impact is downplayed. The report indicates that the 4-lane alternative will have more construction impacts than the 6-lane alternative.
Appendix E— Ecosystems Discipline Report	Page 80	The area of potential wetland creation from removing old bridges is not quantified. The DEIS (Page 5-49) states that 0.6 acres of onsite wetland creation could occur by removing ramps on the WSDOT-owned peninsula near the Arboretum. However, there are other opportunities for wetland creation/restoration from removing existing ramps that aren't quantified.
Appendix E— Addendum to Ecosystems Discipline Report	Exhibit 4 and 7	Inconsistent labeling of wetland in University Slough area that is impacted by Pacific St. interchange option. Exhibit 4 identifies this as Wetland UB-2 but Exhibit 7 identifies as Wetland UB-1. Assume that UB-2 is correct.
Appendix E— Addendum to Ecosystems Discipline Report	Exhibit 6	Exhibit 6 underestimates wetland impacts when compared to Exhibits 7 and 11, and Exhibit 23 in Ecosystems Discipline Report. There is discrepancy between wetland impacts shown in Exhibit 6 compared to other exhibits for the original 6-lane alternative (6 acre vs. 6.94 acre), Pacific St. interchange option (5.3 acre vs. 8.05 acre), and second Montlake bridge option (6 acre vs. 7.05 acre).
Appendix E— Addendum to Ecosystems Discipline Report	Exhibit 10	Wetland impacts from bridge columns shown in Exhibit 10 for Portage Bay are not calculated correctly. If each column covers 78.5 square feet, then both the Pacific St. interchange option and second Montlake bridge option impact 2,826 square feet.
Appendix E— Addendum to Ecosystems Discipline Report	Exhibit 13	Exhibit 13 lists replacement ratios for Category II – IV wetlands although the Seattle segment only contains Category I wetlands. Exhibit 13 underestimates wetland impacts from shading compared to Exhibits 7 and 11 for the original 6-lane alternative (1.3 acre vs. 6 acre), Pacific St. interchange option (1.6 acre vs. 4.78 acre), and second Montlake bridge option (1.3acre vs. 6.26 acre), claiming that only twenty percent of shaded wetlands count as impacts for the project.
Appendix E— Addendum to Ecosystems Discipline Report	Page 29	A replacement ratio of 1:1 will be used to compensate for shading impacts to wetlands. However, it is unclear whether this has been approved by federal, state, and city agencies. Because shading impacts is the main reason for mitigation there needs to be agency approval and confirmation of this approach.

C-018-040

Table I (cont.) Wetland Comments		
Section	Page or Exhibit Number	Comment
Appendix J— Indirect and Cumulative Effects Discipline Report	Page 8	One of the sources of data for population growth is too restrictive. The use of permit applications for proposed development within 0.25 miles of project corridor underestimates the potential affects of the build alternatives.
Appendix J— Indirect and Cumulative Effects Discipline Report	Page 58	Cumulative negative effects to wetlands due to additional transportation projects in the area are identified and deemed possible. This information is not divulged in the DEIS main text.
Appendix J— Indirect and Cumulative Effects Discipline Report	Pages 43-44	The assessment of indirect effects on water resources and wetlands from population growth was only measured by increased impervious surface in watersheds. We disagree with the assumption that indirect impacts to wetlands can be quantified by impervious surface percentages.

Water Resources

Two reports are incorporated by reference into Technical Appendix T—Water Resources which should be considered for review but are not provided in the DEIS:

- CH2M HILL, Parametrix, Inc., Parsons Brinckerhoff, and EnviroIssues. 2002. Trans-Lake Washington Project. AKART and Water Quality Studies for an SR 520 Replacement Floating Bridge. Prepared for the Washington State Department of Transportation Office of Urban Mobility and Sound Transit. December 23, 2002.
- The SR 520 Bridge Replacement and HOV Project Preliminary Stormwater Management Report (CH2M HILL and Parametrix 2004)

Chapter 8-24, 25, 26—talks about unavoidable impacts but these are not specified in the DEIS.

Table 2 contains a series of specific comments concerning water resources in the DEIS and Appendix T—Water Resources.

C-018-040

Section	Page or Exhibit Number	Comment
Appendix T— Water Resources	Page 82	The technical appendix provides a limited evaluation of temporary construction effects on surface water bodies by determining construction actions that may disturb soil and in-water sediments, and by evaluating the potential for accidental spills of hazardous materials. However, areas where erosion and sediment disturbance would be a problem are not identified, nor are Best Management Practices to reduce the risks specified. Instead, this is all left to the TECS plan that is not yet prepared. This lack of information makes it difficult for the reader to fully understand the problems associated with these direct impacts to water quality.
Appendix T— Water Resources	Page 86	<i>"It is unlikely that turbidity would increase in the photic zone (the area of the lake or water body where there is enough light for photosynthesis to take place), and therefore turbidity from project construction would not adversely affect plant photosynthesis or lake productivity. Similarly, water column concentrations in these same upper layers of the lake would be unlikely to reach concentrations that would adversely affect fish (1,000 mg/L for 24 hour [Parametrix 1997]) in this same zone."</i> The report cited here is not available for review so there is no way to verify these scientific findings.
Appendix T— Water Resources	Page 83	<i>"Construction of the new bridges would involve work in and near the waters of Portage Bay and Lake Washington. Construction of work bridges, installation of new columns for the Portage Bay Bridge and the approaches to the Evergreen Point Bridge, and anchoring of the floating bridge pontoons would all take place in the open water, as would construction of the Union Bay Bridge under the Pacific Street Interchange option."</i> There is no discussion of how this is going to be done or the specific impacts that will result. The DEIS does provide general water quality impacts from general construction activities, but does not address the effects from this work, some of which reflect new technologies that may have impacts which have not yet been determined. Rather, the DEIS states that WSDOT will <i>"mitigate the project's potential effects on water quality"</i> because they will <i>"implement plans to control erosion, sedimentation, and spills during construction consistent with the requirements of federal, state, and local permits related to in-water work."</i> More detail is needed in order to determine if this alternative is viable first.
Draft EIS	Page 8-24, 8-25	The DEIS indicates that there will be increased turbidity, but fails to mention to what degree or the potential impacts.

C-018-040

Table 2 (cont.) Water Resources Comments		
Section	Page or Exhibit Number	Comment
Draft EIS	Page 8-25	Construction impacts are discussed as temporary, but this project could potentially take a decade to complete. There is not an adequate discussion of the treatment of water quality from storms during the construction phase. Specifically, the impacts to water quality, not just related to construction-generated parameters, but from the runoff from the "temporary" roads and associated structures.
Draft EIS	Page 5-45 and 6-6	<p><i>"The quality of water discharging to Lake Union and Portage Bay during storms would generally be better than the quality of water today because stormwater facilities would treat runoff from the road surface, which is currently untreated."</i></p> <p><i>"Although the new bridge would have substantially more impervious surface than the current bridge, new stormwater treatment facilities would meet or exceed current federal and state water quality standards."</i></p> <p>Although these statements are true, they are misleading. The assumptions are based on the fact that there is currently no water quality treatment and therefore treatment of future runoff will be beneficial over current conditions. However, this assumption is not supported in the Technical Appendix T. Instead, the amount of pollution-generating surface under the alternatives is substantially higher than that of today. And, in fact, the treatments proposed for water quality provide relatively limited improvements over current conditions for some parameters. Rather, they are needed to simply maintain the same quality in the case of some metals (copper and zinc). In some areas (such as Portage Bay) some pollutant levels under the proposed alternatives will actually be higher than the levels monitored in today's runoff (see Exhibit 29 in Appendix T).</p>
Appendix T— Water Resources	Page 64	<p><i>"From these calculations (Exhibit 32), the water resources discipline team determined that the proposed BMPs for the 4-Lane Alternative would not increase the amount of pollutants discharged to Lake Washington compared to existing 2002 conditions. This would represent an improvement over 2030 discharges under the Continued Operation Scenario (CH2M HILL et al. 2002). The same improvement would occur for the 6-Lane Alternative, except that oil/grease pollutant loading rate would increase by 57 percent compared to 2002 conditions and zinc would increase by 18 percent."</i> It is unclear how the discipline team determined water quality pollution in this scenario. Furthermore, a pollutant loading rate increase of 57 percent for oil/grease and 18 percent for zinc is significant and needs further discussion to define these impacts on the aquatic environment.</p>

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Table 2 (cont.) Water Resources Comments		
Section	Page or Exhibit Number	Comment
Appendix T— Water Resources	Page 59	Modeling of pollutant loading for the water quality parameters is presented using amounts that are not comparable to standards and therefore it is difficult to determine their ecological significance (see Exhibit 29). Specifically, WSDOT presents loadings in pounds per year (mass per unit time) vs. qualities presented more typically in mass per unit volume (typically mg/L) for ecological comparisons to Ecology, NOAA Fisheries, EPA, or U.S.F.W. criteria.
Draft EIS	Page 12	The resource agencies disagree with the method that WSDOT uses to calculate pollutant levels in stormwater runoff. WSDOT's method uses the roadway surface area as a basis for calculating the quantities of pollutants that will be discharged in stormwater runoff. NOAA Fisheries and the U.S. Fish and Wildlife Service prefer a method that uses the average daily traffic volumes on the roadway to estimate pollutant quantities. We agree with the agencies.
Appendix T— Water Resources	Page 66	Although metals are included in the analysis, they are presented for total metals only, which limits the understanding of the impact of these parameters on aquatic species. Total metals account for the total runoff metal content, some of which is dissolved and some of which is particulate bound. Total metals do not have ecological significance except with regard to their attachment to sediments. Conversely, the dissolved portion is bioavailable and therefore has a greater ecological relevance. The dissolved phase fraction should therefore be shown in order to make biologically based conclusions about water quality impacts.
Draft EIS	General Observation	Some water quality parameters which are important to understanding the ecological impact of the project have not been presented in the DEIS. These include the dissolved forms of metals such as copper and zinc, hardness, pH, and Polyaromatic Hydrocarbons (PAHs). The toxicity of metals may also change relative to other parameters such as pH, alkalinity, hardness and the like. As stated above, these data are not provided in the DEIS.
Draft EIS	General Observation	It is not possible to anticipate the toxicological impacts from stormwater runoff containing metals without knowing the concentrations of specific metals in their dissolved and particulate phases. Therefore, WSDOT should estimate on a per-storm basis the likely range of metals and PAH concentrations, as well as the range of concentrations in ug/L.

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Table 2 (cont.) Water Resources Comments		
Section	Page or Exhibit Number	Comment
Draft EIS and Appendix T—Water Resources	General Observation	Regional studies have shown that even low concentrations of metals can have sub-lethal impacts on salmonids. A discussion of these sub-lethal effects should be included in the DEIS. Specifically, they need to address the impacts of more zinc and copper in the runoff at Portage Bay West under the 4-lane alternative, and the increase in zinc to Portage Bay East under the 6-lane alternative.
Draft EIS	General Observation	Finally, estimates of loading of PAHs and metals and other toxicants coming from cars into receiving waters, not just from a total fraction but from a dissolved phase fraction, is not provided. More information is needed to understand how these contaminants are going to partition into sediments or as dissolved particulates. As such, the way contaminants are received by the water body will dictate their relative toxicity. This is particularly relevant to the proposed BMPs that remove sediments and their associated fraction of contaminants. Although sediments will be removed through the treatment process, the DEIS does not account for the dissolved fraction of contaminants not bound in the sediments.

Wildlife Habitat

Project effects to wildlife and wildlife habitat are generally minimized in the DEIS. Construction effects of noise and activity are briefly acknowledged, but the lengthy period of construction (four to eight years) is not addressed. Pile-driving activities are identified as potentially causing fish injuries and fish kills in Appendix E. This is minimized in the DEIS text. Habitat loss and impact are noted as occurring due to the project, and Appendix E notes that wildlife will experience negative impacts as a result. The DEIS fails to mention this analysis in some sections, and minimizes it in others.

Table 3 provides a series of specific comments related to wildlife habitat, and the appropriate locations in the DEIS and Appendix E—Ecosystems.

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Table 3 Wildlife Habitat Comments		
Section	Page or Exhibit Number	Comment
Appendix E— Ecosystems	Page 153	Wildlife use of the project area is minimized in Appendix E. Species of concern, including great blue herons, red-tailed hawks, etc. use the habitat in and around the project area more frequently than the analysis claims.
Draft EIS and Appendix E— Ecosystems	Page 5-45 and 5-49 in the EIS, Page 192 (Appendix E)	According to the DEIS language, many of the mitigation measures will occur “if feasible”, “if practical”, or “could” occur; with some other phrasing that indicates a degree of uncertainty associated with the mitigation procedures. Very few specifics on wildlife and/or fish mitigation are given in the DEIS and Appendix E, although more mitigation specifics for fish are given in Appendix E.
Draft EIS and Appendix E— Ecosystems	Chapter 8: Construction Effects	Neither the DEIS nor Appendix E explores the effects of shading and artificial light (nighttime during and post-construction) on salmonid behavior (feeding behavior, prey capture, schooling, migration, etc.). Yet there is a fairly robust literature that examines behavioral changes in response to different lighting regimes, indicating that migratory behavior is generally disrupted. For example, migrating juvenile salmon may move away from their shallow water migratory routes into deeper water, in order to avoid over- or in-water structures. Numerous large bridge columns are proposed to be inserted into the shallow waters of Lake Washington, yet no mention of avoidance behavior by salmonids is included. Additionally, the DEIS claims that only a negligible effect from an increase in pontoon surface area of 21.5 or 27.3 acres from a current 10.4 acres would occur. Such a conclusion is questionable. Certainly, shading and “shoreline effects” (the increase in non-native piscivorous predators, e.g.) will potentially be greater. Appendix E specifically mentions that fish often behave as if solid structures in the water are similar to shoreline areas—thus, non-native piscivores may show an increase in use of the pontoon habitat, which the DEIS fails to address.

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Table 3 (cont.) Wildlife Habitat Comments		
Section	Page or Exhibit Number	Comment
Appendix E— Ecosystems	Page 132	<p>Indirect/cumulative environmental effects of constructing the pontoons off-site and floating them to the bridge site are not addressed in the DEIS. The DEIS claims that the environmental effects are addressed in a different document. This is true, but disingenuous. The pontoons will be constructed as part of the Hood Canal project. From Appendix E:</p> <p><i>“These would be constructed at a graving dock to be built as part of the Hood Canal Floating Bridge Project.</i></p> <p><i>A graving dock is a large, gated channel excavated next to the shoreline of a body of water. When a group of pontoons and anchors have been constructed, the graving dock is flooded to float the pontoons and anchors. For this project, flooding of the graving dock would follow a protocol developed by WSDOT, in cooperation with WDFW, NOAA Fisheries, and USFWS, for construction of the Hood Canal Bridge pontoons. Work dates at the graving dock would be limited by fish restrictions, as detailed in the Hydraulics Project Approval (HPA) for the Hood Canal Floating Bridge Project to be issued by WDFW. All applicable screening requirements would be followed during pumping operations. The graving dock gate would then be opened, and a tug would tow the pontoons and anchors out of the graving dock into the adjacent body of water. The pontoons and anchors would be towed to the Evergreen Point Bridge site in Lake Washington.</i></p> <p><i>The Hood Canal Floating Bridge Project will satisfy the ESA’s requirements for construction and operation of a graving dock by obtaining Biological Opinions from USFWS and NOAA Fisheries. Continued operation of the graving dock to manufacture the pontoons and anchors for the Evergreen Point Bridge will be covered in a Biological Assessment to be submitted to NOAA Fisheries and USFWS for the SR 520 Bridge Replacement and HOV Project.”</i></p> <p>The construction and operation of the graving dock is expected to result in fish take under the ESA, requiring the issuance of Biological Opinions, and is a project directly associated with the SR 520 bridge replacement. This is not even mentioned in the DEIS. No analysis or mention occurs as to whether the use of the graving dock for constructing SR 520 bridge pontoons will result in an increase in graving dock operational activities or in an increase in negative impacts to fish. No analysis or mention of impacts occurs as to whether aquatic resources are negatively impacted as a result of towing the pontoons from the graving dock to Lake Washington.</p>

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Table 3 (cont.) Wildlife Habitat Comments		
Section	Page or Exhibit Number	Comment
Draft EIS	Page 4-40	Analyses and effects determinations for wildlife and wildlife habitat are not adequately performed for the project-related vegetation removal and staging activities within parks and sensitive areas— between 32.13 and 47.7 acres of upland habitat are expected to be permanently removed. The DEIS notes that much of that upland habitat is relatively rare in the urban environment, but then indicates that the “effects of project development in these areas would vary according to existing habitat quality.” No negative effects to wildlife utilizing such habitat are noted.
Draft EIS and Appendix J— Indirect and Cumulative Effects	9-6 and 9-7 (Draft EIS), Page 58 and 60 (Appendix J)	Appendix E identifies negative cumulative effects to wildlife habitat as occurring due to the project. A reduction in habitat value to wildlife due to wetland loss is noted, as well as a decline in wildlife abundance due to vegetation loss and general degradation of habitat. Appendix J states that “ <i>direct habitat loss and disturbance is expected to result in reduced population abundance of sensitive wildlife species in the vicinity.</i> ” This information is not included in the DEIS text.
Draft EIS and Appendix X— Pacific Street Interchange Options Analysis		No mention is made of additional negative impacts to wildlife under the Pacific St. Interchange Option in either the DEIS or Appendix X. However, currently contiguous habitat in the Arboretum and on Marsh Island will be fragmented by building new on- and off-ramps to the north and south. The ramps may form physical barriers to wildlife movement, and will definitely create a greater level of disturbance to wildlife than currently exists, both during construction and subsequent operation of the bridge. Additionally, higher volumes of traffic will be conducted through the Arboretum than under current conditions, as all traffic exiting or entering onto SR 520 from south of the Montlake Cut will utilize the Arboretum on- and off-ramps. The DEIS provides no analysis of how an increase in traffic activity could impact wildlife in the Arboretum, or how a localized increase in vehicle exhaust, shading by the ramps, disturbance during construction, etc. might impact sensitive plants in the Arboretum.

Geology

The DEIS does not appear to adequately address two major issues with respect to geological hazards. The potential impacts of the project including construction on surficial processes such as hill slope stability, soil loss, excessive stream bank erosion, and stream incision is not discussed. In

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addition, there is no thorough analysis of potential risks associated with geologic hazards, such as earthquakes, and how they would influence the proposed roadway in its various potential forms.

Landslide Hazards

The Geology and Soils Documentation section lists slope stability studies conducted by Shannon & Wilson, Inc., however the results of their work are not presented in the Technical Appendix. This information should be compiled in a map or series of maps that display factors of safety along the road embankments. Information should also be provided about the frequency and magnitude of potential landslide triggering events including not only seismic events, but the impact of frequent use by large vehicles. For example, the exposure of the Lawton clay member and sandy layers of the Vashon till adds to the instability of the steep slopes in the vicinity of the Portage Bay Bridge. This fact is mentioned in the Appendix, but there are no detailed maps of the exposures relative to the proposed alignments and alternatives.

Seismic Hazards

Assessing potential seismic hazards requires detailed probabilistic mapping of the anticipated effects of ground shaking and liquefaction. The data appears to have been collected by Shannon & Wilson, Inc., but it is not presented in the Technical Appendix. Data for constructing maps of ground-shaking intensity should include measurements of intensity, ground acceleration, and ground velocity. These data should be combined with information about the type and thickness of sediments to determine the likelihood of hazards associated with liquefaction. Such information should be presented as maps along the proposed alignments within the Technical Appendices.



Memorandum

To: Peter Dewey, Assistant Director of Transportation Services, University of Washington
Aaron Hoard, Deputy Director, Office of Regional Affairs, University of Washington
Theresa Doherty, Assistant Vice President for Regional Affairs, University of Washington

From: Tom Noguchi, Mirai Transportation Planning and Engineering

Subject: Comments on SR 520 Bridge Replacement and HOV Project DEIS

Date: October 13, 2006

The purpose of this memo is to transmit comments on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS), which was issued by Washington State Department of Transportation (WSDOT), Federal Highway Administration and Sound Transit, dated August 18, 2006.

1. Goals of 6-Lane Alternative Options

The DEIS explains the 6-Lane Alternative options and how they came about on **pages 3-20 and 21**. It states that WSDOT working with the adjacent communities, identified the following goals:

- Narrow the width of the 6-lane alternative
- Improve transit connections
- Improve HOV access
- Design the project to enhance local communities
- Design a facility that is structurally feasible and cost-effective
- Preserve options for future connection to the proposed Sound Transit University Link light rail station at Husky Stadium

The Pacific Street Interchange option described in **pages 3-24 through 3- 28** was identified as one that would support these goals. Most of these goals are positive goals to be achieved with the SR 520 Project. However, WSDOT and Sound Transit need to explain what the goals of “improving transit connections” and “preserving options for future connection to the Husky Stadium station” mean; why those goals are important; and how the Pacific Street Interchange option specifically address these goals.



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The Pacific Street Interchange option would do little to improve transit connections; would need several costly design changes to the currently proposed design to improve HOV access; would not enhance the University of Washington as a community; and would not be a cost-effective design solution.

2. Transit Connections to Sound Transit Husky Stadium Station

The DEIS on **page 3-28** states the Pacific Street Interchange option "would provide a more reliable transit connection to the Sound Transit University Link light rail station at Husky Stadium than the 6-Lane Alternative because buses coming from SR 520 to the Pacific Street bus stops would not be affected by congestion on Montlake Boulevard."

The Pacific Street Interchange option would not improve the transit connection between the North Link Husky Stadium station and SR 520 because:

- No bus-to-rail transfer facility (bus stop or transit center) for bus riders traveling on SR 520 is proposed at the North Link Husky Stadium station entrance. Constructing such a facility associated with the new Pacific Street connection to the new interchange would be difficult. Such a facility would need about an additional 30 to 50 feet of right-of-way on the east leg of the Montlake Boulevard and Pacific Street intersection. With the proposed design, bus riders transferring to rail transit would have to use the current bus stop on Pacific Street, and walk about 1,500 feet to the station platform, which is not convenient.
- When East Link light rail is completed between Eastside communities and downtown Seattle, the transit riders who would have access to the East Link would travel to and from downtown Seattle on East Link light rail. Those who ride regional buses to and from downtown Seattle to Eastside should ride direct express busses via SR 520 without making transfers at the Husky Stadium station. The DEIS should explain why the transit connection to and from the Eastside at the North Link Husky Stadium station is needed.

3. Traffic Impacts of Tolls

The DEIS indicates that single occupant drivers who want to cross Lake Washington on SR 520 under both the 4-Lane and 6-Lane Alternatives would have to pay tolls (**pages 3-46 and 47**). It assumed that the toll amount for single occupant drivers during peak periods would be **\$3.35** one way in 2006 dollars. Commuters would have to pay **\$6.70** per day to cross Lake Washington twice, which would act as a strong



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disincentive to drive alone. Due to the tolls, some drives would either not use SR 520 or not take any trips at all.

In order to understand the traffic impacts due to the tolls, WSDOT should analyze the forecast traffic volumes and publish the results under each alternative with and without the tolls. In addition, the DEIS should include information about the amount of traffic shifts to I-90 and SR 522 from SR 520 due to the tolls.

4. Daily Traffic Volumes

The DEIS compares 2030 forecast traffic volumes for the alternatives (page 4-4). The traffic volume comparisons are shown based on the average of peak periods. The EIS should also show daily traffic volumes among the alternatives.

5. Intersection Levels of Service Analysis

Pages 4-8 and 9 show intersection levels of service on key arterials in the University District and surrounding communities. WSDOT calculated intersection levels of service based on the method in the Highway Capacity Manual 2000. It shows many intersections would operate at LOS D or better on Montlake Boulevard and Pacific Street. Those LOS results, particularly in the afternoon peak hour are contrary to experience of many drivers. It is not clear how the levels of service in congested areas were calculated.

The **Highway Capacity Manual** provides cautions and states the following:

Limitation to the Intersection Level of Service Methodology: "the methodology does not take into account the potential impact of downstream congestion on intersection operation. Nor does the methodology detect and adjust for the impacts of turn-pocket overflows on through traffic and intersection operation." (page 16-1, HCM 2000)

The EIS should indicate which intersections would be affected by vehicle queues extending from the downstream congestion and what adjustments were made to calculate the delay at the intersections in the contested areas. If adjustments were not adequately made to reflect the impacts of vehicle queues from the downstream intersections or traffic merge points, 2030 arterial intersection levels of service shown in the DEIS are seriously understated.



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6. Travel Time Analysis

While the DEIS includes changes to travel time during the peak hour on Montlake Boulevard from 25th Avenue NE to the Montlake interchange on **page 4-10**. However, it fails to show the travel time benefit for the user of SR 520. The EIS should show how the travel time would be affected by choosing travel times between several locations in the University area and the ramp merge points on SR 520, with or without the Pacific Street interchange option.

7. Traffic Impact and HOV Lanes on Pacific Street

The DEIS shows that the Pacific Street interchange option would significantly increase traffic volumes on Pacific Street west of Montlake Boulevard. The increase in volumes from the No Build would be over **1,000 vehicles** during the PM peak hour, which is an increase of **36 percent (page 5-11)**. To accommodate this demand, the DEIS assumed that the existing eastbound HOV lane would be converted to general purpose traffic use (Addendum, 2-13-2006, **Exhibit 3-20**).

The conversion of the HOV lane to a general purpose lane on Pacific Street should not be supported. To provide HOVs and transit a travel time advantage, an eastbound HOV lane should be retained on Pacific Street.

The DEIS fails to show intersection levels of service at several intersections on Pacific Street. The increased traffic volumes on Pacific Street might require improvements to bring the levels of service to an acceptable level.

8. Traffic Impact on Montlake Boulevard

Exhibit 5-5 on page 5-11 of the DEIS also shows a significant traffic volume increase with the Pacific Street Interchange option compared with the No Build Alternative on Montlake Boulevard north of Pacific Street. The increased volume on this street during the afternoon peak hour would be **1,090 vehicles** per hour, which is an increase of **22 percent**. The increased vehicle volumes would impact intersection levels of service on Montlake Boulevard and NE 45th Street. The DEIS failed to show the impacts of the increased traffic on Montlake Boulevard.

9. Traffic Impact on Lake Washington Boulevard through Arboretum

The same Exhibit shows that the traffic volume with the Pacific Street Interchange option would not increase traffic on Lake Washington Boulevard south of SR 520. Contrary to the DEIS, it is highly likely that the traffic volumes on Lake Washington Boulevard south of SR 520 through Arboretum would increase. The DEIS does not

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adequately explain why WSDOT forecast no traffic volume increase on Lake Washington Boulevard through Arboretum with the Pacific Street Interchange option.

The reasons for the substantially increased traffic volumes on Lake Washington Boulevard are as follows:

- The SR 520 access from the areas south of SR 520 would be provided only at Lake Washington Boulevard.
- The Pacific Street extension with the connection to Lake Washington Boulevard would provide an attractive driving route for the movements between Capital Hill/ Madison Park/Madrona Park areas and Laurelhurst/Sand Point/View Ridge areas.

10. Ramp Meters and Vehicle Queues on SR 520 On-Ramps Impacting Transit and Carpool Vehicle Travel

The operation of ramp metering would affect the vehicle queues on the on-ramps during the AM and PM peak periods. Particularly, it is important to evaluate the adequacy of vehicle storage capacity on the on-ramps in the new Pacific Street interchange. The EIS should discuss WSDOT's ramp meter policies and explain the assumptions used to analyze traffic conditions for the Pacific Street Interchange option.

The DEIS forecasts that the new eastbound on-ramp with the Pacific Street interchange option would carry **1,820 vehicles per hour** in the AM peak hour and **1,540 vehicle per hour** in the PM peak hour. These volumes would exceed the capacity provided with the ramp metering. Therefore, there would be long vehicle queues on the eastbound on-ramp. While the length of the queues would be affected by the operational ramp meter policy of WSDOT, it is highly likely that the eastbound vehicle queues from the point of the ramp meter would exceed the length of the on-ramp and extend through the overpass and to the new Pacific Street extension. While the new Pacific Street extension would provide single occupant vehicle storage capacity, it would not provide high levels of access for eastbound HOVs and transit to the HOV ramps. The eastbound HOV lane proposed on the overpass between the HOV ramp and the intersection with the westbound ramps would not be adequate.



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11. Lack of Transit and Carpool Facilities in the Pacific Street Interchange Concept

The Addendum to Transportation Discipline Report dated February 13, 2006 provides traffic analysis of the Pacific Street Interchange. The proposed interchange concept is shown in **Exhibit 3-19** of the Addendum. The interchange can be characterized as a tight diamond interchange with the HOV ramps between the eastbound and westbound ramps. The separations of the HOV ramps and the SOV ramps are approximately **150 feet**. Only **100 feet** of vehicle queuing spaces are provided between the ramps. Because of the lack of the vehicle storage spaces between these ramps, it is highly likely that this interchange would not function adequately with the traffic volumes shown in **Exhibits 3-24 and 3-27** and excessive delays would occur during the AM and PM peak periods. Since carpools, vanpools and transit would operate in a mixed condition on the arterials until they get to the HOV ramps, they would encounter excessive delays unless additional facilities to separate them from general purpose traffic were provided. Because of the interchange design and the lack of HOV facilities, the proposed Pacific Street Interchange design concept would **not** support three of the following goals listed on **page 3-21** of the DEIS:

- Improve transit connections
- Improve HOV access
- Provide more reliable transit connection to the proposed Sound Transit University Link light rail station at Husky Stadium

12. Pacific Street Interchange Design Option

Pacific Street Interchange Option – Screening and Location Analysis, dated July 24, 2006 (Appendix X) explains that WSDOT identified and screened three interchange configuration options: full diamond interchange, 3-level interchange and half-diamond interchange. No concept drawings, except for full diamond interchange location in **Exhibit 1**, are included. It appears that a **Single Point Urban Interchange** concept was not evaluated. WSDOT should evaluate a design concept of a Single Point Urban Interchange with **flyover HOV ramps** concept as one of the viable design options and evaluate impacts, feasibility and cost-effectiveness.

**RESOLUTION ON THE SR520 BRIDGE REPLACEMENT PROJECT, AS ADOPTED
BY THE UNIVERSITY OF WASHINGTON FACULTY SENATE ON OCTOBER 26, 2006**

PREAMBLE

The Washington Department of Transportation has recently released a Draft Environmental Impact Statement (DEIS) which outlines several proposals for the future of the Evergreen Point Bridge on SR 520. Public comment on the document concludes on 31 October 2006.

The DEIS outlines three basic proposals: do nothing, rebuild the bridge as an expanded four-lane structure; or rebuild the bridge as an expanded six-lane structure. There are two permutations of the six-lane option. One would result in a radical change in the Pacific-Montlake intersection at Husky Stadium and University Medical Center by putting a major highway and interchange on University property. The interchange includes a bridge -- 110-feet above the water -- over the Waterfront Activities Center that connects SR 520 to Pacific Street; in addition, the plan calls for expanding Montlake Avenue to six lanes up to NE 45th.

Departing radically from standard environmental statements, this DEIS contains limited details on mitigation requirements and costs for all of the possible bridge construction projects. Thus, any cost estimate associated with these proposals underestimates total project costs. Therefore, decision makers cannot rationally choose between alternatives.

Any alteration of the bridge has ramifications far beyond the communities on either side of Lake Washington that are home to the physical structure. The Washington Department of Transportation held eight public meetings but held them only in the communities housing the physical structure: Bellevue and Seattle-Montlake. Although any revision of the bridge has direct impacts on the Arboretum, there has been no meeting with the Arboretum Foundation since November 2005. The Washington Department of Transportation held only two public hearings on the DEIS, one in Bellevue and one in Montlake. No public meetings were held at the University of Washington, the entity potentially affected the most by the proposed Pacific Interchange alternative. Therefore, there has been insufficient effort to engage all citizens affected by the proposals.

Whereas, the University of Washington operates with a set of core principles relative to the proposed project:

- To promote a vibrant, healthy and livable academic, business and residential community at the University of Washington and in surrounding neighborhoods;
- To promote carpool, bus, rail, bicycle and pedestrian transportation solutions that improve access to the University and that limit the impact of single occupancy vehicles on campus and surrounding neighborhoods;
- To meet the health care needs of the region and to make in impact on global health, all through the contributions of the professional schools in Health Sciences Center and the affiliated hospitals;

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- To preserve and enhance the recreational, conservational and educational habitat of the UW Botanic Gardens in particular the Washington Park Arboretum;
 - To allow for the efficient and effective management of construction projects included in the University's Capital Improvement Program for the Seattle campus; and
 - To preserve the ability of the University to meet current and future development needs.

Whereas, the Pacific Street Interchange as proposed in the Washington Department of Transportation Draft Environmental Impact Statement for SR520 violates core University principles in the following ways:

- It does not specifically consider impacts on the Burke-Gilman trail or on neighborhoods north of Montlake, such as Ravenna or Laurelhurst, or those south of the Arboretum, such as Madison Park;
- It promotes the use of single occupancy vehicles due to a) an increase in carrying capacity on the new bridge, b) expanded intersections at Montlake and Pacific and c) two new lanes of traffic heading north along Montlake from Pacific to 45th;
 - The promotion of single occupancy vehicles increases the region's carbon footprint, in direct opposition to Seattle's Kyoto Challenge and King County's leadership in the Chicago Climate Exchange.
- It further divides the Medical Center from other parts of campus and has both short-term and long-term impacts on patient accessibility to health care services;
- It will reduce pedestrian safety on campus as the result of increased traffic, and attendant vehicle emissions will degrade air quality at the University Medical Center and athletic fields;
- It adversely impacts the Arboretum, through increased shading and degradation of educational habitat. Compared with other bridge alternatives, it will permanently remove the most acres of habitat (DEIS 5-28):
 - The 6-lane Pacific Interchange takes 2.34 acres,
 - The 6-lane base plan takes 0.7 acres,
 - The 4-lane plan adds 0.04 acres;
- It adversely impacts the Arboretum through increased traffic;
- It creates adverse impacts and costs – which cannot be estimated because mitigation plans are not included in the DEIS – on the University's Capital Improvement Projects, defined by the 2003 Master Plan for the Seattle Campus, the City of Seattle-University of Washington Agreement, and the 2001 Arboretum Master plan; and
- It permanently removes about 18 acres of campus property from any future facilities expansion.

Whereas, the Pacific Street Interchange as proposed in the Washington Department of Transportation Draft Environmental Impact Statement for SR520 will adversely impact the University in the following ways:

- It adversely affects the health and vitality of the University by increasing traffic volume 30 percent on the streets in Southeast campus;
 - Specifically, this plan would increase afternoon peak traffic on Montlake between Pacific and NE 45th by approximately 1,000 cars per hour relative to the base six-lane plan and increase it by 1,200 cars per hour relative to the four-lane plan.
 - Specifically, this plan would increase afternoon peak traffic on NE 45th at Montlake by 1,200 cars per hour relative to the base six-lane plan or 1,000 cars per hour relative to the "do nothing" plan.

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- One of the most significant threats of the plan and the resulting increase in traffic is the timely and efficient ability of emergency vehicles to access the UW Medical Center as well as the Children's Hospital and Regional Medical Center.
- Approximately half of the 31.6 acres of new right-of-way required for this option comes from the University of Washington (DEIS, 4-31). Most of this would be in parking areas south of Husky Stadium (E11/12) and along both sides of Montlake Boulevard;
- This taking results in the permanent loss of 500-760 parking spaces in E11 and E12 parking lots as well as a larger taking during construction;

Whereas, the plan provides a minimal benefit for University of Washington faculty, staff and students: approximately 10 percent of the UW population commutes from the Eastside and approximately half of those commute by HOV;

Therefore, be it resolved that the Faculty Senate supports a replacement of the SR 520 bridge that promotes the use of high-occupancy vehicles and transit that enhances transportation modes in our region;

Be it resolved that the Faculty Senate opposes any alteration of SR 520 that fundamentally alters the character of campus and interferes with the ability of the University to carry out its mission;

Be it further resolved that the Faculty Senate has grave concerns about the adoption of the Pacific Street Interchange as Washington Department of Transportation's preferred option because of its adverse effects on the University and surrounding areas relative to the benefits offered.

Respectfully submitted,

Kathy E. Gill
Senior Lecturer
Department of Communication
Chair, Faculty Council on University Relations

Passed by the UW Faculty Senate, 26 October 2006



City of Seattle Department of Neighborhoods

Bernie Matsuno, Acting Director

Gregory J. Nickels, Mayor

October 18, 2006

City of Seattle- University of
Washington Community
Advisory Committee (CUCAC)

Members

Matthew Fox (Co Chair)
Daniel Kraus (Co Chair)
Caroline Colon
Sally Swift
Chloe Neill

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Scott Frosaker
Eric Larson
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Chris MacKenzie
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Matthew Stubbs
Geather Newman
Kelsey Emery

Alternates

Chris Leman
Neal Wechsler
Tom Roth
Larry Sinnott
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Seattle, WA 98101

Mr. Krueger,

We are writing on behalf of the City-University Community Advisory Committee (CUCAC) to offer our comments on the proposed draft Environmental Impact Statement for the SR 520 Bridge Replacement Project. We would also like to express our appreciation that an extension of the initial comment deadline was granted to help encourage greater public comment and involvement in this process.

The members of CUCAC voted overwhelmingly at our October 10, 2006 meeting to take a position in support of a 4-lane approach to replacing the SR 520 Evergreen Point Floating Bridge. Our members are also greatly concerned that the current designs for SR 520 do not allow for the future addition of high-capacity transit to this corridor, and are likely to actually increase the number of single-occupant vehicles using this roadway. It is also the position of CUCAC that lids for a reconstructed SR 520 are mitigation for the increased noise and other environmental impacts of this project rather than simple project enhancements, and that lids are necessary to ameliorate the impacts SR 520 has on the neighborhoods it passes through.

In addition, at our previous meeting on September 12, 2006, the membership of CUCAC voted nearly unanimously to oppose the proposed Pacific Street Interchange now under consideration, in large part due to the impacts on the Arboretum and its wetlands, Union Bay, the University of Washington, and the surrounding neighborhoods.

Thank you for considering our comments.

Sincerely,

Matt Fox, Co-Chair
CUCAC

Danny Kraus, Co-Chair

cc: Mayor Greg Nickels
Seattle Councilmembers

PROPOSALS ON SR520 REVIEW TO THE SEATTLE PLANNING COMMISSION

C-018-043 | The Planning Commission should urge the Mayor and City Council not to adopt a preferred alternative until mid-November at the very earliest, so that comments that are due on Oct. 31 can be received and analyzed. Many months ago, the City Council set up a schedule under which it could adopt a preferred SR520 alternative as early as Oct. 18 or Oct. 25. However, since that time, WSDOT extended the comment period deadline to Oct. 31. Thus, many comments on the draft EIS will not be received until then. Many comments by individuals, businesses, and trade and civic organizations have not yet been received, as well as ones by key governmental entities such as the University of Washington, the state wildlife agencies, and the various City of Seattle departments such as Transportation and Parks.

C-018-044 | THE FOUR-LANE ALTERNATIVE SHOULD BE SEATTLE'S CHOICE UNLESS EIS AND THE SIX-LANE ALTERNATIVES CAN BE IMPROVED.

C-018-045 | Based on the public comments that WSDOT has received so far, there is a good argument that the environmental impacts of the six -lane alternatives, especially the Pacific Street Interchange, are not sufficiently analyzed in the draft EIS for the City to endorse as a preferred alternative either six lane alternative. In a September 28 letter to the City Council, Mayor Nickels raises questions about the six-lane Pacific Street Interchange alternative's negative Arboretum, UW, and neighborhood impacts. The Mayor writes that "the state has not adequately analyzed the environmental impacts on Seattle's cherished Arboretum, the surrounding wetlands, neighborhoods or the University of Washington. Only when these conditions are fully understood and the state has confirmed its intent to provide appropriate mitigation should we make this decision."

C-018-046 | The six-lane alternatives worsen global warming in a way that the four-lane alternative does not. The City Council draft resolution, and WSDOT's EIS both fail to consider global warming, and thus miss this advantage of the four-lane alternative. The City of Seattle's recent "green ribbon" commission report warns that increased driving is our region's largest single contribution to global warming. Each gallon of gasoline used by a motor vehicle produces about 20 pounds of carbon dioxide. Increasing the number of SR520 bridge traffic lanes will cause more driving, and hence produce more greenhouse gases. Keeping SR520 at four lanes is the most important single step that our region can take to reduce its future impact on global warming.

C-018-047 | SR520 construction will cause huge impacts from truck noise, vibration, dust and pollution, traffic safety problems, transit delay, and traffic tie-ups--and building the six-lane alternatives (especially the Pacific Street Interchange) will cause a year or more additional of these impacts than the four-lane alternative. There will be tens of thousands of additional trips by fully laden dump trucks, concrete trucks, and other heavy vehicles on City streets.

C-018-048 | Because of wider lanes and shoulders, and improved connecting ramps, a four-lane SR520 would accommodate somewhat more traffic than the current bridge, but not be as wide or destructive as the six lane proposals. The City Council draft resolution and the WSDOT draft EIS do not give the four-lane alternative its due. Once it is examined carefully, it is seen as a better balance than

the six-lane alternatives.

C-018-049 | WSDOT's EIS fails to respond to the City of Seattle's resolution 30777, which requested that WSDOT "develop policies that prevent the conversion of HOV lanes and rapid transit lanes to general purpose traffic," and that it "design safety shoulders so that future conversion to traffic lanes is not feasible." Throughout the country, HOV and transit lanes have, once built (and sometimes even on the day they opened) been converted to general purpose lanes; and highway shoulders have been converted to traffic lanes (east of the Lake, the SR520 shoulders have for years been used as HOV lanes, and now the I-90 bridge will be restriped to convert shoulders to create two additional traffic lanes). Without measures to prevent such conversions, the SR520 traffic models and the environmental analysis that depend on them are not worth the paper they are written on, because once built, SR520 is likely to have more traffic lanes than was promised in the EIS.

The Conlin-Drago draft City Council resolution proposes a slight reduction in the widths of the lanes and shoulders that supposedly would avert the possibility of future restriping of a new SR520 to increase the number of lanes. However, the proposed reductions are not enough to prevent this likely restriping, which could be done simply by WSDOT obtaining a waiver from the Federal Highway Administration. Also, the very wide bridge that Conlin and Drago are proposing would only require a few more feet of cement on each side to allow the addition of more lanes that would not even require a federal waiver (the I-90 restriping is requiring some physical expansion of the bridge). Much more substantial reductions in the widths of lanes and shoulders are needed to prevent their future restriping to expand the number of lanes.

C-018-050 | Whereas the six-lane alternatives are shown with lids at Montlake and Roanoke, the four-lane alternative is shown without these lids, and hence the EIS erroneously claims that four lanes are noisier than six. WSDOT engineers concede that it would be entirely feasible to put these same lids on the four-lane alternative, but unfortunately the EIS does not do so. The EIS should re-analyze the four-lane alternative with the lids, because to do so would show that its noise impacts would be lower than for any of the six-lane alternatives. The EIS thus did not respond adequately to the City of Seattle's resolution 30777 in its request that WSDOT "pursue all possible measures that promote neighborhood livability with the 4-lane option under study by WSDOT as well as the 6-lane option."

C-018-051 | The draft City Council resolution and the WSDOT EIS both fail to acknowledge that the four-lane alternative would have lower noise impacts throughout the corridor. This is because both consider only noise impacts of 66 decibels or higher, and only at the first floor—even though many homes, businesses, schools, etc. will suffer 65-decibel noise on upper floors, and many others will experience an increase in noise, even if the increase does not reach the 65-decibel level. WSDOT defends this omission on the grounds that the federal government requires noise mitigation only at or above 65 decibels, and only on the first floor. But note that, as federal noise mitigation is not allowed to be spent for interior residential or office uses above the first floor, or for noise below 66 decibels, it is all the more important to consider the full noise impacts of the various alternatives, because each alternative brings with it a certain level of noise that, because of the federal restrictions, cannot be mitigated.

C-018-052 The six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ decibel noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods. The draft City Council resolution is misleading on this issue; it states that the project "has the potential to reduce those impacts if it is designed appropriately." The resolution needs to be revised to acknowledge that the six-lane alternatives would substantially increase noise for most people who live or work in the corridor. Councilmember Conlin should also retract his highly misleading statement that the Pacific Street Interchange "has the lowest number of residents with noise impacts."

C-018-053 Descriptions of the Pacific Street Interchange as being community-generated are inaccurate. In fact, an interchange very similar to the Pacific Street Interchange was designed by WSDOT in the mid 1960s (forty years ago) as a part of what was then to be called the R.H. Thompson Expressway. The interchange, and the associated expressway, was de-funded in 1972 by Seattle voters, and was officially terminated in 1977 by the Seattle City Council. The only real difference between what was rejected then and the current Pacific Street Interchange is that the original WSDOT design would have been partly underwater.

C-018-054 On August 11, 2006, eight stakeholders provided to the City the following statement:

"The organizations that we represent are opposed to the so-called Pacific Street Interchange proposal because it is overly large and expensive, and has unacceptable impacts on the Arboretum and its wetlands, Union Bay, the University of Washington, and the surrounding neighborhoods. Please include this statement in the body of the SR520 Seattle Advisory Committee report."

Jean Amick, Laurelhurst Community Council
Lisa Anderson, Madison Park Community Council
Matt Fox, University District Community Council President
Louis Hoffer, Broadmoor Homeowners' Association
Larry Sinnott, Ravenna-Bryant Community Association
Carsten Stinn, Eastlake Community Council President
Theresa Doherty, University of Washington Assistant Vice President
Fred Hoyt, University of Washington Botanical Gardens
Angela Belbeck, Seattle Board of Park Commissioners

C-018-055 PLANNING COMMISSION AND CITY SHOULD CALL FOR A MORE AFFORDABLE ALTERNATIVE AND FOR BETTER TAILORED TRANSIT IMPROVEMENTS

C-018-056 The four-lane alternative is the only affordable one, and even it needs to be reduced in size. As Mayor Nickels says in his Sept. 28 letter to the City Council, "when Gov. Christine Gregoire's

Expert Review Panel issued its report four weeks ago, the panel noted quite strongly that a viable funding is not in place for the SR520 project." The Expert Review Panel finds the most likely cost of the Pacific Street Interchange six-lane alternative to be \$4.38 billion--\$1.59 billion more than the four-lane cost of \$2.79 billion! It is not realistic for the City Council to be considering the super-expensive Pacific Street Interchange six-lane alternative. Governor Gregoire is the realistic one, in asking the Expert Review Panel and the public for ideas on how to reduce costs even below that of the current four-lane proposal. The attached white paper contains our cost-reduction proposals to the Expert Review Panel.

Against all of our efforts to keep a low-cost, low-impact SR520 bridge replacement in the EIS, the four-lane alternative is far bigger than necessary. The lanes and shoulders are too wide, and there are too many extra lanes on the Portage Bay Viaduct. The four-lane alternative should be reduced in size, cost, and impacts through such actions as narrowing the lanes and shoulders to closer to their current size; keeping the Portage Bay Viaduct to its current four lanes; adjusting tolls by "congestion pricing" to keep the four-lane bridge traffic, including transit, moving, even at rush hour; and converting lanes and ramp at peak period to high occupancy vehicles and transit.

The City Council draft resolution and WSDOT's EIS fail to propose a "congestion pricing" toll level that ensures free flow at rush hour for the four-lane alternative. A rush-hour toll on both the SR-520 and I-90 bridges would manage congestion very well, as has been shown by studies already conducted by WSDOT and the Puget Sound Regional Council; the Mayors "green ribbon" commission also urged such "congestion pricing." Yet WSDOT's EIS fails to study a scenario in which there would be tolls on both the SR520 and I-90 bridges, and the City Council resolution fails to call for such a pricing pattern. Because WSDOT's EIS assumes a toll only on the SR520 bridge, the claim is that I-5 would become clogged as drivers take the free I-90 crossing, and therefore the SR520 four-lane alternative cannot work. But the Federal Highway Administration already recognizes SR-520 and I-90 as a single corridor, and for the purposes of analyzing SR-520 tolls, WSDOT's EIS should have done so as well. When the SR520 EIS studies the four-lane alternative with congestion pricing tools on both SR-520 and I-90, it will show it to be free-flowing.

Portrayal of the Pacific Street Interchange six-lane alternative as being pro-transit are overblown. Elimination of the Montlake flier stop will degrade the bus opportunities for those who live or work south of the Montlake cut. They will have to walk much further to their buses, and without any real improvement in bus times. Centralizing the bus stops at the light rail station would assist a limited number of people who, in the absence of the Pacific Street Interchange, would simply walk another block or two between their bus and the light rail station.

Expanding SR520 to six lanes by adding two HOV/transit lanes will increase single occupancy vehicle traffic. By building new HOV lanes, the six-lane alternatives would move car-pools and buses off of the existing lanes, and this new space would quickly be filled by single occupancy vehicles. We do not help transit by making it easier to drive alone. For a systematic argument that building new HOV lanes encourages single occupancy driving, undermines transit, and harms the environment, see the report on Rethinking HOV which is available at www.noexpansionofSR520.org.

Transit ridership with the current four lanes is excellent, and could be further enhanced if a future four-lane SR520 were provided reasonable and affordable transit improvements. The SR520 corridor is already the state's outstanding corridor for transit and HOV use, largely because single occupancy driving on SR520 is more constrained. As mentioned above, building new transit/HOV lanes will create more room for single occupancy vehicles, and reduce the current transit advantage.

The Planning Commission should encourage the City and WSDOT to add various transit enhancements to the four-lane alternative, among them converting lanes and ramps to transit- or HOV-only, whether at peak period or around the clock. As with other cases where WSDOT's EIS makes the four-lane alternative look bad by depriving it of, the EIS fails to suggest various steps that would maintain the current excellent transit make transit work well or better. Especially valuable would be conversion to transit/HOV use of a traffic or parking lane in each direction of Montlake Blvd and 25th, whether at peak period or around the block. Conversion of one lane of the SR520 bridge to transit or HOV only can be a part of the package, and there is even the possibility of converting the entire bridge to HOVs, buses, and trucks only at the peak period. Yet there may be no logical need for transit/HOV lanes on the SR520 bridge so long as buses and car pools have an advantage in getting to and from the bridge. When the I-90 bridge sank, bus service on SR520 improved rather than degraded, because WSDOT converted an I-5 shoulder to bus only. WSDOT too quickly reserved this improvement, which was an example of how transit can be improved quickly and cheaply, and without the expense and destruction of a Pacific Street Interchange.

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C-018-062

SUGGESTIONS TO THE EXPERT REVIEW PANEL FOR REDUCING COSTS OF THE SR520 PROPOSALS, AND CLARIFYING THAT A FOUR-LANE SR520 COULD, WOULD AND SHOULD BE ELIGIBLE FOR RTID FUNDING

The No Expansion of SR520 Citizens Coalition (www.noexpansionofSR520.org) has been working since 1994 toward a safe and affordable SR520. If we had our way, the bridge would already have been rebuilt at four lanes. Unfortunately, the efforts to replace the bridge affordably with one that would be safe in an earthquake or storm and would be safer to drive on have been delayed for more than a decade by people whose real agenda seems to be to add traffic lanes to the bridge. We cannot afford such short-sightedness, as we will break the budget in the process.

Governor Gregoire and the Expert Review Panel are to be applauded for bringing this debate back to reality, in the effort to identify economies that would make the SR520 project truly affordable, and in the process would better ensure a balance in its transportation and environmental impacts. Below are suggestions for reducing the costs, and we will also be following up in the coming weeks with other suggestions. Also, we begin with a request that the Expert Review Panel revisit its demonstrably incorrect judgment on the four-lane alternative and RTID.

RTID CERTAINLY WOULD CONTRIBUTE FUNDS TO A FOUR-LANE SR520

Page 2-14 of the Panel's September report makes the unfortunate statement, "We have assumed that only the six-lane alternative, if selected, will receive RTID ballot measure funding of \$800 million, because it is the only alternative that provides for increased traffic capacity." This statement is incorrect on so many levels, and needs to be expanded on by an addendum from the Panel. If the statement is not clarified, the Panel will allow itself to be used by those who have for many years been trying to caricature and marginalize the four-lane alternative, and hold public concern for a safer and more secure bridge hostage to further their agenda to add more lanes to the bridge. The proper role of the Panel is to bring some clarity and balance to the discussion, and that is not yet achieved in this particular part of the September report.

- (1) The draft EIS shows that the four-lane alternative does increase traffic capacity, because the lanes and shoulders are bigger, the geometry is improved, there are additional and wider connecting ramps, transit operation is improved, and intelligent vehicle systems and incident management are enhanced.
- (2) A newly constructed four-lane SR520 would embody many improvements that are entirely consistent with the purposes of the RTID, among them to strengthen the bridge against earthquakes and storms, reduce the chance of traffic collisions, and reduce fatalities and damage to vehicles and people when collisions do occur.
- (3) The Expert Review Panel should make it clear that there is nothing in the RTID enabling legislation or rules that would prevent RTID from providing to the four-lane SR520 alternative the full \$800 million in RTID funding. The Panel should make it clear that there are no

C-018-062 | guarantees that, if selected, the six-lane alternative would receive the full \$800 million. And the Panel should also make it clear that, if the four-lane alternative were selected and did not receive the full \$800 million, it could, likely would, and should receive a less but still substantial amount of that total.

(4) The Expert Review Panel's role is not to "assume" anything, but rather to ferret out the truth and to speak it. If people associated with RTID have told the Expert Review Panel that they would withhold funding for a four-lane SR520 simply because it would not add lanes, the Expert Review Panel needs to expose the factual and ethical flaws in this logic. In fact, the Expert Review Panel should affirmatively oppose this position, which, in effect, trumps and dismisses all the traffic, transit, and safety contributions of a four-lane alternative in an apparent effort to use RTID approval as a political lever to extract more lanes--and with the result of forcing choice of an alternative that, financially, likely could never be built.

(5) Not only is that an unworthy position for the region's elected officials to be taking, it also is not a correct prediction of RTID funding if the four-lane alternative were selected. Given the many traffic and safety improvements achieved by the four-lane alternative, it is not conceivable that if selected, it would not receive RTID funding. If the Expert Review Panel feels that the region's elected officials would refuse to provide any funding, or would provide unreasonably low funding, for a four-lane alternative, it should state that this is not a reasonable or desirable position, and that is not that is not consistent with achievement of a safe, functional, and affordable SR520 bridge replacement.

C-018-063 | PROPOSALS TO REDUCE THE COSTS OF THE SR520 ALTERNATIVES.

We will be following up to the Expert Review Panel in the coming weeks with a more detailed e-mail with suggestions for reducing costs of the SR520 alternatives. Below is a rough list that we will be expanding on.

(1) Four lanes are less expensive to build, and can be built more quickly, thus producing a safer and more functional bridge more quickly than the other alternatives.

(2) Among the six-lane alternatives, the Pacific Street Interchange is the most expensive feature and would take the longest to build.

(3) As proposed in all the alternatives, including the four-lane alternative, the Portage Bay Viaduct has far more lanes than are needed. Construction over Portage Bay is unusually expensive, and could be substantially reduced by reducing the width of the new viaduct.

(4) The EIS assumes that lanes, shoulders, and ramp geometry would be built to the full FHWA standards, without considering applications for waivers to reduce the size of lanes and shoulders and ramp geometry. Substantial reductions in all these measurements would dramatically reduce costs.

C-018-063

(5) Transit and HOV lanes need not be achieved only by expanding to six lanes or by building additional ramps. Conversion of ramps, shoulders, and lanes to transit- or HOV-only should also be considered. This is a far cheaper and quicker way to achieve transit- and HOV preference than by construction. When the I-90 bridge sank, WSDOT quickly converted shoulders and lanes to transit/HOV only, successfully expanding the people-moving capacity of SR520. It was regrettable that WSDOT did not listen to urging that it keep those designations, and these people-moving improvements were reversed a few months later. For the case for converting lanes and ramps to transit- or HOV-only see the report for the Chesapeake Bay Foundation that I coauthored on "Rethinking HOV" which is available at www.noexpansionofSR520.org.

(6) A rush-hour toll on both the SR-520 and I-90 bridges would manage congestion very well, as has been shown by studies already conducted by WSDOT and the Puget Sound Regional Council; the Mayors "green ribbon" commission also urged such "congestion pricing." Yet WSDOT's EIS fails to study a scenario in which there would be tolls on both the SR520 and I-90 bridges. Because WSDOT's EIS assumes a toll only on the SR520 bridge, the claim is that I-5 would become clogged as drivers take the free I-90 crossing, and therefore the SR520 four-lane alternative cannot work. But the Federal Highway Administration already recognizes SR-520 and I-90 as a single corridor, and for the purposes of analyzing SR-520 tolls, WSDOT's EIS should have done so as well. When the SR520 EIS studies the four-lane alternative with congestion pricing tools on both SR-520 and I-90, it will show it to be free-flowing.

(7) Traffic on a four-lane SR520 bridge can work smoothly, with a preference for transit and HOV, through a combination of congestion pricing and preferential access, including conversion of lanes, ramps, and City traffic or parking lanes to HOV-only at rush hours.

We thank the Expert Review Panel for its effort to lend greater reality and balance to the SR-520 debate. In coming weeks, we will send additional ideas for reducing the project's cost and helping to achieve more quickly the safer the more functional SR520 that all of us want.

Respectfully submitted by

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October 12, 2006