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Washington State Dept of Transportation
SR 520 Project Team
Jenifer Young
SDEIS Environmental Manager
600 Stewart St., Suite 520
Seattle, WA 98101

April 15, 2010

Re: Comments to SR 520 SDEIS

Dear WSDOT Planners,

C-024-001

The Friends of Seattle's Olmsted Parks (FSOP) are guardians of the historic Olmsted Brothers designed Park and Boulevard System here in Seattle. We are a citizen advisory board to the Seattle Parks and Recreation Dept on issues related to the Olmsted Brothers designed Park and Boulevard System. FSOP is one of the largest local affiliates of the National Association of Olmsted Parks. Our Board is very concerned about your under-recognition, mis-representation and misleading portrayal of Lake Washington Boulevard in this SDEIS.[1]

Lake Washington Boulevard (LWB) is Seattle Parks property, not a City street, and should not be an extended freeway on-ramp. It was laid out in 1903 by John Charles Olmsted on his very first trip to Seattle, design by the Olmsted Brothers firm and construction began in 1904 well before the Montlake Neighborhood was platted (1909), and long before the Washington Park Arboretum was designed (1934). You have chosen not to include it as a potential individual historic property, even after much insistence and documentation from this Board and our representatives. We have been told that the Section 106 reviewers at first "lumped" it in with the WP Arboretum, but in the end they "lumped" it in with the potential Montlake Historic District, neither of which is appropriate. We request that Lake Washington Boulevard from Montlake to Madison be acknowledged as its own separate historic park resource apart from either the Arboretum or Montlake. It is part of a larger city-wide boulevard system that has historic significance all on its own. (See our October 31, 2006 letter to Paul Krueger in response to the DEIS at that time.)

C-024-001

This lack of acknowledgement of Lake Washington Boulevard as a significant Park resource is all the more disturbing because traffic volumes on LWB vary widely between these options and sub-options, as your numbers from Attachment 7 Transportation Exhibit 6-1 and 6-2 show:

	AM	%	PM	%
Option A	900	100	1200	100
Subopt A	1900	211	1800	150
Option K	2000	222	2100	175
Option L	2000	222	2100	175

Increasing traffic by half or more than double is a very significant impact and should be identified! 2 That increased traffic does in fact diminish the character of the entire boulevard, and consequently the entire Park and Boulevard System of this city for residents and visitors, when it is over-run by freeway traffic. LWB is the essential connecting spine of the Park and Boulevard design. Your catalog of affected properties does not recognize this diminished character when LWB is aggregated with either Montlake or the Arboretum. Even your maps mis-label the boulevard section from the curve near E Calhoun St to the curve near E Roanoke St as 26th Av E, which is not correct!3 We hope you will undertake better research before deliberations and presentations for the Preferred Alignment choice and the Final EIS.

C-024-002

FSOP is also concerned about your minimal evaluation of the eastbound bus/HOV on-ramp in Suboption A (A+).4 The southbound Montlake Blvd queuing lane for this on-ramp will encroach on, if not actually carve up, the Montlake Blvd medians, which are also Park Dept property and date from the 1909 AYP Exhibition. This SDEIS has no diagram or plan of sufficient scale to show how this bus/HOV queuing lane, combined with the existing southbound Montlake Blvd 520 queuing lanes, combined with some provision for through traffic, could actually work without over-running the historic Park Dept medians. Your sketchy evaluation also under-represents the additional width in wetland and over water area for tapering-in this bus/HOV lane into the mainline of 520 all the way out to Foster Island. 5

C-024-003

FSOP is also very concerned about your evaluations of the Montlake/McCurdy lid in Option A and Suboption A (A+). You laud the benefits of reconnecting neighborhoods with pedestrian and bicycle paths and you cite the Health Impact Study that supports those ideas, but the lid design in Suboption A has a full-time freeway off-ramp running diagonally across it and an on-ramp dominating one corner. Both of these ramps attract significant volumes of traffic to the boulevard bordering the south edge of this lid. How is such a traffic-dominated landscape the least bit pedestrian friendly or any kind of reconnection for a neighborhood divided by the original highway construction? These LWB ramps of Suboption A also add width to the mainline of 520 for ramp tapering, which means more wetland and over water area taken. You do say that Option A has the better trails and bike paths, but you don't say that Suboption A entirely eliminates those same connecting trails and bike paths.6 We believe you are too quick to say there are no additional effects due to the suboptions.

C-024-004

You have incorporated some of the changes from the recent 520 Legislative Workgroup sessions, but the major and significant differences between the SDEIS Option A and SDEIS Suboption A (A+) should have been in here already and should have had a better airing. Traffic volume differences on LWB in the Arboretum, the negative physical impacts of the eastbound

C-024-004 bus/HOV on-ramp, and the non-functional neighborhood connecting lids, should all get a better explanation in your last presentations and discussions before the Preferred Alignment is identified.

Sincerely,

Larry Sinnott, AIA
FSOP Boardmember and Representative to SR 520 Mediation

Brooks Kolb
President, Friends of Seattle's Olmsted Parks

Footnotes
1) 4-32, 5-46, 5-90, 5-96, Att.6 4f/6f p 29, 37, 43, 48, 59, 60,
2) 4-32, 5-39, 5-46, 5-61, Att.6 4f/6f Exh 52,
3) Exh. 4.6-1, Exh 5.6-3, and all other maps, Att.6 4f/6f p 49, 81,
4) 5-21, 5-24,
5) 5-39, 5-61, 5-78, 5-90, 5-97, 5-136, Att.6 4f/6f p 81,
6) 5-28, 5-42, 5-44, 5-46, 5-53, 5-59, 5-63, 5-90, Att. 7 Transp. 8-32,

Seattle Yacht Club

Established in 1892

April 14, 2010

CERTIFIED MAIL / RETURN RECEIPT #7009 2820 0001 7283 4113

Jenifer Young, Environmental Manager
SR 520 Project Office
600 Stewart Street, Suite 520
Seattle, WA 98101

Re: SR 520 SDEIS

Dear Ms. Young:

C-025-001 This letter presents Seattle Yacht Club's ("SYC"), formal response and comments, including all attachments, on the Supplemental Draft Environmental Impact Statement ("SDEIS") issued on January 22, 2010 regarding the SR 520, I-5 to Medina Bridge Replacement and HOV project (project). We have reviewed the documents closely and believe the proposed project will have direct and indirect impacts on Seattle Yacht Club ("SYC") both during and after construction. In order to mitigate these impacts, SYC request that the additional analysis and mitigation indentified in this letter be included in the Supplemental Final Environmental Impact Statement ("SFEIS").

C-025-002 **1 - SUMMARY OF COMMENTS**

SYC, a not-for-profit Washington corporation formed in 1909, owns and operates a historically designated clubhouse and marina located in Seattle's historic Montlake neighborhood. The SYC clubhouse, marina, and grounds are listed on the National Register of Historic Places (NRHP). This SYC property is located with in the Area of Potential Effect (APE) on Portage Bay and is immediately adjacent to that section of SR 520 that is referred to in the SDEIS as the Portage Bay Bridge ("Bridge"). In addition to our concerns over the impacts to our building and grounds we are particularly concerned about the impacts to Portage Bay and area of traditional significance to the members of our Club.

C-025-003 SYC does not object to the rebuilding of SR 520 between I-5 and Medina. Representatives of the Club have engaged in constructive discussions with WSDOT and its Montlake neighbors about this project for over a decade. Despite the efforts of the community to provided input in the design through the mediation process and other forums, the omissions and lack of specificity in the SDEIS make it difficult to properly assess the potential impacts and adverse effects. The project is presented with indeterminate details on tolling and funding sources and minimal construction detail. None of the State's proposals adequately address the impacts of the proposed project on the neighborhoods immediately adjacent to the Bridge or SYC's historic property.

1807 East Hamlin Street • Seattle, Washington 98112 • telephone 206.325.1000 • fax 206.324.8784

C-025-004 SYC has serious concerns about the proposed project and its expected impact on its historic property and operations. Some of SYC's concerns include:

- Impacts during construction, including limitations of access to the Club via water and land, increased dirt, air pollution, noise, etc.
- The proposed widening and relocation to the north of the existing bridge.
- Environmental degradation such as air and water pollution and noise, among others.
- The impact of tolling on our members' and guests' access to our facilities and adjacent recreational waterfront.
- Degraded north / south travel times from north Capital Hill to Seattle Children's Hospital will inhibit our members' and guests' access to our facility though added congestion of this corridor.
- Interference with SYC traditional cultural activities at our Portage Bay property and adjacent waters.
- The cumulative impacts that degrade our facility such that our membership and revenues from rentals will be reduced.

C-025-005 Omissions and lack of specificity in the SDEIS make it difficult, and sometimes impossible, to properly assess the potential impacts and adverse effects upon SYC. We understand the purpose of the EIS process is to make it possible for potentially impacted parties to better understand how a project will or might affect them. Yet, in this case, where the project is presented in the SDEIS as a group of alternative and competing plans and because each alternate has different road widths, interchanges, access ramps, and heights; with indeterminate tolling and funding; and unknowable construction details due to the decision to pursue a design-build contract; the potential of the EIS process is not realized.

2 - SPECIFIC COMMENTS

C-025-006 **The Bridge Footprint**
The SDEIS does not include any GPS coordinates or other specific markers that allow the project's proposed locations to be determined. All of the proposed options provide for a wider, higher and more northerly positioned bridge carrying more traffic. Each of these bridge features will increase the noise, air pollution and visual impacts on our property. The Bridge, as shown in drawings in the SDEIS, Exhibit 2-6 on page 2-11, appears to come right to the edge of those portions of Portage Bay used for Opening Day and our permanent moorage. More specificity regarding the proposed bridge location is required in order to adequately review and comment. Any new Bridge needs to be located within the footprint of the existing bridge.

C-025-007 **Recreational access to Portage Bay, in the Montlake Cut, Arboretum Waterways and Union Bay**
A significant failing of the SDEIS is the presentation of issues relating to recreation in the Recreation Discipline report. At page 4-28, the full page list of "Recreation Resources in the Project Vicinity" fails to even mention Portage Bay. Portage Bay, the Montlake Cut, Arboretum waterways and Union Bay are vital and heavily used recreational areas for water related activities including swimming, fishing, kayaking, canoeing, and for crew team practices and races. Portage Bay is the central feature of the boating activities of rowing clubs, canoe and kayak rentals, at least three marinas, and the houseboats on the shores of Portage Bay and Lake Union. Portage Bay is used for many events that are vital to the Club's activities including Opening Day, the Junior Sailing program, Special People's Cruise, sailboat

C-025-007 races, and family sail nights. Despite the importance of these activities to the SYC and the community, the SDEIS does not review the impacts of construction on these activities. Nor does it review the long-term impact of any new bridge on the recreational activities after construction.

C-025-008 The failure to speak to the impacts on Portage Bay is also in evidence at page 3-3. There, all of the "typical construction equipment" is listed. However, no barges are included. Without any attempt to describe the numbers, placement, and duration of barges in Portage Bay, it is impossible to assess their impact. Barges located in Portage Bay have the potential of adversely impacting Opening Day, junior sailing programs, small boat racing programs, marina, and restaurant operations. Assessing the degree of impact is impossible as the SDEIS does not include any analysis of how WSDOT will avoid or minimize adverse effects to recreation from construction in Portage Bay.

C-025-009 Additionally, the Montlake Cut is the only marine access from Lake Washington to Portage Bay, Lake Union, the Ship Canal and Puget Sound. Thousands of recreational boat trips through the Cut are made each year. Yet it is also not listed in the SDEIS as a recreational resource. The SDEIS indicates on pages 106-107 that the Montlake Cut and the second bascule bridge will be closed for a period of three weeks during construction. If this closure occurs during the Opening Day time period holding that event would be impossible. The SDEIS makes no mention of scheduling this work to avoid or minimize adverse effects. There may also be long-term impacts to the SYC through increased limitations on the movement of sailboats and other large vessels that are taller the 46'-0" between Lake Washington and Portage Bay with the requirement of opening a second Montlake bridge.

C-025-010 A significant failing of the SDEIS is the presentation of issues relating to recreation in the Recreation Discipline report.

C-025-011 **Noise:**
Allowable noise levels are set by the City of Seattle and we expect the construction process and end design to meet those requirements. While we agree that noise is a *direct* effect since it is detected by people only while close to the SR 520 corridor, for SYC there are also probable *indirect* effects for SYC from the increase in noise from the bridge being closer and with more lanes of traffic. Specifically these impacts include less SYC club usage in all forms with resultant economic impacts of less moorage revenue, less banquet revenue, and less outside restaurant revenue as moorage holders and club patrons respond to the lessened desirability of mooring boats and holding events at the Club.

The SDEIS's assumptions about transit usage and the proportion of quieter vehicles on the road over time are indefensible claims for this report time frame of 2030 (only 20 years). An analyst could just as easily conclude there will be more noise resulting from population growth and more vehicles and mass transit vehicles on the road.

The technical report at pages 5-6 shows the no build bridge as 60 feet wide but the 6 lane at 115+ feet wide (and this does not include the width of the westbound 520 Montlake on-ramp) putting all that traffic and noise much closer to SYC than in the no build alternative. This proximity will certainly increase noise and pollution at the Club.

C-025-012 Finally, the SDEIS states that construction would produce noise and vibration, especially from major construction activities such as pile driving, demolishing existing structures, hauling, and concrete

C-025-012 pumping. During heavy construction periods, noise levels could reach very high levels (85 to 105 A-weighted decibels [dBA]) at 50 to 100 feet from the activities, and these effects would be above the traffic sound levels normally experienced within 500 feet of the right-of-way. We believe short-term and long-term measures are needed to avoid any increased noise arising from the Portage Bay Bridge.

C-025-013 **Air Pollution**

The SDEIS fails to address several critical issues relating to air pollution raised by this project as outlined below. Without addressing these issues the general report is inadequate, incomplete and unacceptable.

a. The SDEIS does not review the Ozone Impacts per EPA standards for this project.
b. The SDEIS does not review Air Toxic Impacts for this project does not present an adequate assessment.
c. The SDEIS does not address the deposition of Air Toxic particles for this project.

C-025-014 **Tolls**

Another significant limitation of the SDEIS is an analysis of the impact of this project from the planned tolling. In the DSEIS, WSDOT makes the assumption that no tolling would be imposed under the "No Build" Option. This is contradictory in that the SDEIS states that tolling was authorized by the Legislature in order to manage congestion (page 1-33) even though under the current statute it is limited to a preconstruction toll. WSDOT fails to analyze whether, with a toll operated in a manner to reduce traffic congestion, a four lane configuration might be adequate for the Project needs. This is in violation of WSDOT's duty to avoid and minimize the impact on historic Montlake Neighborhood and SYC and a material defect in the SDEIS.

C-025-015 Additionally, the lack of specific information about the potential tolling rates makes it impossible to fully analyze the impacts of those tolls on the SYC. The uncertainties of tolling are compounded by the fact that the Legislature has authorized only preconstruction tolling and the final tools have not yet been determined. The SDEIS states its assumption that a maximum toll rate of $3.81 would apply but indicates that the actual rates have not been determined (page 1-34). Regardless of the final rate, tolling has the potential to severely impact the continued operation of the Club as approximately 30% of our members reside east of Lake Washington. Many of these members may choose to find other locations to moor their boats and patronize businesses that do not require paying a toll.

Access to the Club

C-025-016 Land Access

The SYC is also concerned that the SDEIS provides inadequate concern for limitations to the Montlake neighborhood and Portage Bay during construction. The SDEIS acknowledges that local street operations will be affected but provides only general statements on those affects and/or potential remediations. Access to our facilities is critical for our continued public and member operations. The SDEIS does not provide sufficient detail to permit an intelligent analysis of these impacts.

C-025-017 Marine Access

Additionally, the SDEIS completely omits navigation issues for the boating and recreation community during the construction period other than vague comments on bridge related closures. The ability to access SYC from the water side and for boats to move freely through Portage Bay is crucial to general Club activities, the operation of the sailing school, and events sponsored for the community events such

C-025-017 as Opening Day. Any changes to access to the waters of Portage Bay would have significant impacts on club revenues and our ability to maintain our historic facility.

C-025-018 **Impact on Club Operations**
The ability to maintain the historic structure is dependent upon the economic and operational viability of the Club. The SDEIS at page 61 of the Land Use, Economics, and Relocations Discipline Report states "Operation (of the completed 520 project) would not indirectly affect the REGIONAL economy, except through beneficial effects of improved transportation efficiency." The SDEIS omits an analysis of LOCAL economic effects of the project. It ignores entities like SYC that are located within the construction zone and immediately adjacent to the completed Project, focusing instead on entities at commuter beginning or end points.

C-025-019 The SDEIS does state on page 62 (under the "Social Elements" section) of the technical report that

> Construction effects on adjacent communities would include increases in noise, dust, traffic congestion and lane closures; partial closures of sidewalks and bicycle routes/pedestrian trails; and visual clutter in residential, business, and park areas adjacent to construction zones. These effects could temporarily affect community cohesion and limit connections to community resources, patronage at neighborhood businesses, or use of recreational amenities.

We agree with this description of adverse effects but also believe some of the effects would extend beyond the construct period and become permanent rather than temporary in nature. The much larger bridge (a 115+ feet wide bridge plus additional encroachment towards SYC and into Portage Bay from the proposed westbound on-ramp onto 520 from the Montlake Interchange vs. the 60 feet wide no-build alternative) will significantly change the visual environment at the club. This additional visual obtrusion and an almost certain increase in noise, filth, and air pollution will have reduce the appeal of the SYC as a facility for banquets, dining, moorage, and social interaction. The loss of this appeal will cause a significant negative economic impact on the SYC.

SYC's operational and economic viability depends on the revenues generated by members and guests having good access to our facility. SYC is a member operated club rather than professionally managed. Member committees decide and implement Club policies. Access and usage limitations would directly and immediately impair the member committees' ability to manage its historic structure and traditional activities.

C-025-020 The analysis for the "Economic Activity" section of the technical report only focuses on macro level economic impacts and omits micro or local level economic impacts. This omission makes a review of this issue impractical at this time.

C-025-021 **Cultural Resources Analysis**
The SYC believes that the impacts to Cultural Resources, required under NEPA and under Section 106, have not been fully examined. The Cultural Resources report underestimates the effects to the National Register listed Seattle Yacht Club due to the significantly increased encroachment of the new Portage Bay Bridge. The project will result in adverse effects under 36CFR 800.5 as it will "*diminish* the integrity" by significantly degrading the setting and feeling of the property. The report also fails to consider how cumulative effects from visual changes, disruptions to access during construction, and long-term

C-025-021 modifications to mooring and sailing classes may result in economic losses that would result in a change in use of the historic property.

C-025-022 WSDOT has also failed to consider the importance of Portage Bay as a property of cultural significance to the members of the SYC. Our community has utilized Portage Bay continuously for over 90 years to practice traditional boating activities. The sheltered, freshwater marine environment is essential to the continued operation of our sailing program, a key means by which we transmit knowledge of boating. Portage Bay is also integrally linked to our Club as it is the location of our Opening Day Celebrations. The events are an essential aspect of our group's heritage. The SYC is preparing a determination of eligibility for the eligibility of Portage Bay as a traditional cultural property to submit to the Washington Department of Archaeology and Historic Preservation. We expect that WSDOT will work with us to ensure that the project does not effect our traditional use of Portage Bay.

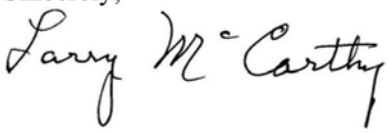
CONCLUSION

C-025-023 In conclusion, the SYC is disheartened by WSDOT's failure to meets is its statutory obligation to adequately consider and document its efforts to avoid and minimize the impacts of the project. As a result, the potential of the EIS process to allow members of the public to understand the alternatives and provide meaningful comments on how these alternatives will impact our community is not realized. However, SYC remains hopeful that if there is to be a new Portage Bay Bridge that it will be environmentally responsible and not destructive of the neighborhoods through which it passes. We hope that WSDOT will addresses the concerns raised in this letter so that the resulting project will remain within the footprint of the existing bridge, offer access and exits no less favorable than those that now exist and of similar size, create no further degradation of water and air resources, maintain or improve existing noise levels, and have no adverse visual impact over that already existing. Such a bridge would not have cumulative effects that exceed the impacts on the community of the existing bridge and would not interfere with SYC traditional culture and activities in the waters of Portage Bay.

Should you have questions or wish to discuss these comments, please contact Steve Hall, SYC's General Manager. His phone is (206) 325-1000.

Attached are more detailed comments addressing specific aspects of the SDEIS.

Sincerely,



Larry McCarthy, Commodore
Seattle Yacht Club

cc: Jack McCullough, Esq., McCullough Hill PS
Kimberly Demuth, Entrix, Inc.

Attachments included

	nent Page/line Cultural Resources Discipline - Vol 1	Name	Comment by WSDOT	Reviewer comment
C-025-024	P iii	E. Van	Once a preferred alternative design has been selected and more detailed construction effects can be evaluated, additional effects determination on historic properties --can be made	This should be noted for follow-up.
C-025-025	P vi	E. Van	Comment by WSDOT re pontoon towing	Towing could possibly have an adverse impact on sailing classes or the Special Peoples Cruise.
C-025-026	P ix	E. Van	Listing of affected historic properties	SYC not listed
C-025-027	P 95	E. Van	The SYC is a recreational and cultural institution that supports and enhances the residen tial quality of the neighborhood (Montlake Historical District)	WSDOT quote that can be used in response letter.
C-025-028	P 135	E. Van	Once a prefered alternative is selected and construction details can be evaluated, construction effects on historic properties will be thoroughly analyzed before publication of the final EIS"	Note that this does not say that the effects will discussed with consulting parties nor suggest possible additional mitigation.
C-025-029	EX 43	E. Van	Potential Detour Routes. All options would close Lake Washington Blvd. ramps.	The current west bound ramp onto Montlake Blvd. provides the only safe access to SYC. The Lake Washington ramp provides no ability to access a left turn lane to Hamlin. This area will also be a haul route.
C-025-030	P 140	E. Van	Inwater construction activities are allowed only from Octobe 1 through April 15.	There is no discussion of barge traffic nor anchoring which could adversely impact SYC public sail classes, Opening Day and Special
C-025-031	P 164	E. Van	Discusses the absence of in-water construction activities from April 15 through Oct. 1	See comment next above.

	nent Page/line Cultural Resources Discipline - Vol 1	Name	Comment by WSDOT	Reviewer comment
C-025-032	P 169	E. Van	Pontoon Construction and Transport. Pontoons would not be towed on Opening Day and there would be no room for other boats during towing.	Opening Day activities occur 1 week prior and 1 week after Opening Day. Interference with activities at that time would adversely impact Opening Day itself.
C-025-033	P 194	E. Van	Mitigation. Discusses cleaning of historic buildings at the conclusion of construction.	Construction is expected to last four years for the Montlake Interchange and Portage Bay bridge. Mitigation should include annual inspection and cleaning, if warranted.
C-025-034	P 195	E. Van	Mitigation. WSDOT would coordinate with SYC so that pontoon towing would not interfere with Opening Day or other important social maritime activities.	How and when? What about barges with build-materials moving in and out or anchored in Portage Bay?
C-025-035	P 196-7	E. Van	List of mitigation properties.	SYC is not included in the list.

From:

Sent:

To: Kip Cramer

Cc:

Subject: SR 520 SDEIS and Section 4(f)/6(f)Evaluation; comments onKip<

Comments:

C-025-036

1. The references to the Seattle Yacht Club are included as an Historical Property in the Montlake Historical District. No mention is made for the disruption of the Club's OPERATIONS I.E. (a) Food and Beverage Revenue impacts, both during construction and the completed project. and, (b) disruptions to member usage of the facilities (docks , special functions (wedding receptions), and Opening Day, et al). These potential revenue changes could bring the Club into financial distress both in terms of current member obligations, and make it harder for the Club to attract new members to insure its continuation as a viable facility.

2. These items of omission may be addressed in other sections of the SDEIS , but, they are not in this section.

3. The SDEIS indicates that any and all impacts are de minimus, for the section reviewed here. For this facility to be only minimally impacted flies in the face of commonsense .

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Construction Windows) (2)

C-025-037

Subject: Adverse Effects on Cultural Resources

Reference: Chapter # 3, Page 3 - 7
Section #4(f)/6(f) Evaluation, Page 17

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC has applied for and was granted "**Consulting Party**" status by WSDOT and there by qualify for Section 106 protections. In addition, WSDOT is obligated to make a 4(f) analysis that requires them to avoid, minimize or mitigate any use of a historic property.

Cultural Element:

C-025-038

Seattle Yacht Club realizes that the SR 520 project contractors must have access and egress to the SR 520 highway rights of way in order to accomplish the bridge replacement and other activities.

In Chapter #3, page 3-7, WSDOT explains that certain agencies require that contractors cannot perform "In Water" construction work in the Lake Washington Ship Canal from October 1 through April 15 of each year. In draft Section # 4(f)/6(f) Evaluation of the SDEIS, WSDOT explains that the Pontoon Towing will take place during the months of March through April.

Attachment #7, titled "Cultural Resources Discipline Report for the SDEIS", at page 140 explains how the Window of Opportunity for not working in the water and for towing bridge pontoons into Lake Washington from Aberdeen conveniently do not conflict with the cultural activities of the club. This assertion by WSDOT is not correct and therefore SYC is Adversely Effected.

C-025-039

SYC appreciates that WSDOT will **not** be towing pontoons on and during Opening Day of Boating Season. Our Sailing Instruction classes run 5 days a week from 9:00 am to 3:00 pm each day, generally mid June until Labor Day. Our Marina is open 24/7. To facilitate SYC cooperation with the bridge replacement project, SYC would appreciate receiving any notices that WSDOT and/or the contractor can give on Ballard Locking Operations associated with their vessels and/or Pontoon Towing.

C-025-039 SYC would be pleased if WSDOT would give notice to Mr. Brian Ledbetter of the Seattle Yacht Club so that he can coordinate the Waterfront Activities with the needs of WSDOT and their contractors.

C-025-040 The Seattle Yacht Club objects to any bridge design and/or construction activity that further encroaches into the navigable waters of Portage Bay; especially in those areas designated by Section 106 as an **Areas of Potential Effect** (APE). Seattle Yacht Club's sailing culture is and will be **Adversely Effected** under Options A, K and L by the SR520 Bridge Replacement and HOV Project during construction. The Club fully expects the Memorandum of Agreement to include provisions that will completely mitigate all **Cultural Resource** conflicts arising from the SR 520 bridge project.

3/24/2010

DRAFT

Air Quality Discipline Report Review

C-025-041 The Air Quality Discipline report and the DEIS discussion and conclusions based on this report are deficient and must be redone. Specific deficiencies are:

1. Ozone impacts were not addressed. The region is currently undergoing a reclassification to non-attainment by USEPA. A non-attainment designation will require strict additional controls on VOC sources even consideration of reduced auto use within the region. Offsets for any projected increases VMT will have to be mitigated.

C-025-042 2. The impacts of the air toxics emissions associated with the 520 bridge replacement were not properly addressed. The existing high risk associated with current diesel particulates (DP) will be negatively influenced by the proposed project alternatives. Any such increases are probably not acceptable risks to the community adjacent to the proposed property.

C-025-043 3. The added cancer risk associated with the construction phase of the project was not quantified. A constructive time frame of seven or more years would add 10% to a lifetime cancer risk.

C-025-044 4. The deposition of air toxics is not adequately addressed. Roadway runoff is partially mitigated by collection and treatment techniques. However, the direct aerial deposition into the aquatic environment is not mentioned or

C-025-044

discussed. Dioxins/ furans are a listed toxic air pollutant by USEPA. They are emitted by mobile sources, in particular diesel engines. They readily bioaccumulate. They surely impact sensitive ecosystems. This may be a broader oversight, but should be discussed in the DEIS in a qualitative manner.

These four issues are discussed in more detail:

C-025-045

Ozone Impacts

EPA is currently in the administrative process of designating the Puget Sound region as non-attainment for ozone. The region is in non-attainment of the current 8-hour standard of 75 ppb based on monitoring data from the Enumclaw Mud Mountain site. EPA is tightening the standard to a level between 60 and70 ppb. There are no definitive strategies available to comply with such options short of restrictive auto use. Conformity and offsets will be required. Hence, any increase in traffic associated with the 520 project alternatives will have to be offset somewhere in the region.

The DEIS will have to be redrafted to address this issue and not simply defer it to future permitting consideration.

C-025-046

Air Toxics

The current cancer risk of diesel particulate exposure in the PS region is at unacceptable levels based on analyses by PSCAA and DOE. Levels of DP in the air translates to a cancer risk of more than 400 chances per million according to these Agencies. 100 chances per million is the accepted criteria for cleanup of Superfund sites.

The DEIS fails to assess the air toxics impacts of the alternative options by claiming that the projected traffic counts are below a stated

C-025-046 threshold specified by FHWA Guidance, i.e., 144,000 VPD. This guidance does not apply to the 520 project situation. The claim in the Discipline Report that current Federal DP emission regulations regarding diesel fuel sulfur reduction and off road vehicle emissions will mitigate further impacts are not defensible. Neither the DOE nor PSCAA have set a goal for reducing the air toxics risks in the Region. Oregon DEQ has set One in a million risk per pollutant. DEQ has conducted a comprehensive modeling project for the Portland Region, which maps the risk levels by geographical location, including near freeways and interchanges. This modeling protocol is directly applicable to the 520 DEIS project. The results of such modeling will reflect the potential cancer risk impacts of the 520 alternatives, including the potential risk benefits of reduced traffic volumes in the 520 corridor.

C-025-047 **Construction Related and Toxic Risks**

Construction machinery is mostly diesel powered. Ambient DP levels will increase to levels above existing levels during the 7 or more years of bridge construction. The incremental exposure that will occur during construction will be in addition to the 70 year lifetime assumed for day to day exposure. These risks were not quantified in the Discipline Report, as they should have been.

Air Toxics Deposition

As described above.

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Filth) (7)

Subject: Adverse Effects on Cultural Resources
(Deposition of solid Particulate Pollutants)

Reference: Chapter # 3, Pages 3 – 11 Air Quality
Chapter # 4, Pages, 4 – 53 Air Quality
Chapter # 5, Page 5, 5 – 112 Air Quality
Chapter #6, Page, 6 – 72 Air Quality

Standing:

Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC applied for and was granted "**Consulting Party**" status by WSDOT and there by qualify for Section 106 protections. In addition, WSDOT is obligated to make a 4(f) analysis that requires them to avoid, minimize or mitigate any use of a historic property.

Cultural Element:

C-025-048

Governor Gregoire and the Washington State Legislature want WSDOT to recognize that building highways through communities causes considerable disruption to the inhabitants. For that reason the Governor signed into law a request that the Mediation panel prepare a Projects Impacts Plan (PIP) that included a Health Impacts Analysis (HIA). A HIA is a project feature that is not required by the traditional NEPA/SEPA Statement.

The HIA report has been prepared and submitted to Governor Gregoire by the Seattle/King County Health Department and the Puget Sound Clean Air Agency. The HIA report found that there are several affects resulting from the construction of a highway through a neighborhood that can affect the health of the nearby residents. For example a highway may be constructed through a neighborhood that cuts off a popular hiking/biking trail. This results in a reduced exercise opportunity for the residents and thus an increase in health risks.

C-025-049

Particulate Matter (PM) measuring 2.5 to 10 Microns can be found along the roadway of SR 520. PM is a fine powdery material composed of ground up tires, brake pad linings and unburned diesel fuel. PM when inhaled presents a health risk.

C-025-049

In addressing Air Quality, the Federal Government sets the allowable concentration levels for gaseous pollutants that are emitted from automobiles and other sources. Preventative measures must be taken that keep the air quality within the concentration standards. Solid particulates (PM) in smoke from sources such as fireplaces are not strictly regulated. But in fact, air stagnation alerts are broadcasted on the nightly news.

SR 520 generates large volumes of particulate matter. Depositions of these homogenous collections of particulates are visible nearly every where one might look adjacent to SR 520. Certainly citizen's health is affected when they breathe in these materials. But more antagonizing than breathing these pollutants is their constant deposition on roofs, sidewalks, parking lots, cars, boats and sundecks. This is truly a Health Impact.

Besides being a clear Impact on the neighborhood, it is a nuisance. Consider when you want to have a deck or patio party. Either surface will have to be pressure washed before having the party. Even with covered moorage the particulate matter filters in and onto the boats which then have to be washed off or your clothing will become contaminated. This black filth generated by SR 520 is everywhere. The closer to SR 520 the more filth you have to deal with. Boat owners, whether sail or power driven, go to considerable expense to keep their boats clean. There is a saying in the boating community, "Cleanliness is next to Godliness."

The Seattle Yacht Club objects to any bridge design and/or construction activity that does not include provisions to control the deposition of solid particulate pollutants, especially in those areas designated by the Section 106 as **Areas of Potential Effect** (APE). Seattle Yacht Club's boating culture is and will be **Adversely Effected** under Options A, K and L by the SR520 Bridge Replacement and HOV Project during construction. The Club fully expects the Memorandum of Agreement to include provisions that will mitigate all **Air Quality** conflicts arising from the SR 520 Portage Bay bridge project.

3/24/2010

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Opening Day)

Subject: Adverse Effects on Cultural Resources (1)

Reference: Chapter # 5, Page 5-82 to 5-87 Cultural Resources- Portage Bay.
Chapter # 6, Page 6-57 & 6-59 Cultural Resources-Portage Bay.

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC applied for and was granted "**Consulting Party**" status by WSDOT and there by qualify for Section 106 protections.

Cultural Element:

C-025-050 Each year on the first Saturday in May, Seattle Yacht Club sponsors "The Opening Day of Boating Season" (Opening Day). This festive event kicks off the season long calendar of boating activities. The program for the day starts with a Commissioning Ceremony that recognizes the Commodores from over 100 visiting Yacht Clubs from the Pacific Northwest and Canada. The ceremony is followed by an International Rowing Regatta sponsored by the University of Washington Crew that features the Windemere Cup challenge race. Rowing crews from all over the world have been invited to challenge race. The regatta is followed by the World Famous Parade of Boats through the Montlake Cut that lasts up to four hours. Decorated boats are judged and receive awards for design decoration in many categories. Thousands of spectators line the race course and Montlake Cut in their boats to view the festivities. Opening Day is the last "free to the public" major event left in Seattle. The waters of Portage Bay and the Montlake Cut are an excellent venue for these events.

Opening Day has been staged each year since before the turn of the past century. First held on Elliott Bay, Opening Day was moved to Portage Bay and the Montlake Cut on May 1, 1920, ninety years ago. Nearly a full week of activities proceeds and follows Opening Day. The Canadian Yacht Clubs participate in an International Exchange that reaches across our common border.

C-025-051 The Seattle Yacht Club objects to any bridge design and/or construction activity that further encroaches into the navigable waters of Portage Bay and the Montlake Cut; especially in those areas designated by Section 106 as **Areas of Potential Effect** (APE). Seattle Yacht Club's boating culture is and will be **Adversely Effected** under Options A, K and L by the SR 520 Bridge Replacement and HOV Project both during construction and in commercial operation. The Club fully expects the Section (106) Memorandum of

C-025-051 Agreement to include provisions that will completely mitigate all **Cultural Resource** conflicts arising from the SR 520 bridge project.

3/24/2010

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project Report
(Montlake Mess) (6)

Subject: Adverse Effects on Cultural Resources (Hamlin/Shelby access/egress)

Reference: Chapter # 4, Pages, 4-1
Chapter # 5, Page 5-1
Chapter #6, Page, 6-1

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site as listed on the **NRHP**. As such, SYC applied for and was granted "**Consulting Party**" status by WSDOT and there by qualify for Section 106 protections. In addition, WSDOT is obligated to make a 4(f) analysis that requires them to avoid, minimize or mitigate any use of a historic property.

Cultural Element:

C-025-052

The "Montlake Mess" is a traffic congested situation that was created in the area adjacent to the south end of the Montlake bascule bridge on Montlake Boulevard at the intersections of East Hamlin Street and East Shelby Street. Both Hamlin and Shelby Streets have fully operational traffic control green/red stop signal lights. The Montlake Mess serves as a de facto interchange for the intersection of Lake Washington Blvd, SR 520 and Montlake Blvd with eight on/off ramps. Back-up congestion exists several hours each day. It is a life threatening experience for Hamlin/Shelby residents entering or leaving this area of Montlake Blvd.

The Seattle Yacht Club membership's only access or egress to their historic clubhouse and moorages is from this severely congested Boulevard via East Hamlin and East Shelby Streets. Cars heading north on Montlake Blvd from Shelby St. experience extremely long waits for a green light before entering north bound traffic.

Our examination of the SR 520 SDEIS indicates that nothing has been presented in the highway designs of Option A or Option L to relieve congestion on Montlake Blvd except for a second bascule bridge that will make the congestion even worse.

The Seattle Yacht Club objects to any bridge design and/or construction activity that further adds to the congestion that presently exists, especially in those areas designated by Section 106 as **Areas of Potential Effect** (APE). Seattle Yacht Club's historic boating culture is and will be **Adversely Effected** under Options A and L by the SR520 Bridge Replacement and HOV Project during construction. The Club fully expects the

C-025-052

Memorandum of Agreement to include provisions that will completely mitigate all **Cultural Resource** conflicts arising from the SR 520 bridge project. The Seattle Yacht Club perceives that Option K, similar to a previous option referred to as the Pacific Street Interchange plan, would in fact relieve a major portion of the congestion at the University of Washington and the western portal of the SR 520 program.

3/24/2010

Discipline Report Comment Summary

Discipline Report: Environmental Justice

Report	Page #	Line #'s	Reviewer	Comment
C-025-053	3	4-19	B Shafer	These two paragraphs state reasons why the project should be implemented even though low income populations would experience disproportionately high and adverse effects because of tolling. No discussion is provided of alternatives to tolling, such as increasing gas taxes or property taxes. Additional information detailing the reasons for selecting tolling over other funding sources needs to be added. The additional information should address the impact of these alternative funding sources on low-income populations.
C-025-054	94	3-10	B Shafer	This paragraph states that WSDOT "might target transit improvements....." to mitigate the burden tolls would present to low-income or LEP drivers. This statement does not describe any proposed mitigation that WSDOT would be obligated to undertake. This paragraph should be deleted or rewritten to indicate specific actions that WSDOT will take to mitigate the impact on low-income or LEP drivers. It should be noted that the preferred alternative eliminates the transit station in the Montlake area which currently may be used by low-income or LEP individuals.

C-025-055

Indirect and Cumulative Effects

(Chapter 7 SDEIS, and associated Discipline Report)

Key Findings:

C-025-056 The SDIES omitted Portage Bay as a major recreational asset/location and therefore did not adequately study and mention potential indirect and cumulative effects on entities and operations in this location. This area is a major boating and water activities center in the region. It is adjacent to 520 currently and is further encroached on during and after the construction of a new *wider* 520 bridge. The encroachment is even *greater* when including the longer/wider westbound

C-025-057 Montlake 520 on-ramp. With significant yacht club operations and community activities ranging from Opening Day, moorage, banquet and restaurant operations, sailing school, family sailing programs, special people's cruise, and other community events too numerous to mention, there will clearly be direct and indirect effects of the 520 expansion on usage and economics that clearly need to be protected as much as possible.

C-025-058 The SDEIS mainly analyzes the 520 project from a "commuter" suburb-to-city viewpoint and omitted and/or did minimal analysis of impacts to assets/entities in the *middle* of 520 around the Portage Bay area. This is more than a just a spot people drive by on their commute to work and is indeed a recreational, social, historic, and economic destination in itself and deserves more consideration in terms of construction impacts.

C-025-059 The SDEIS does not mention the extra width of the proposed westbound Montlake on-ramp to 520 that would further encroach on the Fisheries property and move the bridge that much closer to SYC. The negative impacts of greater noise, filth, visual degradation, and economic impact from less desirable moorage, reduced banquet revenues and reduced revenue from outdoor restaurant operations are foreseeable.

C-025-060 The SDEIS does not analyze the I-5/520 interchange bottleneck in this section and therefore does not correctly consider indirect effects that could impact the Portage Bay environment and entities such as The Seattle Yacht Club and Queen City Yacht Club. With population growth and two more mass transit lanes carrying more mass transit vehicles, it is foreseeable that this bottleneck will get worse and therefore have a negative impact on air quality, noise, access/egress, economics, etc. for the Portage Bay area in general and the yacht clubs specifically.

C-025-061 The SDEIS addresses construction related effects from a macro view (e.g. Puget Sound region economic impacts, point-to-point regional commuter transportation, etc.) and therefore omitted analysis of significant impacts at the micro or neighborhood level for the Portage Bay area.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
... are caused by the action and are later in time or farther removed in distance, but are still reasonably forese
typically involve a chain of cause-and-effect relationships that can take time to develop and can occur at a dist
from the project site. This makes some indirect effects difficult to predict accurately, although they must be
reasonably foreseeable, and usually requires a **qualitative estimate**... (page 2 of technical report)
...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction over the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, pg 8 Ch 4, pg 4-33 Ch 5, p 5-53	16	Erik Sabiers	Baseline Conditions	The process for setting Baseline Conditions was stated to be completed from Surveys, Interviews, and Literature searches (tech report pg. 24, last line). Bay, Seattle Yacht Club, Queen City YC, etc. were omitted. We are not awa surveys or interviews that were done with SYC or QCYC for setting baseline conditions. In fact, Portage Bay in general and SYC, QCYC, etc. were entire omitted in the SDEIS (ch. 4 "The Project Area's Environment) as a Recreati Center, a big omission, considering the SDEIS Ch 4, pg 4-33 DOES referenc Waterfront Activities Center and the Canoe House. Further, in the "Recreat section 5.4 of Chapter 5 of the SDEIS starting on p 5-53, again Portage Bay including SYC and QCYC, are omitted as a recreation center, despite the fac UW recreational facilities and others ARE referenced. Portage Bay hosts 2 very active yacht clubs, acts as a base for Opening Day boating season, is a base for various sailing activities ranging from an activ sailing school to family sailing evenings, and is also an origination point and gathering place for many other community water and non-water based acti events. It is difficult to correctly assess the potential affects to a resource a analyze unintended consequences/indirect effects when the resource itself i recognized in the first place.

C-025-062

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

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Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, pg 8 Ch 7, Pg 17 Ch 5, Sec 5.1, p 5-4	18 8 Last Paragraph	Erik Sabiers	Traffic Growth	Some Indirect Effects are partly predicated on the SDEIS's assumptions ab growth in Ch. 5. Put plainly, we believe the SDEIS's assumptions (Ch. 5, S 5-4, last paragraph) about daily vehicle traffic will prove to be incorrect in term and the SDEIS's conclusions that *"the 6-lane alternative would actual in a small net decrease in daily vehicle traffic demand on SR 520"* because *"addition of the toll, improved HOV reliability, and reduced travel times wo increase the incentive to carpool or take the bus"* are highly speculative ar unsubstantiated and further do not particularly take into consideration trav activities other than the suburb-to-Seattle work commute. The SDEIS's opinions defy logic. The SDEIS's own projections in Ch 5, p 5 population growth in the area is expected to be 1.1 Million by 2030 and po the region is expected to increase from approximately 3.6 million in 2007 t million in 2040 as documented in Vision 2040. Absurdly, p. 50 of the tech says "the project will not generate additional regional traffic, particularly as increasing the capacity for single-occupancy vehicles." Population trends W generate additional traffic and additional lanes for mass transit WILL add a vehicles...the mass transit vehicles themselves (see Ch 7, page 18, line 16

C-025-063

C-025-064

C-025-0068

Discipline Report Comment Summary

Discipline Report: Environmental Justice

Report	Page #	Line #'s	Reviewer	Comment
	3	4-19	B Shafer	These two paragraphs state reasons why the project should be implemented even though low income populations would experience disproportionately high and adverse effects because of tolling. No discussion is provided of alternatives to tolling, such as increasing gas taxes or property taxes. Additional information detailing the reasons for selecting tolling over other funding sources needs to be added. The additional information should address the impact of these alternative funding sources on low-income populations.
	94	3-10	B Shafer	This paragraph states that WSDOT "might target transit improvements....." to mitigate the burden tolls would present to low-income or LEP drivers. This statement does not describe any proposed mitigation that WSDOT would be obligated to undertake. This paragraph should be deleted or rewritten to indicate specific actions that WSDOT will take to mitigate the impact on low-income or LEP drivers. It should be noted that the preferred alternative eliminates the transit station in the Montlake area which currently may be used by low-income or LEP individuals.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction over the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, pg 8 Ch 4, pg 4-33 Ch 5, p 5-53	16	Erik Sabiers	Baseline Conditions	The process for setting Baseline Conditions was stated to be completed from Surveys, Interviews, and Literature searches (tech report pg. 24, last line). Bay, Seattle Yacht Club, Queen City YC, etc. were omitted. We are not awa surveys or interviews that were done with SYC or QCYC for setting baseline conditions. In fact, Portage Bay in general and SYC, QCYC, etc. were entire omitted in the SDEIS (ch. 4 "The Project Area's Environment) as a Recreati Center, a big omission, considering the SDEIS Ch 4, pg 4-33 DOES referenc Waterfront Activities Center and the Canoe House. Further, in the "Recreat section 5.4 of Chapter 5 of the SDEIS starting on p 5-53, again Portage Bay including SYC and QCYC, are omitted as a recreation center, despite the fac UW recreational facilities and others ARE referenced. Portage Bay hosts 2 very active yacht clubs, acts as a base for Opening Day boating season, is a base for various sailing activities ranging from an activ sailing school to family sailing evenings, and is also an origination point and gathering place for many other community water and non-water based acti events. It is difficult to correctly assess the potential affects to a resource a analyze unintended consequences/indirect effects when the resource itself i recognized in the first place.

C-025-066

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

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Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

C-025-067

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, pg 8 Ch 7, Pg 17 Ch 5, Sec 5.1, p 5-4	18 8 Last Paragraph	Erik Sabiers	Traffic Growth	Some Indirect Effects are partly predicated on the SDEIS's assumptions ab growth in Ch. 5. Put plainly, we believe the SDEIS's assumptions (Ch. 5, S 5-4, last paragraph) about daily vehicle traffic will prove to be incorrect in term and the SDEIS's conclusions that *"the 6-lane alternative would actual* *in a small net decrease in daily vehicle traffic demand on SR 520"* because *"addition of the toll, improved HOV reliability, and reduced travel times wo* *increase the incentive to carpool or take the bus"* are highly speculative ar unsubstantiated and further do not particularly take into consideration trav activities other than the suburb-to-Seattle work commute. The SDEIS's opinions defy logic. The SDEIS's own projections in Ch 5, p 5 population growth in the area is expected to be 1.1 Million by 2030 and po the region is expected to increase from approximately 3.6 million in 2007 t million in 2040 as documented in Vision 2040. Absurdly, p. 50 of the tech says "the project will not generate additional regional traffic, particularly as increasing the capacity for single-occupancy vehicles." Population trends W generate additional traffic and additional lanes for mass transit WILL add a vehicles...the mass transit vehicles themselves (see Ch 7, page 18, line 16

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

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Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
C-025-068 Indirect & Cumulative Effects	Ch 7, pg 8 Ch 7, Pg 17 Ch 5, Sec 5.1, p 5-4 continued	18 8 Last Paragraph	Erik Sabiers	Traffic Growth	The combination over time WILL mean greater traffic. More population ar associated cars + more transit lanes and associated more transit vehicles = traffic. Lastly, the SDIES does not adequately discuss and address the bott I-5/520 interchange. As the Seattle Times points out on Friday 3-10-2010 front page, "The New 520 bridge won't solve I-5 merge mess." Senator Ed says "the 520 project is based on a traditional suburb-to-Seattle commute that is becoming obsolete." He also says the plan does not "adapt to the fa 5 is full." More traffic approaching an unsolved I-5 bottleneck equals more congestion around Montlake/Portage Bay.
C-025-069 Indirect & Cumulative Effects	Ch 7, Pg 17	24	Erik Sabiers	Transportation	UW Medical Center Master Plan - improvements are likely to occur at same 520 construction (pg 51 of technical report). This would create cumulative congestion at the time of the projects AND permanently in the area.
C-025-070 Indirect & Cumulative Effects	Ch 7, Pg 17	24	Erik Sabiers	Transportation	UW Campus Master Plan - improvements are likely to occur at same time a construction. This will create cumulative congestion during the projects AN permanently in the area.
C-025-071 Indirect & Cumulative Effects	Ch 7, Pg 17	25	Erik Sabiers	Transportation	North Link Light Rail Station at Husky Stadium - improvements will be goin the same time as 520 construction resulting in cumulative congestion durin projects.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

C-025-072

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, pg 8 Ch 7, Pg 17 Ch 5, Sec 5.1, p 5-4 continued	18 8 Last Paragraph	Erik Sabiers	Traffic Growth	The combination over time WILL mean greater traffic. More population ar associated cars + more transit lanes and associated more transit vehicles = traffic. Lastly, the SDIES does not adequately discuss and address the bott I-5/520 interchange. As the Seattle Times points out on Friday 3-10-2010 front page, "The New 520 bridge won't solve I-5 merge mess." Senator Ed says "the 520 project is based on a traditional suburb-to-Seattle commute that is becoming obsolete." He also says the plan does not "adapt to the fa 5 is full." More traffic approaching an unsolved I-5 bottleneck equals more congestion around Montlake/Portage Bay.
Indirect & Cumulative Effects	Ch 7, Pg 17	24	Erik Sabiers	Transportation	UW Medical Center Master Plan - improvements are likely to occur at same 520 construction (pg 51 of technical report). This would create cumulative congestion at the time of the projects AND permanently in the area.
Indirect & Cumulative Effects	Ch 7, Pg 17	24	Erik Sabiers	Transportation	UW Campus Master Plan - improvements are likely to occur at same time a construction. This will create cumulative congestion during the projects AN permanently in the area.
Indirect & Cumulative Effects	Ch 7, Pg 17	25	Erik Sabiers	Transportation	North Link Light Rail Station at Husky Stadium - improvements will be goin the same time as 520 construction resulting in cumulative congestion durin projects.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

	Report	Page #	LINE #'s	Reviewer	Topic	Comment
C-025-073	Indirect & Cumulative Effects	Ch 7, Pg 17	32	Erik Sabiers	Transportation	Truck traffic traveling through the 520 construction zone. This will be an is affecting Montlake/SYC access as the SDEIS states.
C-025-074	Indirect & Cumulative Effects	Ch 7, Pg 17	34	Erik Sabiers	Transportation	Additional Lane closures and road detours. This will be an issue affecting Montlake/SYC access as the SDEIS states.
C-025-075	Indirect & Cumulative Effects	Ch 7, Pg 17	38	Erik Sabiers	Transportation	The SDEIS states that other projects in addition to the 520 project will cau term and permanent modifications to access. What will they be? There is mention of specific modifications for SYC to address or respond to. With re just the 520 project, actual design features are still being debated, so it is impossible for SYC to respond to actual design features when they are not in the SDEIS.
C-025-076	Indirect & Cumulative Effects	Ch 7, Pg 18 Ch 7, Pg 25	2, 7 37	Erik Sabiers	Transportation	The SDEIS states cumulatively that traffic would improve after constructior during regular operation. This is based on pure speculation and cannot be substantiated. Based on population trends and the I-5/520 bottleneck alon SDEIS's statements are questionable. See comment re: traffic & congestio the second entry above.
C-025-077	Indirect & Cumulative Effects	Ch 7, Pg 18	16, 19	Erik Sabiers	Transportation	The SDEIS states there will be *"Additional Buses"* and *"Increased frequenc service"* along the 520 corridor. This will increase vehicles on the road and filth and noise and reduce air quality.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

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the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

	Report	Page #	LINE #'s	Reviewer	Topic	Comment
C-025-078	Indirect & Cumulative Effects	Ch 7, Pg 18	27, 28	Erik Sabiers	Transportation	The SDEIS states *"Tolling would reduce demand for use of the SR 520 corr single occupancy vehicles."* Therefore the SDEIS AGREES with our though Eastside SYC members will make the drive less frequently because of tolls therefore have a negative economic and social impact to the club. These t not commuter trips so the likelihood of using mass transit is not as viable.
C-025-079	Indirect & Cumulative Effects	Ch 7, Pg 18	34, 35	Erik Sabiers	Transportation	Mitigation such as traffic control, public outreach, details on street closures might only have limited relief on SYC activities because we are in the MIDI construction zone and this type of mitigation seems more referenced to co point-to-point and not with respect to the communities in center of the cor zone.
C-025-080	Indirect & Cumulative Effects	Ch 7, Pg 20	9	Erik Sabiers	Transportation	The SDEIS states that the 520 project *"would convert existing land uses to transportation right-of-way"* and that this would only be a *"small portion total land in the Puget Sound region over the next 30 years."* We disagree reference point being the total Puget Sound region. Some of these conver transportation right-of-way could occur IN Montlake and therefore could ha impact on access/egress to the Seattle Yacht Club on Hamlin and affect the terms of usage and economics.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
... are caused by the action and are later in time or farther removed in distance, but are still reasonably fores
typically involve a chain of cause-and-effect relationships that can take time to develop and can occur at a dis
from the project site. This makes some indirect effects difficult to predict accurately, although they must be
reasonably foreseeable, and usually requires a **qualitative estimate**... (page 2 of technical report)
...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 20	24	Erik Sabiers	Economic Activity	(Also page 61 of the technical report) The SDEIS states *"Operation (of the completed 520 project) would not indirectly affect the REGIONAL economy through beneficial effects of improved transportation efficiency."* This omit analysis of LOCAL economic effects of the project. This ignores entities like are in the middle of the construction zone (and who would be affected duri after construction) as opposed to entities at commuter beginning or end po SDEIS does state on page 62 (under the "Social Elements" section) of the report that *"construction effects on adjacent communities would include in noise, dust, traffic congestion and lane closures; partial closures of sidewa bicycle routes/pedestrian trails; and visual clutter in residential, business, areas adjacent to construction zones. These effects could temporarily affec community cohesion and limit connections to community resources, patron neighborhood businesses, or use of recreational amenities."*

C-025-081

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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typically involve a chain of cause-and-effect relationships that can take time to develop and can occur at a dis
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reasonably foreseeable, and usually requires a **qualitative estimate**... (page 2 of technical report)
...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

C-025-082

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 20 continued	24	Erik Sabiers	Economic Activity	We agree with this but also believe some of what is stated will be permane not temporary in nature. A 115+ ft wide bridge (PLUS additional encroach towards SYC and into Portage Bay from the proposed longer westbound on onto 520 from the Montlake Interchange) vs. the 60 ft wide no-build altern would bring noise, filth, air pollution, and visual obtrusion that much more Portage Bay and towards SYC and will have an impact on banquet, restaura moorage, and social operations of clubs like SYC an QCYC that will carry ar meaningfully negative economic impact. It seems the analyst for the "Ecor Activity" section of the technical report only focused on macro level econon impacts and omitted micro or local level economic impacts.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
C-025-083 Indirect & Cumulative Effects	Ch 7, Pg 21	6	Erik Sabiers	Social	Pg 62 of the technical report states that *"construction effects on adjacent communities would include increases in noise, dust, traffic congestion and closures; partial closures of sidewalks and bicycle routes/pedestrian trails; visual clutter in residential, business, and park areas adjacent to constructi These effects could temporarily affect community cohesion and limit conne community resources, patronage at neighborhood businesses, or use of rec amenities."* First, Portage Bay, SYC, QCYC, etc. should be recognized as th recreational and social assets they are (instead of being omitted in the SDE such). Second, some of these effects of construction would also exist post- construction and should be mitigated as much as possible to protect the so historical community and related activities.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 23 Ch 7, Pg 24	23, 24 13	Erik Sabiers	Recreation	The SDEIS says *"most indirect effects on park and recreational resources w positive by encouraging greater use of recreational resources, improving co and linkages between parks, and improving noise levels and visual quality location."* Separately, Pg 5/6 of the technical report shows the no build bri 60ft wide but the 6 lane at 115+ ft wide (and this does not include the widt westbound 520 Montlake on-ramp). First, the SDEIS ignores SYC, QCYC, a Portage Bay in general as a major recreation center for the area and theref consider the construction impacts appropriately to this area. Indeed, const and the operating end-result could "DIScourage" rather than "encourage" g use of Portage Bay/SYC/QCYC because of greater noise, worse air quality, v visual effects from a bridge built that much further into Portage Bay and clo SYC, greater congestion because the I-5/520 interchange bottleneck is not improved materially, and worse problems with access/egress.

C-025-084

C-025-085

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

C-025-086

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 23 Ch 7, Pg 24 continued	23, 24 13	Erik Sabiers	Recreation	Second, The SDEIS seems to focus mostly on macro level beginning-to-end commuter type impacts and focuses little on effects to recreational areas li Bay/SYC/QCYC that are in the middle of the 520 line where "connectivity," aesthetics, and air/noise/etc. would likely not be improved but rather wors the short and long-term. Noise walls, appealing exterior noise wall design vegetation, quiet pavement, street sweepers, minimizing width of the west 520 Montlake on-ramp, etc. all could be important project features to mini negative or invasive impacts of 520 construction and expansion.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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reasonably foreseeable, and usually requires a **qualitative estimate**... (page 2 of technical report)
...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 25 Ch 7, Pg 26	21 22	Erik Sabiers	Visual and Aesthetics	The SDEIS states *"the project would not produce indirect effects on visual and aesthetics because all changes to structures, landforms, and vegetatio be confined to direct impacts within the project area along the SR 520 corr* find this incorrect for the Portage Bay area since a larger footprint bridge (the width of the westbound 520 Montlake on-ramp) with it's related increas noise, filth, and visual effects encroaching on SYC, QCYC, moorage, and Pc in general would definitely produce indirect effects related to SYC club usag related economics. Some indirect effects specifically could be lesser usage facilities in general in the Portage Bay area, less desire for moorage, fewer banquets held, effects on the sailing school and programs, etc. Minimizing effects somewhat via context-sensitive architectural and design standards vegetation (per page 26, line 22), narrowing the westbound 520 Montlake and utilizing noise walls, quiet pavement, and street sweepers could be hel project features.

C-025-087

C-025-088

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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reasonably foreseeable, and usually requires a **qualitative estimate**... (page 2 of technical report)
...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

C-025-089

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 26	35	Erik Sabiers	Cultural	The SDEIS *"did not identify any indirect effects on cultural resources"* yet t technical report on page 82 states *"construction-related effects on historic in the project vicinity could include increased noise, fugitive dust, vibration, visual quality effects. Temporary street closures would cause traffic detours could increase traffic in and around identified historic properties. These eff would be minimized through mitigation measures that protect building faca comply with local noise regulations, and maintain access."* SYC's historical should not be ignored. SYC is a cultural resource and this includes traditio activities like Opening Day as well as many other events and gatherings.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 28	5	Erik Sabiers	Noise	WSDOT considers all noise-related effects to be direct. While we agree tha a direct effect since it is detected by people only while close to the SR 520 for SYC and QCYC there are also probable indirect effects such as less SYC usage in all forms including related economic impacts of less moorage reve banquet revenue, and less outside restaurant deck revenue as moorage ho club patrons recognize the lessened desirability of mooring boats and holdi at the clubs. Further. the SDEIS's assumptions about transit usage and pr of quieter vehicles on the road over time seem like unsubstantiable claims report time frame of 2030 (only 20 years). An analyst could just as easily there will be more noise resulting from population growth and more vehicle mass transit vehicles on the road. Also, Pg 5/6 of the technical report show build bridge at 60ft wide but the 6 lane at 115+ ft wide (and this does not the width of the westbound 520 Montlake on-ramp) putting all that traffic a that much closer to SYC/QCYC than in the no build alternative. Finally, the technical report on pg 85 states that construction would produc and vibration, especially from major construction activities such as pile driv demolishing existing structures, hauling, and concrete pumping. During hea construction periods, noise levels could reach very high levels (85 to 105 A decibels [dBA]) at 50 to 100 feet from the activities, and these effects wou above the traffic sound levels normally experienced within 500 feet of the r way. We believe short-term and long-term measure are needed to control potential negative effects of increased noise.

C-025-090

C-025-091

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
C-025-092 Indirect & Cumulative Effects	Ch 7, Pg 29	14	Erik Sabiers	Air Quality	We agree that the project would produce indirect effects on air quality duri construction period from hauling construction materials and from particulat from excavation of fill material. Adverse filth affects the SYC clubhouse, b moor at SYC, outside banquet activity, the sailing school, and outside resta deck revenue. However, the SDEIS completely ignores any potential long- increase in air quality despite the fact that p 88 of the technical report stat *"emissions would occur over the long term"* and that *"expanded transit...w offset INCREASES in vehicle emissions from HIGHER traffic volumes."* Gre congestion at the West side I-5/520 bottleneck from increased overall traff would increase noise, CO levels, and filth. Lastly, for a given level of noise quality, just the fact that the bridge footprint would creep further north an substantially further north at the location of the westbound 520 Montlake c makes it worse for the Portage Bay recreational area.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
C-025-093 Indirect & Cumulative Effects	Ch 7, Pg 29	33	Erik Sabiers	Air Quality	The SDEIS statement that *"the project is not expected to create any new v nor increase the frequency of an existing violation of the CO standard"* see unsubstantiated statement and is unlikely to be true since more traffic on t from the Eastside will still bottleneck on the West side right at Portage Bay 5/520 interchange and cause worse air and noise pollution and filth. Nothi Technical report discusses the West side I-5/520 bottleneck PLUS a larger bridge PLUS population growth PLUS more transit vehicles on the road EQU the potential for lower air quality.
C-025-094 Indirect & Cumulative Effects	Ch 7, Pg 32	9	Erik Sabiers	Water	The SDEIS states that the project would not have an adverse effect on wat because storm water runoff would be mitigated. The technical report is ON referencing storm water treatment and does not consider or analyze effects and road filth that occurs during dry weather which ultimately settles on ne structures and surface water. This disturbs water quality in Portage Bay, a the environment and recreational activities such as SYC sailing school.

Discipline Report Comment Summary

Discipline Report: **Indirect and Cumulative Effects Analysis**

Indirect effects (sometimes called secondary impacts or effects) are defined as effects that:
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reasonably foreseeable, and usually requires a **qualitative estimate**... (page 2 of technical report)
...Other indirect effects can take months or years to become apparent (page 23 of technical report)

Cumulative Effects - WSDOT does NOT mitigate cumulative effects because it does not have jurisdiction ove
the many non-WSDOT projects that contribute to them. Ch 7, p 7-1,line 6.

Report	Page #	LINE #'s	Reviewer	Topic	Comment
Indirect & Cumulative Effects	Ch 7, Pg 39		Erik Sabiers	Navigation	This section of the SDEIS and the technical report completely omits naviga issues for the boating and recreation community during the construction pe than bridge related closures. The ability to access SYC, QCYC, etc. from th side is crucial to general club activities and finances not to mention specific community events such as Opening Day, Sailing School, etc.

C-025-095

Comment Page/line	Commentator Name	Comment by WSDOT	Reviewer comment
SDEIS Report, Ch 7 Indirect and Cumulative Effects			
C-025-096 p 7-5	E. Van	Assumption - WSDOT considered construction to be short term and temporary. Therefore, only direct or indirect effects of operating the facility would contribute to cumulative effects	Both construction and operation of the project may have the effect of removing significant parking at the NOAA property utilized in connection with Opening Day activities. Construction and location of the project in Portage Bay may adversely effect the Opening Day operations.
C-025-097 p 7-18	E. Van	The report discusses construction period mitigation measures impacting a number of institutions.	The historic Seattle Yacht Club is not included in the discussion.
C-025-098 p 7-21	E. Van	Social Elements Effects. No indirect effects would result from the project	Impact of tolling and construction may adversely effect usage of Seattle Yacht Club impacting its cultural contribution to the community.
Attachment 7 Discipline Reports Indirect and Cumulative Effects			
C-025-099 p7, Option A	E. Van	"-would include a transit-only off-ramp from westbound 520 to northbound Montlake Blvd."	No auto exit ramp to Montlake Blvd to provide access to Seattle Yacht Club (SYC). No description of eastbound exit to Montlake traveling north.
C-025-100 p18-19 Cumulative Effects	E. Van	"--the analysts considered only direct or indirect effects of operating the completed facility as potential project contributions to cumulative effects."	This gives no consideration to the combination of construction activities coupled with tolling that would cumulatively affect the activities of SYC, a historic structure.
C-025-101 p30-31 History of the Project - Montlake	E. Van	A description of development of the area known as Montlake.	It contains no mention of the historic nature of the area, including SYC.

Comment Page/line SDEIS Report, Ch 7 Indirect and Cumulative Effects	Commentator Name	Comment by WSDOT	Reviewer comment
C-025-102 p58 Land Use	E. Van	"No substantial change to the overall urbanized land use pattern in Seattle would occur, and no indirect effects on land use pattern would occur."	There is no discussion on the dilatory impacts that would occur on the Montlake interchange neighborhoods and the SYC.
C-025-103 p63-64 Social related cumulative effects	E. Van	The report concluded there would be no long term adverse effect on social elements. Therefore, no assessment was pursued.	There was no mention of the potential effects on the social nature of historic properties.
C-025-104 p70-76 Effects on Recreation	E. Van	There is significant discussion re the effects on recreation re parks, and the UW.	There was no discussion on effects on boating or sailing in Portage Bay, sailing classes, Open-Day parade nor the Special Peoples Cruise. Opening Day was mentioned on page74-75, but there was no discussion on the effects of the project or efforts to mitigate the effects.
C-025-105 p 82 Direct and Indirect on Cultural Resources	E. Van	Effects on historic properties would be minimized through mitigation measures that would protect building facades, comply with local noise regulations and maintain access.	There has been no attempt to engage discussions on mitigation with SYC.
C-025-106 p 82 Direct and Indirect affects on Cultural Resources	E. Van	"There are no identified indirect effects to cultural resources"	Indirect effects on cultural resources of the Seattle Yacht Club will include impacts on usage of the property during construction and as a result of tolling which will adversely impact usage of the property: usage of the sailing facilities, and interaction with the community at large, all of which contribute to the historic nature of the property.

Comment Page/line SDEIS Report, Ch 7 Indirect and Cumulative Effects	Commentator Name	Comment by WSDOT	Reviewer comment
C-025-107 p 90 - 91 Air Quality	E. Van	The discussion on air quality does not mention particulate matter, such as tire rubber fragments or exhausts	Air quality should include particulate matter, such as from tires and exhaust that are carried on the prevailing wind and deposited on the historic property.
C-025-108 p 99	E. Van	Water resources - concludes no adverse effect because of storm water runoff treatment.	Does not discuss impacts due to contaminants carried by air.
C-025-109 p 122 Navigation	E. Van	Channels would be closed at times but construction would be staged so that channels would not be closed on the same day. A local notice to mariners would be issued by the Coast Guard.	The channels are not identified precluding specific comment. However, there is no mention of keeping channels open for the conduct of Opening Day or Sail class activities.

Comment Page/line Attachment 7 Discipline Reports Land Use, Economics and Relocation	Commentator Name	Comment by WSDOT	Reviewer comment
C-025-110 Exhibit 31	E. Van	Identification and location of business and institutions	The Exhibit does not identify the locations of MOHAI, NOAA nor the SYC, all of which may be severely impacted
C-025-111 p 4	E. Van	The 6 lane alternative would temporarily increase congestion and affect access to businesses and residents. Some businesses could experience fluctuations in retail sales.	There is no mention of loss of revenue impact on SYC, which may limit the ability to maintain the historic facility.
C-025-112 p 23	E. Van	SYC is mentioned as a yacht club.	There is no mention that the club is also an historic property. It presumes unimportance.
C-025-113 p 62	E. Van	The report discusses minor revenue losses from construction and night-time lane closures that would have a minor effect on local business revenues.	Many of SYC revenue activities occur in the evenings, when loss of revenue could severely impact revenue necessary to support the facility.
C-025-114 p 102-103	E. Van	WSDOT states that signage that clearly marks detour routes and indicates that stores are open during construction will be provided.	The report mentions QCYC and the UW but not SYC. Also mitigation is underway for adverse impacts to several businesses/institutions but not SYC.
C-025-115 p 103	E. Van	QCYC is mentioned for mitigation for temp-orary lost moorage and the UW for special events.	SYC should be included for mitigation for events such as Opening Day weekend, sailing activities and other events, such as the Special Peoples Cruise.
C-025-116 p 113	E. Van	Negative Effects remaining after completion from land use acquisitions	There is no mention of continuing negative effects from land use invasive effects.

Comment Page/line	Commentator Name	Comment by WSDOT	Reviewer comment
Attachment 7 Discipline Reports Land Use, Economics and Relocation			
Seattle's Comprehensive Plan			
C-025-117 LU 241, p 1-12, item 1.	E. Van	"All environmental effects would be mitigated acceding to governmental regulations The 6-Lane Alternative would be consistent with this policy."	The report does not discuss mitigation for ~~adverse~~ adverse impacts to historical properties.
C-025-118 LU 269, p 1-14 , item 2.b.	E. Van	Mentions the Seattle policy for Lake Union and Portage Bay to protect the views in all environments.	WSDOT makes no comment about the impacts on the city view of the bridge and intersections
C-025-119 LU 269, p 1-15, item TG 7	E. Van	Regarding protection of neighborhood streets from through traffic. WSDOT concludes the ------would not substantially change local traffic patterns.	What does "substantially" mean? SYC needs protection for accessibility.

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Dock Zero) (3)

Subject: Adverse Effects on Cultural Resources

Reference: Chapter # 5, Page 5-82 to 5-87(Cultural Resources, Portage Bay)
Chapter #6, Page 6-57 & 6-59(Cultural Resources, Portage Bay)

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC applied for and was granted "Consulting Party" statue by WSDOT and there by qualify for Section 106 protections.

Cultural Element:

C-025-120 Each year, Seattle Yacht Club invites Yacht Clubs from all over the Pacific Northwest and Canada to come celebrate "The Opening day of Boating Season" (Opening Day). This festive event kicks off the season long calendar of boating activities. The program for the day starts with a Commissioning Ceremony that recognizes the Commodores from over 100 visiting Yacht Clubs from all over the Pacific Northwest and Canada. An International Invitational Rowing Regatta featuring the Windemere Challenge Cup sponsored by the University of Washington Crew follows the ceremony. The World Famous Parade of Boats through the Montlake Cut lasts up to four hours following the crew races.

Many of the visiting Yachtsmen travel great distances to participate in Opening Day. As such SYC, the Queen City Yacht Club and several other clubs in the adjacent areas attempt to provide guest moorage for the visitors. SYC erects a temporary dock as guest mooragee in the quiet, (except for SR 520 noise) well protected waters of Portage Bay for our visitors. The waters of Portage Bay are an excellent venue for these Opening Day activities

C-025-121 The Seattle Yacht Club objects to any bridge design and/or construction activity that further encroaches into the navigable waters of Portage Bay; especially in those areas designated by the Section 106 as an **Areas of Potential Effect** (APE). Seattle Yacht Club's sailing culture is and will be **Adversely Effected** under Options A, K and L by the SR520 Bridge Replacement and HOV Project during construction. The Club fully expects the Memorandum of Agreement to include provisions that will completely mitigate all **Cultural Resource** conflicts arising from the SR 520 bridge project.

3/24/2010

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Sailing Classes) (5)

Subject: Adverse Effects on Cultural Resources

Reference: Chapter # 5, Page 5-58 & 59 Cultural Resources - Portage Bay
Chapter # 6, Page 6-58 & 85 Cultural Resources - Portage Bay

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC applied for and was granted "**Consulting Party**" status by WSDOT and there by qualify for Section 106 protections.

Cultural Element:

C-025-122 Great effort has been put forth by the Seattle Yacht Club to preserve its traditions and culture. Each summer since its establishment in 1892, the Club has sponsored sailing classes and regattas to preserve the Art and Science of sailing. These sailing classes on Portage Bay are available to all youths of the Seattle and Puget Sound vicinity. Sailing education consists of boating safety, boat handling, sailing equipment utilization, rules of competition and sailing tactics. Many Olympic and International class competitors have graduated from this sailing education program. Portage Bay waters are an excellent venue for these purposes.

C-025-123 The Seattle Yacht Club objects to any bridge design and/or construction activity that further encroaches into the navigable waters of Portage Bay or interferes with the conduct of these sailing classes, especially in those areas designated by the Section 106 as **Areas of Potential Effect** (APE). SYC's sailing culture is and will be **Adversely Effected** under Options A, K and L by the SR520 Bridge Replacement and HOV Project both during construction and in commercial operation. SYC fully expects the Memorandum of Agreement to include provisions that will completely mitigate all **Cultural Resource** conflicts arising from the SR 520 bridge replacement project as they relate to the conduct of SYC's sailing education program.

3/24/2010

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Access/egress to Slips) (4)

Subject: Adverse Effects on Cultural Resources

Reference: Chapter # 4, Pages, 4 – 77, Navigation
Chapter # 5, Page 5, 5 - 151
Chapter #6, Page, 6 - 107

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC applied for and was granted "**Consulting Party**" status by WSDOT and there by qualify for Section 106 protections. In addition, WSDOT is obligated to make a 4(f) analysis that requires them to avoid, minimize or mitigate any use of a historic property.

Cultural Element:

C-025-124 Seattle Yacht Club realizes that the contractors must have access and egress to the SR 520 highway rights of way in order to accomplish the bridge replacement and other activities. In like manner, the SYC boat owners must have access and egress to their moorages. Any blockage of the fairways leading to the moorages by boats, barges and other floating materials will adversely affect the Seattle Yacht Club. It would appreciate any notices that WSDOT and or the contractor can give to enable its cooperation in the bridge replacement project. It would also appreciate timely notices regarding WSDOT's Pontoon Towing and Ballard Lock Operation to minimize any effect on its activities.

C-025-125 The Seattle Yacht Club objects to any bridge design and/or construction activity that further encroaches into the navigable waters of Portage Bay, especially in those areas designated by the Section 106 as **Areas of Potential Effect** (APE). Seattle Yacht Club's sailing culture is and will be **Adversely Effected** under Options A, K and L by the SR520 Bridge Replacement and HOV Project during construction. The Club fully expects the Memorandum of Agreement to include provisions that will completely mitigate all **Cultural Resource** conflicts arising from the SR 520 bridge project.

3/24/2010

Seattle Yacht Club Comments on
SR 520 Bridge Replacement HOV Project SDEIS Report
(Indirect & Cumulative Effects) (8)

Subject: Indirect & Cumulative Effects on Cultural Resources

Reference: Chapter # 7, Page 7-81 to 7-85 (Cultural Resources, Portage Bay)
Discipline Report - Indirect & Cumulative Effects Analysis

Standing: Seattle Yacht Club (SYC) is a **Consulting Party** to the planning and construction of the SR 520 bridge replacement project. SYC is a historic site and is listed on the **NRHP**. As such, SYC applied for and was granted "Consulting Party" status by WSDOT and there by qualify for Section 106 protections.

Cultural Element:

C-025-126 Chapter 7 of the SR 520 Bridge Replacement and HOV, SDEIS report addresses the Indirect and Cumulative Impacts. We noted that WSDOT uses the words "Impacts" and "Effects" interchangeably. At page 7-1 Indirect Effects are defined as those Impacts that are the result of a previous or distant action. Cumulative Impacts are effects that result from a collective or incremental set of actions. WSDOT declares that it does not mitigate Cumulative Impacts because it does not have jurisdiction over all of the contributing actions that result in the cumulative effects. That may not always be the case.

C-025-127 The SDEIS is suppose to identify all effects a proposed action might have on the environment or the effected area's resources, such as the SR 520 project. Impacts such as direct effects, indirect effects, operational effects, construction effects, permanent effects, positive effects, adverse effects all operating in an effected area.

C-025-128 Indirect and cumulative Impacts are considered to identify to the public the effects that a resource might experience in addition to those that are revealed by the normal project assessments

C-025-129 WSDOT examined a number of disciplines using FHA prescribed methodologies. Seattle Yacht Club found that the cultural resources they have great concern with did not have an indirect and cumulative effects assessment. Portage Bay is a cultural resource that the Seattle Yacht Club and the Boating Community depends upon to maintain their many historic activities associated with our traditional cultural properties such as Opening Day of Boating Season each Spring

C-025-130 Seattle Yacht Club objects to any bridge or highway design that further encroaches into Portage Bay. That would be an adverse effect that degrades that Historic nature of the Montlake Community and the waters of Portage Bay.

4/10/2010

February 18, 2010

Subject: Review of SR 520 EIS Navigable Waters Discipline Report

C-025-131 The undersigned was requested to review subject document from the point of view of the impact of the proposed SR 520 Bridge and feeder routes on the interests of the Seattle Yacht Club, its properties and activities with respect to Navigable waters. I have completed my review and offer the following comments (previously communicated verbally to Messrs. Bob Ranzenbach, Gary Stone and Commodore Ed Jennerich, QCYC and Vice President, RBAW).

Attachment 7, Section 12 of the SR 520 Environmental; Impact Statement was prepared by Parametrix, Inc. for Washington State Department of Transportation and the Federal Highway Administration. This document deals with the potential impact of the construction of and resulting SR 520 floating bridge proposed to replace the existing SR 520 Albert D. Rossellini Floating Bridge over Lake Washington and the feeder routes crossing Portage Bay and the Montlake Cut as well as the routes through navigable waters of the Pacific Ocean, Juan De Fuca Straights, Puget Sound and Lake Washington Ship Canal to be traversed by sections of the new SR 520 Bridge from the point of manufacture to the point of installation in Lake Washington. The report limits consideration to the established navigable channels in the various bodies of water involved through which commercial and recreational marine traffic normally pass to traverse the involved bodies of water.

C-025-132 The impact of the new bridge and feeder bridges or construction thereof does not consider the impact on bodies of water used by recreational, commercial and emergency service marine traffic associated with either the normal activities of Seattle Yacht Club and/or the Queen City Yacht Club and/or waterfront properties or moored houseboats and other marine commercial and/or recreational users of waters adjacent to the navigable channels in the affected bodies of water.

The major change in SR520 affecting navigable waters is the removal of the draw span mitigated by raising the clearance height of the eastern high rise passage under the bridge to approximately 70 feet vertical clearance. The impact would be limiting only to the passage of vessels and other watercraft with a superstructure, mast, boom or other top hamper exceeding 70 feet in height from passage to Lake Washington south of SR 520.

Some inconvenience to marine traffic will be experienced during the construction of an additional Montlake Cut bridge but closures are to be limited to a few days during the construction period.

The report lacks details of the impact on waters and shorelines outside the navigation channel through Portage Bay. While the construction of temporary construction bridges both north and south of the existing Portage Bay bridge while that bridge is rebuilt is described in the report, the extent of such temporary bridge's incursion into Portage Bay waters to the North of the existing bridge is not defined nor is the presence of floating cranes, barges, etc. to be used in the reconstruction mentioned, much less defined as to position and impact.

C-025-132 The major threat to Seattle Yacht Club and similarly to Queen City Yacht Club properties and operations could potentially be loss of moorage space for SYC's Dock "0" used during Opening Day of Yachting on the first weekend of May annually as well as access to permanent moorage on the South sides of both yacht clubs' fixed moorage facilities. Such loss would create a loss of revenue for SYC and QCYC in displaced moorage, restriction of visitor moorage and related club use revenues and hinder normal marine/on-the-water club programs currently conducted in the Portage Bay waters.

Further, no mention is made of the potential impact on the shorelines of Portage Bay, waterfront properties and floating home moorages caused by temporary structures and floating construction equipment.

I conclude that a full assessment of the potential impact cannot be determined without the additional information required to determine the position of temporary structures associated with the "construction bridges" and the floating construction equipment positions and duration of stay associated with the temporary bridges.

Viggo C. Bertelsen, Jr.

Comment Page/line Attachment 7 Discipline Reports Social Elements	Commentator Name	Comment by WSDOT	Reviewer comment
C-025-133 p 1	E. Van	NEPA requires a systematic, interdisciplinary approach when considering environmental and community factors in decision making,--	An important element for our focus
C-025-134 p 20	E. Van	Affected areas include the Montlake Historic District	The report does not mention the Seattle Yacht Club, an historic facility.
C-025-135 p 21	E. Van	Map of the study area identifies many major features.	The map does not identify MOHAI, NOAA, or the Seattle Yacht Club, an historic facility.
C-025-136 p 30-43	E. Van	Discussion of the existing social characteristics of the study area	There is no mention of the waterside activities nor the Seattle Yacht Club and its historic nature.
C-025-137 p 47	E. Van	A comment that construction activities associated with the project could cause residents and users of facilities to avoid the disrupted areas.	These activities could severely impact usage and financial structure bearing on the ability of the Seattle Yacht Club to maintain its historic property.
C-025-138 p 48	E. Van	Exhibit 14, Detour routes. Shows 520 exit westbound onto Montlake northbound.	Believe this will create heavy, slow traffic adversely impacting usage of the Seattle Yacht Club, an historic facility, without adequate traffic control.
C-025-139		Exhibit 15. Construction staging. Displays work bridges in Portage Bay.	Possible waterway access restrictions to Seattle Yacht Club facilities.

SR 520- Attachment No. 8
Supplemental Draft Environmental Impact Statement
Review Comments

by: Jeff Howard
3/14/10

C-025-140 Attachment no. 8 to the SR 520 SDEIS is a summary of the development history of the project, which started in 1998. This summary discusses alternatives considered and rejected, as well as the three Montlake alternatives studied in more depth. This document does not contain specific technical issues, so the comments are limited to the overall alternatives considered, and their potential impact to SYC.

The relative impacts to SYC are primarily related to the horizontal distance between the proposed Portage Bay viaduct and the SYC main station facilities, with closer distances having the most significant negative impacts. The horizontal distance and viaduct height will impact most of the direct environment issues, including noise, visual, air quality, fugitive dust and road debris.

As shown on Exhibit 9 (page 76) of Attachment No. 8, the existing 4 lane highway is 60 feet wide. As shown on Exhibit 10 (page 76), the proposed 6-lane alternative is 115 feet wide at the Evergreen Point bridge section, or almost twice as wide.

The proposed Portage Bay bridge is even wider. The extent of the extra width, and the distance to SYC facilities will depend on which of the three final Montlake alternatives (A, K or L) is chosen, and if the interchange includes exclusive transit lanes and flyer stops.

From the standpoint of distance, Alternative A, the Montlake Interchange, with bus transit stops is the worst, and the Pacific Interchange alternatives (K and L), would be the best because they move the existing Montlake Interchange further east. As discussed on pages 64 and 66, the Montlake Interchange requires 9 lanes across Portage Bay (6 normal lanes plus two auxiliary lanes and one westbound acceleration lane from the Montlake Freeway transit station. **These three additional lanes would add approximately another 60 feet to the Portage Bay bridge, bringing the total width to about 175 feet, or about three times wider than the current bridge.**

C-025-141 The other issue that is not addressed in Attachment 8 is the proposed esthetics of the Portage Bay bridge. Exhibit 4, page 56 shows sound walls on both sides of the bridge. What will these walls look like? How high? Bridge profile?